

CCP-TP-002

Revision 26

CCP

Reconciliation of DQOs and Reporting Characterization Data

EFFECTIVE DATE: 06/19/2013

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PRINTED NAME

APPROVED FOR USE

RECORD OF REVISION

Revision Number	Date Approved	Description of Revision
18	11/16/2006	Revised to implement the Waste Isolation Pilot Plant Hazardous Waste Facility Permit requirements resulting from the Section 311/Remote-Handled (RH) Permit Modification Request (PMR). Addressed Carlsbad Field Office (CBFO) Document Review Record (DRR) comments.
19	12/22/2006	Revised to clarify Waste Stream Profile Form contents.
20	08/18/2008	Revised Section 4.2.1 to incorporate Central Characterization Project (CCP) Standing Order CCP-SO-32. Updated several document/procedure titles. Minor changes to Section 5.0.
21	08/04/2009	Revised to answer Waste Isolation Pilot Plant (WIPP) Form 09-050, and add changes to Sections 3 and 4 and make any other editorial changes needed.
22	06/30/2010	Revised for Class 2 Modification Request WIPP Hazardous Waste Facility Permit EPA I.D. Number NM4890139088.
23	12/29/2010	Revised to implement the revision of the <i>Waste Isolation Pilot Plant Hazardous Waste Facility Permit</i> .
24	12/28/2011	Revised to make editorial changes. Replacing Waste Stream Profile Form (WSPF) change notice with revision to WSPF. Revising instructions for completing WSPF package.
25	02/11/2013	Revised to include timeframe for transmitting the waste stream profile form package to records. Also revised to make editorial changes needed.
26	06/19/2013	Revised to implement the Permit Modification Request Class 2 approved by New Mexico Environment Department (NMED) dated March 13, 2013.

TABLE OF CONTENTS

1.0	PURPOSE.....	4
1.1	Scope.....	4
2.0	REQUIREMENTS.....	5
2.1	References.....	5
2.2	Training Requirements.....	6
3.0	RESPONSIBILITIES.....	7
3.1	Site Project Manager (SPM)	7
3.2	Acceptable Knowledge Expert (AKE).....	7
3.3	Host Site Subcontract Technical Representative (STR).....	7
4.0	PROCEDURE.....	8
4.1	Assigning the WSPF Number.....	8
4.2	Compilation and Evaluation of DQO Parameters.....	8
4.3	Preparing Waste Stream Profile Form (WSPF).....	10
4.4	Completing the Characterization Information Summary (CIS)	10
4.5	Summation of Aspects of the AK Summary	11
4.6	Submitting the WSPF Package to DOE CBFO	12
4.7	Subsequent Data Reconciliation	12
4.8	Completing the Waste Stream Characterization Package	14
5.0	RECORDS.....	15

LIST OF ATTACHMENTS

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example)	16
Attachment 2 – CCP Waste Stream Profile Form (Example)	20
Attachment 3 – CCP Characterization Information Summary Cover Page (Example)	34
Attachment 4 – CCP Correlation of Container Identification Number to Batch Data Report Numbers (Example)	35
Attachment 5 – CCP RTR/VE Summary of Prohibited Items (Example)	36

1.0 PURPOSE

Upon completion of waste characterization activities, and prior to shipment of waste, the Central Characterization Program (CCP) is required to reconcile the data in accordance with the requirements of CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan (QAPjP)*. Data reconciliation is required in order for the CCP Site Project Manager (SPM) to complete and submit a Waste Stream Profile Form (WSPF) (see Attachment 2, CCP Waste Stream Profile Form, for an example).

1.1 Scope

This procedure provides data reconciliation with the data quality objectives (DQOs) following data validation and verification at the CCP Project Office. This reconciliation is performed at the waste stream or waste stream lot level. This procedure provides the instructions for the completion of the WSPF Package for submittal to the U.S. Department of Energy (DOE) Carlsbad Field Office (CBFO) for permittee review and CBFO approval prior to shipment.

2.0 REQUIREMENTS

2.1 References

Baseline Documents

- DOE/WIPP 01-3194, *CH-TRU Waste Content Codes (CH-TRUCON)*
- DOE/WIPP 90-045, *RH-TRU Waste Content Codes (RH-TRUCON)*
- CCP-PO-002, *CCP Transuranic Waste Certification Plan*
- CCP-PO-003, *CCP Transuranic Authorized Methods For Payload Control (CCP CH-TRAMPAC)*
- CCP-PO-505, *CCP Remote-Handled Transuranic Waste Authorized Methods for Payload Control (CCP RH-TRAMPAC)*

Referenced Documents

- *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan*
- DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plan*
- 40 CFR 261, *Identification and Listing of Hazardous Waste, Subpart C, Characteristics of Hazardous Waste.*
- 40 CFR 261, *Identification and Listing of Hazardous Waste, Subpart D, Lists of Hazardous Wastes*
- DOE/TRU-11-3425, *Annual Transuranic Waste Inventory Report – 2011*
- CCP-PO-001, *CCP Transuranic Waste Characterization Quality Assurance Project Plan*
- CCP-QP-002, *CCP Training and Qualification Plan*
- CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*
- CCP-QP-008, *CCP Records Management*
- CCP-TP-005, *CCP Acceptable Knowledge Documentation*

2.2 Training Requirements

2.2.1 Personnel performing this procedure will be trained and qualified in accordance with CCP-QP-002, *CCP Training and Qualification Plan*, prior to performing this procedure.

