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TITLE: Waste Container Labeling and Marking Requirements for Storage	<u>3</u> YR PERIODIC REVIEW DATE: <u>03/25/27</u>	
	APPROVED BY: DATE:	Lindsay Adkins 03/25/24 (Signature on File)

USE CATEGORY:	GENERAL INTENT	Page 1 of 27
SME: Michael Butler	Writer: Joyce Netter	

Level 3 Technical Procedure

Revision	Record of Issue/Revision	Affected Pages
10	Revision/Periodic Review. Changed the SME. Reworded Steps 5.1 and 7.5 and added to the Acronym List. Deleted #8 & 9 in Appendix A.	Title page, 3, 4, 14, 15

Previous Record of Issue/Revision information is available from the history files.

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1.0 PURPOSE

- 1.1 This procedure was developed to implement applicable requirements for the labeling and marking of waste containers.
- 1.2 This document implements applicable regulatory requirements. They are listed in Appendix A, *Regulatory Requirements Flow Down*.

2.0 SCOPE AND APPLICABILITY

- 2.1 This Level 3 procedure applies to personnel who label and mark waste containers for storage managed by Fluor-BWXT Portsmouth LLC (FBP) for the Department of Energy (DOE) at Portsmouth Gaseous Diffusion Plant (PORTS).
- 2.2 This procedure does not include labeling and marking of small diameter containers which are addressed in FBP-NO-PRO-00003, *Use of Small Diameter Containers for Storage of Uranium Material*.
- 2.3 This procedure applies to drums, boxes, soft-sided shipping containers (bags and boxes), and gondolas.

3.0 GENERAL INFORMATION

None

4.0 USE REFERENCES

- A. FBP-BS-PRO-00062, *Records Management Process*
- B. FBP-JHA-13-1450, *Site Safety Orientation (SSO)*
- C. FBP-JHA-13-1647, *General Work Job Hazard Analysis (JHA)*
- D. FBP-JHA-17-0324, *General JHA for Waste Management/Waste/Operations/Transportation/Container Field Services*
- E. FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*
- F. FBP-WM-PRO-00046, *Waste/Recyclables Tracking*

5.0 PRECAUTIONS AND LIMITATIONS

5.1 Special Hazards and Controls

Upon identification of hazards and their analyses through use of the Hazard Reference List (HRL), it was determined that all job step activities and associated hazards are addressed through the General Work (FBP-JHA-13-1647) and/or Site Safety Orientation (FBP-JHA-13-1450) and/or Waste Management General Work (FBP-JHA-17-0324) JHAs' hazard controls as mitigating factors.

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5.2 Safety and Health Precautions

- 5.2.1** Containers must be managed in a manner that will **not** cause leaks or damage to the container, lid, or bungs.

WARNING

DO NOT work in unsafe or uncertain conditions!

Failure to stop and ask when questions arise or work conditions change may result in injury or death, environmental insult, equipment damage, and regulatory noncompliance.

- A.** If you believe that any portion of this procedure cannot be performed safely or conditions arise that this procedure does not address, **stop** performance of this procedure and obtain resolution before proceeding.
- B.** Notify the Plant Shift Superintendent (PSS) in the event of an emergency.
- C.** If a container ruptures or material spills from a container during the performance of this section, refer to FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*.

NOTE

For specialty containers (i.e., soft-sided), labels may not be able to be affixed. Contact container management for further guidance.

5.3 Work Area Limitations

PPE requirements for work performed under a Radiological Work Permit (RWP) shall be in accordance with the applicable RWP.

6.0 PREREQUISITES

None

7.0 TOOLS AND SUPPLIES

- 7.1** Labels
- 7.2** Adhesive
- 7.3** Portable ladder/ladder stand
- 7.4** Label scraper
- 7.5** Cut resistant gloves American National Standards Institute (ANSI) Level 2 or higher
- 7.6** Nitrile gloves (work with adhesives)

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8.0 ACTIONS

NOTE

Any Radiological marking, labeling and/or posting required per FBP-RP-PRO-00022, *Posting and Labeling*, for waste storage will be applied by Radiological Protection personnel. Step 8.1.5 will be used as guidance for label placement on a container.

