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Environment, Safety, Health Directorate

Administrative Procedure

Facility TSF Operating Record

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1.0 INTRODUCTION

The purpose of this document is to provide requirements for Facility TSF (Treatment and Storage Facility) Operating Record. This procedure is managed and owned by the Associate Directorate Environment, Safety and Health and provides instructions on the applicability of the requirement.

1.1 Purpose

This procedure summarizes the requirements in 40 CFR § 264.73 (Operating Record), Section 2.12.2 of LANL's Hazardous Waste Facility Permit (Facility Operating Record, http://int.lanl.gov/environment/waste/permit_tracking.shtml), and various other references to the Facility Operating Record within the Permit.

1.2 Scope

This procedure applies to any LANL employee, contractor, or sub-contractor who has been identified as a waste generator or a TSF worker.

2.0 PRECAUTIONS AND LIMITATIONS

This procedure cannot establish new requirements; it may only summarize the requirements in federal/state statutes/regulations/permits, DOE Orders, and authorized Laboratory policies.

3.0 FACILITY TSF OPERATING RECORD

3.1 Definition

The Operating Record applies specially to the management of hazardous and mixed waste as defined by Resource Conservation Recovery Act (RCRA). The written Operating Record is intended to keep track of hazardous waste activity at the facility and shall:

- Describe the hazardous waste received
- Describe methods and dates of treatment
- Describe location of wastes in the facility.

The Operating Record for each hazardous/mixed waste streams and individual hazardous/mixed waste containers are maintained in Waste Compliance and Tracking System (WCATS).

3.2 Interim Status and Permitted Areas Operating Record Requirements

The following are all the elements of the operating record as delineated in Section 2.12.2 of LANL's Hazardous Waste Facility Permit as well as other sections of the Permit. The Facility Operating Record for the operations of each permitted unit and interim status unit at the Facility are maintained for the life of the unit, including the post-closure care period.

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1. *A description of the hazardous waste received, that is an authorized waste, and the methods and dates of treatment and/or storage at each permitted unit.*
 - Ensure descriptions of waste received and storage records are kept for the permitted storage units this information can be found in WCATS in most cases.
 - Ensure treatment units at TA-55 (Stabilization), TA-16 (Open Burning) and TA-36 and TA-39 (Open Detonation) document when hazardous waste was received, and methods and dates of treatment at each unit.

2. *The location of each type of hazardous waste within each permitted unit and the total quantity of all wastes and waste types at each unit (unit and structure).*
 - Ensure the location within each unit, total quantity of waste and waste types for storage units is documented in WCATS. Any changes to location information must be documented in WCATS. For certain units, portions of this information is kept separately from WCATS in a separate database for security reasons.
 - Ensure treatment units keep this information available for each unit at their facility.

3. *Documentation that treatment reagents are compatible with waste to be treated.*
 - Ensure documentation is kept at the applicable units at TA-16, TA-36, TA-39 and TA-55. This includes documentation about any secondary material/chemical/neutralizer that is added to the waste prior to or during treatment.

4. *Documentation that containers and liners are compatible with waste stored.*
 - Ensure liners are not reused.
 - Ensure containers and liners meet manufacture specifications and documentation is kept.
 - Ensure documentation is kept within the records specific to the permitted and interim status units.

5. *Records and results of waste analyses and waste determinations (AK and sampling and analysis).*
 - Ensure waste characterization documentation for each individual waste stream item or waste stream is located within its, WCATS record (as an updated document), or a reference to the documentation is included in the waste stream profile in WCATS. All AK documentation must include a unique identifier.

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6. *Records and results of inspections including:*

- a. Inspection Record Form (IRF),
- b. TA-50-69 storm water controls,
- c. TA-54, Area L holding tank,
- d. TA-63 retention basin,
- e. documentation of items that are carried as issues, and
- f. close-out of issues.

- Ensure documents that records inspections are kept within the records specific for the applicable units. These include the inspection record forms, any documentation (including database information) of issues identified, and documentation of close-out of those items.

7. *Documentation of inspections by a registered engineer trained and experienced in the proper installation of tank systems or components prior to replacing a portion of the tank or stabilization unit systems (40 CFR § 264.192(b) and Permit Section 4.3(3)).*

- Ensure documentation is kept by the owner of the TA-55 for the tank storage system and stabilization unit.

8. *Documentation of maintenance and repair activities conducted at permitted and interim status units that involve equipment used for storage and/or treatment activities at the unit.*

- Ensure documentation is kept with records specific for the applicable units. This includes maintenance documentation, replacement part procurement, restart inspections, and mitigations put in place while the equipment was out of service.

9. *Documentation demonstrating the installation and maintenance of secondary containment system coatings, sealants, or liners as required at Permit Sections 3.7.1(4) and 4.4(4).*

- Ensure documentation is kept by the unit owner with records specific to the applicable units at TA-3, TA-54 and TA-55.