3.0 RESPONSIBILITIES

3.1 Site Project Manager (SPM)

3.1.1 Ensures that all data generated and used in decision making meet the DQOs

[A] Assesses whether data of sufficient type, quality, and quantity have been collected.

NOTE

The WSPF Package consists of the WSPF, the Characterization Information Summary (CIS) and the Summation of Aspects of the Acceptable Knowledge (AK) Summary.

3.1.2 Completes and submits the WSPF package and required revisions.

3.1.3 Prepares the Waste Stream Characterization Package per CCP-PO-001, Section C3-6b(3) upon request from the DOE CBFO.

3.2 Acceptable Knowledge Expert (AKE)

NOTE

As the waste stream is characterized, the Acceptable Knowledge Expert (AKE) is responsible for corroborating the AK information with the characterization data collected. For the final data reconciliation (conducted in accordance with this procedure), the AKE provides assistance to the SPM.

3.2.1 Compiles the AK information for the waste stream being characterized.

3.2.2 Creates the AK summary which is used to create the Summation of Aspects of the AK summary.

3.2.3 Assigns a unique waste stream number for each waste stream based on information in the DOE/TRU-11-3425, *Annual Transuranic Waste Inventory Report (ATWIR)* and/or information from the Host site.

3.2.4 Reviews and concurs with the WSPF Package and subsequent revisions.

3.3 Host Site Subcontract Technical Representative (STR)

3.3.1 If required by the site-specific interface document, reviews, and concurs with the WSPF Package.

4.0 PROCEDURE

NOTE

The attachments in this document are examples of the requirements. The examples identify the minimum information required in the final approved report.

NOTE

Steps DO **NOT** need to be followed in sequence.

SPM

4.1 Assigning the WSPF Number

NOTE

The unique number will be limited to a maximum of 20 alpha-numeric characters. The first two characters will be the two letter site designator, and the remaining characters should coincide, to the maximum extent possible, with the title page of the AK Summary Report.

- 4.1.1 Assign the Waste Stream Number to the WSPF per the AK Summary Report.
-

NOTE

The Waste Stream Number is recorded on all applicable attachments.

4.2 Compilation and Evaluation of DQO Parameters

- 4.2.1 For the lot to be processed, select an appropriate number of containers that have completed CCP Project Office verification and validation from the waste stream population.

- [A] Ensure that all of the containers selected are from the same waste stream by comparing the container numbers/waste stream identification numbers with the AK Tracking Spreadsheet for the subject site.

- [B] Ensure all containers from any waste stream that requires Gas Generation Testing (GGT) meet one of the following requirements:

- [B.1] The container is on an approved GGT Batch Data Report (BDR) and that the BDR is the most recent.

- [B.2] The container is included in an approved Long Term Objective population.
- [C] Ensure all containers from any waste stream that require Flammable Gas Analysis (FGA) for Transportation Sampling are on an approved FGA for transportation BDR and that the BDR is the most recent:
- [D] Ensure all data to be used for certification was generated using certified equipment.
- [E] Ensure that each of the BDRs chosen to certify the containers is the most recent BDR available for that characterization process (i.e., real-time radiography [RTR] or visual examination [VE], nondestructive assay [NDA], FGA, Dose-to-Curie [DTC]), Radiological Characterization.
- 4.2.2 Obtain copies of the following documents from CCP Records, as applicable:
- Documentation of Radiological Properties (e.g., NDA BDR), VE, RTR, FGA **AND/OR** an AK Sufficiency Determination
 - Previous records of data completion and reconciliation with DQOs (see Attachment 1, CCP Reconciliation with Data Quality Objectives for an example)
 - Previously completed CIS submitted to records on interoffice memo
- 4.2.3 Determine if sufficient data have been collected to determine if program-required waste parameters have been met, by completing the CCP Reconciliation with Data Quality Objective Attachment 1, using the attached instructions.
- 4.2.4 **IF** sufficient data has been collected,
THEN enter the Waste Stream Number and Lot Number on the CCP Reconciliation with Data Quality Objective.
- 4.2.5 **IF** data **DOES NOT** meet the criteria on the CCP Reconciliation with Data Quality Objective,
THEN sufficient data has **NOT** been collected to fully characterize the waste stream, therefore, determine the additional waste characterization that needs to be performed **AND** direct the appropriate site facility to collect the additional data.

NOTE

The CCP Reconciliation with Data Quality Objective contains multiple questions for each entry. If there are discrepancies between questions or if entries are Not Applicable (N/A), comments will be added to the form explaining how criteria are met.

- 4.2.6 Complete the CCP Reconciliation with Data Quality Objective, using the attached questions.
 - 4.2.7 Print name, sign, and date the CCP Reconciliation with Data Quality Objective.
 - 4.2.8 Place the CCP Reconciliation with Data Quality Objective in the holding file.
- 4.3 Preparing Waste Stream Profile Form (WSPF)
-

NOTE

The current approved revision of the waste stream AK Summary should be used in preparing or revising the WSPF.

