



From: Maestas, Ricardo, NMENV
Sent: Friday, June 02, 2017 9:22 AM
To: Allen, Pam, NMENV
Subject: FW: LANL GSTR Monday Presentations
Attachments: Institutional Waste Management LA-UR-17-23471.pdf; RCRA Compliance Presentation LA-UR-17-23475.pdf

From: Lacy, Lesley E [mailto:lesley@lanl.gov]
Sent: Friday, April 28, 2017 10:06 AM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>
Cc: Hypes, Philip A <phypes@lanl.gov>; Lacy, Keith Allen <lacy@lanl.gov>; Courtland Fesmire <courtland.fesmire@cbfo.doe.gov>; Hurtle, Jackie C <jhurtle@lanl.gov>
Subject: RE: LANL GSTR Monday Presentations

Hi Ricardo,

Please find attached the presentations you requested.

Thank you for your patience while we got them approved for public release.

Have a nice weekend.

Lesley Lacy

Readiness Coordinator
(505) 667-2998 office
(505) 257-8330 cell
(505) 664-3010 pager
lesley@lanl.gov

From: Maestas, Ricardo, NMENV [mailto:Ricardo.Maestas@state.nm.us]
Sent: Friday, April 21, 2017 2:23 PM
To: Lacy, Lesley E; Lacy, Keith Allen; Courtland Fesmire
Cc: Hypes, Philip A; Maestas, Ricardo, NMENV
Subject: RE: LANL GSTR Monday Presentations

Sounds good!
Thanks again all for your help and interactions!
Have a good weekend!

Ricardo

From: Lacy, Lesley E [mailto:lesley@lanl.gov]
Sent: Friday, April 21, 2017 2:20 PM
To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Lacy, Keith Allen <lacy@lanl.gov>; Courtland Fesmire



<courtland.fesmire@cbfo.doe.gov>

Cc: Hypes, Philip A <phypes@lanl.gov>; Lacy, Lesley E <lesley@lanl.gov>

Subject: RE: LANL GSTR Monday Presentations

Hopefully should have it available by Wednesday or Thursday of next week, Ricardo.

LL

From: Maestas, Ricardo, NMENV [<mailto:Ricardo.Maestas@state.nm.us>]

Sent: Friday, April 21, 2017 1:59 PM

To: Lacy, Lesley E <lesley@lanl.gov>; Lacy, Keith Allen <lacy@lanl.gov>; Courtland Fesmire <courtland.fesmire@cbfo.doe.gov>

Cc: Hypes, Philip A <phypes@lanl.gov>

Subject: RE: LANL GSTR Monday Presentations

Much appreciated!

Ricardo

From: Lacy, Lesley E [<mailto:lesley@lanl.gov>]

Sent: Friday, April 21, 2017 9:07 AM

To: Lacy, Keith Allen <lacy@lanl.gov>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Courtland Fesmire <courtland.fesmire@cbfo.doe.gov>

Cc: Hypes, Philip A <phypes@lanl.gov>

Subject: RE: LANL GSTR Monday Presentations

Will do.

From: Lacy, Keith Allen

Sent: Friday, April 21, 2017 9:06 AM

To: Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>; Courtland Fesmire <courtland.fesmire@cbfo.doe.gov>

Cc: Lacy, Lesley E <lesley@lanl.gov>; Hypes, Philip A <phypes@lanl.gov>

Subject: RE: LANL GSTR Monday Presentations

Lesley,

If you can get the requested documents to Phil, he will request an LA-UR. That is the path to address Ricardo's request.

Keith

From: Maestas, Ricardo, NMENV [<mailto:Ricardo.Maestas@state.nm.us>]

Sent: Friday, April 21, 2017 9:03 AM

To: Lacy, Keith Allen <lacy@lanl.gov>; Courtland Fesmire <courtland.fesmire@cbfo.doe.gov>

Cc: Lacy, Lesley E <lesley@lanl.gov>; Maestas, Ricardo, NMENV <Ricardo.Maestas@state.nm.us>

Subject: LANL GSTR Monday Presentations

Good morning Keith, Court,

Thanks again for inviting us to observe the LANL GSTR.

I would like to make a request for the two power point presentations that was presented on Monday, I believe they were the presentations on WCATS and RCRA.

I believe the presentations was marked as unclassified. I do not have access to the share folder that is being used for the GSTR nor am I interested in access.

