

**ROCKY FLATS
ENVIRONMENTAL TECHNOLOGY SITE
1-PRO-573-SWODP**

VERSION 4

SANITARY WASTE OFFSITE DISPOSAL PROCEDURE

Responsible Organization: Material Stewardship Effective Date: 6/28/05

Approved By: Manager / Non-Rad Waste / 6/27/05
Title of Organization Date

P. Arnold / /S/ P. M. Arnold
Print Name Approval Signature

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Print Name of Responsible Manager (N/A if RM is Approval Authority)

Review/concurrence documentation is contained in the document history file.

IMPORTANT NOTES
ISR: Not Required
This version supersedes PRO-573-SWODP, Sanitary Waste Offsite Disposal Procedure, Version 3 and PRO-1775-SOC-Operations, Sanitary Waste Offsite Shipping Operations, Version 0

ADMIN RECORD

1/47

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VERSION CHANGE SUMMARY

To prepare for radiological hand scanning of sanitary waste trucks when the Radiometric Scanners are inoperable, the following changes were made:

Changed last bullet in Radiological Operations responsibilities from "Performs unrestricted release surveys on loaded transportation vehicles if radiological scanners at the scale are inoperable." To "Performs unrestricted release surveys on loaded transportation vehicles, as applicable."

Added the following to Limitations and Precautions.

- Routine Waste that is collected in Roll-Offs **SHALL** be managed as Non-Routine Waste and **SHALL** meet all the requirements for Non-Routine Waste.

NOTE *During times when the Site Scale is inoperable, the container **SHALL** be weighed at the appropriate Landfill and the Bill Of Lading **SHALL** be returned to SSWP.*

- Waste containers leaving Site **SHALL** have their weight recorded on a Bill of Lading **AND** pass through the Radiometric Scanners **OR** have an Unrestricted Release Survey performed.
- **IF** an alarm is initiated by vehicles passing through the Radiometric Scanners, **THEN** the vehicle **SHALL** complete successful passes in accordance with Table 1.

NOTE *The World Electronics Panel has a North Pillar and a South Pillar indicator for each of the following alarms: High, Radiation, and Low.*

Table 1, Alarm Responses

World Electronics Panel Alarm Indications	Required Vehicle Subsequent Successful Passes
HIGH Alarm	One Successful Pass
HIGH and RAD Alarm	Two Successful Passes
Rad Alarm	Two Successful Passes
LOW Alarm	One Successful Pass
LOW and RAD Alarm	Two Successful Passes

- Vehicles **SHALL NOT** be processed through the Radiometric Scanners when alarms, as identified in Table 1 or a Tamper Alarm, are indicated on the World Electronics Panel.
- **IF** the loaded transportation vehicle fails the Unrestricted Release Survey, **THEN** discontinue waste shipments from that specific project until cleared

Added Note before Section 9.2, to read:

NOTE *Routine and non-routine waste inspections described in this section are **not** required provided one of the following has occurred:*

- *The Environmental Manager/Representative and Radiological Engineer has approved the Sanitary and Special Waste Project (SSWP), Waste Acceptance Criteria (WAC) form, and Radiological Waste Release approving the projects waste for disposal and meeting the requirements for the disposal facilities Facility Use Decision (FUD). SSWP will verify with document review that waste meets FUD acceptance criteria as part of the review process described in this procedure.*
- *A walk-down or review of the project waste has been conducted by one of the following; K-H Environmental Manager, DOE or CDPHE and found acceptable for management as sanitary waste. This walk-down or review approval is documented with the Environmental Manager signature approval on the Sanitary and Special Waste Projects, Waste Acceptance Criteria (WAC) Form.*

Special Waste requires waste and transportation inspections as described in this procedure.

Routine waste collected in Roll-offs will be managed as non-routine waste and must meet the requirements for non-routine waste.

VERSION CHANGE SUMMARY (continued)

Revised Sections 11.1, Routine Sanitary Waste and Section 11.2, Shipping Non-Routine and Special Sanitary Waste to a Disposal Facility to address obtaining Unrestricted Release/Hand Scans, providing directions for completion of Bills of Lading, and instructions for handling weight concerns.

Added new Section 11.4, Radiation Detection Disposition.

Added new Appendix 6, Unrestricted Radiological Release Survey Form (Radiological Hand Scan), and added reference to Appendix 6 in Section 13, Records processing.

Changes for this version appear on all pages except Pages 9, 12-13, 24,28-33, 35, and 48.

1. PURPOSE

This procedure provides written instructions for the compliant management of Rocky Flats Environmental Technology Site (Site) solid sanitary waste. In addition, the procedure provides guidance on requirements for the transportation and off-site disposal of waste at a Site approved sanitary waste landfill in accordance with applicable Federal, State, and local regulations, the off-site sanitary landfill waste acceptance criteria, and Site procedures.

2. SCOPE

This procedure applies to Site personnel who characterize, generate, package, inspect and transport for disposal routine, non-routine and special solid sanitary waste with guidance and oversight from Sanitary and Special Waste Projects (SSWP).

3. OVERVIEW

SSWP is responsible for managing solid sanitary waste program elements for the Site to ensure that the waste meets Site requirements and approved sanitary waste landfill waste acceptance criteria for off-site disposal. SSWP personnel review, approve and document waste characterization; coordinate disposal of waste (including waste inspections as applicable), prepare Bills of Lading, and track and maintain the sanitary waste records and database. In addition, SSWP personnel provide direction to Site personnel for proper sanitary waste disposal.

4. DEFINITIONS

Demo Trailer: A container approximately 60 cubic yards in volume. Mechanical means integral to the tractor/trailer combination are used to unload waste contents.

Due Diligence: A SSWP requirement for a final signature by an approved Radiological Engineer following his or her review of the waste release evaluation (WRE) to document that the waste shipment meets the off-site shipment criteria for non-radiological waste.

Dumpster: A closed receptacle that receives and holds routine sanitary waste for lifting and unloading by mechanical means. A dumpster is specifically designed for use with front-loading compaction equipment (front loaders), and is approximately 6 cubic yards in volume.

End Dump: A self-contained tractor/trailer combination that receives sanitary waste for transportation. The trailer portion is a container approximately 20 cubic yards in volume. Mechanical means integral to the tractor/trailer combination are used to unload waste contents.

4. **DEFINITIONS (continued)**

Front Loader: A front-loading collecting vehicle that loads, compacts, transports, and unloads routine sanitary waste with a container lifting mechanism.

FUD: Facility Use Decision. A Site process used to evaluate and approve an off-site facility that will handle, treat, and dispose of Site waste.

Inspection Personnel: Trained and qualified personnel who inspect waste and waste containers, and perform other activities, as applicable. SSWP staff, Traffic and Transportation staff or Hazard Reduction Technicians (HRTs) may serve as Inspection Personnel.

NC Verification: A type of inspection that verifies that non-conforming dumpsters or dumpsters containing non-conforming waste are properly marked and secured.

Non-Routine Sanitary Waste: Solid sanitary waste generated by Site construction, demolition, strip-out, or maintenance activities, which is approved for disposal at an off-site sanitary waste landfill. Non-routine sanitary waste includes, among other things, materials such as concrete, asphalt, and building debris.

100% Inspection: A type of inspection in which the contents of each routine sanitary waste package in a dumpster is verified to meet the routine sanitary waste acceptance criteria, and that the dumpster is evaluated for damage, and proper labeling.

Roll-off Container: A receptacle, typically 10, 20, 30 or 40 cubic yards in volume, that receives and stores sanitary waste. A Roll-off container is specifically designed for use with tilt frame equipment that can pick up, transport, unload and set off the container.

Routine Sanitary Waste: Waste generated at a Site office or administrative area from normal activities. Routine Sanitary Waste is "soft" and "compactable" and consists of non-recyclable paper, food, packaging, and office refuse which is placed into a dumpster on a routine basis by Site Services custodial and Site personnel.

Sanitary Waste: Non-radioactive, non-hazardous solid waste destined for disposal in a sanitary waste landfill, as defined in Colorado Department of Public Health and Environment (CDPHE) Regulations Pertaining to Solid Waste Disposal Sites and Facilities. Site-generated sanitary waste is categorized as routine, non-routine and special.

Side Dump A self-contained tractor/trailer combination that receives sanitary waste for transportation. The trailer portion is a container approximately 20 cubic yards in volume. Mechanical means integral to the tractor/trailer combination are used to unload waste contents.

4. DEFINITIONS (continued)

Special Sanitary Waste: Solid sanitary waste that requires specific handling, packaging, documentation and landfill approval prior to disposal at a Site-approved sanitary waste landfill.

Visual Inspection: A type of inspection in which the contents of routine sanitary waste packages are verified to meet the routine sanitary waste acceptance criteria, and the dumpster is inspected for damage.