8.1 Labeling Waste Containers

8.1.1 General Container Labeling Requirements

CAUTION

To reduce risk of puncture to containers, ensure that metal label scrapers are not used on plastic drums.

Qualified Worker

NOTE

If waste is stored in a metal box (e.g., ST-90, B-25), the NNSS labels are required to be within the middle third of both long sides and therefore no other labels should be placed in this area.

- A. Apply labels and complete label content based on information provided by the Supervisor in consultation with the Waste Disposition Specialist (WDS) based on the waste container contents. **IF** provided directions conflict with available information (e.g., area or equipment postings), **THEN STOP** and notify Supervisor or WDS for resolution.
- B. Ensure waste tracking number and waste description on label matches waste description on Waste Material Generation (WMG) tracking form. (An abbreviated description may be used, if needed.)
- C. Place/locate labels as directed in Step **8.1.5**.
- D. Ensure all labels are legible.
- E. Ensure waste containers are positioned to maximize container label visibility.
- F. **IF** a container has been relabeled for any reason, **THEN** verify the container is allowed in the assigned storage area. If it is not allowed, **STOP** and contact the Supervisor who will consult with the appropriate Subject Matter Expert (SME).

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8.1.2 Applying Inventory Bar Codes and Content Labels

NOTE

Application of a container inventory label is required on all containers (i.e., drums, boxes, soft-sided containers) obtained through Container Management prior to issue for use. If container inventory label is not available, contact Container Management.

For specialty containers (i.e., soft-sided), labels may not be able to be affixed. Contact Container Management for further guidance.

- A. Apply *Container Inventory Label* (Appendix B) on each drum, can, box, and soft-sided container.
- B. Apply a *Waste Information Label* (Appendix C) on each drum, can box, and soft-sided container upon placement of waste within the container. The following information shall be completed on the label:
 - Generator – Project or facility where the waste is being generated
 - Contents – Common name of the waste material (e.g., Polychlorinated Biphenyl [PCB] liquid >500 ppm, soil, dry active waste, oil spill clean-up, oil.)
 - WMG as well as the eMWaste bar code.
 - PCB start data – date that first PCB waste is placed in container (if applicable), unless already documented on PCB Label from Appendix G.
 - Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) designation – Mark YES if directed by WDS as a CERCLA Project
 - Weight – Gross Weight
- C. **IF** container weight has changed (due to re-weighing), **THEN** update container label information (line through old weight, enter date, and initial change; enter new weight). Notify Supervisor of any changes (an FBP-WM-PRO-00046-F05, *Change to Waste Tracking Information*, can be submitted per FBP-WM-PRO-00046, *Waste/Recyclables Tracking*).
- D. Apply an *eMWaste Bar Code* label (Appendix D) to each waste container slated for storage. (Obtain bar code labels from the eMWaste Database Administrator – eMWaste). Ensure that it matches the corresponding WMG form.
- E. **IF** container is emptied, **THEN** remove all labels and place an empty label on the container.

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8.1.3 Regulatory Designation Labels

NOTE

The yellow Hazardous Waste label with a red border may be typed, handwritten, or personalized by the supplier.

A. Hazardous Waste Label

- **IF** a container contains hazardous waste, **THEN** label the container of hazardous waste with a *Hazardous Waste Label* (Appendix E). Complete the following information listed below, as appropriate:
 - Name: FLUOR-BWXT PORTSMOUTH/US DOE
 - Address: P.O. Box 548, 3930 U S Route 23, Piketon OH 45661
 - Phone: (740) 897-3025
 - Environmental Protection Agency (EPA) ID NO. OH7890008983
 - Accumulation Start Date
 - EPA Waste No.