The presentations themselves would be great if possible.

Please let me know if you are ok with this.

Thanks again.

Ricardo Maestas
NMED WIPP Staff Manager
Hazardous Waste Bureau
2905 Rodeo Park Dr., Bldg 1
Santa Fe, New Mexico 87505
Ricardo.Maestas@state.nm.us
505-476-6050

LA-UR-17-23471

Approved for public release; distribution is unlimited.

Title: Institutional Waste Management

Author(s): Bretzke, John Clifford

Intended for: Environmental Programs

Issued: 2017-04-27

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Institutional Waste Management

John Bretzke

Division Leader

Environmental Protection and Compliance

April 17, 2017

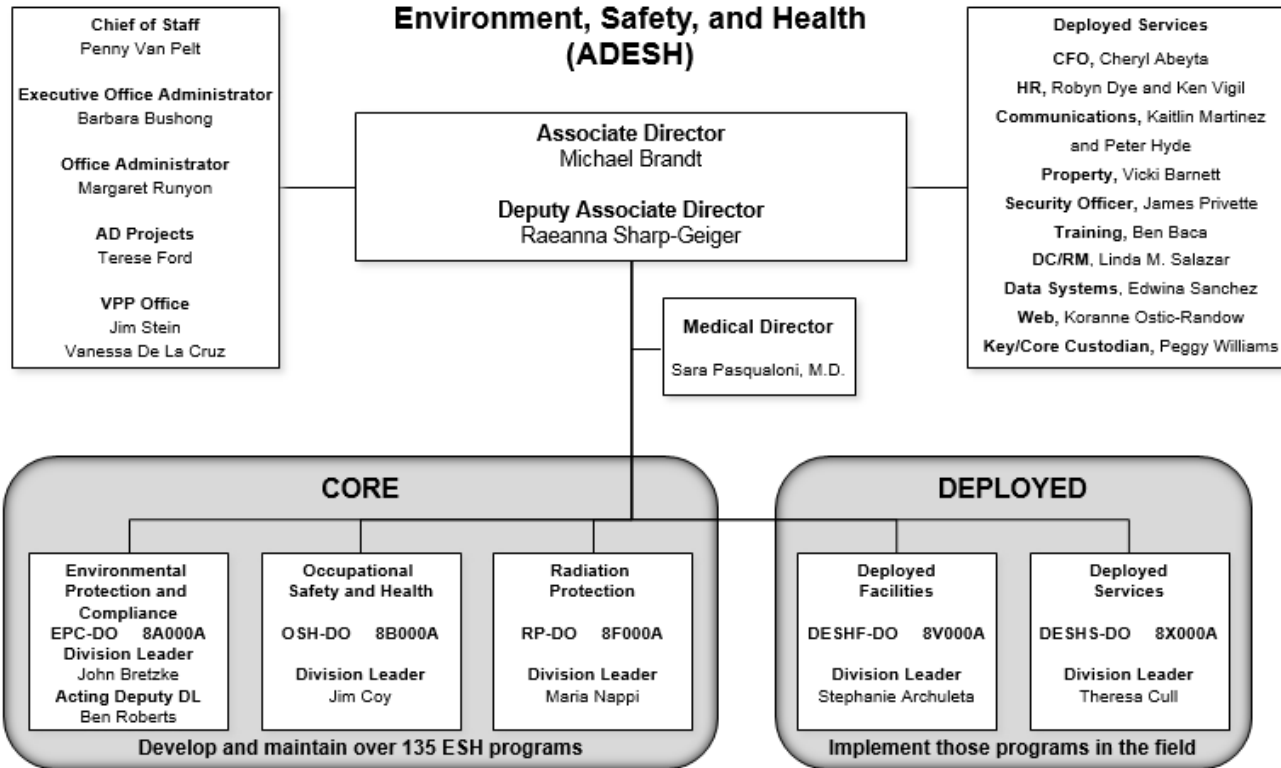
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ADESH Organization

ADESH.81000A.03-20-17

Associate Directorate for Environment, Safety, and Health (ADESH)