5. RESPONSIBILITIES

Kaiser-Hill (K-H) Project Manager

- Ensures sanitary waste acceptance criteria and facility use decision (FUD) requirements are communicated to all sanitary waste generators within their area of responsibility.
- Identifies and manages non-routine and special sanitary wastes generated within their project.
- Ensures sanitary waste is properly segregated from those wastes deemed prohibited, regulated or recyclable.
- Requests waste containers (i.e. Roll-offs and end dumps) for large projects or additional waste collection services from SSWP.
- Coordinates staging locations for waste containers with SSWP, Waste Operations (WO), and Traffic and Transportation, if applicable.
- Ensures waste containers are in an operable condition and empty when first received. The Project Manager contacts SSWP if a waste container needs replacement or repair.
- Complies with the requirements of PRO-1004-RSP-09.08, Radioactive Material Transfer and Unrestricted Release of Property, Waste and Samples, to initiate WREs.
- Notifies SSWP when waste containers require collection and/or require collection on a more frequent basis.
- Coordinates with SSWP for shipping unique waste items including, but not limited to, oversized equipment, tanks, tires and containerized waste.
- Provides a single point of contact to resolve nonconformances and support issues for waste containers (i.e., dumpsters and Roll-offs) assigned to their area of responsibility.
- Takes the appropriate steps to respond to and complete corrective actions pertaining to nonconformances and nonconforming sanitary waste generated within their project.
- Ensures all documentation has been properly completed and forwarded to SSWP for processing, authorization, and approval prior to or during waste generation.
- Participates in the inspection of waste containers assigned to their area of responsibility when requested by SSWP.
- Coordinates overtime requests for support staff.

5. RESPONSIBILITIES (continued)

Radiological Engineering

- Provides WREs for unrestricted release of non-routine and special sanitary wastes in accordance with Site procedures.
- Provides technical guidance to SSWP if potentially radioactive material is identified in waste containers or in sanitary waste.
- Provides technical guidance at off-site disposal location if, in the unlikely event, potentially radioactive material is identified in sanitary waste.
- Performs due diligence for non-routine and special sanitary waste shipments.

Radiological Operations

- Performs unrestricted release surveys, as directed by Radiological Control Technician (RCT) Management, within radioactive management areas (RMMAs) and non-RMMAs, prior to transport off-site and in accordance with applicable Site procedures.
- Supports radiological reviews/surveys if potentially radioactive material is identified in waste containers.
- Supports investigation of sanitary waste vehicles/containers if potentially radioactive material is identified at the Site.
- Supports investigation at off-site disposal location if, in the unlikely event, potentially radioactive material is identified.
- Performs random unrestricted release surveys on loaded transportation vehicles as directed by SSWP.

5. RESPONSIBILITIES (continued)

Sanitary and Special Waste Projects

- Ensures compliance with applicable Federal, State, and local regulations, the off-site sanitary landfill waste acceptance criteria, and Site procedures through tracking, inspections, and surveillances.
- Provides technical guidance for disposition of sanitary wastes.
- Ensures that sanitary waste meets selected disposal facilities' waste acceptance criteria and FUD requirements.
- Obtains appropriate waste containers (Roll-offs, end dumps, etc.) directly from container subcontractor.
- Schedules and coordinates the logistics of transporting vehicles, shipping containers and escorts.
- Prepares Bills of Lading, using the DOE ATMS database for off-site waste disposal.
- Maintains a database and the documentation records for sanitary waste disposal.
- Maintains Electronic Vehicle Information System (ELVIS).
- Ensures nonconformances are resolved by the responsible project.
- Completes landfill waste profiles, including waste documentation as required, and ensures landfill approval of waste is received prior to off-site waste disposal.
- Ensures all waste documentation is properly completed and transferred to Traffic Management for processing.
- Reconciles procedural violations with KH Project Manager.
- Coordinates the development of training qualifications for hazard reduction technicians (HRTs) and conducts training classes.
- Inspects routine, non-routine and special sanitary waste and containers.

Waste Operations

- Provides trained and qualified HRTs to perform final inspections on routine and non-routine waste, as needed, or when directed by SSWP.
- Notifies SSWP of waste or waste container non-compliance when performing waste inspections.

6. LIMITATIONS AND PRECAUTIONS

- To avoid personal injury when installing and removing tarps,
 - Care **SHALL** be used when installing and removing tarps, and hooking and unhooking straps, especially in windy conditions.
 - Bungees **should** be inspected before use to ensure no cracks or damage is observed. Damaged bungees **SHALL not** be used and should be disposed of.
 - Care **SHALL** be used when rolling back and closing permanently attached "rolling tarp."
- Radiological Operations **SHALL** survey sanitary waste generated inside an RMMA or if waste release evaluation (WRE) requires surveys.
- When inspecting or packaging waste, appropriate PPE **SHALL** be worn, such as long sleeve coveralls, leather work gloves, safety glasses with side shields, safety shoes/boots, and bump cap or hard hat, as applicable.
- Care **SHALL** be used when possible while using a waste snake or hook grabbers to pick up waste to prevent physical injury from sharp objects, heavy tipping objects, pinching from dumpster and Roll-off lids, falls, equipment movement, or crushing.
- To avoid chemical inhalation or skin contamination:
 - Close contact with waste **SHALL** be avoided.
 - All waste generated **should** be placed in sealed, clear plastic bags.
 - Leather work gloves **SHALL** be worn when handling waste.
 - Bags **SHALL** be opened only to remove non-conformances, or to perform inspections.
- Personnel **SHALL** be aware of biological hazards from food waste, rodents, snakes, spiders hazards when packaging or inspecting waste. If hazards are encountered, inspection or waste activity **SHALL** be discontinued, personnel **SHALL** move away from waste containers with hazards, and supervision **SHALL** be notified.
- Airborne contamination from methane gas build-up may be present. If waste has a strong or unusual odor, personnel **SHALL** move away from waste container and supervision **SHALL** be notified. Venting of container may be necessary before an inspection may continue. Odors are rare, due to waste collection frequency; however, during periods of high temperatures, waste can create strong odors.

6. LIMITATIONS AND PRECAUTIONS (continued)

- The following requirements must be followed if a dumpster is considered as confined space:
 - The waste dumpster **SHALL not** be entered without prior approval from Industrial Hygiene and Safety (IH&S).
 - Accessing dumpsters through top lids is allowed in order to perform waste inspections.
 - End dump and similar trailers **SHALL not** be entered, except as approved by IH&S.
 - Roll-offs **may** be entered with prior approval for loading waste via the rear door access areas.
- Truck and other traffic **may** be present around waste loading and inspection areas. A reflective vest **SHALL** be worn, and personnel **SHALL** watch for traffic in the work area. Safety cones can be placed to help slow traffic and provide a barrier around the work area. If work cannot be performed safely, operations **SHALL** be discontinued and supervision **SHALL** be notified.
- To avoid personal injury from lifting and handling heavy objects, heavy objects **SHALL** be loaded into waste containers with the aid of a fork truck, loader or other such equipment. Bags of waste that are hand placed in waste containers **SHALL** be of a size and weight that the generator can easily handle without help. Bags of waste **SHALL** be free of rips or tears to prevent objects inside the bag from falling on personnel. Overhead lifting is likely, so the bag of waste **SHALL** be light enough for the generator to place easily into the waste container. Proper lifting techniques **SHALL** be used when lifting from ground level.
- Established fixed ladders or steps on waste containers **SHALL** be used. No other climbing on containers is allowed. Fixed ladders, portable ladders or platforms **SHALL** be used for performing waste inspection. Ladder safety must be observed and no one **SHALL** use a ladder as an aid to enter the container. Fall protection is required for work on platforms over 6 feet in elevation.
- Routine Waste that is collected in Roll-Offs **SHALL** be managed as Non-Routine Waste and **SHALL** meet all the requirements for Non-Routine Waste.

NOTE *During times when the Site Scale is inoperable, the container **SHALL** be weighed at the appropriate Landfill and the Bill Of Lading **SHALL** be returned to SSWP.*

- Waste containers leaving Site **SHALL** have their weight recorded on a Bill of Lading **AND** pass through the Radiometric Scanners **OR** have an Unrestricted Release Survey performed.

6. **LIMITATIONS AND PRECAUTIONS (continued)**

- **IF** an alarm is initiated by vehicles passing through the Radiometric Scanners, **THEN** the vehicle **SHALL** complete successful passes in accordance with Table 1.