NOTE

When possible, use a label applied to a magnetic backing for the Fissile Material and Nuclear Criticality Safety (NCS) Exempt labels for ease of removal prior to shipment.

B. Fissile Material Label

- **IF** applicable, complete the *Fissile Material Label* (Appendix F). Mark the appropriate box for value justification, “Shipper Values,” “Batched Values,” Nondestructive Assay “(NDA) Values,” or “Analytical Values.” **IF** using process knowledge (PK), **THEN** write in “PK” and ensure a statement is prepared documenting the justification.
- **IF** the waste/material in the container is stored using Batched Values, Shippers Values, or PK, **THEN** enter the Maximum (Max) ^{235}U grams, Max enrichment, and whether the material is oily or non-oily.
- **IF** the waste/material in the container is being stored using NDA or Analytical Values, **THEN** enter (nominal) ^{235}U mass, uncertainty, and Max ^{235}U grams. Enter (nominal) enrichment, uncertainty and Max wt. % ^{235}U , and whether the material is oily or non-oily.
- **IF** pertinent information cannot be obtained, **THEN** contact Supervisor for direction.

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- Place the label on the container.

C. NCS Exempt Label

- **IF** container contents meet one of the following exempt fissile material limits, **THEN** an *NCS Exempt Label* (Appendix M) may be applied and the container stored in an NCS exempt array:
 - Uranium enriched to less than or equal to 1.0 wt. % ^{235}U , including uncertainty, for oily and non-oily uranium compounds.
 - Uranium enriched to less than or equal to 0.93 wt. % ^{235}U , including uncertainty, for uranium metal.
 - Less than or equal to 15g ^{235}U , including uncertainty, (oily or non-oily) in a 10L or larger, container.
 - Less than or equal to 100g ^{235}U , including uncertainty, (oily or non-oily) in a 55-gallon, or larger, container.

D. PCB Label

NOTE

Use a PCB (yellow) waste label when the source of PCBs contains greater than or equal to 50 parts per million (ppm).

- Apply the PCB Label (Appendix G) and ensure that the PCB start date is entered on either the waste information label or the PCB label.
- **IF** a container has PCB liquids greater than 500 ppm and is stored within a Toxic Substance Control Act 30-day storage area, **THEN** mark the Waste Information label to indicate that the PCB liquid content is greater than 500 ppm.

E. Universal Waste Label

NOTE

Universal Waste includes lead acid batteries, mercury containing equipment and light bulbs.

- **IF** waste is Universal Waste, **THEN** apply the *Universal Waste Label* (Appendix H). Mark the appropriate box and complete the required information.

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F. Used Oil Label

- Mark or label all used oil with the words “Used Oil”. This can either be marked with an indelible marker or a *Used Oil Label* may be applied (Appendix I).

G. Regulated Asbestos Label

- **IF** the WDS indicates a container contains regulated asbestos, **THEN** apply an *Asbestos Hazard Label* (Appendix J). **IF** there are markings on bags and WDS did not indicate the system was asbestos, **THEN STOP** and contact Supervisor to rectify with WDS and Health and Safety prior to labeling the container.

8.1.4 Additional Labels

The following labels may be applied at the direction of the WDS:

- *Recycle Material* (Appendix K)
- *Generator Waste Certification Label* (Appendix L)

NOTE

At the Supervisor’s discretion for ease of inspection, labels may be placed on two opposing sides of boxes.

Whenever possible, labels on containers that will be stored outside should be protected using a plastic sleeve.

8.1.5 Standard Labeling System Layout

- A. IF** the waste container is a metal/plastic drum or a 5-gallon container, **THEN** place the required labels as shown in Figure 1, *Standard Labeling System for Metal Drums and 5-Gallon Containers*.

