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SUBJECT AREA: Waste Certification	EFFECTIVE DATE: 2/8/03	Page 1 of 8
DOC TYPE: Procedure	PREPARER/POC: T. C. Tharp	
TITLE: GENERATOR REQUIREMENTS FOR TRANSFERRING WASTE	APPROVED BY/DATE: Mike West 1/8/03 [Approval Signature On File]	

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REVISION LOG		
Revision Number	Description of Changes	Pages Affected
0	<p>Intent change.</p> <p>Changed number and headings to bring document up-to-date with Performance Documents Process. Clarified that scope does not include transfers to EMWMF. Changed “Generator Services Group” to “Waste Acceptance Group” as applicable throughout. Clarified that generators should get barcode labels from Site Point of Contact for the Waste Information Management System. Added requirement for one UCN-2109 Form per container of radioactive (LLW, MLLW, or TRU) waste. Deleted reference to 180-day limit to responsibility by generator.</p> <p>This procedure replaces WM-A-2001, Rev. 1, <i>Generator Requirements For Transferring Waste</i>.</p>	All

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PURPOSE To provide instructions to generators for transferring waste to Bechtel Jacobs Company LLC (BJC) waste management organizations (including waste disposition and waste operations subcontractors), in accordance with waste acceptance criteria, as specified in Oak Ridge Reservation (ORR) Master Profiles.

SCOPE Applies to the transfer of solid and containerized liquid waste to BJC waste management organizations (i.e., waste disposition and waste operations subcontractors) on the ORR. Does not apply to waste transfers at the Paducah or Portsmouth Gaseous Diffusion Plants. Does not apply to the transfer of waste to the Environmental Management Waste Management Facility or to the Liquid and Gaseous Waste Operations organization at Oak Ridge National Laboratory.

TRAINING Individuals involved in waste transfer/certification are required to meet the applicable training requirements of the [Training Matrix for Positions Critical to the Oak Ridge Reservation Waste Certification Program](#).

OTHER DOCUMENTS NEEDED

- [ORR Master Profiles](#)
- BJC/OR-57, *Oak Ridge Reservation Waste Certification Program Plan*
- BJC-WM-2010, *Procurement and Inspection of Items Critical to the Oak Ridge Reservation Waste Certification Program*
- [Generator Entry System \(GES\)](#) software
- Form UCN-2109, Waste Item Description, and applicable Attachments (this Form set is available only in the GES software)
- [Form BJCF-349](#), Waste Certification Variance Request
- [Form BJCF-398](#), Process Knowledge (PK) Documentation

WHAT TO DO **A. Identify the Applicable Master Profile**

Generator **1.** Identify the applicable Master Profile for the waste stream to be transferred. Become knowledgeable of the requirements of the Master Profile. Contact the respective [BJC subcontractor Waste Acceptance Group \(WAG\)](#) for assistance in identifying a Master Profile, if necessary.

WAG **2.** Assist the Generator, as requested, in identification of the appropriate Master Profile for the waste stream. Provide technical assistance to clarify the requirements of the Master Profile.

NOTE: If the Master Profile cannot be identified for the Generator’s waste stream, the respective WAG, in consultation with the applicable BJC Waste Type/Project Manager [or Subcontract Technical Representative (STR), where applicable], will assist the Generator in identifying waste characterization and packaging requirements until enough information is available to make a Master Profile determination.

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B. Characterize, Package, and Certify Waste

Generator

1. Identify and procure services and materials for waste characterization, packaging/containerization, and any other critical items based on the requirements of the Master Profile. Request container barcode labels from the site point of contact for the Waste Information Management System (WIMS). These barcodes should only be used for containers/items that will be tracked in WIMS.

NOTE: Waste containers and other critical items needed for transfer of radioactive waste and/or nuclear materials are subject to stringent quality assurance (QA) requirements, including requirements for design control, supplier evaluation, and receipt inspection. BJC/OR-57, *Oak Ridge Reservation Waste Certification Program Plan*, BJC-WM-2010, *Procurement and Inspection of Items Critical to the Oak Ridge Reservation Waste Certification Program* (or equivalent generator process), the applicable Master Profile, and the Generator's corporate QA program should be consulted for specific requirements.

2. Verify that the container and associated hardware (e.g., rings, fasteners, and gaskets) appear to be in good condition. At a minimum, the container should be empty prior to use and free from obvious defects, cracks, holes, bulges, or dents; significant corrosion; missing rings or bolts; or other damage that could compromise container integrity.
3. Characterize, control, package (as applicable), and label the waste in accordance with the Master Profile requirements.
4. Complete the Data Package [including preparing UCN-2109 Form set by using the most current version of the Generator Entry System (GES) software] and other documentation as specified in the Master Profile.

NOTE: Generators can obtain access and installation instructions for GES by downloading from [WIMS](#). Once installed, the Help menu at the right end of the menu bar in the GES software provides field-by-field guidance for completing the UCN-2109 Form set.