NOTE *The World Electronics Panel has a North Pillar and a South Pillar indicator for each of the following alarms: High, Radiation, and Low.*

Table 1, Alarm Responses

World Electronics Panel Alarm Indications	Required Vehicle Subsequent Successful Passes
HIGH Alarm	One Successful Pass
HIGH and RAD Alarm	Two Successful Passes
Rad Alarm	Two Successful Passes
LOW Alarm	One Successful Pass
LOW and RAD Alarm	Two Successful Passes

- Vehicles **SHALL NOT** be processed through the Radiometric Scanners when alarms, as identified in Table 1 or a Tamper Alarm, are indicated on the World Electronics Panel.
- **IF** the loaded transportation vehicle fails the Unrestricted Release Survey, **THEN** discontinue waste shipments from that specific project until cleared

7. INSTRUCTIONS- WASTE CHARACTERIZATION

This is an independent instruction section and may be performed independently or in conjunction with other instruction sections.

7.1 Waste Types

- **Routine Sanitary Waste**

- Waste generated at a Site office or administrative area from normal activities. Routine Sanitary Waste generally consists of non-recyclable paper, food, packaging, and office refuse which is placed into a dumpster on a routine basis by Site Services custodial and Site personnel. Waste outputs listed in the WSRIC Building Books as "trash" or "sanitary waste" do NOT guarantee classification as routine sanitary waste.
- Waste that is generally "soft" and "compactable".
- Waste that does not require documentation prior to generation or disposal.

- **Non-Routine Sanitary Waste**

- Non-hazardous, non-radioactive waste that does not meet the definition of "Routine" yet is approved for disposal at an off-site sanitary landfill.
- Waste that consists of materials generated by Site construction/demolition and maintenance, to include items such as non RCRA-regulated fluorescent light bulbs (green tipped bulbs), building strip-out debris, building demolition debris, concrete, asphalt, etc.

- **Special Sanitary Waste**

- Waste that requires more documentation than non-routine sanitary waste, and landfill approval prior to disposal at a Site-approved sanitary waste landfill. Special sanitary waste includes but is not limited to friable and non-friable asbestos containing material, petroleum-contaminated media/soil, beryllium-contaminated material, water pre-treatment sludge and non-regulated waste chemicals.

7.2 Waste Documentation

7.2.1 Documentation for Routine Sanitary Waste

NOTE 1 *Routine waste is shipped in accordance with the annual WRE and MRO.*

NOTE 2 *If the routine sanitary waste is in accordance with the annual WRE and Master Return Order (MRO), no additional documentation is required to ship the waste.*

Sanitary Waste Generator

- [1] **IF** the routine sanitary waste requires a specific WRE and MRO
THEN handle waste as non-routine or special sanitary waste.

SSWP

- [2] Ensure that the annual MRO and the annual WRE are current.

7.2.2 Documentation for Non-Routine Sanitary Waste

Sanitary Waste Generator

- [1] Contact SSWP to discuss the following information:
- Size, weight and quantity limitations of waste destined for disposal in the landfill
 - Packaging guidance/options for non-typical wastes
 - Packaging guidance/options for wastes destined for the central collection yard (CCY)
 - Scheduling requirements
- [2] Contact Radiological Engineering prior to generating the waste to obtain a WRE.
- [3] **IF** sanitary waste was generated inside an RMMA,
OR IF the WRE requires surveys,
THEN contact Radiological Operations to have the sanitary waste surveyed for radioactive contamination in accordance with the survey requirements contained on the WRE.

7.2.2 Documentation for Non-Routine Sanitary Waste (continued)

- [4] Complete a material transfer and disposal form (MTDF) (RF-47555), to include the following information:
- Record a brief description, location and/or Project name of the item(s) (Block 1).
 - Record the approximate waste volume in cubic yards (i.e., 10 cubic yards) (Blocks 2 and 3).
 - Record the waste destination name (Front Range Landfill, Tower Road Landfill, or Hwy 93 - Foothills Landfill) (Block 10 Name).
 - Sign, Date and fill out all information in Block 13a.
 - Check "Off-Site Shipment" and "Landfill" in Block 15.
 - Record the WRE number and the Roll-off Container number (Block 20).
 - Obtain Radiological Engineering signature on back of MTDF (Block 22b).
- [5] Complete Appendix 1, Sanitary Waste Disposal Waste Acceptance Criteria Form.

NOTE *Facsimile WRE, WAC, or MTDF forms are NOT acceptable and will NOT be processed.*

- [6] Forward the following documents to SSWP for approval:
- The completed original MTDF
 - The completed WAC with supporting characterization documentation, [i.e. MSDS, laboratory analysis and other relevant documentation such as letters describing waste, reconnaissance level characterization report (RLCR), building demolition reports, etc].
 - Copy of the completed WRE with applicable surveys

SSWP

- [7] **WHEN** review of the documentation and approval of the waste is completed,
THEN:
- [A] Obtain final Due Diligence on the WRE from a qualified Radiological Engineer.
- [B] Notify the waste generator that the waste is ready for inspecting, loading and shipping.

7.2.3 Documentation for Special Waste

Special sanitary waste requires specific handling, analyses, certification, documentation and/or packaging prior to acceptance by the off-site sanitary landfill.

Sanitary Waste Generator

- [1] Contact SSWP to discuss the following information:
 - Size, weight and quantity limitations of waste destined for disposal in the landfill
 - Packaging guidance/options for non-typical wastes
 - Packaging guidance/options for wastes destined for the CCY
 - Scheduling requirements
- [2] Contact Radiological Engineering prior to generating the waste to obtain a WRE.
- [3] **IF** sanitary waste was generated inside an RMMA or if the WRE requires surveys,
THEN contact Radiological Operations to have the sanitary waste surveyed for radioactive contamination in accordance with the survey requirements contained on the WRE.
- [4] Complete a MTDF (RF-47555), to include the following information:
 - Record a brief description, location and/or Project name of the item(s) (Block 1).
 - Record the approximate waste volume in cubic yards (i.e., 10 cubic yards) (Blocks 2 and 3).
 - Record the waste destination name (Front Range Landfill, Tower Road Landfill, or Hwy 93 - Foothills Landfill) (Block 10 Name).
 - Sign, Date and fill out all information in Block 13a.
 - Check "Off-Site Shipment" and "Landfill" in Block 15.
 - Record the WRE number and the Roll-off Container number (Block 20).
 - Obtain Radiological Engineering signature on back of MTDF (Block 22b).

7.2.3 Documentation for Special Waste (continued)

- [5] Complete Appendix 1, Sanitary Waste Disposal Waste Acceptance Criteria Form (WAC).

NOTE *Facsimile WRE, WAC, or MTDf forms are NOT acceptable and will NOT be processed.*

- [6] Forward the following documents to SSWP for approval:

- The completed original MTDf
- The completed WAC with supporting characterization documentation, [i.e. MSDS, laboratory analysis and other relevant documentation such as letters describing waste, reconnaissance level characterization report (RLCR), building demolition reports, etc].
- Copy of the completed WRE with applicable surveys

SSWP

- [7] **WHEN** approval from the landfill is received,
THEN:

- [A] Obtain final Due Diligence on the WRE from a qualified Radiological Engineer.
- [B] Notify the waste generator the waste is ready for inspecting, loading and shipping.

8. INSTRUCTIONS-Waste Generation and Packaging

This is an independent instruction section and may be performed independently or in conjunction with other instruction sections.

8.1 Routine Sanitary Waste

Site Services

- [1] Use clear plastic bags for the packaging of routine sanitary waste.
- [2] Collect routine sanitary waste from the buildings and proceed as follows:

NOTE: *Each dumpster is identified with a unique number that identifies the origin of the waste by building location.*

- [A] Refer to Appendix 2, Guidelines for Recycling, and recycle/reuse any recyclable items as appropriate.
- [B] Review Appendix 3, Specific Landfill Approved and Prohibited Sanitary Waste Items, for items that are acceptable or prohibited by the landfills.
- [C] Place bag into the appropriate waste dumpster assigned to the area and close the lid.
- [D] **IF** waste is in bulk quantities or it will **NOT** blow out of the dumpster, **THEN** place the acceptable sanitary waste in the assigned dumpster without a bag.

8.2 Non-Routine Sanitary Waste

NOTE 1: *SSWP determines the waste disposal venue [central collection yard (CCY), Roll-off container or end dump] for non-routine sanitary waste.*

NOTE 2: *Non-routine sanitary waste CANNOT be placed into dumpsters.*

Sanitary Waste Generator

- [1] Refer to Appendix 2, Guidelines for Recycling, and recycle/reuse any recyclable items as appropriate.
- [2] Review Appendix 3, Specific Landfill Approved and Prohibited Sanitary Waste Items, for items that are acceptable or prohibited by the landfills.
- [3] Contact SSWP for sanitary waste disposal packaging guidance for non-routine sanitary waste.