10. *Documentation of removal of liquids from secondary containment structures and from TA-54, Area G, Dome 224.*

- Ensure documentation is kept by the unit owner of TA-54, Area G, Pad 5.

11. *Correspondence between the Permittees and the NMED-HWB, including but not limited to permit applications, modifications, reporting, notifications, and noncompliance.*

- Ensure correspondence documentation is kept by Environmental Compliance Programs Group (ENV-CP) and may exist in the LANL electronic public reading room (EPRR).

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12. *Documentation of all instances where an indoor fire suppression system has been activated resulting in fire suppressants contacting a waste storage floor.*
 - Ensure documentation is kept with the records specific to the applicable units at TA-3, TA-50, TA-54, and TA-55.
13. *Documentation of notifications and trainings associated with alternate emergency equipment as required at Permit Section 2.10.2.*
 - Ensure facility notifications and training are documented by the owner of the unit.
14. *Record keeping and reporting requirements associated with manifests in accordance with 40 CFR §§ 264.71, 264.72, and 264.76, whenever a shipment of hazardous waste is either received at, or initiated from a permitted unit.*
 - Ensure manifests for hazardous and mixed wastes are kept in WCATS. Manifests for transuranic waste are kept by OS-PT.
15. *Documentation that waste stored for greater than one year meet the conditions outlined in Permit Section 2.3.1.*
 - Ensure documentation for the Site Treatment Plan is kept by WM-SVS.
16. *Documentation that waste from off-site sources meets the requirements outlined in Permit Section 2.2.1.*
 - Ensure documentation about program is kept by Off-Site Source Recovery Program (OSPR).
17. *For stored wastes, the notice (or information contained in the notice for wastes generated on-site) and certification required at 40 CFR § 268.7.*
 - Ensure that a one-time notice is kept in the record for wastes that have been determined to be excluded from the definition of hazardous or solid waste or exempted from the regulation (e.g. deactivated characteristic hazardous waste managed in a waste water treatment system or materials used or reused as ingredients in an industrial process to make a product). Information on the generation of the material is included in WCATS.
18. *For treated wastes, information documenting if the treatment meets LDR standards as outlined in 40 CFR § 268.7(b).*
 - Ensure documentation associated with testing of residuals or treated wastes is kept within the records specific to the applicable units at TA-16, TA-36, TA-39 and TA-55.
 - Ensure documentation associated with whether a waste is treated to meet land disposal restriction standards is also kept within the records specific to the applicable units at TA-16, TA-36, TA-39 and TA-55.

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19. *Monitoring, testing, analytical data, and response actions when there are issues with the integrity of tanks or secondary containment for tanks, miscellaneous units, or volatile organic control devices.*
 - Ensure documentation is kept within the records specific for the applicable units. This includes the inspection record forms, any documentation (including database information) of issues identified, and documentation of close-out of those items.
20. *Personnel training records.*
 - Ensure training records are kept in Utrain.
21. *Records required by the Permit during the course of any unresolved enforcement action regarding the Facility or as required by the Department.*
 - Ensure documentation of this information is kept with ENV-CP.
22. *A copy of emergency response agreements.*
 - Ensure documentation of agreements is kept with ENV-CP.
23. *Notices to off-site generators or notices of ownership transfer.*
 - Ensure notifications from the TSDF to the generator of off-site sources that the facility has the appropriate permit(s) for the waste must be kept with the specific program brokering with the generator (the off-site source recovery program) and within the records specific for the applicable units at TA-54.
24. *Annual certification stating a Facility program is in place to reduce the volume and toxicity of hazardous waste generated (waste minimization report).*
 - Ensure ENV-CP keeps the annual waste minimization report that documents this program.
25. *Documentation demonstrating distribution of the Contingency Plan (Attachment D)*
 - Ensure documentation of the distribution of the Contingency Plan is kept with by ENV-CP.
26. *Documentation of the annual review of the Contingency Plan (Attachment D) by the emergency managers.*
 - Ensure documentation of the annual review is kept with ENV-CP.
27. *Annual certification that emergency response personnel are familiar with the potential hazards in performing their duties associated with the hazardous wastes at LANL's permitted hazardous waste management units.*
 - Ensure documentation of the certification is institutional and is kept with ENV-CP