- 4.3.1 **IF** a WSPF exists for the waste characterization data being reconciled,
THEN GO TO Section 4.7.
 - 4.3.2 Ensure all characterization data obtained from CCP Records for the waste stream in question have gone through project level validation (i.e., signed SPM checklists).
 - 4.3.3 Prepare a CCP WSPF (see CCP Waste Stream Profile Form, for an example) using the instructions included in Attachment 2.
 - 4.3.4 Review, print name, sign, and date the WSPF.
- 4.4 Completing the Characterization Information Summary (CIS)
- 4.4.1 Record the Waste Stream Number and Lot Number, including the list of site specific/CCP procedures, revisions, and dates used in characterizing the containers in the lot, on the CCP Characterization Information Summary Cover Page (see Attachment 3, CCP Characterization Information Summary Cover Page for an example).
 - 4.4.2 Complete the cross-reference listing the container numbers to each BDR (see Attachment 4, CCP Correlation of Container Identification Numbers to Batch Data Report Numbers for an example).

- [A] For items **NOT** analyzed enter N/A.
- [B] Print name, sign, and date the CCP Correlation of Container Identification Numbers to Batch Data Report Numbers.

- 4.4.3 **IF** the AK Summary for the waste stream identified the U.S. Environmental Protection Agency (EPA) Hazardous Waste Number (HWN) U134 (hydrofluoric acid), **THEN** address in CCP RTR/VE Summary of Prohibited Items (see Attachment 5, CCP RTR/VE Summary of Prohibited Items for an example) that any liquid identified is a prohibited item per the applicable operating procedure and is **NOT** acceptable by the Treatment, Storage, and Disposal Facility (TSDF).
- 4.4.4 Complete the CCP RTR/VE Summary of Prohibited Items to document that prohibited items are **NOT** present in the waste stream or waste stream lot and to verify the physical form of the waste matches the waste stream description as determined by AK.

NOTE

If CBFO approves, VE may be performed on S3000 and S4000 when the material is not removed from the characterized container.

- 4.4.5 Complete the justification for the selection of radiography and/or VE as the appropriate method for characterizing the waste.
- 4.4.6 Print name, sign, and date CCP RTR/VE Summary of Prohibited Items.
- 4.5 Summation of Aspects of the AK Summary
 - 4.5.1 Obtain an approved copy of the AK Summary for the subject waste stream in order to create a summary level version of the AK Summary, entitled the Summation of Aspects of the AK Summary (Summation).
 - 4.5.2 Create the Summation and include the following information: waste stream name and number, point of generation, waste stream volume (current and projected), generation dates, TRUCON codes, Summary Category Group, Waste Matrix Code(s) (WMC) and Waste Matrix Code Group, other ATWIR information, waste stream description, areas of operation, generating processes, Resource Conservation and Recovery Act (RCRA) determinations, radionuclide information, method for determining Waste Material Parameter (WMP) weights per unit of waste contact-handled ([CH] only), all references used to generate the Summation, and any other information required by CCP-PO-001.

- 4.5.3 Include a list of any approved AK Sufficiency Determinations for the waste stream.
- 4.6 Submitting the WSPF Package to DOE CBFO
- 4.6.1 Compile the WSPF Package consisting of the following:
- WSPF
 - CIS
 - Summation
- 4.6.2 Forward a copy to the AKE for review and concurrence.
- 4.6.3 **IF** required by the appropriate site-specific Interface Document, **THEN** forward a copy to the STR for review and concurrence.
- 4.6.4 **IF** comments are received from the AKE **AND/OR** STR, **THEN** resolve the comments, **AND** forward a copy of the resolution to the reviewer(s) for concurrence.
- 4.6.5 **AFTER** concurrence(s) is/are received, **THEN** continue with this section.
- 4.6.6 Transmit the WSPF Package via e-mail to the DOE CBFO electronic mail (email) site at site.documents@wipp.ws for permittee review and CBFO approval.
- 4.6.7 **IF** comments are received from the permittees, **THEN** repeat steps 4.6.2 through 4.6.6 until comments have been resolved.
- 4.6.8 Submit approved WSPF Package to CCP Records in accordance with CCP-QP-008, *CCP Records Management*, with an interoffice memo within 30 calendar days of WSPF approval.
- 4.7 Subsequent Data Reconciliation
- 4.7.1 Obtain a copy of the WSPF Package from CCP Records.
- 4.7.2 Perform applicable steps of Sections 4.2 and 4.4.

NOTE

A revision required to the WSPF package that results in the addition of EPA HWNs will require the waste stream to be suspended until DOE approves the revised WSPF.

4.7.3 **IF** the waste **DOES NOT** meet the WSPF Package description, **THEN** revise the WSPF Package, **OR** assign the waste to a new waste stream.

[A] **IF** subsequent data collection reveals discrepancies that identify different EPA HWNs, **THEN** the Waste Stream Profile will be revised.

[B] **IF** subsequent data collection reveals discrepancies that indicate the waste belongs to a different waste stream, **THEN** initiate a nonconformance report (NCR) in accordance with CCP-QP-005, *CCP TRU Nonconforming Item Reporting and Control*.

NOTE

A revision required to the WSPF Package that **DOES NOT** result in addition of EPA HWNs (application of additional TRUCON Content codes, or addition of material parameter weight estimates per unit of waste) will not require the waste stream to be suspended.

[C] **IF** the WSPF Package requires a revision, **THEN** make the appropriate changes in accordance with guidance provided in the CCPWSPF, **AND** submit the WSPF revision to CCP Records and DOE CBFO in accordance with the applicable steps in Section 4.6.