8.2 Non-Routine Sanitary Waste (continued)

SSWP

- [4] **IF** the non-routine sanitary waste is designated for the CCY,
THEN instruct the generator to transfer the non-routine sanitary waste to the CCY in accordance with Section 10.3, Shipping Non-Routine and Special Sanitary Waste to the Central Collection Yard.
- [5] **IF** the non-routine sanitary waste is designated for a Roll-off container/end dump,
THEN obtain and place designated Roll-off containers/end dumps.

Sanitary Waste Generator

NOTE 1: *Where applicable, SSWP and the responsible Project Manager will have keys or combination locks to control access to the designated Roll-off containers.*

NOTE 2: *All containers must be covered by a tarp once waste is placed in them. Tarps are either integral to the container or are supplied by SSWP.*

- [6] **IF** the Roll-off/end dump is tarped,
THEN remove the tarp.
- [7] Load the non-routine sanitary waste so that the waste is evenly distributed in the Roll-off container/end dump.
- [8] Ensure that the non-routine sanitary waste does **NOT** extend beyond the sides of the Roll-off container/end dump.
- [9] Ensure that the Roll-off container is covered by a tarp, as applicable.
- [10] **WHEN** the Roll-off container has reached capacity (either by volume or weight), or the project is complete,
THEN contact SSWP to schedule the final inspection of the waste.

8.3 Special Sanitary Waste

SSWP

- [1] Review Appendix 3 for items that are acceptable or prohibited by the landfills.

Sanitary Waste Generator

- [2] **WHEN** SSWP gives permission to generate and package special waste,
THEN package the special waste in accordance with instructions given by SSWP.

SSWP

- [3] **IF** the special waste is designated for the central collection yard,
THEN instruct the generator to have the special waste transferred to the CCY in accordance with Section 11.3.
- [4] **IF** the special waste is designated for a Roll-off containers/end dumps,
THEN obtain and place the designated Roll-off containers/end dumps.

Sanitary Waste Generator

NOTE 1: *Where applicable, SSWP and the responsible Project Manager will have keys or combinations and access to the designated Roll-off containers.*

NOTE 2: *All containers must be covered by a tarp once waste is placed in them. Tarps are either integral to the container or are supplied by SSWP.*

- [5] **IF** the Roll-off/end dump requires a liner,
THEN line the container.
- [6] Load the special sanitary waste so that the waste is evenly distributed in the Roll-off container/end dump.
- [7] Ensure that the special sanitary waste does **NOT** extend beyond the sides of the Roll-off container/end dump.
- [8] Ensure that the Roll-off container is covered by a tarp, as applicable.
- [9] **WHEN** the Roll-off container has reached capacity (either by volume or weight), or the project is complete,
THEN contact SSWP to schedule the final inspection of the waste.

9. INSTRUCTIONS-INSPECTIONS

This is an independent instruction section and may be performed independently or in conjunction with other instruction sections.

9.1 Routine Sanitary Waste

9.1.1 Visual Inspection

NOTE *SSWP determines which dumpsters are inspected and the inspection schedule.*

Inspection Personnel

- [1] **WHEN** instructed by SSWP,
THEN use Appendix 4 to perform a visual inspection of the waste packages and of the container integrity.
- [2] **IF** the routine sanitary waste and the dumpster are acceptable,
THEN ensure that Appendix 4 is transmitted to SSWP.
- [3] **IF** non-conformances are identified,
THEN:
 - [A] Record the non-conformances on Appendix 4.
 - [B] Notify SSWP.
 - [C] Return the completed Appendix 4 to SSWP.

SSWP

- [4] Resolve the non-conformances.
- [5] **IF** the non-conformances require the container to be isolated,
THEN:
 - [A] Have Inspection Personnel complete a NC sign.
 - [B] Attach the NC sign to the container.
 - [C] Secure the container to prevent usage.
- [6] **WHEN** the NC issue is resolved,
THEN remove the NC sign and the locks.

9.1.2 100% Inspection

NOTE *SSWP determines which dumpsters are inspected and the inspection schedule.*

Inspection Personnel

- [1] **WHEN** instructed by SSWP,
THEN use Appendix 4 to perform a 100% visual inspection of the waste packages and of the container integrity.
- [2] **IF** the routine sanitary waste and the dumpster are acceptable,
THEN ensure that Appendix 4 is transmitted to SSWP.
- [3] **IF** non-conformances are identified,
THEN:
 - [A] Record the non-conformances on Appendix 4.
 - [B] Notify SSWP.
 - [C] Return the completed Appendix 4 to SSWP.

SSWP

- [4] Resolve the non-conformances.
- [5] **IF** the non-conformances require the container to be isolated,
THEN:
 - [A] Have Inspection Personnel complete a NC sign.
 - [B] Attach the NC sign to the container.
 - [C] Secure the container to prevent usage.
- [6] **WHEN** the NC issue is resolved,
THEN remove the NC sign and the locks.

9.1.3 NC Verification

Inspection Personnel

- [1] Use Appendix 4 to perform an NC verification on each non-conforming dumpster.
- [2] **IF** the NC sign is attached and the dumpster is secured.,
THEN ensure that the waste inspection sheet is transmitted to SSWP.
- [3] **IF** any non-conforming dumpster does not have a NC sign or the dumpster is not secured,
THEN notify SSWP.
- [4] **IF** the non-conforming issue is not resolved for the dumpster in Step [3],
THEN ensure that Appendix 4 is transmitted to SSWP.

9.2 Non-Routine Sanitary Waste

NOTE *Routine and non-routine waste inspections described in this section are not required provided one of the following has occurred:*

- *The Environmental Manager/Representative and Radiological Engineer has approved the Sanitary and Special Waste Project (SSWP), Waste Acceptance Criteria (WAC) form, and Radiological Waste Release approving the projects waste for disposal and meeting the requirements for the disposal facilities Facility Use Decision (FUD). SSWP will verify with document review that waste meets FUD acceptance criteria as part of the review process described in this procedure.*
- *A walk-down or review of the project waste has been conducted by one of the following; K-H Environmental Manager, DOE or CDPHE and found acceptable for management as sanitary waste. This walk-down or review approval is documented with the Environmental Manager signature approval on the Sanitary and Special Waste Projects, Waste Acceptance Criteria (WAC) Form.*

Special Waste requires waste and transportation inspections as described in this procedure.

Routine waste collected in Roll-offs will be managed as non-routine waste and must meet the requirements for non-routine waste.

Inspection Personnel

- [1] **Use Appendix 5, Sanitary and Special Waste Projects Waste and Transportation Inspection Checklist to perform periodic or final inspections of non-routine sanitary waste and the waste container.**
- [2] **IF** the inspection of non-routine sanitary waste and the waste container is acceptable,
THEN ensure that the Appendix 5 is transmitted to Shipping Operations Center (SOC) personnel.
- [3] **IF** non-conformances are identified,
THEN notify SSWP.

SSWP

- [4] **Resolve the non-conformance.**
- [5] **IF** the issue requires container to be isolated,
THEN secure the container to prevent usage.
- [6] **WHEN** the NC issue is resolved,
THEN ship the waste in accordance with Section 10, Instructions-Shipping Sanitary Waste.

9.3 Special Sanitary Waste

SSWP

- [1] Use Appendix 5, Sanitary and Special Waste Projects Waste and Transportation Inspection Checklist and other applicable SSWP documents to inspect the special sanitary waste packages and waste container.
- [2] **IF** the final inspection of special sanitary waste and the waste container is acceptable,
THEN ensure that the Appendix 5 is transmitted to SOC personnel, if applicable.
- [3] **IF** non-conformances are identified,
THEN record the non-conformances on Appendix 5.
- [4] Resolve the non-conformance.
- [5] **IF** the issue requires container to be isolated,
THEN secure the container to prevent usage.
- [6] **WHEN** the NC issue is resolved,
THEN ship the waste in accordance with Section 10, Instructions-Shipping Sanitary Waste.

10. INSTRUCTIONS-WASTE ACCEPTANCE

This is an independent instruction section and may be performed independently or in conjunction with other instruction sections.

10.1 Initial Waste Approval

SSWP

- [1] **WHEN** documentation is received from the sanitary waste generator,
THEN review the documentation for completeness.
- [2] **IF** the documentation is not complete,
THEN resolve the discrepancies with the sanitary waste generator.
- [3] **IF** the documentation is complete,
THEN:
 - [A] Sign the WAC form.
 - [B] Assign an authorization number (LO) to the MTDf.
 - [C] Sign the MTDf.
 - [D] Record the necessary information on the Waste Authorization Log.
 - [E] Enter the necessary information into the Sanitary Waste Tracking System (database).
- [4] Notify the sanitary waste generator that the waste is approved for off-site shipment.
- [5] **IF** the waste is going to the central collection yard (CCY),
THEN return the yellow copy of the MTDf to the sanitary waste generator.