EPC is the institutional authority for waste management policy

ADESH POCs	ADESH Seminars - Amanda Cvinar	Ethics - Penny Van Pelt	PFITS/RMS/MRB - Linda Nelson
	CASI/MRB - John McCann	Housekeeping - LeAnn Purtzer and Jim Stanton	Policy - Terese Ford/Penny Van Pelt
	Communications/Arts/Services - LANL Form 1999	LL - Mike Petrowski	SSIP - WSST Chair Mike Mallet
	Deliverables/LOCATES - Saundra Martinez	LSS - Krista Black	Space - Terese Ford
	EMS - Christine Bullock	OCSR - James Privette and Terese Ford	SPOT/LAAP Awards - Penny Van Pelt
	EPC Compliance (RCRA/MSGP) - Tony Grieggs	PEMP - AD Office	

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LANL Waste Management Policy and Requirements

- Environmental Protection and Compliance (EPC) Division Leader is the Responsible Manager for:
 - P409 LANL Waste Management
 - P409 Functional Series Documents
 - P930-1 LANL Waste Acceptance Criteria

There are three major components to LANL Waste Management policy

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P409 LANL Waste Management

- P409 establishes specific requirements for waste generation and waste management at LANL generation areas and TSDFs.
- It describes LANL's DOE O 435.1 Waste Certification Program, a documented approach to ensure that management (treatment, storage, and disposal) of all waste streams complies with applicable requirements.



**LANL policy protects Laboratory workers,
public health and safety, and the environment**

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P409 Functional Series Documents

- [100 Series – General Information](#)
- [200 Series – Hazardous Waste](#)
- [300 Series – Radioactive Waste](#)
- [500 Series – NM Special Waste](#)
- [600 Series – Transport of Waste](#)
- [700 Series – Other](#)
- [800 Series – TSF](#)
- [900 Series – Treatment](#)
- [Recycling](#)



<http://int.lanl.gov/org/padops/adesh/environmental-protection/quality-assurance/p409-tools.shtml>

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P930-1 LANL WAC is Organized by Waste Type and Facility

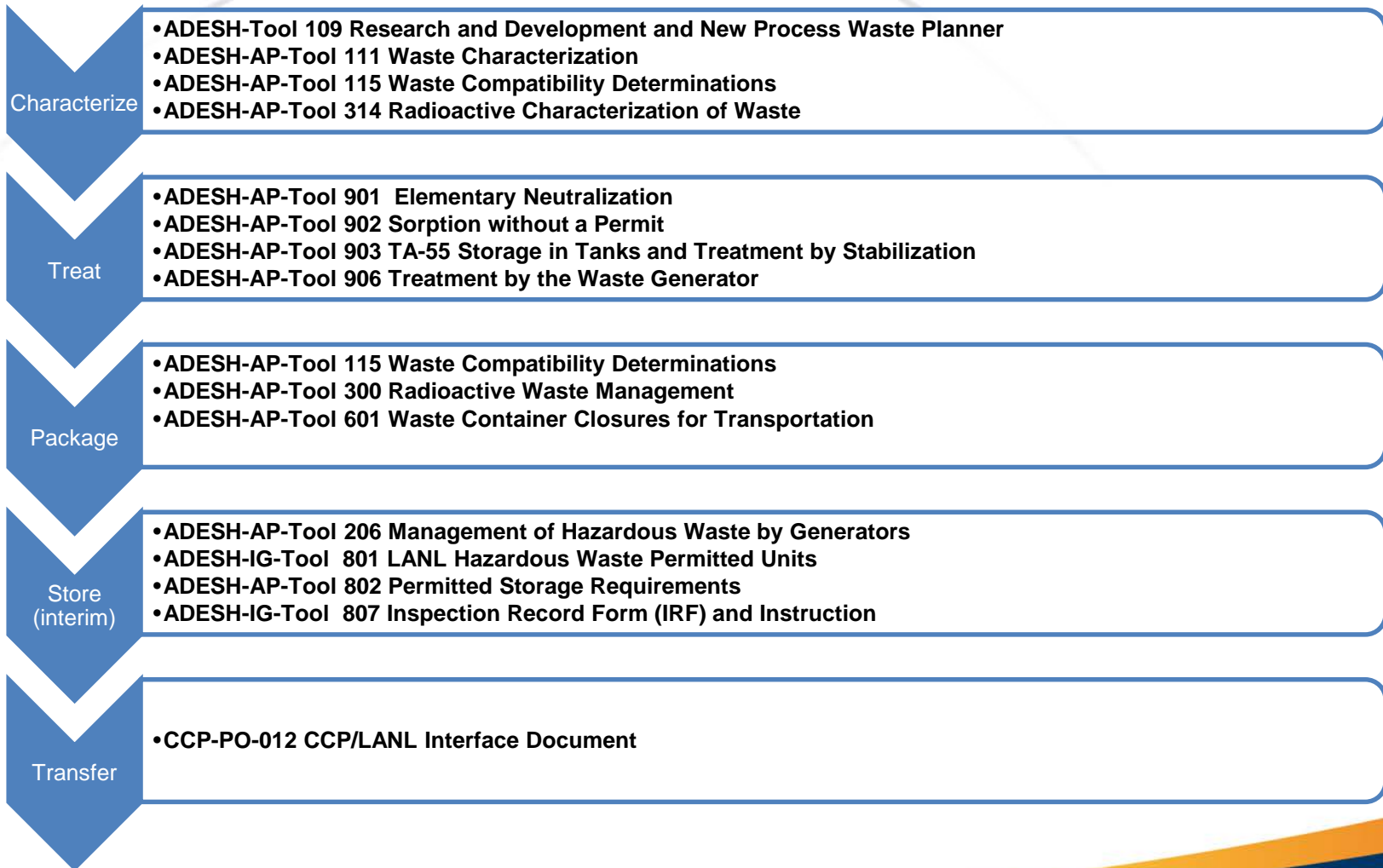
- Attachment 1 Radioactive Liquid Waste Treatment Facility (RLWTF)
- Attachment 2 Contact-Handled Transuranic (TRU) Waste
- Attachment 3 Solid Low-Level Waste (LLW)
- Attachment 4 [Removed and Reserved]
- Attachment 5 Tritium-Contaminated Waste
- Attachment 6 Hazardous and Universal Waste
- Attachment 7 Mixed Low-Level Waste (MLLW)
- Attachment 8 Other Low-Level Waste (LLW)
- Attachment 9 Asbestos Waste
- Attachment 10 Infectious/Medical/Biological Waste
- Attachment 11 Polychlorinated Biphenyl (PCB) Waste
- Attachment 12 Green is Clean Waste
- Attachment 13 New Mexico Special Waste
- Attachment 14 Non-Hazardous Waste
- Attachment 15 Dumpster Waste
- Attachment 16 Sanitary Wastewater System (SWWS)
- Attachment 17 Waste Acceptance at the Nevada National Security Site (NNSS)
- Attachment 18 TA-53 Radioactive Liquid Waste Treatment Plant (RLWTP)
- Attachment 19 Non-Hazardous, Non-Radioactive Scrap Metal