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28. *Documentation associated with the implementation of the Contingency Plan (Attachment D) and all subsequent reporting and notification.*
- Ensure documentation of implementation of the Contingency Plan (and all associated reporting) is kept with ENV-CP.
29. *Monitoring, corrective action program, and closure of unit considerations (264.73(b)(17) & (18)):*
- Ensure all monitoring records associated with the implementation of a remediation program are kept.
 - Ensure all monitoring reports and records required by this Permit are kept, including but not limited to:
 - a. sampling procedures, records of field measurements, laboratory analytical data, quality assurance/quality control documents, chain-of-custody records, well completion reports and periodic monitoring reports;
 - b. records of all monitoring data used to complete Permit Application(s);
 - c. sampling and analysis and removal of contents within holding tank at TA-54, Area L;
 - d. sampling and analysis of contents within TA-54, Area G, Dome 224;
 - e. sampling and analysis and removal of contents of TA-63 retention basin;
 - f. vapor monitoring at TA-63;
 - g. all data gathered or generated during the closure or post-closure process;
 - h. all documentation of implementation and planned corrective action activities; and
 - i. all laboratory reports, drilling logs, bench-scale or pilot scale data.
 - Ensure documentation of permit application data and the closure process is currently kept with ENV-CP.
 - Ensure documentation associated with bench-scale or pilot scale data and laboratory reports that are used for waste characterization purposes should be included or referenced within WCATS.
 - Ensure documentation associated with bench-scale or pilot scale data and laboratory reports for the purposes of proving waste treatment methodologies are kept within the records specific for the applicable units at TA-3, TA-16, TA-36, TA-39, TA-50, TA-54, and TA-55.
30. *For disposal units, for hazardous wastes left in the ground after closure the information required of a treatment facility.*
- Ensure documentation of closure and post-closure activities is currently kept with ENV-CP.

For assistance or questions regarding the Facility Operating Record please call ENV-CP at 7-6259.

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4.0 DEFINITIONS AND ACRONYMS

See LANL [Definition of Terms](#).

See LANL [Acronym Master List](#).

5.0 RECORDS

Records generated by this document will be submitted for records management in accordance with [P1020-1](#), *Laboratory Records Management* and if applicable, with the [ADESH-AP-006](#), *Records Management Plan*.

Operating Record Requirements			
Requirements from Section 3.2	Waste Specific	Unit/Location Specific	Institutional (Facility Wide)
1. Description and date of the hazardous waste received and the methods and dates of treatment and/or storage at each permitted unit		X	
2. Records of the location of each type of hazardous waste within each permitted unit, and the type and total quantity of all wastes at each unit and structure		X	
3. Treatment reagents are compatible with waste to be treated		X	
4. Containers and liners are compatible with waste stored		X	
5. Records, and results of waste analyses and waste determinations	X		X
6. Records associated with the results of inspections		X	
7. Inspections by a registered engineer prior to replacing a portion of a tank or stabilization unit systems		X	
8. Maintenance and repair activities conducted on equipment used for storage and/or treatment activities at permitted and interim status units		X	
9. Installation and maintenance of secondary containment system coatings, sealants, or liners		X	
10. Removal of liquids from secondary containment structures and from TA-54, Area G, Dome 224.		X	
11. Correspondence between the Permittees and the NMED-HWB			X

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Operating Record Requirements			
Requirements from Section 3.2	Waste Specific	Unit/Location Specific	Institutional (Facility Wide)
12. Instances where an indoor fire suppression system has been activated resulting in fire suppressants contacting a waste storage floor		X	
13. Notifications and trainings associated with alternate emergency equipment		X	X
14. Record keeping and reporting requirements associated with manifests, whenever a shipment of hazardous waste is either received at, or initiated from a permitted unit			X
15. Waste stored for greater than one year			X
16. Waste from off-site sources meets the requirements outlined in Permit Section 2.2.1			X
17. Notice (or information contained in the notice for wastes generated on-site) and certification of stored wastes			X
18. Treated wastes, treatment meets LDR standards		X	
19. Monitoring, testing, analytical data, and response actions when there are issues with the integrity of tanks or secondary containment for tanks, miscellaneous units, or volatile organic control devices		X	
20. Personnel training records			X
21. Records required by the Permit during the course of any unresolved enforcement action regarding the Facility or as required by the Department			X
22. Emergency response agreements			X
23. Notification to off-site generators or notification of ownership transfer		X	
24. Annual waste minimization report			X
25. Distribution of the Contingency Plan (Attachment D)			X
26. Annual review of the Contingency Plan (Attachment D) by the emergency managers			X
27. Emergency personnel are familiar with potential			X

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Operating Record Requirements			
Requirements from Section 3.2	Waste Specific	Unit/Location Specific	Institutional (Facility Wide)
hazards in performing their duties associated with the hazardous wastes at LANL's permitted hazardous waste management units			
28. Implementation of the Contingency Plan (Attachment D) and all subsequent reporting and notification.			X
29. Monitoring reports and records, corrective action program, and closure of unit considerations		X	X
30. Closure and post-closure activities.			X

6.0 TRAINING

N/A

7.0 REFERENCES

LANL Hazardous Waste Facility Permit

P409, LANL Waste Management

40 CFR 260 through 268

8.0 ATTACHMENTS OR APPENDICES

N/A