10.2 Final Waste Approval

10.2.1 Central Collection Yard

SSWP

- [1] **IF** a collection container is full and ready to ship,
THEN perform a quality check on the container file to ensure that a completed consolidation log, the appropriate MTDfs, WREs, WACs, and other documentation (such as waste profiles, analytical data or process knowledge) is present.
- [2] Resolve any discrepancies that are found.

10.2.1 Central Collection Yard (continued)

- [3] **IF** the waste is special sanitary waste,
THEN prepare the appropriate documentation and coordinate with the specific landfill to receive approval.
- [4] **WHEN** approvals are complete and the container is approved for shipment,
THEN:
 - [A] Ensure Due Diligence forms are completed properly.
 - [B] Obtain Due Diligence from a qualified Radiological Engineer.
- [5] Schedule a final inspection on the container.
- [6] Arrange to have the waste shipped in accordance with Section 10.2, Shipping Non-Routine and Special Waste to a Disposal Facility.
- [7] Enter the shipping information into the Sanitary Waste Tracking System (database).

10.2.2 Roll-off/End Dump/Other Conveyance

SSWP

- [1] **IF** a container is full and ready to ship,
THEN perform a quality check on the container file to ensure that completed MTDfFs, WREs, WACs, and other documentation (such as waste profiles, analytical data or process knowledge) are present.
- [2] Resolve any discrepancies that are found.
- [3] **IF** the waste is special sanitary waste,
THEN prepare the appropriate documentation and coordinate with the specific landfill to receive approval.
- [4] **WHEN** approvals are complete and the container is approved for shipment,
THEN:
 - [A] Ensure Due Diligence forms are completed properly.
 - [B] Obtain Due Diligence from a qualified Radiological Engineer.
- [5] Schedule a final inspection on the container.
- [6] Arrange to have the waste shipped in accordance with Section 10.2, Shipping Non-Routine and Special Waste to a Disposal Facility.
- [7] Enter the shipping information into the Sanitary Waste Tracking System (database).

11. INSTRUCTIONS-SHIPPING SANITARY WASTE

This is an independent instruction section and may be performed independently or in conjunction with other instruction sections.

11.1 Routine Sanitary Waste

SSWP

- [1] Set a schedule for routine sanitary waste collection.
- [2] Ensure that the annual MRO and the annual WRE are current.
- [3] **IF** the vehicle configuration is new,
THEN coordinate with transporter to verify tare weight prior to the initial vehicle load on the first day of waste transport.
- [4] Direct or have the transporter escorted to project site for loading or container pickup.

NOTE 1 *Radiological Operations personnel under the direction of the manager of SSWP, shall schedule and ensure random unrestricted radiological release surveys are performed on waste shipments to the Foothills Landfill. This random survey may be accomplished by the current operating Radiometric Scanner or by the hand scanning process. Random surveys will be determined by the total shipments by project or overall shipments by projects during the workweek.*

NOTE 2 *All Waste Shipments to Front Range and Tower Landfills require a Radiological Survey by the Radiometric Scanner or a Hand Scan in accordance with PRO-1805-HAND-SCAN, Radiation Survey of Trucks Using the Bicron Micro-Rem Survey Meter.*

- [5] Obtain a Radiological Scan (Radiometric Scanner **OR** Unrestricted Release Survey/Hand Scan, per PRO-1805-HAND-SCAN) of the loaded transport vehicle as required.
- [6] **IF** the loaded transport vehicle requires an Unrestricted Release Survey (Hand Scan),
THEN
 - [A] Document the truck number on Appendix 6, Unrestricted Release Survey Form (Radiological Hand Scan), and provide Appendix 6 to the transporter.
 - [B] Request Radiological Operations perform an Unrestricted Release Survey (Radiological Hand Scan) per PRO-1805-HAND SCAN.

11.1 Routine Sanitary Waste (continued)

Radiological Operations Personnel

- [C] Perform the radiological hand scan, and complete Appendix 6,
THEN provide the completed Appendix 6 to the transporter.

SSWP

- [7] IF radiation is detected on the loaded transport vehicle,
THEN follow instructions in Section 11.4, Radiation Detection Disposition
AND return when complete.

NOTE 1 *During times when the Site Scale is inoperable, the container SHALL be weighed at the appropriate Landfill and the Bill Of Lading SHALL be returned to SSWP.*

NOTE 2 *During times when the Site Scale is inoperable, the containers SHALL be loaded less than capacity.*

- [8] BEFORE the loaded transport vehicle leaves site,
THEN obtain the unique identification numbers for the transport vehicle, and weight of loaded vehicle and waste.
- [9] IF the total weight of an End Dump or Flat bed Trailer is greater than 80,000 lbs.
AND is going to the Tower Landfill,
OR the total weight of an End Dump or Flat bed Trailer is greater than 85,000 lbs.
AND is going to the Erie or Highway 93 Landfill,
THEN contact a TSWM or designee
AND instruct the driver to return to the building/project to have some waste removed.
- [10] IF the total weight of a Front End Loader or Roll Off Truck is greater than 54,000 lbs.
THEN resolve the overweight condition.
- [11] Enter information in the shipping database,
AND print the Bill of Lading.
- [12] Review the Sanitary and Special Waste Projects Non-Routine and Special Waste Inspection Checklist (inspection checklist) for building/project number, truck number, landfill, and driver name.
- [13] IF the inspection checklist is not completed properly,
THEN notify the appropriate HRT.

11.1 Routine Sanitary Waste (continued)

- [14] Have the driver sign the Bill of Lading and the waste manifest for the Erie Landfill, if required,
OR a Bill of Lading and waste manifest for the Tower or Highway 93 Landfill.
- [15] Staple the original scale ticket and the manifest (if required) to a blue copy of the Bill of Lading.
- [16] Give two (2) copies of the Bill of Lading to the driver and the appropriate number of the manifest (if required).
- [17] Hold the original Bill of Lading for later transfer to the Traffic Department.

NOTE *Storage of a loaded transport vehicle in safe haven secured areas overnight or for an unplanned event must be approved by K-H.*

- [18] Direct transporter to proceed directly to the landfill.

11.2 Shipping Non-Routine and Special Sanitary Waste to a Disposal Facility

SSWP

- [1] Schedule the delivery of approved shipping containers, if necessary.
- [2] Schedule KH-approved transporters (KH Traffic and Transportation department maintains a list of approved transporters).
- [3] Ensure that the SOC has a description of all hauling vehicles (Roll-off, end dump, etc.), gross highway limits, tare weights, license and other unique vehicle identification numbers prior to loading.
- [4] **IF** the vehicle configuration is new,
THEN coordinate with transporter to verify tare weight prior to the initial vehicle load on the first day of waste transport.
- [5] Consult with Traffic Management for the preparation of Bills of Lading and Waste Manifests for special sanitary waste.
- [6] Ensure Traffic and Transportation has a current Master Return Order (MRO) or a Shipping Memo.
- [7] Prepare the appropriate documentation for special sanitary waste.

11.2 Shipping Non-Routine and Special Waste to a Disposal Facility (continued)

- [8] Schedule waste inspections.
- [9] Direct or have the transporter escorted to project site for loading or container pickup.

Sanitary Waste Generator

- [10] **IF** the transport vehicle is an end dump or side dump,
THEN:
 - [A] Ensure that Inspection personnel are available to inspect the waste as necessary per Section 9 (if required).
 - [B] Load the waste.

Inspection Personnel

- [C] **IF** waste is non-routine sanitary waste,
THEN inspect the waste in accordance with Section 9.2, Non-Routine Sanitary Waste (if required).
- [D] **IF** waste is special sanitary waste,
THEN inspect the waste in accordance with Section 9.3, Special Sanitary Waste (if required).

Sanitary Waste Generator

- [E] **IF** the waste and waste container pass inspection,
THEN tarp the container, as applicable.

Inspection Personnel

- [F] **IF** the waste or waste container does **NOT** pass inspection,
THEN:
 - [a] Notify SSWP.

SSWP

- [b] Resolve the non-conformance.
- [c] **AFTER** the con-conformance is resolved,
THEN instruct the transporter to report to the SOC.

Inspection Personnel

- [11] Transmit Appendix 5 to SOC personnel.

11.2 Shipping Non-Routine and Special Waste to a Disposal Facility (continued)

SOC Personnel

NOTE 1 *Radiological Operations personnel under the direction of the manager of SSWP, shall schedule and ensure random unrestricted radiological release surveys are performed on waste shipments to the Foothills Landfill. This random survey may be accomplished by the current operating Radiometric Scanner or by the hand scanning process. Random surveys will be determined by the total shipments by project or overall shipments by projects during the workweek.*

NOTE 2 *All Waste Shipments to Front Range and Tower Landfills require a Radiological Survey by the Radiometric Scanner or a Hand Scan in accordance with PRO-1805-HAND-SCAN, Radiation Survey of Trucks Using the Bicron Micro-Rem Survey Meter.*

[12] Obtain a Radiological Scan (Radiometric Scanner **OR** Unrestricted Release Survey/Hand Scan, per PRO-1805-HAND SCAN) of the loaded transport vehicle as required.