- a. For waste being transferred according to a low-level waste (LLW), mixed low-level waste (MLLW), hazardous waste, transuranic (TRU) waste, or containerized waste waters Master Profile, certify that the requirements of the Master Profile (in effect at the time of certification) are met. For radioactive waste (LLW, MLLW, TRU) complete one UCN-2109 Form set for each container, unless an approved variance from this requirement exists for the given waste stream. Using the GES software, submit the UCN-2109 Form set information electronically. Print a hardcopy of the completed UCN-2109 Form set using GES, complete the required signatures, and forward the signed original UCN-2109 Form set with the complete data package as required by the Master Profile to the respective WAG.

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- b. For waste intended for on-site sanitary/industrial landfill (LF) disposal, affirm that the requirements of the applicable sanitary/industrial waste Master Profile are met. Using the GES software, complete and print a hardcopy of the UCN-2109 Form, or if the waste is included within a “blanket 2109” make a copy of the applicable UCN-2109 Form. Perform internal review of the completed form against the applicable Master Profile in accordance with generator procedures/process. Do not submit the UCN-2109 Form electronically in GES for sanitary/industrial waste. For first time submittal of a UCN-2109 for sanitary/industrial waste, forward for LF WAG review a copy of the completed UCN-2109 Form by fax to the LF office 8 hours (minimum) in advance of expected delivery.

NOTE: It is important to give the LF WAG as much advanced notice as possible (e.g., construction/demolition projects should include a LF representative in the planning stages to reduce possible delivery/acceptance delays and to determine whether a Special Waste Evaluation Request with TDEC will be necessary).

- 5. When notified by the respective WAG of nonconformances with a Master Profile, conduct corrective actions as needed to meet the requirements of the Master Profile.

C. Variance Process

NOTE: In certain circumstances (health and safety concerns, impending 90-day storage limitations, etc.), a Generator, waste packager, or waste certifier may not be able to fully provide certification for a waste or may not be able to meet every requirement of the Master Profile or this procedure. In such cases, BJC or its subcontractor may conditionally accept waste consistent with storage facility authorization bases and permits. The stipulated conditions, duration, and expiration date of the variance will be specified on the Variance Request form.

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| Generator | 1. Complete, sign, and submit Form BJCF-349, Waste Certification Variance Request, to the respective WAG. |
| WAG | 2. Review completed variance request and, after consultation and signature by the applicable BJC Waste Type/Project Manager (or STR as applicable) and BJC Waste Certification Official, notify the Generator whether the request is approved or denied. |
| Generator | 3. IF the variance request is approved, THEN sign the concurrence line on the bottom of the approved BJCF-349, and submit the signed Variance Request form with the original UCN-2109 Form set and data package to the respective WAG. |

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4. **IF** the variance request is denied, **THEN**
take measures to ensure the waste conforms to an existing Master Profile, or submit a revised Variance Request with different conditions, timetables, and/or exceptions. (Continue with Step C.2.)

D. Transferring LLW, MLLW, Hazardous Waste, TRU Waste, or Containerized Wastewaters

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| Generator | 1. Ensure waste packages are available for pickup at the location specified on the UCN-2109 Form or, if the waste has been moved, at an alternate location specified in an official notice of relocation. |
| WAG | 2. Provide the Generator with an e-mail or other written notification when the waste has been approved for acceptance. |
| | 3. Provide the Generator with an e-mail or other written notification when the waste has been transferred from the Generator's location to a BJC (or subcontractor) treatment/storage/handling facility. |

E. Transferring Sanitary/Industrial Waste

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| Generator | 1. Deliver the waste to the Y-12 Landfill. |
| | 2. Attach a paper copy of the UCN-2109 Form to each delivery. This form is the primary "ticket" to gain access to the landfill. Per the instructions in the Master Profile, additional information (attachments) may be required. For waste generated in a radiologically controlled area, evidence of a health physics survey is required; this is usually in the form of a "green tag." For waste containing respiratory hazards there are attachments as outlined in Master Profile S-040. As part of the affirmation to proper characterization, if process knowledge is used, a completed BJCF-398 form, or equivalent form, is required. |

F. Waste Verification and Responsibilities for Non-Compliant Waste

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| All Personnel | 1. Notify the appropriate internal QA and management personnel <u>and</u> the BJC Waste Certification Official of all nonconformances or issues that have the potential to detrimentally affect waste certification, and the resulting disposition of the issue. |
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NOTE: All waste transferred to BJC or its subcontractors is subject to a waste verification program that may include intrusive and nonintrusive examination and sampling.

For sanitary/industrial waste, the waste acceptance program may include a request/requirement by the Landfill WAG for written evidence of the Generator's affirmation process towards meeting the waste profiles; assessment by the Landfill WAG may also occur as part of the Landfill QA program.

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The Generator is responsible for meeting the waste acceptance criteria (i.e., Master Profile) in effect at the time of transfer. The Generator has no further responsibilities for meeting future revisions to the Master Profile should the Master Profile change after the time of waste transfer.

