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| <b>DOCUMENT NO.:</b> FBP-WM-PRO-00329   | <b>REV. NO.</b> 6  | <b>EFFECTIVE DATE:</b> <u>09/26/24</u>            |
| <b>TITLE:</b><br><br>Waste Generation Under Activities Governed by Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) | <b><u>5</u> YR PERIODIC REVIEW DATE:</b> <u>04/15/29</u> |   |
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| <b>SME:</b> Scott Payne | <b>Writer:</b> Joyce Netter |                     |

## Level 2 Administrative Procedure

| Revision | Record of Issue/Revision   | Affected Pages |
|----------|--|----------------|
| 6        | Revision: Changed some requirements and definitions in the procedure | All            |

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

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## 1.0 PURPOSE

**1.1** This procedure provides guidance to personnel employed by or contracted to Fluor-BWXT Portsmouth LLC (FBP) at Portsmouth Gaseous Diffusion Plant (PORTS) that generate or manage waste generated under the *Record of Decision (ROD) for the Process Buildings and Complex Facilities* (FBP-ER-RIFS-BG-RPT-0037), *Record of Decision (ROD) for the Site-Wide Waste Disposition Evaluation Project* (FBP-ER-RIFS-WD-RPT-0041), *Comprehensive Deactivation, Demolition and Disposition Remedial Design/ Remedial Action (RD/RA) Work Plan (WP)* (FBP-ER-RDRA-BG-PLN-0075), *Deactivation of non-time Critical Buildings and Structures Remedial Action (RA) Work Plan (WP)* (FBP-ER-EECA-BG-PLN-0056), or any waste generated during activities that support work activities covered in these documents. All primary and secondary wastes generated in support of these documents are subject to this procedure with the exception of the waste stored in the X-330 Resource Conservation and Recovery Act (RCRA) Part B permitted storage area. Other sanctioned Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) activities are the X-114A Outdoor Firing Range and the site preparation and construction activities at the Onsite Waste Disposal Facility (OSWDF). The primary and secondary waste generated under these CERCLA activities (non-RCRA permitted waste) is governed by the CERCLA and is henceforth referenced as CERCLA waste. The CERCLA waste will be eligible for disposal at the OSWDF if it is demonstrated to meet the requirements specified in the Waste Acceptance Criteria (WAC). Activities that do not support the scope of the ROD, RDRA, and RAWP work plan will manage primary and secondary wastes according to FBP-WM-PRO-00090, *Waste Generation*.

**1.2** This procedure has been developed to implement applicable requirements from the following:

- DOE Order 435.1, *Radioactive Waste Management*
- DOE Order 436.1, *Departmental Sustainability*
- FBP-PM-PDD-00001, *Integrated Safety Management System*
- FBP-QP-PDD-00001, *Environmental Safety, Health, & Quality (ESH&Q) Performance Measurement, Analysis, and Reporting*
- FBP-WM-PL-00001, *Waste Management Plan*
- FBP-WM-PL-00084, *Waste Minimization and Pollution Prevention*
- FBP-ER-RIFS-WD-RPT-0041, *Record of Decision for the Site Wide Waste Disposition Evaluation Project at the Portsmouth Gaseous Diffusion Plant*
- FBP-ER-RIFS-BG-RPT-0037, *Record of Decision for the Process Buildings and Complex Facilities Decontamination and Decommissioning Evaluation Project at the Portsmouth Gaseous Diffusion Plant*
- FBP-EP-PL-00004, *Spill Prevention, Control, and Countermeasure Plan*

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- FBP-ER-RDRA-BG-PLN-0066, *Remedial Design/Remedial Action Work Plan and Remedial Design for the Process Building Deactivation at the Portsmouth Gaseous Diffusion Plant, Piketon Ohio*
- FBP-ER-RDRA-BG-PLN-075, *Comprehensive Deactivation, Demolition, and Disposition Remedial Design/Remedial Action Word Plan for the Process Buildings and Complex Facilities Remedial Action Project and Remedial Design for Deactivation of Complex Facilities at the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio*