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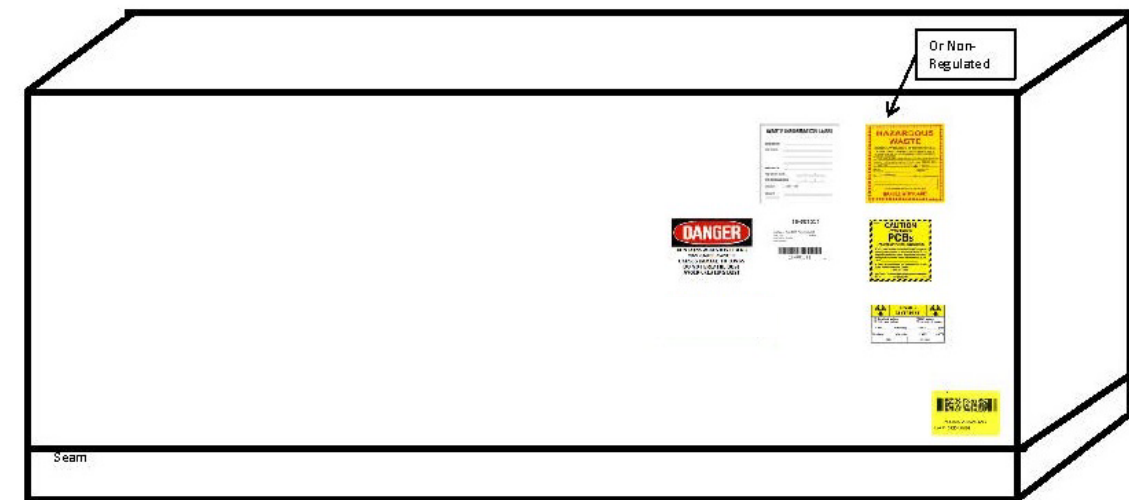
**Figure 1 - Example
Standard Labeling System for Metal/Plastic Drums and 5-Gallon Containers**



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- B. IF** the waste container is a box, **THEN** place the required labels as shown in Figure 2, *Standard Labeling System Layout for Boxes*.

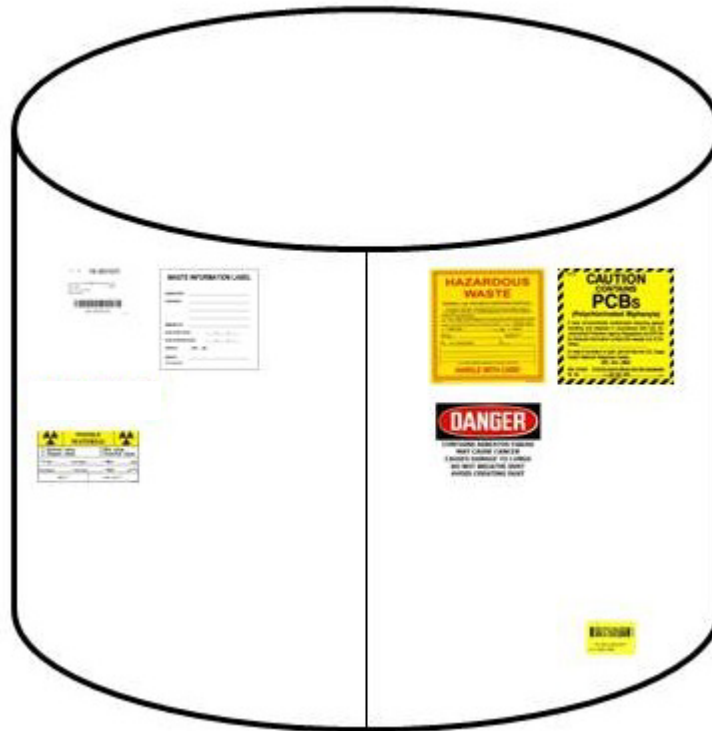
Figure 2 - Example
Standard Labeling System Layout for Boxes



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- C. IF the waste container is a small or irregular container or a labpack, THEN place the required labels as shown in Figure 3, *Standard Labeling System for Small or Irregular Containers and Labpacks*.