However, the Generator will continue to have responsibility for the waste should it be determined that the waste does not meet waste acceptance criteria that were in effect at the time of waste transfer.

RECORDS

The following records are generated by this procedure:

- UCN-2109 Form set and associated data package, including a Process Knowledge documentation form and/or variance form as applicable, and any other forms required by the applicable Master Profile

SOURCE DOCUMENTS

- BJC/OR-57 (latest revision), *Oak Ridge Reservation Waste Certification Program Plan*

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Attachment A
DEFINITIONS/ACRONYMS
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Acceptance - The process by which BJC (or its subcontractor) will take possession of waste from a Generator for treatment, storage, and/or disposal. This process ensures that any waste accepted meets applicable waste acceptance criteria.

BJC - Bechtel Jacobs Company LLC

Blanket 2109 - The term applied to a specific completed UCN-2109 form set that may be used for multiple transfers of the same recurring waste stream. The form must be approved by the respective WAG and is good for a period defined by the WAG (e.g., blanket 2109s written for sanitary dumpsters are typically good for a one-year period).

Certification - A process by which a waste Generator formally confirms that a given waste or waste stream meets the waste acceptance criteria of the facility to which the Generator intends to transfer waste for treatment, storage, or disposal.

Conditional Acceptance - The temporary possession of waste by BJC (or its subcontractor) received from a Generator until it can be verified that the waste meets applicable acceptance criteria. While in conditional acceptance, the waste remains the responsibility of the Generator although BJC (or its subcontractor) maintains the waste in a regulatory compliant manner.

Data Package - The UCN-2109 Form, applicable Attachments, process knowledge forms, analytical data reports, and auxiliary information prepared to document that waste meets waste acceptance criteria.

Generator - The person or entity producing a waste that requires treatment, storage, and/or disposal. The Generator may be either BJC, another DOE prime contractor on the Oak Ridge Reservation, or a direct or tiered subcontractor to a DOE prime contractor.

GES - Generator Entry System

Hazardous Waste - Waste as defined in Chapter 261.3 of the *Resource Conservation and Recovery Act*, as amended. Wastes containing polychlorinated biphenyls, asbestos, or other such toxic components regulated under the Toxic Substances Control Act are also included.

LF - Landfill

Low-Level Waste (LLW) - All radioactive waste not classified as high-level waste, spent nuclear fuel, transuranic (TRU) waste, uranium mill tailings, mixed waste, or 11e(2) by-product material.

Master Profile - A 5- to 9-page set of acceptance requirements for an individual waste stream or group of waste streams, developed in accordance with the waste acceptance criteria of off-reservation treatment, storage, or disposal facilities or on-reservation treatment/disposal facilities. The Master Profile includes requirements for chemical, physical, and radiological limits for the waste stream; characterization and packaging requirements; and other information required to facilitate treatment, storage, and disposal of wastes.

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Mixed Low-Level Waste (MLLW) - LLW determined to contain both a hazardous component subject to the Resource Conservation and Recovery Act (RCRA), as amended, and a radioactive component subject to the Atomic Energy Act, as amended, that shall be managed in accordance with the requirements of RCRA and DOE Order 435.1, *Radioactive Waste Management*. MLLW also includes LLW containing polychlorinated biphenyls, asbestos, or other such regulated toxic components managed in accordance with the Toxic Substances Control Act.

ORR - Oak Ridge Reservation

QA - Quality Assurance

Radioactive Waste - Waste that is managed for its radioactive content, including solid, liquid, or gaseous material that contains radioactive nuclides regulated under the Atomic Energy Act, as amended, and of negligible economic value considering costs of recovery.

Sanitary/Industrial Waste - Waste that is not regulated under RCRA or TSCA and meets radiological free release criteria under DOE Order 5400.5, *Radiation Protection of the Public and the Environment*. May also include waste that is specifically approved for on-site landfill disposal by TDEC under a Special Waste Request.

STR - Subcontract Technical Representative

Transuranic (TRU) Waste - Radioactive waste containing alpha-emitting radionuclides having an atomic number greater than 92, half-lives greater than 20 years, and activities greater than 100 nCi/g.

UCN-2109 Form set - The set of forms that typically include the Waste Item Description (UCN-2109 Form) and attachments. These forms are completed by the Generator, with technical assistance as needed from the respective WAG, and when completed, are provided to the WAG by the Generator with the associated waste container.

WIMS - Waste Information Management System

Waste Acceptance Criteria - The requirements, terms, and conditions under which a facility will accept waste from a generator for treatment, storage, and/or disposal.

Waste Acceptance Group (WAG) - The cognizant BJC or subcontractor waste acceptance organization. [Points of contact](#) for waste acceptance.

Waste Characterization - The identification of waste composition and properties, whether by review of process knowledge, or by nondestructive examination, nondestructive assay, or sampling and analysis, to determine the appropriate storage, treatment, handling, transportation, and disposal requirements.

Waste Container - A receptacle for waste, including any liner or shielding material that is intended to accompany the waste in disposal.