



# Waste Operations

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**IEI**

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- Lines of Inquiry (LOIs)
- Outside LOIs
  - Non-hazardous facilities
  - Bulk Survey for Release
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# Waste Operations

Facility security, fencing, and signs

Waste acceptance criteria compliance

Profile approval and verification

Waste receipt and traceability

Container storage

Waste processing

- **Different – incinerator ash**
- **Less - compaction**
- **more – solidification**

32 LOIs

- **Information sheet = 5**
- **Dynamic = 5**
- **Not Applicable = 1 (non-radiological facilities)**
- **Remote = 14**
- **Static = 7**



# Audit Preparation

Understand the waste information flow for the facility and what paperwork is completed

- Profile submittal, review, and approval
  - Sampling?
- Shipment submittal, review and approval
- Shipment receipt
  - Sampling?
- Container movements
- Waste processing
  - Types and regulations
- Land Disposal Restriction (LDR) Testing/sampling
- Final disposition
  - On-site landfill
  - Ship to other facility



# Audit Preparation for Remote Audits



Cannot walk down waste processing and storage areas



Pictures or videos can be requested



Rely on completed paperwork to ensure work conducted per procedures





# Audit Preparation: Remote

- Identify the documents you need
  - Procedures and/or forms uploaded to DOECAP site can be out-of-date
- Communicate with point-of-contact
  - Be as specific as you can
    - Reference procedures and form numbers (e.g., Waste profile [form WP-2021] per WP-003, *Waste Profiling*, Inventory per IN-002, *Waste Tracking*)
- Give your self time to review information

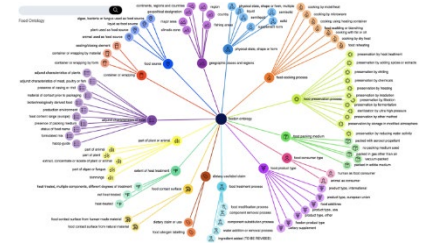


# Audit Preparation: Remote

- Use virtual platforms to view databases and electronic tracking systems
  - Screenshots can be used also
- Use inspection results and/or photographs for container and storage area compliance
- ½ hour interview time
  - Close old findings?
  - Questions arising from your document reviews
  - Any outstanding requests
  - Set up time for one-on-one interviews/screen sharing



# Follow the waste to see where it goes



- Waste In –Waste Managed –Waste Out
- Received waste meets requirements
  - Waste Codes, profile
- Storage Containers
  - Condition, labeled, secondary containment, aisle space
- Central Accumulation Areas
  - Satellite Accumulation Areas, Universal Waste Collection Areas
- Treatment process:
  - Sort/Segregation, Incineration, stabilization, etc.
- Disposal and/or shipped offsite
  - LDR treatment standards achieved prior to land disposal





# Future Emphasis?

- Pick one Waste Operation
  - Waste process most requested by DOE?
  - Profile review, receipt, storage, treatment, disposal, tracking
- Walk down process
  - Follow procedure step-by-step
  - Worker knowledge/training
- Very site-specific LOIs



# Outside LOIs

- Non-hazardous Facilities
  - Most LOIs are based on 40 CFR requirements (RCRA hazardous waste) so try to verify LOI “intent” and link to Radioactive Material License (RML) if possible
  - RML usually contains training, container storage, and waste management conditions but you may need to request the application for specifics
- Bulk Survey for Release
  - Released waste disposed at local approved landfills



# Issues

- Paperwork
  - Not signed/dated
  - Incomplete
- Work not performed to procedure
  - Are the workers wrong or is the procedure?
- Non-conformance timing and need
  - Upon receipt, after 15 days, etc.
  - Minor typographical error, graded approach
- Don't forget to mention the positives



# Training/Qualifications

- Questioning mind
  - Ask the question, question the answer
- Auditor training
  - How not to ask yes/no questions
  - How to listen
  - You don't have to like it for it to be compliant
  - Requirement vs. best management practice
  - Opinion vs. fact



# Questions?

