

Waste Planning Checklist	Manual Document	Operations
	Page	TFC-OPS-WM-C-01, REV B-1
	Issue Date	1 of 6
		April 24, 2019

Ownership matrix	RPP-27195
----------------------------------	------------------

1.0 PURPOSE AND SCOPE

(7.1.1, 7.1.2, 7.1.4, 7.1.5, 7.1.4.)

This procedure describes the process for completing and approving a Waste Planning Checklist (WPC) for work activities associated with the Tank Operations Contractor (TOC). This procedure applies to generators, field work supervisors (FWS), planners, and Waste Technical Services (WTS) personnel that support work planning for Tank Farms, Effluent Treatment Facility and 222-S Laboratory who are involved in the development of the WPCs. This procedure does not apply to normal processing of PPE/step off pad waste, nor management of waste within the tanks. This procedure does not apply to transuranic (TRU) waste, which will be addressed on a case-by-case basis by a WTS TRU subject matter expert.

The WPCs are used to ensure sufficient information is available to perform point of generation designations, and provide waste management instructions for accumulation, segregation, packaging and storage of waste in compliance with state and federal regulations, and to ensure the waste meets the treatment, storage, or disposal (TSD) receiving facility's acceptance criteria for packaged waste.

The WPC is used to incorporate waste management requirements of TFC-PLN-33, TFC-OPS-MAINT-01, and WRPS waste management procedures. This procedure is implemented in accordance with the core functions and guiding principles of TFC-PLN-41. The WPC identifies the facility specific waste management procedures.

2.0 IMPLEMENTATION

WPCs that are initiated after the publication date of this procedure must be developed using this procedure.

WPCs that are initiated prior to the publication may be processed using existing methods in previous revisions.

3.0 RESPONSIBILITIES

The waste generator is responsible for identifying the work activities that will generate waste and provides the necessary information to the planner for initiation of the WPC. The planner populates Section A of the WPC by following the Waste Planning Checklist Instructions provided for Site Form A-6002-848. Once Section A has been populated, the WPC is submitted to the WTS point of contact (POC). WTS is responsible for reviewing the WPC, evaluating the waste generated designating waste at the point of generation, identifying waste types, providing waste minimization and waste management instructions, and approving the WPC where waste is identified.

Additional responsibilities are provided in Section 4.0.

4.0 PROCEDURE

(7.1.1, , 7.1.4, 7.1.5, 7.1.5)

4.1 Planning

Work instructions, and procedures are used in the planning process to identify waste generated during work activities. The checklist ensures that generators and planners provide the necessary information for WTS personnel to designate waste and provide proper waste disposition instructions to the generator. The WPC must be submitted before the work activity start date and shall be completed and approved for the work package prior to waste generation.

The WPC provides a means to document the solid waste generation process, waste minimization directions, waste management and disposition instructions, as well as any special instructions related to ensuring that the waste meets the treatment, storage, and disposal facility waste acceptance criteria requirements.

4.2 Non-Routine Work Activities

Some examples of non-routine work activities may include the removal of jumpers, pump replacements, and HEPA filter replacements. A WPC must be submitted for non-routine work activity using Site Form A-6002-848, "Instructions," and Site Form, A-6002-848, "Waste Planning Checklist."

Planner/Generator/
FWS

1. Determine if waste will be generated based on planned work activities.
2. If utilizing a generic WPC, go to Section 4.3, Step 3a of this procedure.
3. If waste will be generated, follow Site Form A-6002-848 instructions to complete Part A of site form, A-6002-848.
4. Provide site form A-6002-848 with Part A completed to WTS.
5. For work packages being processed through WORA, attach the completed WPC in the WORA Checklist application, then submit it to WTS.
6. For all other work packages, send the WPC directly to WTS for review and approval.
7. If no waste will be generated, follow Site Form A-6002-848 instructions to complete WPC, and upload into the WORA.

NOTE: SWITS can be used as product evaluation tool for determining designations at the point of generation and proving waste management instructions in the WPC.

WTS

8. Review the information in Section A of the WPC, follow Site Form A-6002-848 instructions to complete Section B of the form to provide waste management disposition instructions.

- | | |
|---------------------------|--|
| Planner | <ul style="list-style-type: none"> a. For work packages utilizing WORA attach the completed WPC in the WORA application, then approve the WORA checklist. b. For other work packages, approve and send the completed WPC back to the Planner. |
| Peer Reviewer | <p>9. If Secondary review is selected in Section B, #5, select WTS WORA review.</p> <ul style="list-style-type: none"> • The peer review is performed by someone other than the WPC originator. <p>10. Provide peer review, as necessary, and complete WORA approval.</p> <ul style="list-style-type: none"> a. Notify WPC originator if changes are necessary. <p>11. Originator update WPC as applicable in accordance with Section 4.4.</p> |
| Planner/Generator/
FWS | <p>12. Ensure a current WPC is in WORA and included in the work packages.</p> <ul style="list-style-type: none"> a. If the work scope changes (regarding waste composition, MSDS/SDS, or significant change in quantity) at any time after the WPC has been completed, contact WTS to determine if an updated WPC is required. b. If required, update the WPC and resubmit to the WTS representative for update and revision as applicable. |
| Generator/FWS | <p>13. Review WPC during the pre-job.</p> <p>14. Ensure proper waste segregation and packaging in accordance with the WPC and facility specific procedures.</p> |

4.3 Routine Work Activities

Routine work activities generate the same type of waste on a routine basis. Generic WPC can be used for preventive maintenance work activities, recurring routine work activities, and work activities that are directed by a procedure. Planners are encouraged to utilize generic WPCs. One generic WPC may be used for multiple work packages as long as they include the same MSDS/SDS, similar waste description and work activities. Generic WPCs are issued up to one year in advance and expire the last day of the calendar year.