[13] **IF** the loaded transport vehicle requires an Unrestricted Release Survey (Hand Scan),
THEN

[A] Document the truck number on Appendix 6, Unrestricted Release Survey Form (Radiological Hand Scan), and provide Appendix 6 to the transporter.

[B] Request Radiological Operations perform an Unrestricted Release Survey (Radiological Hand Scan) per PRO-1805-HAND SCAN.

Radiological Operations Personnel

[14] Perform the radiological hand scan, and complete Appendix 6,
THEN provide the completed Appendix 6 to the transporter.

[15] **IF** radiation is detected on the loaded transport vehicle,
THEN follow instructions in Section 11.4, Radiation Detection Disposition
AND return when complete.

11.2 Shipping Non-Routine and Special Waste to a Disposal Facility (continued)

NOTE 1 *During times when the Site Scale is inoperable, the container SHALL be weighed at the appropriate Land Fill and the Bill Of Lading SHALL be returned to SSWP.*

NOTE 2 *During times when the Site Scale is inoperable, the containers SHALL be loaded less than capacity.*

[16] **BEFORE** the loaded transport vehicle leaves site,
THEN obtain the unique identification numbers for the transport vehicle, and weight of loaded vehicle and waste.

[17] **IF** the total weight of an End Dump or Flat bed Trailer is greater than 80,000 lbs.
AND is going to the Tower Landfill,
OR
the total weight of an End Dump or Flat bed Trailer is greater than 85,000 lbs.
AND is going to the Erie or Highway 93 Landfill,
THEN contact a TSWM or designee
AND instruct the driver to return to the building/project to have some waste removed.

[18] **IF** the total weight of a Front End Loader or Roll Off Truck is greater than 54,000 lbs.
THEN resolve the overweight condition.

SSWP

[19] For special sanitary waste, coordinate the preparation of the Bill of Lading or Waste Manifest through Traffic Management, as appropriate.

SOC

[20] For non-routine sanitary waste, prepare a Bill of Lading.

SSWP/Traffic Management

[21] Provide the Bill of Lading and/or Waste Manifest, as appropriate, to transporter for signature, and provide the transporter with two copies of each, one copy of each for the transporter and one copy of each for the landfill.

[22] Distribute the balance of the Bill of Lading and/or Waste Manifest copies.

NOTE *Storage of a loaded transport vehicle in safe haven secured areas overnight or for an unplanned event must be approved by K-H.*

SSWP

[23] Direct transporter to proceed directly to the landfill.

11.3 Shipping Non-Routine and Special Sanitary Waste to the Central Collection Yard

SSWP

- [1] **WHEN** review of the documentation from the sanitary waste generator is complete,
THEN:
 - [A] Notify the sanitary waste generator to package the waste.
 - [B] Return the yellow copy of the MTDF to the waste generator.

Sanitary Waste Generator

- [2] Package the waste in accordance with Sections 8.2, Non-Routine Sanitary Waste or 8.3, Special Sanitary Waste.
- [3] **WHEN** waste packaging is complete,
THEN coordinate with SSWP to transport waste to the central collection yard (CCY).

Inspection Personnel

- [4] **WHEN** the waste is at the CCY,
THEN verify:
 - [A] The waste was accepted.
 - [B] The LO number is recorded on the MTDF.
 - [C] The LO number is recorded on the waste packages.
- [5] Load the waste into the waste container noted on the MTDF and ensure that the waste is evenly distributed in the container.
- [6] Forward the necessary paper work (yellow copy of MTDF) to SSWP.
- [7] Record the necessary information on the Sanitary Waste Consolidation Log.
- [8] **WHEN** a waste container at the CCY approaches capacity,
THEN notify SSWP.

SSWP

- [9] Review the container's documentation for completeness.
- [10] Perform a final waste acceptance in accordance with Section 10.2.1, Central Collection Yard.

11.4 Radiation Detection Disposition

SSWP

- [1] **IF** radiation is detected by the World Electronics Panel,
THEN
- [A] Determine what Alarm indications are present.
 - [B] Reset the World Electronics Panel
AND log the incident.
 - [C] Request the driver re-enter the Radiometric Scanners
AND complete the required number of successful passes in accordance with Table 1.

NOTE *The World Electronics Panel has a North Pillar and a South Pillar indicator for each of the following alarms: High, Radiation, and Low*

Table 1, Alarm Responses

World Electronics Panel Alarm Indications	Required Vehicle Subsequent Successful Passes
HIGH Alarm	One Successful Pass
HIGH and RAD Alarm	Two Successful Passes
Rad Alarm	Two Successful Passes
LOW Alarm	One Successful Pass
LOW and RAD Alarm	Two Successful Passes

- [D] **IF** the World Electronics Panel alarms again,
THEN:
- [a] Notify Radiation Operations to assist in truck monitoring.
 - [b] Notify the SSWP Program Manager.
 - [c] Log the incident.
 - [d] Coordinate with the waste generator and Radiological Engineering to resolve the radiological issues.
- [E] **IF** the vehicle clears the scanners without additional alarms,
THEN log as "OK" and notify the SSWP Manager of the incident.
- [2] **IF** radiation is detected by the Hand Scan,
THEN coordinate with the waste generator and Radiological Engineering to resolve the radiological issues.

12. INSTRUCTIONS-WASTE TRACKING

This is an independent instruction section and may be performed independently or in conjunction with other instruction sections.

All sanitary waste disposed in the off-site disposal facility is tracked in the Sanitary Waste Tracking System database. The database contains information on all sanitary waste shipments, inspections, containers, transport vehicles, transporters and disposal facilities. SSWP is responsible for entering the information into the database. The database information provides a record of sanitary waste activities, a means of investigation for nonconforming items, a means for verifying invoices received from the landfill and generating reports for forecasting and budgeting.

SSWP

- [1] Ensure an authorization number (LO) was entered into the database.
- [2] **WHEN** routine container and waste inspection sheets from the Inspection personnel are received by SSWP,
THEN enter the inspection information into the database.
- [3] Enter Bills of Lading information into the database.
- [4] File the Bills of Lading or Waste Manifests in the project and container file.
- [5] **WHEN** SSWP receives specific landfill information such as invoices, or monthly statements,
THEN enter the information into the database.
- [6] Enter into the database any new information that is received on transport personnel, transport vehicles, waste containers, site locations and off-site disposal facilities.

13. RECORDS PROCESSING

Documents generated by this procedure are maintained and processed as follows.

Record Identification	Record Type Determination	Protection/Storage Methods	Processing Instructions
<ul style="list-style-type: none"> • Material Transfer and Disposal Form (MTDF) • Bill of Lading/Waste Manifest/ Weigh Tickets • Master Return Order • Waste Release Evaluation (WRE) • Appendix 1, Sanitary Waste Disposal Waste Acceptance Criteria Form • Appendix 4, Sanitary Waste Dumpster Inspection Checklist • Appendix 5, Sanitary and Special Waste Projects Waste and Transportation Inspection Checklist • Appendix 6, Unrestricted Release Survey Form (Radiological Hand Scan) • Supporting waste documentation 	<p>QA Documents</p>	<p>File folder in standard office filing equipment</p>	<p>Generators complete forms and submit to Sanitary and Special Waste Projects (SSWP). SSWP maintains forms until no longer needed and submits to Record Management in accordance with 1-V41-RM-001, Records Management Manual</p>

14. REFERENCES

MAN-T91-STSM-001, Site Transportation Safety Manual

1-V41-RM-001, Records Management Manual

PRO-1004-RSP-09.08, Radioactive Material Transfer and Unrestricted Release of Property, Waste, and Samples

PRO-1671-SPP-SWOD, Self-Performing Projects Sanitary Waste Offsite Disposal

PRO-1775-SOC OPERATIONS, Sanitary Waste Offsite Shipping Operations

PRO-1805-HAND SCAN, Radiation Survey of Trucks Using the Bicron Micro-Rem Survey Meter

PRO-T95-OSTP-002, Off-Site Transportation Procedure

Rocky Flats Pollution Prevention (P2) Program Plan

APPENDIX 1

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SANITARY WASTE DISPOSAL WASTE ACCEPTANCE CRITERIA FORM

*Extended Waste Approval? Yes No Expires: _____ Container/Project #: _____
(See Section C)

SECTION A: General Information

Generating Company/Organization: _____ Project: _____

Waste Generator Contact Name: _____

Phone Number: _____ Pager: _____ Radio: _____

WASTE CATEGORY (Check All That Apply)

- | | |
|---|--|
| <input type="checkbox"/> Non-Routine Sanitary Waste | <input type="checkbox"/> PCB small capacitors |
| <input type="checkbox"/> Asbestos (Friable) | <input type="checkbox"/> Personal Protective Equipment (PPE)/Filters |
| <input type="checkbox"/> Asbestos (Non-Friable) | <input type="checkbox"/> Petroleum contaminated soil/material |
| <input type="checkbox"/> Beryllium contaminated wastes | <input type="checkbox"/> Sludge (water plant) |
| <input type="checkbox"/> CERCLA waste | <input type="checkbox"/> Treated wood (railroad ties, telephone poles, etc.) |
| <input type="checkbox"/> PCB bulk product waste | <input type="checkbox"/> Waste Chemical(s) |
| <input type="checkbox"/> PCB fluorescent light ballasts | <input type="checkbox"/> Other (describe) _____ |

WARNING: Radioactive waste, RCRA hazardous waste, and waste with PCB concentrations exceeding landfill regulatory levels cannot be disposed as sanitary waste.