**1.3** 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 2 procedure applies to personnel employed by or contracted to Fluor-BWXT Portsmouth LLC (FBP) at Portsmouth Gaseous Diffusion Plant (PORTS) who generate waste under the cited Remedial Design/Remedial Action (RD/RA) documentation. Throughout the remainder of this document, this waste shall be referred to as CERCLA waste.
- 2.2** This procedure is applicable to waste generation activities that support demolition and deactivation activities that fall under and support the Waste Disposition ROD, Process Building ROD, Action Memorandum, and work plans associated with those documents. Processes and Activities that have direct contact with contaminated environmental media covered under the RCRA corrective action program are NOT covered by this procedure.
- 2.3** This procedure is applicable to waste generated during facility modifications in support of activities covered in the Waste Disposition ROD, Process Building ROD, Action Memorandum, and work plans associated with those documents; Waste generated as a result of Surveillance & Maintenance (S&M) activities outside the scope of Section 1.1 will manage waste under FBP-WM-PRO-00090; *Waste Generation*.
- 2.4** Waste generation in support of the RCRA corrective action program that is contaminated with environmental media for Trichloroethylene (TCE) is exempt from this procedure and is governed under FBP-WM-PRO-00090 *Waste Generation*.
- 2.5** This procedure applies to any spill clean-up waste generated within facilities conducting work authorized under CERCLA. This procedure does not preclude any additional reporting requirements specified in the spill response procedures. See Appendix B, *Spills Under CERCLA*, for managing spills under CERCLA. Consult FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*.
- 2.6** This applies to the management of waste generated through dispatch work as well as project work within CERCLA facilities.
- 2.7** This procedure does not apply to any hazardous waste generated and stored in the Satellite Accumulation Areas (SAA) and RCRA Central Accumulation Areas (CAA).
- 2.8** This procedure does not apply to any of the primary or secondary wastes generated through the UF<sub>6</sub> cylinder transfer program.

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### 3.0 GENERAL INFORMATION

The Record of Decision (ROD) is designed to address the management of waste from legacy operations and decommissioning activities. For ROD activities conducted under this procedure, there is an expectation for personnel to practice waste minimization and pollution prevention techniques to minimize secondary waste. All persons are also expected to demonstrate a duty of care when placing wastes into community receptacles such as garbage cans and dumpsters. None of the following prohibited items are ever to be placed in a community receptacle: chemicals, batteries (other than D cell or smaller alkaline), oils, light bulbs, or electronic equipment. Consult this procedure or contact Waste Management (WM) for guidance on disposal.

### 4.0 USE REFERENCES

- A. FBP-BS-PRO-00062, *Records Management Process*
- B. FBP-MC-PRO-00067, *Nuclear Material Container Transfers*
- C. FBP-RP-PRO-00004, *Release of Material and Equipment from Department of Energy Control*
- D. FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*
- E. FBP-WM-PRO-00046, *Waste/Recyclables Tracking*
- F. FBP-WM-PRO-00090, *Waste Generation*
- G. FBP-WM-PRO-00115, *Contaminated Metal Requirements*
- H. FBP-WM-PRO-00264, *Waste Disposition*
- I. FBP-WM-PRO-00295, *Waste Container Labeling and Marking Requirements for Storage*
- J. FBP-WM-PRO-00322, *Excess Personal Property Transfer*
- K. FBP-WM-PRO-00330, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Waste Storage and Staging Areas*

### 5.0 RESPONSIBILITIES

#### 5.1 Project Manager/Waste Generation Manager

- A. Develops the Work Breakdown Structure to execute the RD/RA WP identifying the scope of the work to be completed.
- B. Coordinates with Waste Management to develop and maintain the schedule to allow for waste generation, packaging, storage and applicable regulatory disposition milestones for ALL waste generated under the scope, prior to generating ANY waste.

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- C. Coordinates with the On-Site Waste Disposal Facility (OSWDF) and Waste Acceptance Organization (WAO) to ensure proper planning and coordination of waste destined for the OSWDF.
- D. Verifies that waste containerizing, labeling, handling, and storage requirements are integrated into the Work Control Document.
- E. Ensures flow down of all applicable Waste Management Procedures during waste generation activities.
- F. Ensures the high risk property review is completed in accordance with FBP-BS-PRO-00020, *Property Management*, prior to the designation of the material to be dispositioned as waste and send applicable documentation to WDS.

## 5.2 Waste Disposition Specialist (WDS)

- A. Serves as the single point of contact responsible for coordinating containerization, characterization, on-site transportation, and disposition for recyclables and wastes generated under this procedure.
- B. Evaluates wastes to the requirements of FBP-WM-PRO-00264, *Waste Disposition*.
- C. Determines labeling, handling, containerization and storage requirements that may pertain to the waste.
- D. Provides containerizing, labeling, handling, and storage requirements to PM or generator as requested.
- E. Coordinates with PM or Waste Generator (WG) to identify item(s) or materials that may be candidates for recycle or reuse and coordinate their management in accordance with FBP-WM-PRO-00322, *Excess Personal Property Transfer*.
- F. Coordinates with FMs and Waste Operations to construct any needed CERCLA Waste Staging and Storage Areas in full compliance with Radiation Protection and Nuclear Safety Requirements. Will also coordinate with Environmental Protection to document that they meet the Applicable or Relevant and Appropriate Requirements (ARARs) and the requirements for FBP-WM-PRO-00330, *Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Waste Storage and Staging Areas*, prior to the placement of waste.

## 5.3 Facility Manager (FM)

- A. Has authority for determining acceptable waste areas and any additional waste storage requirements that apply within their facility.
- B. Evaluates the WCD to ensure that waste generation activities will allow the facility to maintain compliance with safety basis in regards to types and quantities of waste, staging locations, storage locations, and containment.