**TWF criteria will be
included in WAC revision**

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Institutional TRU Waste Flow Path



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Generate, Treat, Package, Repackage, or Store TRU Waste

LANS TRU Waste Generation, Treatment, Storage, Packaging, and Receiving Operations									
Program	POC/ RCRA Contact	Location	Status	Generate	Treat	Store	Pack	Re-Pack	Receive
CVD Project and Bag-Out Processes	Keith Lacy/ Jeff Carmichael	TA-3-29, CMR	active operation	X		X	X		X
Plutonium Processing Waste Packaging	Keith Lacy/ Jeff Carmichael	TA-55-PF-4	active operation	X	X	X	X	X	X
Plutonium Processing Waste Cementation	Keith Lacy/ Jeff Carmichael	TA-55-PF-4	inactive operation		X	X	X		
Radioactive Liquid Waste Solidification	Keith Lacy/ Jeff Carmichael	TA-50-1	inactive operation		X	X	X		X
Transuranic Waste Facility	TBD	TA-63 TWF	inactive operation			X			X
Waste Disposition	Ben Roberts/ Victoria Baca	TA-54 Area G	active operation			X		X	X
Waste Disposition	TBD	TA-54 RANT	inactive operation			X	X		X
Waste Disposition (remediation and repackage)	Ben Roberts/ Victoria Baca	TA-50-69 WCRRF	active operation	X	X	X	X	X	X

Off-Site Recovery Program (OSRP) was addressed at the pre-visit

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TA-55/CMR/RLW

OSRP

EPC

Area G/WCRRF

Los Alamos National Laboratory

Institutional Leaders

Charlie McMillan
Laboratory Director

Richard (Rick) Kacich
Deputy Laboratory Director

Dave Lyons
Executive Director

Randy Erickson
Associate Director

Environmental Management

Chief Financial Officer	Laboratory Counsel
Chief Information Officer	Ethics & Audit Director
Communications & Public Affairs	Government Affairs & Protocol
Prime Contract Manager	Office of Equal Opportunity & Diversity
LANS, LLC Executive Staff Director	Ombuds Office
National Security & International Studies	