[D] **IF** the waste **DOES NOT** match the subject WSPF Package (i.e., have common physical form, contain similar hazardous constituents, and were generated from a single process or activity discrepancies are noted that identify different EPA HWNs or indicate that the waste belongs to a different waste stream), **THEN** perform the following:

[D.1] Notify the AKE that the subject waste must be redefined to a separate waste stream in accordance with the applicable steps of CCP-TP-005, *CCP Acceptable Knowledge Documentation*, Section 4.8.

[D.2] Generate a new WSPF Package in accordance with Sections 4.2 through 4.6.

4.7.4 Provide documentation of the waste stream lot data reconciliation to CCP Records that includes the CCP CIS and CCP Reconciliation with Data Quality Objective.

4.8 Completing the Waste Stream Characterization Package

4.8.1 When requested by DOE CBFO, prepare the Waste Stream Characterization Package for the requested waste stream.

4.8.2 Obtain a copy of the subject WSPF Package from CCP Records.

4.8.3 Obtain copies of the subject CISs for each of the waste stream lots associated with the subject waste stream from CCP Records.

4.8.4 Obtain a complete copy of the AK Summary for the subject waste stream from CCP Records.

4.8.5 Obtain copies of the BDRs as requested by DOE CBFO from CCP Records.

4.8.6 Obtain copies of other data requested by DOE CBFO from CCP Records.

4.8.7 Assemble the information, **AND** transmit to DOE CBFO.

5.0 RECORDS

- 5.1 Records generated during the performance of this procedure are maintained as quality assurance (QA) Records in accordance with CCP-QP-008. The records are the following:

QA/Lifetime

- [A] Characterization Information Summary with attached interoffice memorandum
 - [A.1] Attachment 1 – CCP Reconciliation with Data Quality Objective
 - [A.2] Attachment 3 – CCP Characterization Information Summary Cover Page
 - [A.3] Attachment 4 – CCP Correlation of Container Identification Number to Batch Data Report Numbers
 - [A.4] Attachment 5 – CCP RTR/VE Summary of Prohibited Items
- [B] Waste Stream Profile Form Package
 - [B.1] Attachment 2 – CCP Waste Stream Profile Form – includes Interoffice Memorandum of Submittal from the SPM
 - [B.2] CIS for the lot addressing the applicable analysis data
 - [B.3] Summation of Aspects of the AK Summary, if applicable

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example)

Sampling Completeness

RTR:

Number of valid samples: _____ Number of total samples analyzed: _____

Percent Complete: _____ (QAO is 100%)

NDA:

Number of valid samples: _____ Number of total samples analyzed: _____

Percent Complete: _____ (QAO is 100%)

|

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

Waste Stream#: _____ Lot #: _____

	Y/N/NA	Reconciliation Parameter			
1.		Waste Matrix Code.			
2.		Waste Material Parameter Weights.			
3.		The transuranic (TRU) activity reported in the BDRs for each container demonstrates with a 95 percent probability that the container of waste contains TRU radioactive waste.			
4.		<u>AK Sufficiency</u> . Is there an approved AK sufficiency Determination for this waste stream?			
5.		The data demonstrates whether the waste stream exhibits a toxicity characteristic under Title 40 <i>Code of Federal Regulations</i> (CFR), Part 261, <i>Identification and Listing of Hazardous Waste</i> , Subpart C, <i>Characteristics of Hazardous Waste</i> .			
6.		Does the waste stream contain listed waste found in 20.4.1.200 NMAC incorporating 40 CFR Part 261, Subpart D, <i>Lists of Hazardous Wastes</i> ?			
7.		Waste stream can be classified as hazardous or nonhazardous.			
8.		The overall completeness, comparability, and representativeness quality assurance objectives (QAOs) were met for each of the testing procedures as specified in CCP-PO-001 Sections C3-1 through C3-2 prior to submittal of a WSPF for a waste stream or waste stream lot.			
			Completeness	Comparability	Representativeness
		Radiography			
		VE			
Comments					

 SPM Printed Name

 Signature

 Date

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

Instructions for completing form:

Prior to completing Blocks 1 through 13, the SPM or Designee shall complete the Sampling Completeness portion of Attachment 1.

For each waste container and process, verify that:

- The waste container, by serial number, is included in the BDR shown for each characterization methodology listed in Attachment 4, CCP Correlation of Container Identification Numbers to Batch Data Report Number.
- The BDR has gone through project level validation and verification and has received SPM approval.
- The waste container was not removed from the BDR via NCR.

This information is recorded on Attachment 1 under the Sampling Completeness.

This process confirms that the samples are valid and that there is analysis data in the BDRs to support the determination, by the SPM, of program-required waste parameters for the total number of samples collected.

1. Waste Matrix Code. Is the waste matrix code assigned to the waste stream in the AK Summary Report supported by the radiography and/or VE testing BDRs?
2. Waste Material Parameter Weights. Are the waste material parameters listed in the AK Summary reported in kilograms for each of the waste material parameters identified in the waste stream?
3. TRU Radioactive Waste. Does the TRU activity reported in the BDR for each container demonstrate compliance with CCP-PO-002, *CCP Transuranic Waste Certification Plan*?
4. AK Sufficiency Determinations requested for the waste stream? If the answer is Yes, record request in comments field and document the use of the AK Sufficiency Determination as objective evidence for answering Yes to other DQOs.
5. Toxicity Characteristic. Does the waste exhibit a toxicity characteristic under 40 CFR Part 261, Subpart C?
6. Listed Waste. Does the waste stream contain listed waste found in 20.4.1.200 NMAC incorporating 40 CFR Part 261, Subpart D?
7. Hazardous Waste Determination. Can the waste stream be classified as hazardous or nonhazardous?