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- C. Ensures that requested dispatch work is coordinated with WDS to ensure waste is properly managed upon generation.

#### **5.4 Environmental Protection**

Approves and documents approvals of CERCLA Waste Storage Areas that will house Hazardous Waste, Toxic Substances Control Act (TSCA) waste, used oil, or universal waste to ensure that they meet the ARARs specified in the RD/RA WP and FBP-WM-PRO-00330 prior to the placement of waste within storage areas. Environmental Protection will not approve areas that will hold strictly Low Level Waste (LLW).

#### **5.5 Project Supervisor**

- A. Responsible for the oversight of generation and/or placement of waste into a container while performing a given project under CERCLA.
- B. Confirms waste generating activities are covered under the RD/RA WP and ensures applicable packaging, labeling, staging and storage requirements are contained in a technical work document for FBP or contractor personnel to follow.
- C. Ensures workers have the prerequisite training for labeling, handling, and placement into the CERCLA Waste Staging Area including requirements under Radiation Protection (RP), Nuclear Criticality Safety (NCS), Nuclear Materials Control and Accountability (NMC&A), and Safeguards and Security for the waste to be generated.
- D. Contacts the WDS prior to handling any waste not identified in the WCD.
- E. Consults with WDS to understand what constitutes a Non-Conforming item for designated receiving facilities, including the OSWDF, and segregates as necessary.
- F. Coordinates with the WDS or Waste Associate - Field Services Representative for approved container and label delivery.
- G. Ensures waste certification personnel are present for containerization of waste.
- H. Arranges for transfer of waste to a CERCLA Waste Staging or Storage Area per the WCD.

#### **5.6 Waste Associate - Field Services Representative**

- A. Serves as the field representative for WM, coordinating with the WDS and Waste Generator on delivery and pick-up of waste containers and waste labels.
- B. Assists generator with introduction of waste containers into the eMwaste® tracking system through the completion of the Waste/Material Generation (WMG) form. Ensures all applicable WMG forms are marked CERCLA.

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- C. Works with the FM to ensure that waste generated through dispatch work is properly identified to ensure proper packaging, labeling and staging.
- D. Assists FM and WDS with establishing CERCLA Waste Staging Areas, as applicable.

#### **5.7 Radiation Protection (RP)**

Responsible for ensuring all waste generation operations are completed in accordance with the applicable requirements of the Radiological Protection Program.

#### **5.8 Waste Operations**

Establishes all CERCLA Waste Storage Areas and coordinates receipt of waste from the CERCLA Staging Areas into the CERCLA Waste Storage Areas in accordance with FBP-WM-PRO-00330.

#### **5.9 Waste Generator**

Anyone that generates waste. It is their responsibility to ensure any waste or recycled material generated is managed in accordance with the requirements of this procedure.

### **6.0 ACTIONS**

#### **6.1 General Waste Management (WM)**

##### **Project Supervisor**

- 6.1.1 Ensure the activities conducted are part of a CERCLA RD/RA WP or a Demolition Design Plan or in support of D&D activities.
- 6.1.2 Ensure all WM controls including but not limited to labeling, container choice, and storage requirements are flowed into or contained in a WCD or as directed by WDS or field associate.
- 6.1.3 Promote waste minimization practices to reduce the amount of radioactive waste generated by minimizing or preventing the introduction of porous packaging materials such as paper, cardboard, and wood, including wood pallets, into areas controlled for removable radiological contamination.
- 6.1.4 Ensure crews practice good housekeeping and transfer waste to designated staging or storage and accumulation areas as specified in the WCD or as directed by WDS or field associate.
- 6.1.5 Ensure the following are not placed into a general collection receptacle such as a garbage can or dumpster: chemicals, oils, batteries (other than D cell or smaller alkaline; no NiCads), light bulbs, or electronic equipment. Requirements for handling these items are provided in the balance of the procedure.



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- 6.1.6** Ensure any waste originating within a radiological control area is not disposed of in a receptacle outside of that control area.
- 6.1.7** Ensure items indicating radioactivity such as unused radiological control labels, tape, or yellow booties are disposed into receptacles designated as containing low level Radioactive Waste or LLW.
- 6.1.8** Ensure RP is available and any required radiological surveys are performed.
- 6.1.9** Ensure all labels are applied in accordance with FBP-WM-PRO-00295, *Waste Container Labeling and Marking Requirements for Storage*.
- 6.1.10** Ensure WMG form is completed and submitted to WM for all containerized wastes except accumulation containers. WMG is required under FBP-WM-PRO-00046, *Waste/Recyclables Tracking*.

### **Waste Generator**

- 6.1.11** Designate if any scrap metal or electronic equipment is identified for release or recycle/reuse. The waste generator shall place recycle/reuse equipment in designated area as agreed with the FM.