Alan Bishop
Principal Associate Director
Science, Technology & Engineering

Bob Webster
Principal Associate Director
Weapons Programs

Terry Wallace
Principal Associate Director
Global Security

Craig Leasure
Principal Associate Director
Operations & Business

Larry Simmons
Principal Associate Director
Capital Projects

Chemistry, Life, & Earth Sciences	Engineering Sciences	Experimental Physical Sciences	Theory, Simulation, & Computation
ADCLS	ADE	ADEPS	ADTSC
Applied Energy Program	Orphan Nuclear Energy Program	Laboratory Directed Research & Development	National Security Innovation Center
Office of Science Programs	Office of Science Programs	Science Resource Office	

Plutonium Science & Manufacturing	Weapon Engineering & Experiments	Weapons Physics
ADPSM	ADW	ADK
Nuclear Process Infrastructure	Weapon Systems Engineering	Weapons Research Services
	Science Capabilities	Weapons Research Services
	Weapons Research Services	Weapons Research Services

Threat Identification & Response
ADTR
Nuclear Engineering & Simulation
Special Operations
Office of Counterintelligence
Program Support Office

Business Innovation	Environment, Safety, & Health	Nuclear & High Hazard Operations	Mission Assurance, Security, & Emergency Response
ADBS	ADESH	ADNHO	ADMAGER
Departmental Contracting Services	Environmental Protection & Compliance	LANSCE Facility Operations	Security
Human Resources	Radiation Protection	Science & Technology Operations	Quality & Performance Assurance
Network & Infrastructure Engineering	Waste Management	15-60 Facility Operations	Security & Emergency Operations
Service Innovation	Deployed Facilities	USSES & Institutional Facilities	Weapons Facility Operations
Software & Applications Engineering	Deployed Services	Weapons Facility Operations	Engineering Services
	Operations Integration Office	Weapons Facility Operations	File Protection
		Weapons Facility Operations	Nuclear Community Safety
		Weapons Facility Operations	Operations Support
		Weapons Facility Operations	Safety Risk
		Weapons Facility Operations	Training Services

Project Management
ADPM
Maintenance & Site Services
Major Project Delivery
Chemistry & Building Research Reimbursement
Infrastructure Project Delivery

Drum Breach Ordered Actions

Causal Analyses

- New Mexico Environment Department Administrative Compliance Order
- Accident Investigation Board – Judgements of Need

LANL implemented significant changes after the rad release at WIPP

Corrective Actions

- Enhanced Training
- Permit Modifications
- Policy/Procedure Enhancement
- Improved Change Control
- Waste Stream Profile Reviews
- Operating Record Validation
- Interface Agreement Update
- Safety Culture Gap Analysis
- Safety, Compliance, and USQ Reviews

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Key Waste Management Assessments

- DOE Independent Audit of DOE O 435.1 Compliance
 - Conducted by subcontractor on behalf of both NA-LA and EM-LA
 - Assessed compliance with Order at LANL and specifically TA-54-G
 - 11 Findings, 5 Observations, and 3 noteworthy practices
 - CAPs for finding and observations tracked in PFITS
- NA-LA Directed RCRA Self-Assessment
 - Assessed TRU Waste Packaging and Processing
 - Supported by field observations at CMR, PF-4, and OSRP
 - All assessment activities shadowed by DOE
 - 1 Finding, 1 Incidental finding, 16 Opportunities for improvement, and 10 noteworthy practices
 - CAPs for findings tracked in PFITS