Attachment 1 – CCP Reconciliation with Data Quality Objective (Example) (Continued)

8. Completeness, Comparability, and Representativeness. Have the overall completeness, comparability, and representativeness quality assurance objective (QAOs) for each of the testing processes been met for the waste stream or waste stream lot by answering each of the following questions:
- Completeness:
 - RTR: Is there an audio/videotape (or equivalent media) of the radiography examination and a validated radiography data form for 100 percent of the containers subject to radiography?
 - VE: A validated VE data form will be obtained for 100 percent of the waste containers subject to VE.
 - Comparability: RTR and VE:
 - Was the correct approved version of the procedure used by qualified operators to acquire, verify, and validate the data?
 - Representativeness: Was the correct approved version of the procedure used to control:
 - RTR: Viewing test image, resolving discrepancies between two operators
 - VE: Reconciling any discrepancies between the operator and the Independent Technical Reviewer

Attachment 2 – CCP Waste Stream Profile Form (Example)

(1) Waste Stream Profile Number:			
(2) Generator site name:		(3) Generator site EPA ID:	
(4) Technical contact:		(5) Technical contact phone number:	
(6) Date of audit report approval by New Mexico Environment Department (NMED):			
(7) Title, version number, and date of documents used for WIPP-WAP Certification:			
(8) Did your facility generate this waste? YES NO			
(9) If no, provide the name and EPA ID of the original generator:			
Waste Stream Information			
(10) WIPP ID:		(11) Summary Category Group:	
(12) Waste Matrix Code Group:		(13) Waste Stream Name:	
(14) Description from the ATWIR:			
(15) Defense TRU Waste: YES NO			
(16) Check One: CH RH			
(17) Number of SWBs		(18) Number of Drums	
(17a) Number of SLB2		(19) Number of Canisters	
(20) Batch Data Report numbers supporting this waste stream characterization:			
(21) List applicable EPA Hazardous Waste Numbers:			
(22) Applicable TRUCON Content Numbers:			
(23) Acceptable Knowledge Information			
(For the following, enter the supporting documentation used [i.e., references and dates])			
Required Program Information			
(23A) Map of site:			
(23B) Facility mission description:			
(23C) Description of operations that generate waste:			
(23D) Waste identification/categorization schemes:			
(23E) Types and quantities of waste generated:			
(23F) Correlation of waste streams generated from the same building and process, as applicable:			
(24) Waste certification procedures:			
(25) Required Waste Stream Information			
(25A) Area(s) and building(s) from which the waste stream was generated:			
(25B) Waste stream volume and time period of generation:			
(25C) Waste generating process description for each building:			
(25D) Waste Process flow diagrams:			
(25E) Material inputs or other information identifying chemical/radionuclide content and physical waste form:			
(25F) Waste Material Parameter Weight Estimates per unit of waste			
(26) Which Defense Activity generated the waste:			
Weapons activities including defense inertial confinement fusion		Naval Reactors development	
Verification and control technology		Defense research and development	
Defense nuclear waste and material by products management		Defense nuclear material production	
Defense nuclear waste and materials security and safeguards and security investigations			

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

CCP WASTE STREAM PROFILE PACKAGE

A WSPF Package should be completed as early as possible (once sufficient data has been obtained [e.g., at least one lot]) and submitted to DOE CBFO for approval.

The SPM, in completing the WSPF, should seek the assistance and participation of the AKE in the preparation of the form and attachments.

The WSPF package submitted to DOE CBFO for approval contains three parts. The first part is the WSPF itself. The second part is the CIS Report for the waste stream or waste stream lot used to support the WSPF. The last part is the *Summation of Aspects of the AK Summary Report*, to support the WSPF. The completion of the first and third parts of the package is addressed in these instructions. Completion of the CIS is addressed in CCP-TP-002, *CCP Reconciliation of DQOs and Reporting Characterization Data*, and associated forms.

Instructions for completing the Waste Stream Profile Form:

Obtain an approved copy of the current WSPF Package from CCP Records; for new WSPFs, it will be blank.

Line numbers indicated below refer to the number in the parenthesis on the CCP WSPF.

The brackets [] indicate the primary source of the information requested if not otherwise referred to within the instruction.

Line 1:

Assign a site-specific waste stream profile number to each form generated. The number should normally coincide, to the extent possible, as it appears on the title page of the AK Summary Report. The SPM is responsible for selecting the number after referring to the AK Summary Report. The number should start with the applicable two-digit site designator. The number should be limited to 20 alpha-numeric characters maximum. Indicate waste stream lots with a period and sequentially numbered digits added to the waste stream profile number.

Line 2:

Enter the name of the site where the waste is currently stored. [AK Summary Report]

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 3:

Enter the EPA Identification (ID) Number of the site listed in Line 2. The ID number, if not included in the AK Summary Report, can be obtained from the EPA Regional office in which the site is located. The AKE should assist in the acquisition of this information.

Line 4:

Enter the name of the technical contact for this site. This is the individual to be contacted if there are questions concerning the data reported on the form, usually the SPM.