Figure 3 – Example
Standard Labeling System for Small or Irregular Containers and Labpacks



9.0 POST-PERFORMANCE ACTIVITIES

Qualified Worker

- 9.1 Return reusable equipment to appropriate storage area (clean or decontaminate first, if necessary).

Supervisor, Waste Disposition Specialist (WDS), or designees

- 9.2 Ensure any waste and PPE generated from labeling and marking of waste containers in radiological areas is packaged, managed, and storage in accordance with WDS guidance.

10.0 RECORDS

10.1 Records Generated

- A. FBP-WM-PRO-00046-F05, *Change to Waste Tracking Information*
- B. Container Inventory Label

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- C. Waste Information Label
- D. eMWaste Bar Code
- E. Hazardous Waste Label
- F. Fissile Material Label
- G. Caution-Radioactive Material Label
- H. PCB Label
- I. Universal Waste Label
- J. Used Oil Label
- K. Asbestos Hazard Label
- L. Recycle Material label
- M. Generator Waste Certification Label

10.2 Requirements

Records generated or received as a result of performing this procedure shall be managed according to FBP-BS-PRO-00062, *Records Management Process*.

11.0 DEFINITIONS/ACRONYMS

11.1 Definitions

- A. **Box** – Any 4-sided, top, and bottom metal container.
- B. **Qualified Worker** – FBP personnel who are trained, qualified, and authorized to perform work at the PORTS worksite.
- C. **Waste Disposition Specialist (WDS)** – Authorized FBP employees that provide management and guidance to FBP personnel for the characterization and packaging requirements for materials being sent for treatment, storage, disposal, and recycling, develops waste profiles, and interfaces with treatment, storage, disposal, and recycling facility's (TSDRFs) for the proper disposition of materials off-site.

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11.2 Acronyms

- A.** **ANSI** – American National Standards Institute
- B.** **CERCLA** – Comprehensive Environmental Response and Liability Act
- C.** **MAX** – Maximum
- D.** **NCS** – Nuclear Criticality Safety
- E.** **NNSS** – Nevada National Security Site
- F.** **PK** – Process Knowledge
- G.** **ppm** – Parts Per Million

12.0 SOURCE REQUIREMENTS

- A.** FBP/PORTS-446, *Technical Safety Requirements for the X-345 And X-744G Facilities Portsmouth Gaseous Diffusion Plant Piketon, Ohio*
- B.** FBP-OS-PRO-00014, *Accident Prevention/Equipment Control Tags*
- C.** FBP-OS-PRO-00031, *Portable Ladders*
- D.** FBP-WM-PRO-00028, *Preparing Off-Site Shipments of Non-Hazardous Materials*
- E.** FBP-WM-PRO-00044, *Preparing Off-Site Shipments of Hazardous Materials*
- F.** FBP-WM-PRO-00329, *Waste Generation Under Activities Governed by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)*
- G.** FBP-WM-PRO-00330, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Waste Storage and Staging Areas*

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Appendix A REGULATORY REQUIREMENTS FLOW DOWN

1. 40 CFR 761, *Toxic Substances Control Act, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*, except for Parts 761.1, .3, .65(d)–(h), .70, .75, .80, .120, .123, .185, .187, and .193
2. DOE/OR/11-3037/V1&D0, *RCRA Part B Permit Renewal Application, Vol. 1, Text*, 02/015/00, and corresponding *HW Facility Installation & Operation Permit Renewal*, “General Permit Conditions”
3. FBP/PORTS-444, *Documented Safety Analysis for the X-345 And X-744G Facilities at the Portsmouth Gaseous Diffusion Plant Piketon, Ohio*
4. FBP/PORTS-446, *Technical Safety Requirements for the X-345 And X-744G Facilities Portsmouth Gaseous Diffusion Plant Piketon, Ohio*
5. Ohio Administrative Code (OAC) Section 3745-51, *Identification & Listing of Hazardous Waste*, parts –01 to –33
6. Ohio Administrative Code (OAC) Section 3745-52, *Generator Standards*, parts –11, –12, –20, –22, –23, –30 through –34, –40, –41, –42, –43, and –44
7. Ohio Administrative Code (OAC) Section 3745-55-70, *Use and Management of Containers*
8. POEF-FBP-020, *Safety Management Program Descriptions for Fluor-BWXT Portsmouth Decontamination and Decommissioning Project*