SECTION B: Waste Characterization Information

Narrative Waste Description:

(Provide physical description, how and where generated, and identify chemical contaminants, if known—description must be consistent with Waste Release Evaluation description).

Source of Characterization Information: (please attach copies of all supporting characterization documents)

Analytical Data (list Lab Report #): _____

Material Safety Data Sheet (MSDS)

WSRIC#: _____

Has WSRIC information been re-verified within last 13 months: Yes No

Other: _____

Based on review of the above generator-provided information, SSWP may require additional analytical data to support characterization of the waste prior to acceptance for disposal. Listed below is the additional analytical data required.

APPENDIX 1

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SANITARY WASTE DISPOSAL WASTE ACCEPTANCE CRITERIA FORM

SECTION B: Waste Characterization Information (continued)

B-1 Prohibited: RCRA Regulated Waste

Waste has been evaluated in accordance with 40 CFR 261, and is not a RCRA regulated waste.

True _____ False _____

B-2 PCB-Contaminated Waste

Is this waste considered PCB Bulk Product Waste?
(may include fluorescent light ballasts; applied coatings or sealants, and caulking; plastics; non-liquid building demolition debris, preformed or molded rubber parts; and intact, non-leaking small capacitors.)

Yes _____ No _____

Other than indicated above, this waste has been evaluated in accordance with 40 CFR 761, and is not a TSCA regulated waste.

True _____ False _____

Explain: _____

B-3 CERCLA Waste (Including approved soil/material)

Is this waste being generated from a D&D activity conducted under a RFCA Standard Operating Protocol (RSOP) or a Decommissioning Operations Plan (DOP)?

Yes _____ No _____

Is waste Environmental Remediation waste? Yes _____ No _____

Does this waste contain soil/material/debris that has been taken from an Individual Hazardous Substance Site (IHSS), Under Building Contamination (UBC) area or Potential Area of Concern (PAC)?

Yes _____ No _____

B-4 Asbestos Waste - Friable and/or Non-friable

Is this waste friable asbestos containing material? Yes _____ No _____

Is this waste non-friable asbestos containing material? Yes _____ No _____

WARNING: Nonfriable asbestos that has the potential to become friable during handling, transport, and disposal (i.e. transite, drywall, etc.) must be managed as friable asbestos waste.

B-5 Beryllium - Contaminated Waste

Does this waste originate from a Beryllium-controlled or -regulated area?

Yes _____ No _____

If Yes, this waste has been evaluated for the presence of beryllium contamination. Based on this evaluation, the waste:

_____ is not beryllium contaminated:

- sufficiently decontaminated (e.g., wet technique); no inaccessible areas
- fixative applied; no inaccessible surfaces

_____ is beryllium contaminated (surface contamination is removable; or no removable surface contamination but inaccessible areas present)

APPENDIX 1

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SANITARY WASTE DISPOSAL WASTE ACCEPTANCE CRITERIA FORM

SECTION C: Waste Characterization Signature Approval

Project Environmental Manager (or appropriate designee) signature below indicates that waste characterization information provided in **Blocks B-1, B-2, B-3, B-4 and B-5** is accurate, and that waste is approved for sanitary waste disposal.

**Signature for an Extended Waste Approval indicates that waste characterization will not change through the designated expiration date.*

Print _____

Sign _____

Date _____

SECTION D: Documentation/Packaging/Handling

Procedures 1-PRO-573-SWODP and/or PRO-1671-SPP-SWOD specify documentation, packaging and handling requirements for each Waste Category. The generator must provide this completed Waste Acceptance Criteria Form, Material Transfer & Disposal Form, Waste Release Evaluation Form and other applicable documentation before waste disposal as part of the documentation, packaging, handling, and characterization requirements.

Does waste documentation, packaging/handling and characterization meet the requirements of procedures 1-PRO-573-SWODP and/or PRO-1671-SPP-SWOD?

Yes _____ No _____

If no, explain discrepancy: _____

SECTION E: Verification and Acceptance Signatures

SSWP may charge the generating organization/project any necessary expenses to bring waste into compliance with 1-PRO-573-SWODP and/or PRO-1671-SPP-SWOD requirements. Additionally, if the generator certifies that waste is compliant with these procedures and SSWP finds the waste is not compliant, the cost to rectify these deficiencies may be assessed against the generating organization/project.

I have read and understand the limitation stated above. The information provided on this form is true and accurate to the best of my knowledge.

Generating Organization/Project Signature _____

(must be same as Waste Generator Contact Name in Section A)

Date _____

Based on the waste characterization information and approvals provided above, I accept this waste into SSWP custodianship.

SSWP Signature _____

Date _____

APPENDIX 2

Page 1 of 1

GUIDELINES FOR RECYCLING

Below is a partial list of items that may be recycled. The latest information regarding recycling can be found in the Site P2 Program Plan, Recycling Guide, the P2 Website, or by calling the P2 Hotline, extension 7777.

- Aluminum Cans
- Asphalt*
- Automotive Recyclables
- Batteries [except: alkaline, carbon zinc (unless marked as high mercury), lithium (C size or smaller)]
- Cardboard*
- Chemicals
- Circuit Boards
- Computer equipment
- Concrete*
- Electronic Equipment
- Film
- Fluorescent Light Bulbs
- Mercury
- Lubricating Oils
- Office furniture, supplies, and equipment
- Office and Mixed Paper *
- Photographic Fixer Solution and Film
- Plastic Bottles
- Toner Cartridges, Drums, Developers and Fuser Units*
- Scrap Metal
- Wood Pallets

* SSWP manages these items for recycle. Information on collection and packaging of these items can be obtained by calling the SSWP hotline at extension 2001.

APPENDIX 3

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SPECIFIC LANDFILL APPROVED AND PROHIBITED SANITARY WASTE ITEMS

NOTE *SSWP specifies the packaging and coordinates landfill approval for special sanitary waste.*

ITEMS	FRONT RANGE LANDFILL	TOWER ROAD LANDFILL	HWY 93 - FOOTHILLS LANDFILL
Aerosol cans/containers	YES (Punctured Only)	YES (Punctured Only)	YES (Punctured Only)
Animal carcasses	NO	NO	NO
Asbestos (friable and non-friable that may readily become friable)	NO	YES (contact SSWP)	NO
Asbestos (non-friable)	YES (contact SSWP)	YES	YES (contact SSWP)
Beryllium contaminated waste	YES (contact SSWP)	NO	NO
CERCLA Waste	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)
Class A & B explosives	NO	NO	NO
Containerized and un-containerized free liquid including oil filled transformers	NO	NO	NO
Controlled property with U.S. DOE-Rocky Flats Site Property Control Numbers	NO	NO	NO
Construction and demolition Debris	YES	YES	YES

APPENDIX 3

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**SPECIFIC LANDFILL APPROVED AND PROHIBITED SANITARY WASTE ITEMS
(continued)**

ITEMS	FRONT RANGE LANDFILL	TOWER ROAD LANDFILL	HWY 93 - FOOTHILLS LANDFILL
Empty tanks, piping, or packages displaying the following labels: <ul style="list-style-type: none"> • NFPA • Hazardous waste • PCB • Radioactive material • DOT hazard class • Classified or sensitive unclassified lettering or labels 	NO	NO	NO
Fly ash	NO	NO	NO
Free liquid or sludge	NO	NO	NO
Medical or infectious waste	NO	NO	NO
Municipal or household waste from employees' homes or businesses	NO	NO	NO
Non-hazardous solid waste	YES	YES	YES
Original controlled documents or records	NO	NO	NO
Packages up to 85 gallons	YES RCRA empty	YES RCRA empty	YES RCRA empty
PCB bulk product waste	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)
PCB light ballast, small capacitors and contaminated soils/materials	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)

APPENDIX 3

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**SPECIFIC LANDFILL APPROVED AND PROHIBITED SANITARY WASTE ITEMS
(continued)**