Line 5:

Provide the telephone number of the person identified in Line 4.

Line 6:

Enter the date of the most recently approved audit report approval by NMED. If the site has been audited but an audit report has not yet been approved by DOE CBFO, contact the CCP Project Manager. If DOE CBFO has approved the audit report and is awaiting approval by New Mexico Environmental Department (NMED), submit the WSPF package to DOE CBFO for distribution to the Waste Isolation Pilot Plant (WIPP) Review Team.

Line 7:

List the site-specific waste program documents (such as CCP-PO-001, the CCP-PO-003, Interface, etc.) listing the current revision.

Line 8:

Check the appropriate box. [AK Summary Report]

Line 9:

If the site where the waste is currently stored is not the site where the waste was generated, then provide the name and EPA identification number of the site where the waste was generated. [The AK Summary Report should provide the information as to where the waste was generated. The ID number, if not included in the AK Summary Report, can be obtained from the EPA Regional Office in which the site is located. The AKE should assist in the acquisition of this information.]

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

If the waste was generated at the site where it is currently stored, place an N/A in this box.

Line 10:

Enter the WIPP identification number from the current revision of the Annual Transuranic Waste Inventory Report (ATWIR) that best describes the waste stream being certified. CCP may split or combine ATWIR waste streams for the purposes of defining waste sampling populations. If CCP has split or combined ATWIR waste streams, all contributing ATWIR waste streams listed on the WSPF should also be indicated on the Summation of Aspects of AK Summary Report.

If there is no corresponding WIPP ID number listed in the ATWIR or if the ATWIR information is in error or no longer applies, enter None Available. If there is no corresponding WIPP ID number listed in the ATWIR, contact the AKE for assistance. (A copy of the ATWIR may be found in the WIPP Technical Library in the Skeen Whitlock Building.)

Line 11:

Enter the Summary Category Group identified in the AK Summary Report as representing this waste stream.

Line 12:

Enter the Waste Matrix Code (WMC) Group identified in the AK Summary Report as representing this waste stream. Use only WMC Groups identified in the *Waste Isolation Pilot Plant Hazardous Waste Facility Permit, Waste Analysis Plan* (WIPP-WAP).

Line 13:

Enter the name of the waste stream from the AK Summary Report.

Line 14:

Enter the waste stream description from the ATWIR (preferred) or AK Summary Report.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 15:

Check the appropriate box. [AK Summary Report]

If the answer to this question is NO, stop work and notify the CCP Program Manager immediately. This waste can not be disposed of at the WIPP Site.

Line 16:

Check the appropriate box.

CH=contact-handled TRU waste
RH=remote-handled TRU waste

[AK Summary Report for the waste stream identified above.]

Line 17:

Enter the number of standard waste boxes in this waste stream (current and projected). [AK Summary Report] If there are no standard waste boxes in the waste stream, N/A should be entered.

Line 17a:

Enter the number of standard large box 2s (SLB2s) in this waste stream (current and projected). [AK Summary Report] If there are no SLB2s in the waste stream, N/A should be entered.

Line 18:

Enter the total number of drums in the waste stream (current and projected). Enter the number of Ten-Drum Overpacks (TDOPs), 85-gallon drums and 100-gallon drums if applicable (current and projected). [AK Summary Report]

If there are no drums (e.g., only SWBs, SLB2s, or Canisters) in the waste stream, N/A should be entered.

Line 19:

Enter the number of canisters in this waste stream (current and projected). [AK Summary Report]

If there are no canisters in the waste stream, N/A should be entered.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 20:

List the TRU Waste BDR numbers used to support the completion of this WSPF. This list shall include every container and the associated BDRs from each process in the waste stream OR every container in the waste stream lot and the associated BDRs from each process used in that characterization (for example NDA, RTR, HSG, VE, etc). Reference may be made to the CIS (Attachment 3 and contents) (The CIS for the waste stream, or waste stream lot associated with the WSPF, is submitted as part of the WSPF package to DOE CBFO for approval).

Line 21:

List each EPA HWN that is present in the waste stream. Each EPA HWN must be listed in the WIPP Hazardous Waste Facility Permit, Attachment C, Table C-9, Hazardous Waste Permit Application, Part A. Each EPA HWN must be justified in the Waste stream specific AK Summary Report. The AKE should assist in this determination.

Line 22:

Enter all of the TRUCON Content Numbers, from the current revision of the content codes document applicable to this waste stream. [AK Summary Report]

Line 23: A-F

Reference all of the appropriate sections, figures, or pages in the current revision of the AK Summary Document (including the document title, number, revision number, and effective date) for this waste stream where the listed information can be found in the AK document.

Line 24:

List all of the waste stream certification procedures applicable to this waste stream. Include procedure numbers, revision numbers, titles, and effective date. This list should contain all revisions of a document that were used during the characterization of the waste. References may be made to the CIS, Attachment 3.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Line 25 A-F:

Reference all of the appropriate sections, figures, or pages in the current revision of the AK Summary Document (including the document title, number, revision number, and effective date) for this waste stream where information listed can be found in the AK document.

Line 26:

Check all that apply that describes the defense activities that generated the waste.
[AK Summary Report]

Line 27 A-L:

Sites must provide the appropriate references to the site-specific documents that contain documentation that is used to support the use of AK for TRU waste characterization. Items in this section must be given the same level of consideration as the items in the Required Program Information and Required Waste Stream Information sections. This information may either be inserted into the block or referenced as listed on a continuation sheet. The AKE should provide appropriate lists of documents for use in completing Line 27. Only those documents referenced in the AK Source Documents List in the Summation of Aspects should be included in these lists.

