



Allen, Pam, NMENV

From: Maestas, Ricardo, NMENV
Sent: Thursday, June 26, 2014 2:29 PM
To: Allen, Pam, NMENV
Subject: FW: Shipping Site Requirements
Attachments: NMED Question 3-24-2014.docx; Shipping Site Requirements.docx

March

From: Kliphuis, Trais, NMENV
Sent: Thursday, March 27, 2014 2:02 PM
To: Maestas, Ricardo, NMENV; Holmes, Steve, NMENV; Smith, Coleman, NMENV
Subject: Shipping Site Requirements

To discuss



As requested, below is the response to a question posed during the daily WIPP Environmental Update call. The question is (paraphrased): Describe the process to maintain WIPP waste certification and RCRA compliance of TRU waste that is temporarily stored at Waste Control Specialists (WCS) and at a later date, this waste will be shipped to the WIPP facility.

Response:

- Before the TRU waste is shipped to WCS, it is characterized and certified to the WIPP Waste Analysis Plan in accordance to the WIPP Certified Program and approved procedures. The waste data will be entered into the Waste Data System database.
- In addition, the TRU waste will comply with the WCS Waste Acceptance Criteria and the WCS RCRA permit for temporary storage.
- The TRU waste will be shipped according to the WIPP transportation certification program approved procedures.
- All waste will be profiled in accordance with WCS's RCRA permit.
- Each shipment will be submitted in accordance with WCS's process for inbound shipments and approved prior to release from shipping site. Container information will be provided for the shipment confirming that WCS's RCRA requirements are met.
- Upon arriving at WCS, the waste containers will be inspected and received in accordance with requirements of the WCS permit and license.
- In storage, the TRU waste containers will be inspected weekly in accordance to the WCS RCRA permit. WCS will maintain the physical inventory location of the TRU waste in storage.
- CCP will perform an on-site inspection of the TRU stored inventory monthly.
- CCTV cameras will be used to monitor the waste containers on a 24/7 basis.
- Security patrols of storage areas and use of Tamper Indication Devices on access points during non-working hours.
- All TRU waste stored at WCS will be segregated from all other waste.
- All shipments from WCS to the WIPP facility will complete TRU waste confirmation in accordance with the WIPP Waste Analysis Plan (WAP) before the shipment is released from WCS.
- All TRU waste containers will be shipped from WCS to the WIPP facility using the approved WIPP Transportation Program. This includes container integrity inspections prior to shipment loading and manifesting of the waste for container accountability.

DRAFT Storage/Generator Site Requirements for WIPP

2.2. WASTE SOURCES

2.2.1. Off-site Wastes

The Permittees may receive off-site TRU mixed waste in compliance with the requirements and conditions specified in this Permit. The Permittees may only receive TRU mixed waste from those sites which comply with the applicable requirements of the Waste Analysis Plan (WAP) specified in Permit Section 2.3.1 and Permit Attachment C, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.13(a)) and as verified through the Audit and Surveillance Program specified in Permit Section 2.3.2.

2.2.2. Required Notification to Off-Site Sources

Before the Permittees receive TRU mixed waste from an off-site source for the first time, they shall inform the generator/storage site in writing that they have the appropriate Permits for, and will accept, the waste the generator/storage site is shipping. The Permittees shall keep a copy of this written notice as part of the operating record, as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.12(b)).

2.3.1.1. Implementation of Requirements

- i. The Permittees shall require that generator/storage sites implement applicable waste characterization requirements of the WAP, specified in Permit Attachment C, prior to the Permittees' receipt of TRU mixed waste at WIPP.
- ii. The Permittees or the co-Permittee DOE shall implement applicable waste confirmation requirements of the WAP, pursuant to Permit Attachment C7 (TRU Waste Confirmation), prior to shipment of TRU mixed waste from generator/storage sites to WIPP.

2.3.1.2. Waste Characterization Testing Methods

The Permittees shall require that generator/storage sites comply with the applicable method requirements, quality control, equipment testing, inspection, maintenance, and equipment calibration and frequency standards for the procedures specified in Permit Attachment C1 (Waste Characterization Testing Methods).

2.3.2. Audit and Surveillance Program

The Permittees shall not manage, store, or dispose TRU mixed waste at WIPP from a generator/storage site until the following conditions have been met as necessary for the Secretary to determine that the applicable characterization requirements of Permit Section 2.3.1 have been implemented:

2.3.2.1. Requirement to Audit

DOE shall demonstrate to the Secretary that the generator/storage sites have implemented and comply with applicable requirements of the WAP by conducting audits as specified in Permit Attachment C, Section C-5a(3), and Permit Attachment C6 (Audit and Surveillance Program), and as required by 20.4.1.500 NMAC (incorporating 40 CFR §264.13).

C-5a(3) Audit and Surveillance Program

An important part of the Permittees' verification process is the Audit and Surveillance Program. The focus of this audit program is compliance with this WAP and the Permit. This audit program addresses all AK implementation and testing activities, from waste stream classification assignment through waste container certification, and ensures compliance with SOPs and the WAP. Audits will ensure that containers and their associated documentation are adequately tracked throughout the waste handling process. Operator qualifications will be verified, and implementation of QA/QC procedures will be surveyed. A final report that includes generator/storage site audit results and applicable WAP-related corrective action report (CAR) resolution will be provided to NMED for approval, and will be kept in the WIPP facility operating record until closure of the WIPP facility.

DOE will perform an initial audit at each generator/storage site performing waste characterization activities prior to the formal acceptance of the WSPFs and/or any waste characterization data supplied by the generator/storage sites. Audits will be performed at least annually thereafter, including the possibility of unannounced audits (i.e., not a regularly scheduled audit). These audits will allow NMED to verify that the Permittees have implemented the WAP and that generator/storage sites have implemented a QA program for the characterization of waste and meet applicable WAP requirements. The accuracy of physical waste description and waste stream assignment provided by the generator/storage site will be verified by review of the radiography results, and visual examination of data records and radiography images (as necessary) during audits conducted by DOE. More detail on this audit process is provided in Permit Attachment C6.