NOTE: Work activities that are not processed through WORA, and do not generate waste, do not require a WPC.

- | | |
|---------|--|
| Planner | <ul style="list-style-type: none"> 1. Determine if waste will be generated. 2. Determine if a WPC is available on the Waste Services web page for the facility specific generic WPC. |
|---------|--|

3. For WPCs currently available on the generic WPC web page, select the most appropriate generic WPC for the work being performed, complete all blank areas in Section A, save the WPC as a pdf file and place a copy in the work package.
 - a. If WORA is used for the work package, attach the selected WPC in WORA.
 - b. If a Generic WPC is not available, follow Site Form A-6002-848 instructions to complete Section A of site form, A-6002-848.
 - c. Send the WPC directly to WTS for completion and approval.
 - d. Once the WPC is approved, the POC will then upload the signed copy to Waste Services web page and send a copy to the Planner. The Planner needs to include the completed WPC in the work package.

- WTS
 4. For generic WPCs in WORA, review and approve in WORA as applicable.
 - a. For newly generated generic WPCs, review the information in Section A, and follow Site Form A-6002-848 instructions to complete Section B of the WPC.
 5. Notify Planner WPC is available on the web page.

- Planner/Generator/
FWS
 6. If the work scope changes (regarding waste composition, MSDS/SDS, or significant change in quantity) at any time after the WPC review is completed in WORA, contact WTS to determine if an updated waste designation is required, or change to the WPC is required.
 - a. If required, update the WPC and resubmit to the WTS POC for revision and approval.
 7. Ensure that the blanks are completed and a copy of the WPC is placed into applicable work packages.
 - a. Mark NA in any blanks if not applicable.

- Generator/FWS
 8. Review WPC prior to the start of work at pre-job planning meeting.
 9. Ensure proper waste segregation and packaging in accordance with the WPC and facility specific procedures.

4.4 **Change Control** (7.1.1, 7.1.4)

If changes are made to work activities (regarding waste composition, MSDS/SDS, or significant change in quantity) that affect waste generation after the WPC is completed, the form must be reviewed and revised to reflect the changes. WPCs, with the exception of Generic WPCs are valid for one year from the date of issue, and shall be reviewed and revised if the expiration date has been exceeded. Generic WPC expire at the end of the calendar year in which they are approved. WPCs, which identify no waste to be generated, will expire two years from the date of issue.

- | | |
|---------------------------|--|
| Planner/Generator/
FWS | 1. Contact WTS WPC originator to determine if a revision is required.

a. If major revision is required, complete the changes in Section A and email the WPC to WTS. |
| WTS | 2. Review changes and update the point of generation waste designation, if needed, and adjust the WPC instructions as appropriate.

a. Update the Revision Number at the top left corner of the WPC.

b. Insert a space in Section B above 1.a., enter Revision #, initials, date, and a brief description of the changes.

c. Save WPC with revision number in file name (e.g., WPC-123456 Rev 1, Change AP Farm filters), and print, sign, and scan a pdf copy to the Planner. |
| Planner | 3. If work package was processed in WORA, upload the revised WPC and place a copy in the work package.

a. For all other work packages, place a copy of the revised WPC in the work package. |
| Generator/FWS | 4. Review WPC in prejob.

5. Ensure proper waste segregation and packaging in accordance with the WPC and facility specific procedures. |

4.5 Waste Characterization

(7.1.2, 7.1.4)

Some waste cannot be fully characterized until it is containerized. If changes are made to a WPC that has previously been signed and submitted by WTS, a revision is required. These waste streams will be reviewed to ensure appropriate packaging and segregation. For waste designation accuracy and proper disposition, the waste inventory sheet is used along with generator information provided to WTS to perform the final waste characterization in accordance with WAC-173-303 and TFC-PLN-33 requirements. Additional information may be required based on waste acceptance criteria, profiles, and shipping authorization documents. The final transportation and marking requirements are established prior to shipments and will be provided by the responsible shipper in accordance with TFC-OPS-WM-C-19 and TFC-OPS-WM-C-20.

5.0 DEFINITIONS

No terms or phrases unique to this procedure are used.

6.0 RECORDS

The following records are generated during the performance of this procedure:

- Waste Planning Checklist, included in Work Package
- Generic Waste Planning Checklist in Waste Services Shared Area (IDMS).

The record custodian identified in the Company Level Records Inventory and Disposition Schedule (RIDS) is responsible for record retention in accordance with TFC-BSM-IRM_DC-C-02.

7.0 SOURCES

7.1 Requirements

- 7.1.1 TFC-BSM-IRM_DC-C-01, "Document Control."
- 7.1.2 TFC-OPS-MAINT-C-01, "Tank Operations Contractor Work Control."
- 7.1.3 TFC-PLN-33, "Waste Management Basis."
- 7.1.4 TFC-PLN-41, "Integrated Safety Management System Description."
- 7.1.5 WAC-173-303-070, Washington Administrative Control, "Designation of Dangerous Waste."

7.2 References

- 7.2.1 TFC-BSM-IRM_DC-C-02, "Records Management."
- 7.2.2 TFC-OPS-WM-C-19, "Onsite Hazardous Material Shipments."
- 7.2.3 TFC-OPS-WM-C-20, "Offsite Hazardous Material Shipments."