Using information from the AK Record or from a document that is traceable to the AK record, provide a reference for the following parameters:

- (A) Process design document (e.g., Title II Design).
- (B) Standard operating procedures, including procedure date and reference number, that may include a list of raw materials or reagents, a description of the process or experiment generating the waste, and a description of the process or experiment generating the waste, and a description of waste generated and how the wastes are managed at the point of generation.
- (C) Preliminary and final safety analysis reports and technical safety requirements.
- (D) Waste packaging records.
- (E) Test plans or research project reports that describe reagents and other raw materials used in experiments.
- (F) Site databases (e.g., chemical inventory database for Superfund Amendments and Reauthorization Act Title III requirements).
- (G) Information from site personnel (e.g., documented interviews).

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

- (H) Standard industry documents (e.g., vendor information).
- (I) Analytical data relevant to the waste stream, including results from fingerprint analyses, spot checks, routine verification sampling, or other processes that collect information pertinent to the waste stream. This may also include new information acquired apart from the confirmatory process, which supplements required information (e.g., visual examination not performed in compliance with the WIPP-WAP, radiography screening for prohibited items).
- (J) MSDSs, product labels, or other product package information.
- (K) Sampling and analysis data from comparable or surrogate waste streams (e.g., equivalent nonradioactive materials).
- (L) Laboratory notebooks that detail the research processes and raw materials used in an experiment.

Line 28:

List the most current revisions of the approved applicable procedure(s) by the title, number, revision number, and effective date in the appropriate block.

Line 29:

For a list of the waste characterization procedures used and date of respective procedures, see the list of procedures on the attached CIS.

Instructions for completing the Summation of Aspects of the AK Summary Report:

This summation should be as succinct as possible and consistent with the AK Summary Report.

Example:

SUMMATION OF ASPECTS OF AK SUMMARY REPORT: WASTE STREAM NTXXXXXXX

Overview

The overview is an executive summary of the summation. It should contain general information about where the waste was generated, where it is stored, reference to the WSPF number and the AK Summary Report from which the information is compiled, etc. In addition, the overview should contain summary level information that the waste stream is derived from defense related activities.

Waste Stream Identification Summary

This section should contain, as a table, the information identified below, if applicable.

Waste Stream Name
Waste Stream Number

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Dates of Waste Generation
Waste Stream Volume (current and projected by container)
Summary Category Group
Waste Matrix Code Group
Waste Matrix Code
TRUPACT-II Content code (TRUCON)
TRUPACT-III Content Code
ATWIR ID Number

Waste Stream Description and Physical Form

This section should contain information regarding what the waste consists of generally. For instance: the source of the waste - nonline laboratory trash that is heterogeneous debris and includes plastics, rubber, paper, glass, etc.

Point of Generation

Location

Specifically where the waste was generated:
Facility, description of the site, state, area designation, building number, production line, etc.

Area and/or Buildings of Generation

Short summary regarding the buildings or areas or productions lines, etc. that generated the waste.

Generating Processes

Description of Waste Generating Processes

This section should be a more detailed description of where and how the waste is generated. It can be building by building, process line by process line, or any other grouping that makes sense. These descriptions should be complete enough for understanding yet still striving for brevity.

Waste Stream Material and Chemical Inputs

A Table of Chemicals, for which an EPA HWN has been assigned. Include at least one identified use for each chemical.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

RCRA Determinations

Historical Waste Management

The Historical Waste Management section is used to explain site policies or previous RCRA designation of the waste and how CCP uses those determinations. Explanations of how the site physically managed the waste and discussion of waste tracking or other management programs are optional. Include a discussion of duplicated CBFO approved waste streams generated under other certified programs.

Hazardous Waste Determinations

The AKE should assist in the hazardous waste determination. Include discussions in appropriate section below for instances where EPA HWNs are added as a result of confirmation activities.

The following text should be used to begin the discussions of ignitable, corrosive, and reactive characteristics.

Ignitability, Corrosivity, Reactivity

The waste material in this waste stream does not meet the definition of ignitable, corrosive, and reactive as defined in 40 CFR 261.21.

The waste in this waste stream is not liquid and does not contain unreacted corrosive chemicals; therefore, it does not meet the definition of corrosivity found in 40 CFR 261.22.

The waste material in the waste stream does not meet the definition of reactivity in 40 CFR 261.23. The materials are stable and will not undergo violent chemical change without detonating. The materials will not react violently with water, form potentially explosive mixtures with water, nor generate toxic gases, vapors, or fumes when mixed with water. Include other text such as the absence of sulfides and cyanides as appropriate.

Provide adequate detail to describe the absence of ignitable, corrosive, or reactive waste in the waste stream. Ensure the discussion closes with a statement such as, "The containers in the waste stream will be evaluated in accordance with the WIPP-WAP using radiography (and/or VE) prior to shipment to ensure the waste is not ignitable, reactive, or corrosive.

Ignitable (D001) wastes are prohibited from disposal at WIPP. Any potential D001 wastes in the waste stream must be evaluated and a determination of whether or not to apply the D001 number must be made.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Special care must be taken to address items such as metal powders which are not normally thought of as ignitable.