## **6.2 CERCLA Used Oil**

### **Project Supervisor**

#### **NOTE**

Open-topped containers such as pails, buckets, etc., used to collect leakage from tanks, piping systems, motors, etc., are not required to be obtained through Container Management.

Used oil staging area must have secondary containment per Spill Prevention, Control, and Countermeasure (SPCC).

- 6.2.1** Establish a CERCLA Staging Area for used oil per instructions in the WCD or as directed by the WDS or field associate.
- 6.2.2** Coordinate with WM Field Services Representative to schedule the delivery of containers and labels.
- 6.2.3** Upon receipt of the containers, ensure all containers are in good condition with no holes and no dents greater than ¼-inch deep. Standard container sizes include 5-, 30-, 55-, or 85-gallon metal or plastic drums; and 275-gallon plastic totes.
- 6.2.4** Contact WM if any size container other than as mentioned above or other methodology for collecting/containerizing Used Oil is to be implemented or used. Controls will be stated in the Generators Waste Management Plan.

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**6.2.5 WHEN** generating a new container of used oil, **THEN** ensure the following:

- A. A WMG form is initiated and the barcode label is placed on the container.
- B. Coordinate with WDS or Field Services Representative to initiate FBP-RP-PRO-00004-F01, *Request to Release Material/ Equipment from Department of Energy Control*. **IF** approval for the FBP-RP-00004-F01 (UE-5) cannot be obtained, **THEN** contact WDS and FM.
- C. The container must be marked or labeled with the words “Used Oil”.
- D. **WHEN** a container of used oil is full, **THEN** install Tamper Indicating Devices (TIDs) on the container if sampling activities are required or as directed by the WDS or Field Service Representative. Ensure container has appropriate secondary containment.
- E. Prior to placement in CERCLA Staging Area, confirm all containers are clearly marked or labeled as “Used Oil”, a Waste Information Label checked ‘yes’ for CERCLA, and a Waste Container Tracking barcode.
- F. **IF** at any point within the disposition process (e.g., sampling, characterization) it is determined the container does not meet the criteria for “Used Oil,” **THEN** complete the disposition process in accordance with Section 6.4, *CERCLA Hazardous and/or TSCA Regulated Waste*.
- G. The WMG must be completed and submitted per FBP-WM-PRO-00046.

**6.2.6 WHEN** a legacy container of used oil is identified, **THEN** ensure the following:

- Contact the cognizant WDS and provide them with the available container information.
- **IF** the container has not already been identified with a waste tracking number, **THEN** ensure a WMG form is completed and the barcode label is placed on the container.
- The container is properly labeled or marked as “Used Oil”; the WDS will advise if other labels or CERCLA markings are required.
- The WDS will advise if sampling is required.
- Ensure legacy container is placed into appropriate storage area.

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### 6.3 CERCLA Universal Waste

#### Project Supervisor

**6.3.1** Establish a CERCLA Waste Staging Area that can accommodate Universal Waste per instructions in the WCD or as directed by WDS or field associate.

**6.3.2** Ensure CERCLA Universal Wastes are segregated by type. The generator may manage the following wastes as universal:

#### **NOTE**

Alkaline batteries are not recycled and can be disposed of in sanitary trash (terminals taped).

- Batteries: Car Type Batteries, Forklift Type Batteries, Uninterruptible Power Supply (UPS) Batteries, Large Gel-Cell and Ni-Cad Batteries, and Small Gel-Cell and Nickel-Metal Hydride Batteries

#### **NOTE**

If ampules containing mercury are removed from thermostats, the area in which the ampules are removed must be well ventilated and monitored to ensure that applicable exposure limits are not exceeded. When handling mercury ampules, a mercury spill kit is to be available.

- Intact Mercury containing thermostat(s) or other mercury containing equipment
- Lamps: metal halide, mercury vapor, sodium vapor, incandescent, and fluorescent

**6.3.3** Ensure each individual item or approved container in which items are contained is labeled with a Universal Waste Label. The label must be marked CERCLA. Additionally, check appropriately according to waste type with the following information:

- Batteries:

#### **NOTE**

Lead Acid batteries may be under 40 CFR 226, Subpart G. There are no labeling requirements when handling batteries under this regulation

- 1) Check the box next to the words "Universal Waste - Battery(ies)" in accordance with universal waste regulations. Refer to FBP-WM-PRO-00295 and FBP-FRM-00971, *Universal Waste Label*.
- 2) Accumulation start date (the first date battery was removed from service and declared a waste).

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3) Battery conductive terminals shall be insulated or taped (using non-conductive tape) upon being taken out of service.