ITEMS	FRONT RANGE LANDFILL	TOWER ROAD LANDFILL	HWY 93 - FOOTHILLS LANDFILL
Petroleum-contaminated media/soil	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)
Piping that is capped or does not have ends removed	NO	NO	NO
Pressurized tanks or containers	NO	NO	NO
Radioactive waste	NO	NO	NO
RCRA/TSCA wastes	NO	NO	NO
Soil, concrete, asphalt waste	YES	YES	YES
Sludge (semi-solid sewage or septic)	NO	NO	NO
Sludge (water plant)	NO	YES (contact SSWP)	NO
Tanks and container greater than 85 gallons empty and cut in half	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)
Tires (bulk)	NO	NO	NO
Treated wood products (includes telephone poles, railroad ties, fence posts, etc.)	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)
Waste chemicals/products/materials	YES (contact SSWP)	YES (contact SSWP)	YES (contact SSWP)

APPENDIX 4

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ROUTINE SANITARY WASTE INSPECTION CHECKLIST

WASTE INSPECTOR <small>NOTE: Complete this form with ink. If an error is made, draw a single line through the error, initial, date and enter the correct information.</small>			
1) Name _____		2) Date: _____	
3) Inspection Location _____		4) Dumpster #: _____	
5) Dumpster Type <input type="checkbox"/> Routine Waste <input type="checkbox"/> Paper Recycle <input type="checkbox"/> Cardboard Recycle <input type="checkbox"/> Other: _____		6) Packaging <input type="checkbox"/> Clear Plastic Bags <input type="checkbox"/> Bulk <input type="checkbox"/> Black Plastic Bags <input type="checkbox"/> Other: _____ Comments: _____	
7) Inspection Type <input type="checkbox"/> 100% <input type="checkbox"/> Visual* <input type="checkbox"/> NC Verify* <input type="checkbox"/> Other: _____		8) Percent Full <input type="checkbox"/> Empty <input type="checkbox"/> Between 75% and 100% <input type="checkbox"/> Less than 25% <input type="checkbox"/> Between 50% and 75% <input type="checkbox"/> Between 25% and 50% <input type="checkbox"/> Overflowing	
9) Waste Dumpster Conditions <input type="checkbox"/> Labeled/Marked <input type="checkbox"/> Locked/Secured <input type="checkbox"/> Damaged <input type="checkbox"/> In Appropriate Location <input type="checkbox"/> Covered <input type="checkbox"/> Other: _____ <input type="checkbox"/> Working Condition		10) Nonconformance Documentation <input type="checkbox"/> NC Sign Issued <input type="checkbox"/> Resolved NC <input type="checkbox"/> N/A <input type="checkbox"/> NC Sign Removed Comments: _____	
11) Nonconformance Items: _____ _____ _____ _____ _____			
12) Dumpsters (*Visual/NC Verify)			
Building: _____ Dumpster # _____	Building: _____ Dumpster # _____	Building: _____ Dumpster # _____	Building: _____ Dumpster # _____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
The Inspector signature below affirms that to the best of my knowledge and ability, this container has been properly inspected. I understand by signing this form, I will in no way be held liable for nonconforming issues related to this container as a result of this inspection.			
SIGNATURES			
Inspector _____ Date _____		QC _____ Date _____	
Inspector Employee #: _____		QC Employee #: _____	

APPENDIX 5

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**SANITARY AND SPECIAL WASTE PROJECTS WASTE AND TRANSPORTATION
INSPECTION CHECKLIST**

SANITARY and SPECIAL WASTE PROJECTS WASTE and TRANSPORTATION INSPECTION CHECKLIST		Building/Project																												
Project / Container Information	Shipping Information	Waste Information																												
<p>Self-Performing: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Type of container:</p> <p><input type="checkbox"/> End Dump <input type="checkbox"/> Flat Bed</p> <p><input type="checkbox"/> Roll-off <input type="checkbox"/> Other: _____</p> <p style="text-align: center;">Percent Full:</p> <p><input type="checkbox"/> 0 - 25% <input type="checkbox"/> 50 - 75%</p> <p><input type="checkbox"/> 25 - 50% <input type="checkbox"/> 75 - 100%</p> <p>Vehicle Information:</p> <p>Truck #: _____</p> <p>Container(s) #: _____</p> <p>Other: _____</p>	<p>LO #: _____</p> <p><input type="checkbox"/> Unregulated - Warehouse prepares Bill of Lading.</p> <p><input type="checkbox"/> Regulated - Traffic prepares Bill of Lading.</p> <p>Consignee:</p> <p><input type="checkbox"/> Front Range Landfill Republic Services 1830 Weld County Rd Erle, CO 80518</p> <p><input type="checkbox"/> Tower Road Landfill BFI Waste Systems 88th Ave. and Tower Rd. Commerce City, CO 80022 <i>BFI Waste Code:</i></p> <p><input type="checkbox"/> Hwy 93 - Foothills Landfill BFI Waste Systems 8900 Highway 93 Golden, CO 80403 <i>BFI Waste Code:</i></p>	<p>Acceptable materials: (check all that apply)</p> <p><input type="checkbox"/> Non-routine sanitary waste: [concrete; asphalt; untreated lumber; metal; office debris; wall board; etc.]</p> <p><input type="checkbox"/> CERCLA approved soil/debris</p> <p><input type="checkbox"/> PCB bulk product waste: [plastics; dry paints, varnish; caulking; etc]</p> <p><input type="checkbox"/> PCB fluorescent light ballasts</p> <p><input type="checkbox"/> PCB small capacitors</p> <p><input type="checkbox"/> Treated wood: [railroad ties, telephone poles, etc]</p> <p><input type="checkbox"/> Asbestos (friable / non-friable) [must be labeled]</p> <p><input type="checkbox"/> Beryllium-contaminated waste [must be labeled]</p> <p><input type="checkbox"/> Petroleum contaminated debris</p> <p><input type="checkbox"/> Waste chemicals</p> <p><input type="checkbox"/> Other: _____</p>																												
<p>Final Inspection: <i>If any of the responses below are "NO", contact Sanitary & Special Waste Project Personnel prior to shipping. Inspection may represent multiple waste shipments from this project.</i></p> <table style="width:100%; border: none;"> <tr> <td></td> <td colspan="3" style="text-align: right;"><u>Circle response</u></td> </tr> <tr> <td>• Is the waste free of prohibited items?</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">NA</td> </tr> <tr> <td>• Does the waste match the acceptable materials indicated above?</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">NA</td> </tr> <tr> <td>• Is waste evenly distributed in the truck/container?</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">NA</td> </tr> <tr> <td>• Is all waste inside the sides of the container?</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">NA</td> </tr> <tr> <td>• Is container door closed and latched?</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">NA</td> </tr> <tr> <td>• Has the container been tarped, as applicable, before leaving the job site?</td> <td style="text-align: center;">Yes</td> <td style="text-align: center;">No</td> <td style="text-align: center;">NA</td> </tr> </table> <p>Inspector (Name and ID#): _____ Date: _____ Time: _____</p>				<u>Circle response</u>			• Is the waste free of prohibited items?	Yes	No	NA	• Does the waste match the acceptable materials indicated above?	Yes	No	NA	• Is waste evenly distributed in the truck/container?	Yes	No	NA	• Is all waste inside the sides of the container?	Yes	No	NA	• Is container door closed and latched?	Yes	No	NA	• Has the container been tarped, as applicable, before leaving the job site?	Yes	No	NA
	<u>Circle response</u>																													
• Is the waste free of prohibited items?	Yes	No	NA																											
• Does the waste match the acceptable materials indicated above?	Yes	No	NA																											
• Is waste evenly distributed in the truck/container?	Yes	No	NA																											
• Is all waste inside the sides of the container?	Yes	No	NA																											
• Is container door closed and latched?	Yes	No	NA																											
• Has the container been tarped, as applicable, before leaving the job site?	Yes	No	NA																											
<p>SSWP resolution of "No" response: _____</p> <p>SSWP QC: _____ QC ID #: _____ Date: _____</p>																														
<p>SSWP Form 10-1-000000-01-000000-000000-000000</p>																														

APPENDIX 6

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**UNRESTRICTED RADIOLOGICAL RELEASE SURVEY FORM
(RADIOLOGICAL HAND SCAN)**

This sanitary waste shipment has been hand scanned with appropriate radiological monitoring equipment per PRO-1805-HAND SCAN, and found acceptable for shipment offsite to an approved disposal facility.

Truck Number

Radiological Operations Approval Signature

Date

Time

Completed form shall be provided to the waste transporter. Transporter shall provide this form to the Sanitary and Special Waste Projects (SSWP) shipping personnel as evidence that scanning has been completed. SSWP will retain this form with shipment documentation.

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