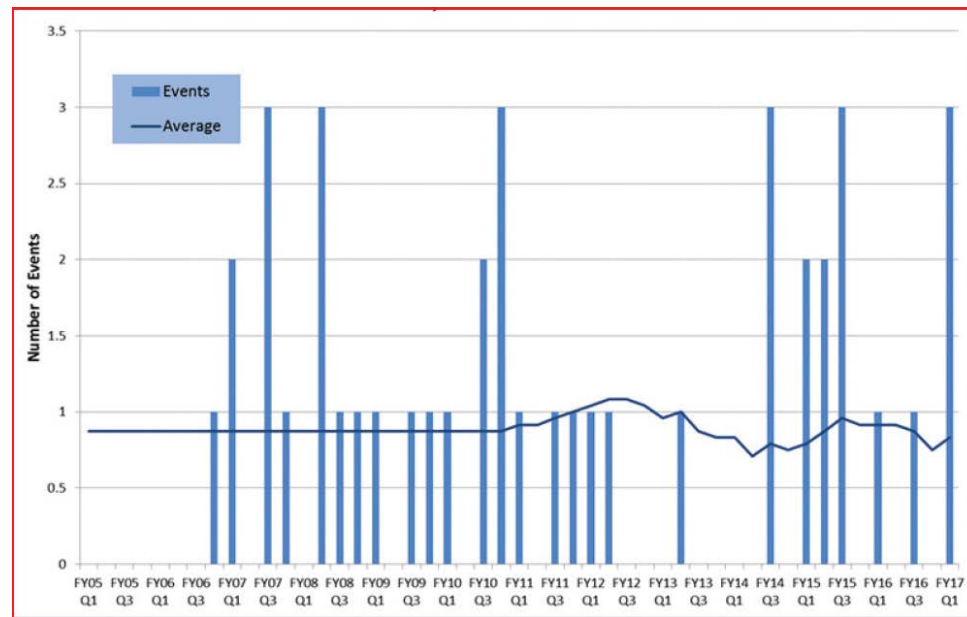
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Metrics



Group 9: Noncompliance Notification Notice of Violation Trend Snapshot (FY17 Q1):

- Petroleum storage tank corrosion protection
- Diesel fuel storage tank issue
- Hazardous waste labeling issues and failure to complete previous corrective measure



- Average less than 1 event per quarter
- Range 0-3 events per quarter

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RCRA Compliance Team

Roles and Responsibilities

- Interpret state and federal hazardous waste management laws and regulations
- Assist with permit and permit modification submittals
- Provide permit compliance guidance
- Develop and implement institutional standards and policies to ensure that regulated waste is characterized, managed, stored, treated, and transported compliantly
- Provide institutional coordination, integration, and communication of hazardous waste management and reporting activities
- Interact with regulatory agencies, stakeholders, the public, and Indian tribes on hazardous waste management issues

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LA-UR-17-23475

Approved for public release; distribution is unlimited.

Title: Transuranic Waste Resource Conservation and Recovery Act (RCRA)
Compliance

Author(s): Haagenstad, Mark P.

Intended for: Environmental Programs

Issued: 2017-04-27

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Transuranic Waste Resource Conservation and Recovery Act (RCRA) Compliance

Mark Haagenstad

Environmental Compliance Programs

April 17, 2017

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LANL Hazardous Waste Facility Permit

- 23 of the 24 permitted units were permitted in support of transuranic (TRU) waste operations at LANL
 - 9 – TA-54, Area G
 - 8 – TA-55
 - 2 – TA-50-69, WCRRF
 - 2 – TA-54, West (RANT)
 - 1 – TA-63, TWF
 - 1 – TA-3-29, CMR

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Current TRU Waste Operations

- Current legacy waste operations
 - Locations at WCRRF and TA-54, Area G
 - Waste storage, repackaging, and waste treatment
- Newly generated waste
 - Locations at CMR and TA-55
 - Waste generation and storage areas
 - Enduring LANL mission support

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ACO/SFO Corrective Actions and Lessons Learned

GSTR

April 2017

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Background

- February 14, 2014
LANL Drum Breach at WIPP
 - External and internal investigations
- NMED Issued an Administrative Compliance Order (ACO)

“Identify Issues and Implement Corrective Actions”

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NMED Identified Violations

Violation Type	Description
UNAUTHORIZED TREATMENT	Failing to obtain a permit to treat hazardous waste
	Performing treatment in non-permitted facilities
IMPROPER CHARACTERIZATION	Failure to properly characterize and annually re-evaluate regulated waste
INCOMPATIBLE WASTES	Inappropriately mixing incompatible wastes and materials
FAILURE TO NOTIFY NMED	Failing to notify NMED that LANL intended to treat wastes
	Failure to allow NMED to inspect treatment facilities prior to treatment
	Failure to notify NMED of RCRA permit violation

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The December 2014 ACO Contained 9 Ordered Actions