- Mercury containing equipment:

- 1) Check the box next to the words “Universal Waste – Mercury Thermostat(s) only” or “Universal Waste – Mercury Containing Equipment”, in accordance with August 23, 2007, Ohio EPA guidance letter *Proper Management of Mercury Thermostats, Thermometers, and other Mercury Containing Equipment*. Refer to FBP-WM-PRO-00295 and FBP-FRM-00971.
- 2) Accumulation start date (the first date the equipment was removed from service and declared a waste).

**NOTE**

All bulbs that are to be crushed must be managed as hazardous waste from the point of generation. Only bulbs that have been managed as hazardous waste may be crushed. Follow the hazardous waste generation section of this procedure for direction on how to manage hazardous waste.

- Lamps (bulbs):

- 1) Check the box next to the words “Universal Waste – Lamp(s)”. Refer to FBP-WM-PRO-00295 and FBP-FRM-00971.
- 2) Accumulation start date (the first date the lamp was removed from service and declared a waste).
- 3) Waste generated by the bulb crushing process will be containerized, labeled, and managed as hazardous waste.

**NOTE**

Due to safety concerns and for waste minimization purposes on large jobs (i.e., re-lamping in process buildings and other areas as determined/identified), new and used bulbs may be placed into the same container during a **SINGLE SHIFT**, provided the containers are labeled appropriately. At the end of any shift, there must NOT be any mixed containers of bulbs.

**6.3.4** Ensure that Universal waste containers are securely closed when waste generation activities are not in progress.

**6.3.5** Ensure the label is placed so it is easily accessible for viewing.

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- 6.3.6 For CERCLA universal waste generated outside of a radiological control area, complete FBP-RP-PRO-00004-F01 in accordance with FBP-RP-PRO-00004, *Release of Material and Equipment from Department of Energy Control*, and submit to RP for approval.
- 6.3.7 Request RP to approve and return a copy of the (i.e., approved) request for release form and applicable survey records.
- 6.3.8 Complete the WMG, in accordance with FBP-WM-PRO-00046.
- 6.3.9 Submit waste-tracking documentation to WDS per FBP-WM-PRO-00046.
- 6.3.10 **WHEN** CERCLA Staging Area becomes full, **THEN** contact Waste Operations to transfer to CERCLA Waste Storage Area.

### **Waste Operations**

- 6.3.11 Establish storage areas for universal waste to allow for consolidation. Establish areas for universal waste storage/staging in accordance with FBP-WM-PRO-00330.
- 6.3.12 Add all incoming inventory into the CERCLA Waste Storage Area to the inventory for the area by means of the eMWaste® tracking system.
- 6.3.13 Coordinate with necessary WM personnel to facilitate on-site or off-site transport.
- 6.3.14 Ensure the WMG is completed and submitted per FBP-WM-PRO-00046.

### **6.4 CERCLA Hazardous and/or TSCA Regulated Waste**

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| <p style="text-align: center;"><b>WARNING</b></p> <p><b>In addition to the WM Requirements, Hazardous, and TSCA, regulated wastes may be subject to additional controls including, but not limited to, containerization, staging, storage, and labeling requirements associated with NCS, RP, NMC&amp;A, and Safeguards and Security. The generator is responsible for understanding and ensuring implementation of any applicable additional requirements under these programs.</b></p> |
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### **Project Supervisor**

- 6.4.1 Consult the WDS to identify wastes known or suspected of being RCRA and/or TSCA. The WDS shall designate the applicable container for waste collection; this will be incorporated into the WCD or as directed by WDS or field associate.
- 6.4.2 Establish CERCLA Waste Staging Area for the placement of waste anticipated to be generated. Specific administrative and physical controls will be specified in the WCD. These may include volume limits, secondary containment requirements, or time limits prior to transfer off site or to the CERCLA Waste Storage Area.

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- 6.4.3** Notify WM when staging areas are established.
- 6.4.4** Schedule the delivery of containers, labels, and TIDs with the Waste Associate – Field Services Representative.
- 6.4.5** Ensure containers are labeled in accordance with FBP-WM-PRO-00295. Ensure the CERCLA box is checked ‘yes’ on Waste Information Label.
- 6.4.6** Ensure all containers are kept closed unless adding, removing, sampling, or inspecting wastes. Ensure containers are free from damage or swelling. **WHEN** filling is complete, **THEN** apply TIDs if required.
- **IF** damage is detected but the container is not leaking, **THEN** contact the WDS.
  - **IF** the container is either swelling or leaking, **THEN** immediately contact the Plant Shift Superintendent (PSS); clean-up of spills must commence immediately. Refer to FBP-WM-PRO-00016, *Spill Cleanup and Repackaging/Transferring Waste*.
- 6.4.7** Complete and submit the WMG per FBP-WM-PRO-00046; the WDS or the WM Field Services Representative can assist.
- 6.4.8** Contact Waste Operations to transfer containers to the CERCLA Waste Storage Area.
- 6.4.9** Ensure **ALL** Hazardous Waste should be transferred from the CERCLA Waste Staging Area either off-site or to a CERCLA Storage Area within seven days of generation (defined as the date the first piece of waste is placed into the container). **IF** the transfer cannot occur by that date, **THEN** the project is responsible for providing secondary containment for the waste for liquid waste, spill response equipment, and for completing and documenting inspections in accordance with FBP-WM-PRO-00330.
- 6.4.10** Ensure **ALL** TSCA Waste should be transferred from the CERCLA Waste Staging Area either off-site or to a CERCLA Storage Area within thirty days of generation. **IF** the transfer cannot occur by that date, **THEN** the project is responsible for providing secondary containment for liquid waste, spill response equipment, and for completing and documenting inspections in accordance with FBP-WM-PRO-00330. TSCA staging area must comply with storage requirements per 40 CFR 761.65, *Code of Federal Regulations; Storage for Disposal*.