Some chemicals, to which the D001 EPA HWN is applied, may be identified in the AK. The D001 number is applied due to ignitability. The SPM must be able to address the ignitability of these wastes and determine that the characteristic of ignitability does not apply.

If the SPM can not positively state at the conclusion of this section that “The waste number for ignitability (D001) does not apply to this waste stream,” contact the CCP Project Manager.

Corrosive (D002) wastes are prohibited from disposal at WIPP. Any potential D002 wastes in the waste stream must be evaluated and a determination of whether or not to apply the D002 number must be made.

If the SPM can not positively state at the conclusion of this section that “The waste number for Corrosivity (D002) does not apply to this waste stream,” contact the CCP Project Manager.

Reactive (D003) wastes are prohibited from disposal at WIPP. Any potential D003 wastes in the waste stream must be evaluated and a determination of where or not to apply the D003 number must be made.

If the SPM can not positively state at the conclusion of this section that “The waste number for Reactivity (D003) does not apply to this waste stream,” contact the CCP Project Manager.

Toxicity Characteristic

Determine if the waste in this waste stream meets the definition of toxicity as defined in 40 CFR 261.24. For each chemical listed in CFR 261.24, determine if the EPA HWN should be applied to the waste stream.

If it is not possible to identify a specific source of the chemical, but the determination is made to apply the number, state that the number is being applied based on the information available.

Listed Waste

F-Listed Waste

Determine if the waste in this waste stream meets the requirements for listing as an F-Listed (Hazardous Waste from Non-Specific Sources) as defined in 40 CFR 261.31. For each chemical listed in CFR 261.31, determine if the EPA HWN should be applied to the waste stream.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

If it is not possible to identify a specific reason to apply the number for a chemical, but never the less the determination is made to apply the number, state that the number is being applied based on the information available.

K-Listed Waste

K-Listed wastes (Hazardous Waste from Specific Sources) are unlikely in waste to be shipped to WIPP. If K wastes are included, document as below for P- and U-Listed wastes.

P- and U-Listed Wastes

P- and U-Listed wastes are lists of chemicals that if present in the waste as pure un-used commercial chemical products would require the application of the EPA HWN.

Determine if the waste in this waste stream meets the requirements for listing as a P- or U-Listed as defined in 40 CFR 261.33. For each chemical listed in CFR 261.33, determine if the EPA HWN should be applied to the waste stream.

If it is not possible to identify a specific reason to apply the number for a chemical, but never the less the determination is made to apply the number, state that the number is being applied based on the information available.

Hydrofluoric acid (U134) and Beryllium (P015) are of special interest and must be addressed in every WSPF.

Polychlorinated Biphenyls

Evaluate the presence of Polychlorinated Biphenyls (PCBs) in the waste.

Prohibited Items

Include the appropriate prohibited items discussion from the AK Summary Report including a discussion as to how the prohibited items will be identified and remediated prior to shipment (such as radiography or VE).

Method for Determining Waste Material Parameter Weights per Unit of Waste

Describe the method used for determining waste material parameter weight estimates per unit of waste and include the WMP estimates table.

List of Any AK Sufficiency Determinations Requested for the Waste Stream

List applicable AK sufficiency determinations.

Attachment 2 – CCP Waste Stream Profile Form (Example) (Continued)

Transportation

Briefly discuss DOE/WIPP-02-3122, *Transuranic Waste Acceptance Criteria For The Waste Isolation Pilot Plant* (WIPP-WAC) transportation requirements as they pertain to identified TRUCON codes as dictated by the waste stream.

Beryllium

Address the WIPP-WAC requirements for beryllium.

Radionuclide Information

Present the two most prevalent isotopes expected from the waste stream (CH only). Insert radionuclide table from the AK Summary Report.

Include a brief discussion on payload management per the WIPP-WAC, Appendix E.

Source Documents

Insert reference list from AK Summary Report.

Revision to the Waste Stream Profile Form Package

If a revision to the WSPF Package is needed, a revised WSPF is created. Reasons for revising the WSPF Package include:

- Addition of EPA HWNs
- Application of additional TRUCON Content codes
- Addition of material parameter weight estimates per unit of waste

Attachment 3 – CCP Characterization Information Summary Cover Page (Example)

Waste Stream #: _____ Lot #: _____

AK Expert Review: _____ Date: _____

SPM Review: _____ Date: _____

SPM signature certifies that through Acceptable Knowledge testing and/or analysis that the waste identified in this summary is not corrosive, ignitable, reactive, or incompatible with the TSDF.

A summary of the Acceptable Knowledge regarding this waste stream containing specific information about the corrosivity, reactivity, and ignitability of the waste stream is included as an attachment to the Waste Stream Profile Form. By reference, that information is included in this lot.

List of procedures used:

Attachment 5 – CCP RTR/VE Summary of Prohibited Items (Example)

CCP RTR/VE Summary of Prohibited Items

Waste Stream
 Number: _____

Lot(s)#: _____

Container Number	RTR Prohibited Items ^{a,b}	Visual Examination Prohibited Items ^{a,b}	Does the Physical Form of the Waste Match the Waste Stream Description as Determined by AK
a. See Batch Data Reports b. If AK has assigned U134 to this waste stream, then any liquids in these containers are prohibited items (not acceptable by the TSDF)			
Justification for the selection of RTR and/or VE:			

Site Project Manager Signature

Printed Name

Date