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Appendix B
CONTAINER INVENTORY LABEL



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Appendix C
WASTE INFORMATION LABEL

<h2 style="margin: 0;">WASTE INFORMATION LABEL</h2>	
GENERATOR:	_____
CONTENTS:	_____ _____ _____ _____
WMG/WCT #:	_____
PCB START DATE:	____/____/____
PCB STORAGE DATE:	____/____/____
CERCLA:	<input type="checkbox"/> YES <input type="checkbox"/> NO
WEIGHT:	_____
FBP-FRM-00974	

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Appendix D
eMWASTE BAR CODE

Fluor-B&W

16-001531

Cust. Name: Fluor-BWXT Portsmouth, LLC

Cont. Type: Weight:

Date Rcvd in Storage:

Origin Location:

16-001531

Waste

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Appendix E
HAZARDOUS WASTE LABEL

<h1 style="margin: 0;">HAZARDOUS WASTE</h1> <p style="margin: 5px 0;">FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.</p> <p style="margin: 5px 0;">IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.</p> <p style="margin: 5px 0;">GENERATOR INFORMATION:</p> <p style="margin: 5px 0;">NAME <u>U.S. DOE PORTSMOUTH GASEOUS DIFFUSION PLANT</u></p> <p style="margin: 5px 0;">ADDRESS <u>P.O. BOX 548, 3930 U.S. ROUTE 23 SOUTH</u> PHONE <u>740-897-3025</u></p> <p style="margin: 5px 0;">CITY <u>PIKETON</u> STATE <u>OH</u> ZIP <u>45661</u></p> <p style="margin: 5px 0;">MANIFEST TRACKING NO. _____ ACCUMULATION START DATE _____</p> <p style="margin: 5px 0;">EPA ID NO. <u>OH 7890008983</u> EPA WASTE NO. _____</p> <div style="border: 1px solid black; height: 40px; margin: 10px 0;"></div> <p style="margin: 5px 0; text-align: center;">D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX</p> <h2 style="margin: 0;">HANDLE WITH CARE!</h2>	
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100-5
WWW.JBCOMPANY.NET