#### **WDS**

- 6.4.11** Document whether TSCA wastes meet the requirements of the OSWDF WAC. For wastes not meeting the OSWDF WAC, coordinate disposition in accordance with FBP-WM-PRO-00264, *Waste Disposition*.

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### **Waste Operations**

- 6.4.12** Establish CERCLA staging area when Waste Ops functions as the waste generator.
- 6.4.13** Establish CERCLA Waste Storage Areas in accordance with FBP-WM-PRO-00330 for regulated RCRA and TSCA waste.
- 6.4.14** Coordinate with necessary WM personnel to facilitate on-site or off-site transport.

### **6.5 CERCLA Low Level Waste (LLW)**

#### **NOTE**

CERCLA LLW may also meet the definition of accountable material. Movement of accountable nuclear materials into or within a designated Material Balance Area (MBA) must be coordinated with the NMC&A Organization and approved by the Nuclear Material Custodian in accordance with FBP-MC-PRO-00067, *Nuclear Material Container Transfers*.

Non-liquid LLW destined for disposal at OSWDF does not have to be containerized unless there is a secondary hazard or concern (e.g., high particulate waste). LLW, however, may be subject to additional containerization requirements and additional controls including, but not limited to, staging, spacing, storage, and labeling requirements associated with NCS, RP, Fire Protection, and Safeguards and Security.

### **CERCLA Facility Director or designated Project Manager**

- 6.5.1** Coordinate with the WDS and FM during the project planning phase to minimize the amount of LLW to be shipped offsite when eligible for disposal at OSWDF.
- 6.5.2** Coordinate with Environmental Protection and the WDS regarding anticipated outside storage space for containerized waste or other large quantities of waste prior to generation. Only properly containerized LLW will be considered for outside storage.
- 6.5.3** Develop storage strategy with FM.

### **Project Supervisor**

- 6.5.4** Consult with Project Management to identify LLW to be containerized. Uncontainerized waste left in facilities will be managed per FBP-WM-PRO-00330.
- 6.5.5** Establish areas with the concurrence of the FM for the placement of containerized waste. Specific administrative and physical controls will be specified in a WCD or as directed by WDS or field associated. These may include absorbent additions, liner requirements, posting requirements, and inspection requirements.

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- 6.5.6 Coordinate with the WM Field Services Representative on delivery of the required bar-coded containers.
- 6.5.7 **WHEN** filling containers with known classified/sensitive contaminated metal, **THEN** follow requirements in FBP-WM-PRO-00115, *Contaminated Metal Requirements*.
- 6.5.8 **WHEN** storing, handling, transporting, or sorting classified/sensitive matter, **THEN** contact Security for appropriate storage locations in conjunction with the WDS and the FM.
- 6.5.9 Confirm all containers are clearly marked or labeled as Low Level Radioactive Waste or LLW on the Waste Information Label.
- 6.5.10 Check “yes” for CERCLA on the Waste Information Label and has a waste Container Tracking barcode.
- 6.5.11 Ensure waste certification personnel are present during containerization.
- 6.5.12 Ensure RP is available and any required radiological surveys are performed prior to placement in the container.
- 6.5.13 Provide completed surveys obtained from RP to the WDS.
- 6.5.14 Complete and submit WMG per FBP-WM-PRO-00046 for containerized waste; the WDS or WM Field Services Representative can assist in completion.

## **RP**

- 6.5.15 Provide the surveys traceable to the waste containers or items to the Generator and WDS.

## **6.6 CERCLA Asbestos**

### **NOTE**

Inspection of suspect Asbestos Containing Material must be done by an Asbestos Hazard Evaluation Specialist.

- 6.6.1 The generation of asbestos waste is governed by 40 CFR 61 Subpart M, *National Emission Standard for Asbestos*. Asbestos abatement requires extensive supplemental training and can only be done with qualified personnel. If you suspect a waste contains or may contain asbestos, stop work and contact Industrial Hygiene (IH) for evaluation.