	OA NUMBER (ACO paragraph)	BRIEF SUMMARY OF OA
PROPOSED ACTIONS TO PREVENT RECURRENCE	1 (129)	Develop report: actions taken to prevent recurrence [<i>including description of changes to procedures already implemented</i>]
NITRATE SALT REMEDIATION	2 (130)	Develop plan to remediate 57 daughters
	3 (131)	Develop plan to remediate 29 parents
CORRECTIVE ACTIONS SPECIFIED BY NMED	4 (132)	Review every MTRU waste stream to verify characterization [<i>document in Operating Record</i>]
	5 (133)	Provide procedure for annual reevaluation of waste streams
	6 (134)	Provide most recent annual reevaluation of all waste streams [<i>submit documentation from Operating Record</i>]
	7 (135)	Develop procedure for AK communication system, internal and external
	8 (136)	Revise CCP/LANL interface agreement
	9 (137)	Revise procedure for procedures [<i>to ensure SME review</i>]

Actions to Address the Violations and Prevent Recurrence

Description	Violation Categories			
	UNAUTHORIZED TREATMENT	IMPROPER CHARACTERIZATION	INCOMPATIBLE WASTES	FAILURE TO NOTIFY NMED
Review every MTRU waste stream characterization	X	X	X	
Examine annual waste stream reevaluation procedure		X		
Provide most recent annual reevaluation of all waste streams		X	X	
Examine internal and external AK communication	X	X	X	X
Revise CCP/LANL interface agreement	X	X	X	X
Ensure SMEs engaged in procedures	X	X	X	X

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Categories of Ordered Action Responses

Categories	Examples
Immediate Compensatory Actions	Standing Orders, New ADEM Management Team, ADESH Reorganization, Management Briefings
FACT-FINDING ACTIONS / Extent of Condition	
Extent of Condition (EOC) Review	<ul style="list-style-type: none"> • Extensive review of all legacy non-nitrate salt wastes processed under deficient waste management procedures • Self-disclosure of additional non-compliances
Walkdowns	Evaluation of RCRA Self-Assessment program; Wall to walls; Operating Record Validation at all TSFs
Waste Characterization Reviews	<ul style="list-style-type: none"> • Waste Stream Profile Form validation for all mixed and hazardous wastes • Develop/ implement WCATS change control process

Categories of Ordered Action Responses (cont).

Categories	Examples
IMPLEMENT CHANGED/ IMPROVED PROCESSES	
<p>Develop New/ Improved Guidance</p>	<ul style="list-style-type: none"> • P409 revised/ reissued • New/ improved P409 tools issued • Communication of ACO actions Lab-wide
<p>Train waste management workers (<i>managers, supervisors, technicians, generators</i>) to recognize when processing becomes treatment.</p>	<ul style="list-style-type: none"> • McCoy's training • Deployed Environmental Professional (DEP)/Waste Management Coordinator (WMC) RCRA Compliance training • <i>RCRA Refresher for Waste Managers</i> training • On-the-Job Training (OJT) for Treatment, Storage and Disposal Facilities (TSDF) inspectors • Revise <i>Waste Generator Overview</i>, <i>RCRA Personnel</i> training
<p>Implement AK communication system: the Waste Characterization and Processing Review Board</p>	<ul style="list-style-type: none"> • Develop Board Charter and Procedure • Convene Board • Convene Subcommittees to address issues
<p>Implement Revised CCP/LANL Interface Document</p>	<ul style="list-style-type: none"> • Implement revised agreement

Categories of Ordered Action Responses (cont).

Categories	Examples
IMPLEMENT CHANGED/ IMPROVED PROCESSES	
Strengthen Waste Management Coordinators (WMCs), Deployed Environmental Professionals (DEPs)	<ul style="list-style-type: none"> • Improved guidance • Revised training • Additional support from ADESH core organizations
Implement Compliance Technical Assistance Program (CTAP)	<ul style="list-style-type: none"> • Continue RCRA Self-Assessments • Verification of waste characterization in the field • Verify proper storage practices in the field
Continue to Strengthen Waste Stream Characterization	<ul style="list-style-type: none"> • Comprehensive Review of Waste Stream Profiles (WSPs) • Higher Quality Standard for WSPs • Strengthen WSP review, extension processes • Improvements to WCATS
Continue to Identify/ Review Waste Processing Procedures	<ul style="list-style-type: none"> • Review of P1020-2, <i>Laboratory Document Control completed</i> • Continuing EPC-CP reviews of Lab-wide procedures potentially involving waste management/ treatment • Feedback to improve procedure-writing process
Strengthen Subcontractors' ES&H Compliance/ Awareness	<ul style="list-style-type: none"> • Standing Order for incorporation of EPC Exhibit F reviews • Implement actions strengthening Subcontract Exhibit Fs