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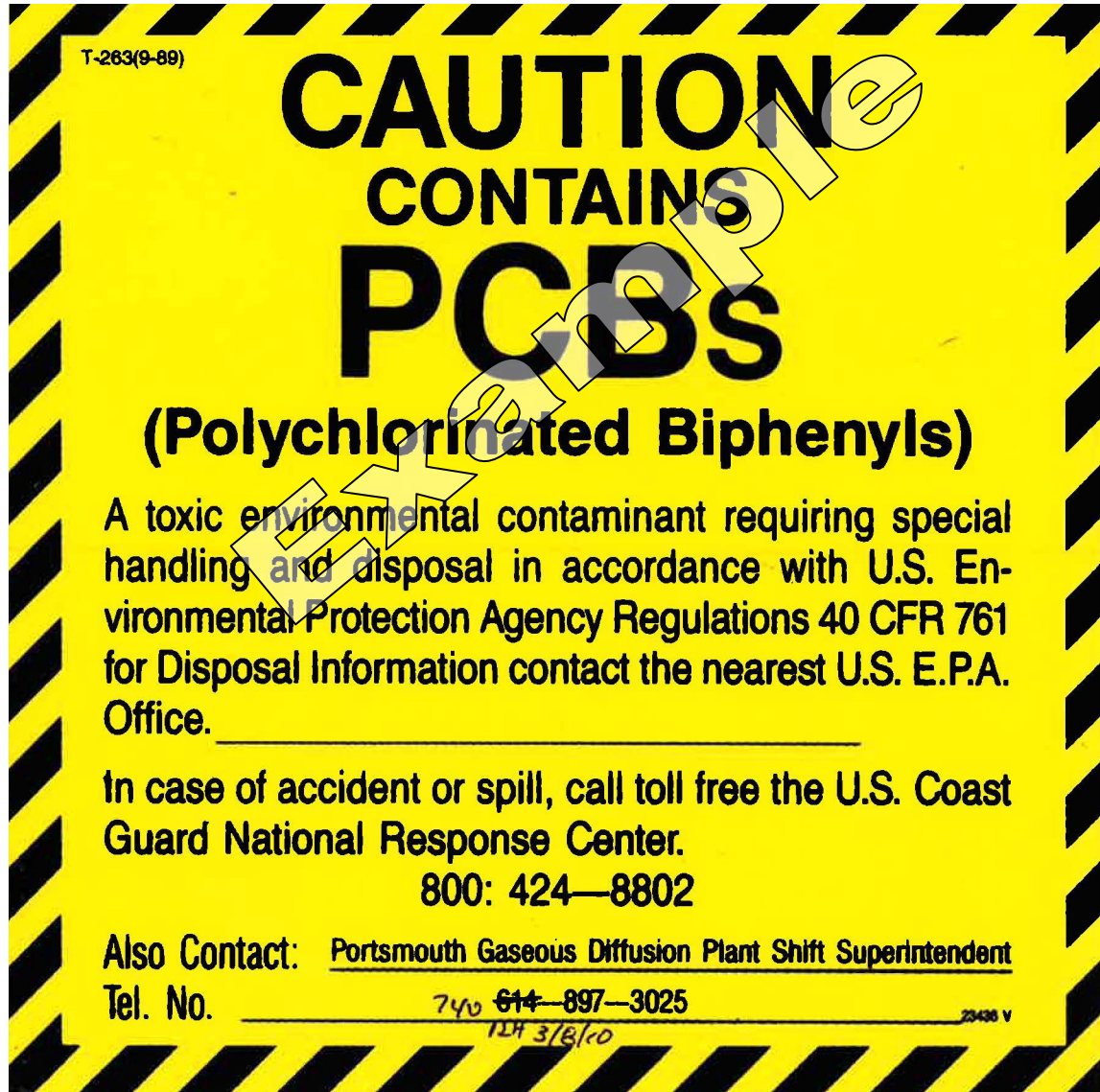
Appendix F
FISSILE MATERIAL LABEL

	FISSILE MATERIAL	
<input type="checkbox"/> Batched values <input type="checkbox"/> NDA values <input type="checkbox"/> Shippers values <input type="checkbox"/> Analytical values		
²³⁵ U Mass _____ + Uncertainty _____ = Max. _____ grams		
Enrichment _____ + Uncertainty _____ = Max. _____ wt% ²³⁵ U		
OILY <input type="checkbox"/>		NON - OILY <input type="checkbox"/>

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Appendix G
PCB LABEL



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Appendix H
UNIVERSAL WASTE LABEL

UNIVERSAL WASTE

FEDERAL AND STATE LAW PROHIBIT IMPROPER DISPOSAL

THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273 AND OAC 3745-273.