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**6.6.2** Regulated Asbestos Waste that is correctly generated by an abatement team is required by 40 CFR 61.150 to be stored wetted and contained in an airtight container or bag that will prevent friable asbestos from entering the atmosphere. While this is the minimum requirements to be compliant with the regulation, many Treatment Storage and Disposal Facilities (TSDF) require regulated asbestos to be wetted and double bagged with 2 six mil plastic bags or equivalent. It is highly recommended that generators here on the Portsmouth site comply with the TSDF requirements to help facilitate timely disposal.

**6.6.3** Non-Regulated Asbestos Waste that is correctly generated by an abatement team could have different packaging requirements than Regulated Asbestos waste. This includes Category I non-friable asbestos containing material (ACM) and Category II nonfriable ACM. The WDS will make a determination on packaging requirements in conjunction with safety/IH.

## **7.0 RECORDS**

### **7.1 Records Generated**

Waste/Material Generation Form (WMG)

### **7.2 Requirements**

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

## **8.0 DEFINITIONS/ACRONYMS**

### **8.1 Definitions**

- A. Category I nonfriable asbestos-containing material (ACM)-** Asbestos containing packings, gaskets resilient floor covering and asphalt roofing products containing more than 1 percent asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy.
- B. Category II nonfriable asbestos-containing material (ACM)-** any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the methods specified in appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

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- C. CERCLA Waste Staging Area** – An identified area in the vicinity which waste is being collected and containerized prior to movement to offsite disposal, the OSWDF or a CERCLA storage area. These areas are under the control of the project generating the waste and must be posted as specified in the Work Control Document, generally as a CERCLA Waste Staging Areas. No inventory tracking requirements shall apply unless specifically required in the Integrated Work Document. Limitations on number of containers, volume of waste, or other controls (e.g., spill pallets) must be implemented as specified in the Integrated Waste Documents governing the generating work. These are temporary staging areas and all wastes are to be transferred either off-site, the OSWDF, or to a CERCLA Waste Storage Area after the generating operation is complete. Examples include the collection of several drums of oil collected from a draining operation.
- D. CERCLA Project Waste** – Waste generated from activities identified in an RD/RA WP as approved by the cognizant regulators. Waste is subject to the controls listed as ARARs. Waste may be recycled or disposed.
- E. CERCLA Waste Storage Area** – An identified area used to consolidate wastes from multiple generating projects. These areas are under the control of WM, registered with Environmental Protection and must be posted as CERCLA Waste Storage Areas. Substantive requirements for construction and required equipment will be specified based on the waste to be held, consistent with the ARARs approved by Ohio EPA. All wastes placed in these areas must be entered into an inventory for tracking (i.e. via eMWaste® tracking system). The CERCLA Waste Storage Areas are anticipated to house wastes also governed as RCRA, TSCA, and Universal Wastes.
- F. Classified/Sensitive Matter Reviewer** – An individual approved to witness sorting operations in writing by the Site Classification Officer.
- G. Classified Waste** – Any waste classified for security reasons. Materials may be classified due to configuration, composition, contamination, or contained information.
- H. Hazardous Waste** – Any waste that is dangerous or potentially harmful to health or the environment, as defined by RCRA. They can be liquids, solids, gases, or sludges, and can be discarded commercial products, like cleaning fluids or pesticides, or the by-products of manufacturing processes.
- I. Universal Waste** – Any of the following hazardous wastes that are managed under the Universal Waste requirements of 40 CFR Part 273 and OAC 3745-273:
- Batteries as described in 40 CFR 273.2 and OAC 3745-273-02
  - Mercury containing equipment as described in 40 CFR 273.4 and OAC 3745-273-04
  - Lamps as described in 40 CFR 273.9 and OAC 3745-273-05.

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- J. Used Oil** – Any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result has been contaminated by physical or chemical impurities. This includes, but is not limited to compressor oils, coolants, mineral oil, electrical insulating oil, transmission fluid, and refrigeration oil. It does not include antifreeze, kerosene, petroleum products used as solvents, unused products or spills from unused products.
- K. Waste Generator** – For purposes of completing the waste/material generation form or electronic fillable form, a Waste Generator is any person whose act or process produces waste or other qualified individuals with sufficient process knowledge of the waste and the process to adequately complete the WMG fields. Examples: D&D operations, chemical operations, etc.