Lessons Learned

1. Communicate requirements clearly and often
2. Engage Subject Matter Experts
3. Ensure procedures and documents capture the work performed
4. Trust, but verify

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1. Communicate Requirements

- Communicate clearly
- Communicate often
- Measure effectiveness

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Institutional Changes

- ADESH-AP-TOOL-117 *Managing Operating*
- P315 *Conduct of Operations Manual*
- P409 *LANL Waste Management and associated guidance tools*
- P101-18 *Procedure for Pause/Stop Work*
- P850 *Subcontract Technical Representative Procedure*
- LANS *Corrective Action Plan – AIB Phase 2, 10/2015*
- LANS/DOE LAFO, *Response to Ordered Actions 1 - 9 Settlement Agreement HWB-14-20, 3/2016*
- LA-UR-16-24452, *Class 1 Permit Modification Request for the Addition of Treatment in Containers by Stabilization, 06/2016*
- LA-UR-16-26708, *LANL Nitrate Salt-Bearing Waste Container Isolation Plan, 09/2016*
- EPA ID #NM0890010515, *LANL Hazardous Waste Facility Permit (HWFP), 09/2016*
- *Record Changes in WCATS*
- *WM-AP-005 Waste Characterization Processing and Review*

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Institutional Changes Cont.

- ENV-CP-QP-115, *Compliance Technical Assistance Program (CTAP), ENV-AP-CP-200 Regulatory Procedure Review of Waste Management Procedures*
- *ENV-AP-CP-200 Regulatory Procedure Review of waste Management Procedures*
- WM-AP-0005 *Waste Characterization and Processing Review*
- EP-CHARTER-10012, *Charter for waste Processing Integrated Process Control Teams*
- EP-AP-10001 *ADEP Document Control*
- EP-AP-10007 *ADEP Technical Procedure Development*
- EM-AP-10008 *ADEM Roles, Responsibilities, Authorities, and Accountabilities*
- EP-AP-20284, *EWMO RCRA Permit Operating Record and Compliance Programs*
- PA-AP-01000 *Document Control Process*
- PA-AP-01016 *Technical Procedure Use and Development Process*

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Institutional and Directorate Level Training

Institutional	Directorate (ADEM example)
<ul style="list-style-type: none">• RCRA Refresher for Waste Managers	<i>Waste Disposition Criticality Safety Fundamentals</i>
<ul style="list-style-type: none">• WMC-DEP Live Briefing – Waste Treatment Training	<i>Fundamentals of Chemical Compatibility</i>
<ul style="list-style-type: none">• Waste Generator Overview initial course and refresher training	<i>Environmental and RCRA Inspector</i>
<ul style="list-style-type: none">• RCRA personnel initial course and annual refresher	<i>Waste Characterization Glovebox Parent Drum Operations</i>
<ul style="list-style-type: none">• On-the-Job Training for TSDF Inspectors	<i>Waste Characterization GB Daughter Drum Operations</i>
	<i>WCRRF RNS Waste Treatment Operations</i>

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2. Engage Subject Matter Experts (SMEs)

- Integrated Project Teams (IPTs)
- Waste Characterization and Processing Review Board
- RCRA SME reviews of waste-generating and-managing procedures

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3. Ensure Procedures and Documents Capture the Work Performed

- **Monica C. Regalbuto September 23, 2015 Memo**
Self-Assessment of Resource Conservation and Recovery Act Requirements for Treatment and Repackaging of Transuranic Waste and Associated Local Federal Oversight Required for Waste Disposal at the Waste Isolation Pilot Plant
- **James J. McConnell February 29, 2016 Memo**
National Nuclear Security Administration Actions Regarding the Waste Isolation Pilot Plant Accident Investigation Board Corrective Actions for Transuranic Waste

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4. Trust, But Verify

- Ensure the workers know the requirements
- Engage Subject Matter Experts to create technically sound and useable work documents
- Employ procedure validation and field verification
- Provide sufficient oversight

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