☐ UNIVERSAL WASTE-BATTERY(IES)
 ☐ UNIVERSAL WASTE-MERCURY CONTAINING EQUIPMENT
 ☐ UNIVERSAL WASTE-MERCURY THERMOSTATS ONLY
 ☐ UNIVERSAL WASTE-LAMP(S)

ACCUMULATION START DATE: _____

LOCATION WHERE IN-SERVICE _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49 CFR PARTS 172-180)

HANDLE WITH CARE

FBP-FRM-00971

TITLE:

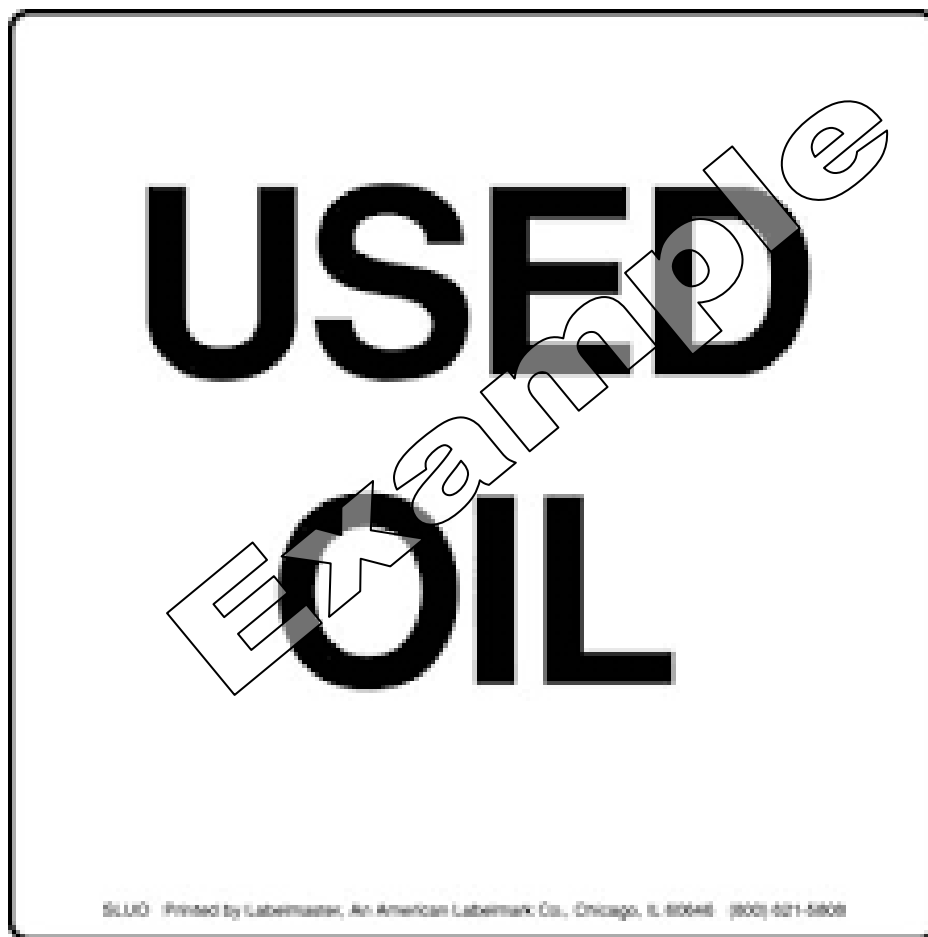
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**Appendix I
USED OIL LABEL**




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Appendix J
ASBESTOS HAZARD LABEL



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Appendix K
RECYCLE MATERIAL


<h1 style="margin: 0;">RECYCLE/REUSE</h1>
<p>MATERIAL DESCRIPTION:</p>
FBP-FRM-00970

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Appendix L
GENERATOR CERTIFICATION LABEL

**GENERATOR CERTIFICATION
FOR WASTE THAT IS NOT
HAZARDOUS OR UNIVERSAL**

I hereby certify that this package does not
contain any of the following non-conforming items:

- Free Liquids
- Batteries (small cell alkaline "D" or less okay)
- Light Bulbs
- Discarded Chemicals
- Mercury Containing Equipment
- Lead or Other Hazardous Waste
- Aerosol Cans
- ACM

SIGNATURE

FBP-FRM-00972

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Appendix M
NCS EXEMPT LABEL

NCS
EXEMPT

A-603