## 8.2 Acronyms

- A. ARAR** – Applicable or Relevant and Appropriate Requirement
- B. CERCLA** – Comprehensive Environmental Response, Compensation, and Liability Act
- C. DFF&O** – Director’s Final Findings and Orders
- D. FM** – Facility Manager
- E. IH** – Industrial Hygiene
- F. LLW** – Low-Level Waste
- G. NCS** – Nuclear Criticality Safety
- H. NMC&A** –Nuclear Materials Control and Accountability
- I. Ohio EPA** – Ohio Environmental Protection Agency
- J. OSWDF** – On-Site Waste Disposal Facility
- K. RCRA** – Resource Control and Recovery Act
- L. RD/RA WP** – Remedial Design/Remedial Action Work Plan
- M. ROD** – Record of Decision
- N. RP** – Radiation Protection
- O. TID** – Tamper Indicating Device
- P. TSCA** – Toxic Substances Control Act
- Q. TSDF** – Treatment Storage and Disposal Facility

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- R. WAC** – Waste Acceptance Criteria
- S. WCD** – Work Control Document
- T. WDS** – Waste Disposition Specialist
- U. WM** – Waste Management
- V. WMG** – Waste/Material Generation

## **9.0 SOURCE REFERENCES**

- A.** 40 CFR 761.65, *Code of Federal Regulations; Storage for Disposal*
- B.** 40 CFR Part 273, *Universal Waste*
- C.** 40 CFR 61 Subpart M, *National Emission Standard for Asbestos*
- D.** 40 CFR 226, Subpart G, *-Spent Lead-Acid Batteries Being Reclaimed*
- E.** DOE Order 435.1, *Radioactive Waste Management*
- F.** DOE Order 436.1, *Departmental Sustainability*
- G.** DOE P 450.4A, Chg 1 (MinChg), *Integrated Safety Management Policy*
- H.** FBP-BS-PRO-00020, *Property Management*
- I.** FBP-PM-PDD-00001, *Integrated Safety Management System*
- J.** FBP-QP-PDD-00001, *ESH&Q Performance Measurement, Analysis, and Reporting*
- K.** FBP-WM-PL-00001, *Waste Management Plan*
- L.** FBP-WM-PL-00084, *Waste Minimization and Pollution Prevention*
- M.** FBP-WM-PRO-00063, *Certification of (Portsmouth Gaseous Diffusion Plant) PORTS Waste for Disposal at the Nevada National Security Site (NNSS)*

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**Appendix A**  
**REGULATORY REQUIREMENTS FLOW DOWN**

1. DOE Order 435.1, *Radioactive Waste Management*
2. DOE Order 436.1, *Departmental Sustainability*
3. DOE P 450.4A, Chg 1 (MinChg), *Integrated Safety Management Policy*
4. 40 CFR 761.65, *Code of Federal Regulations; Storage for Disposal*
5. 40 CFR Part 273, *Universal Waste*
6. 40 CFR 61 Subpart M, *National Emission Standard for Asbestos*
7. 40 CFR 226, Subpart G, *-Spent Lead-Acid Batteries Being Reclaimed*

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## Appendix B SPILLS UNDER CERCLA

### Spills Under CERCLA

#### Instructions

1. A spill of a hazardous substance of less than 1 gallon is considered an incidental spill:
  - A. Report spill to Supervisor.
  - B. Cleanup all incidental spills in accordance with site procedures and plans.
  - C. Contact Waste Management for assistance with management of waste generated during spill cleanup.
  
2. A spill of a hazardous substance of greater than 1 gallon, or any spill of hazardous waste regardless of volume (except spills of hazardous waste meeting the definition of a significant spill or release under Step 3), is considered a minor spill.
  - A. Report spill to Plant Shift Superintendent and Supervisor.
  - B. Supervisor shall record information on the spilled material including substance spilled, quantity, and location.
  - C. Clean up minor spills in accordance with site procedures and plans.
  - D. Contact Waste Management for assistance with management of waste generated during spill cleanup.
  - E. Obtain GPS coordinates for the spill location if the spill reaches environmental media (e.g., soil). GPS coordinates may be obtained by contacting Environmental Remediation Field Characterization supervision.
  - F. Supervisor shall ensure information collected in Step 2B and 2E is provided to FBP Environmental Protection.
  
3. A significant spill or release infers that there are serious consequences to human health or the environment requiring immediate and coordinated spill response such as:
  - A fire that causes the release of toxic fumes
  - A fire that spreads, possibly igniting materials at other locations or causing heat-induced explosions
  - A spill that results in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard
  - A spill that cannot be contained on PORTS, resulting in off-PORTS soil contamination or groundwater or surface water pollution
  - A spill or release into the environment of a petroleum product (e.g., oil, diesel fuel, gasoline) with the potential for impacting streams by causing a sheen, or a significant quantity of oil (i.e., 25 gallons or greater) that has reached or can potentially reach beyond the project boundary
  - Spill or release into the environment of a substance meeting/exceeding a legally Reportable Quantity
  - A. Leave area of spill or release and alert others when leaving.
  - B. Immediately report spill to Fire Services or the Plant Shift Superintendent to begin emergency response actions.
  - C. Report spill or release to Supervisor.
  - D. Provide information to responding emergency personnel.
  - E. Immediate response actions will be completed in accordance with site plans and training.
  - F. Ohio EPA shall be promptly informed of any significant spills.
  - G. Clean up spill.
  - H. Notify waste management for assistance with managing waste.