

# The DOECAP Remote Audit

## Navigating the DOECAP Checklist

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August 12, 2022



# Key Requirement

## **Access to Internet DOECAP Resources:**

### **DOECAP Audit Report Site:**

<https://doecapauditreports.projectenhancement.com/pages/AuditInfo.aspx>

### **Project Enhancement DOECAP SharePoint Site :**

<https://projectenhancementcorp.sharepoint.com/sites/projects/AU21/DOECAP/SitePages/Home.aspx>

# DOECAP AUDIT REPORTS WEBSITE

Department of Energy  
DOECAP Audit Reports Website  
For Documenting and Creating DOECAP Audit Reports

Audit Information Findings Observations Close Finding Site Sheets Checklist Evaluation Form Cost Tracking Audit Report Logout

Logged In As: Patricia Hunt

Audit Facility:

## Audit Information

**Audit Program:**

**Audit Type:**

**Audit Location:**

**City:**

**State:**

**Report Type:**

**Starting Date:**

**Ending Date:**

## Audit Scope

- Quality Assurance Management Sys (QA)  Complete  Alternate
- Sampling & Analytical Data Quality (SA)  Complete  Alternate
- Waste Operations (WO)  Complete  Alternate
- Environmental Compliance & Permitting (EC)  Complete  Alternate
- Radiological Control (RC)  Complete  Alternate
- Industrial & Chemical Safety (IC)  Complete  Alternate
- Transportation Management (TM)  Complete  Alternate

\*Closed refers to those findings listed in prior audits which objective evidence has demonstrated there is no longer a deficiency.

\*\* Open identifies those findings from prior audits which remain open at the time of this audit. An open item may be elevated to a higher priority if not properly addressed. Such instances will be accounted for in both Open and Priority columns.

# Project Enhancement SharePoint Site



## Home

ASP Annual Training  
Workshop Presentations

Calendar

Lab Toolbox

Resources

TSDF Toolbox

Facility Usage Query link

Patty Hunt AU Detail

Lab Assessments

EMSL

Eurofins Frontier Global  
Sciences – Tacoma

Pace Analytical National  
- TN

TSDF Audits

Clean Harbors  
Aracoma LLC - UT

DOECAP has a clearly defined mission to improve the quality of environmental and industrial hygiene data provided to DOE by commercial laboratories and to ensure compliant waste management services are provided by commercial vendors.



# Limitations of the Remote Audit

**Problem:** The audit is limited to Information that the facility has uploaded to the SharePoint Site

So, focus for Remote Audits BY **NECESSITY** is limited –  
Document Review Vs Boots on the Ground



**Solution:** YOU !!! The quality of uploaded information is up to YOU!!!!!!

# Getting Started

1. Up to two weeks before the audit: Review the available information on DOECAP sites:

1. The **DOECAP SHAREPOINT SITE** will be populated with information for the upcoming audit.
2. The Facility should have already answered the questions on the **Checklist** for your functional area

# Goal: Efficient Transfer of Information

## Share Point Documents to the Checklist

Name: \_\_\_\_\_

Class: \_\_\_\_\_

### Match The Color

Direction: Match the color with the right name.



● Red



● Yellow



● Blue



● Green



● Brown

# Obstacle: Navigating between Sharepoint Audit Documents and the Checklist

## Tools:

- Access to Sharepoint/ Docushare information
- Checklist open and sorted to your Functional Area
- Pen and Paper/Notebook
- Access to Regulatory References



# Auditor's SharePoint Site



DOECAP

Home

ASP Annual Training Wo...

Calendar

Lab Toolbox

Resources

TSDF Toolbox

Facility Usage Query link

Patty Hunt AU Detail

Lab Assessments

TSDF Audits

+ New ▾

↑ Upload ▾

📄 Edit in grid view









🔗 Share

🔗 Copy link

🔄 Sync

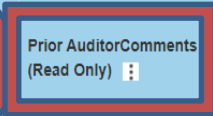
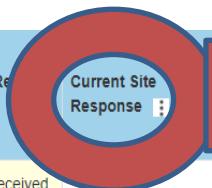
↓ Download

## Audit Materials (2017-2021)

 Name ▾	Modified ▾	Modified By ▾
 2017 Audit Materials	November 23, 2020	Garrett, Heather
 2018 Audit Materials	November 23, 2020	Garrett, Heather
  2019 Audit Materials  ⋮	November 23, 2020	Garrett, Heather
 2020 Audit Materials	November 23, 2020	Garrett, Heather
 2021 Audit Materials	March 4	Garrett, Heather

# Auditor's Checklist

Section	Sub Section	LOI Description	Frequency Identifier	Prior Site Response (Read Only)	Current Site Response	Prior Auditor Comments (Read Only)	Current Auditor Comments
18.1.1 (a) Basic Questions About The Material	18.1.1 (a)	Do materials (including samples) shipped from or received by the facility as hazardous materials meet the definition in 49 CFR 171.8, and is the facility registered with DOT? 49 CFR 171.8 and 49 CFR 107.608	R	Materials shipped and received at the ORSC meet the definition of Hazard Class 7, Radioactive Materials. All materials arriving at the ORSC must meet the requirements of procedure USG-ORSC-WAG. UniTech Services Group is registered with the DOT. Procedure USG-ORSC-WAG and the UniTech DOT Hazardous Materials Certificate have been uploaded to Sharepoint.	All permits are current	Reviewed the Registration- it is good until 2021	Reviewed the registration for DOT certificate of registration. Was renewed in 2021 and expires June 30, 2024. There is also a Tennessee Radioactive Waste License for delivery of radioactive materials T-TN-067-12 , expiration date is 12/31/2021 Unitech is also registered with the Alliane for Uniform Hazmat Transportation procedures under USDOT consensus # 283376, expiration date June 30, 2021. This registration is for Highway Motor Carriers . Ask the question- how does this registration apply to Unitech ORSC in Oak Ridge Tennessee? Due dates for registration are tracked by Windows calendar Is Unitech the motor carrier for rad wastes coming in or out of Oak Ridge? No Answer Unitech ORSC does not perform any carrier functions.
18.1.1 (b) Basic Questions About The Material	18.1.1 (b)	Does the facility report outbound shipments of waste through an automated transportation management system? DOE Order 460.2A, Section 4.a(2)(a)	R	The ORSC does not report outboard shipments of waste through an automated waste transportation management system as the facility does not currently process DOE hazardous or nonhazardous waste.	No changes to program.	There is no requirement to use an automated waste transportation management system for this facility	no automated transportation management requirement
18.1.1 (c) Basic Questions About The Material	18.1.1 (c)	Are any shipments made by or on behalf of the facility done under an on-site transportation plan? NQA-1; DOE O 460.1C, Section 4.d	R	All required shipments requiring a transportation safety plan made by the ORSC are in accordance with UniTech procedure OP-041, Transportation Security Plan. Procedure UniTech OP-041, Transportation Security Plan has been uploaded to Sharepoint.	No changes to program.	Reviewed transportation Safety Plan- it is really a Security Plan, as this facility is not required to have a transportation security plan for the types of shipments that go out.	have there been any changes to the Transportation Security Plan since the last audit? No Reviewed the Transportation Security Plan OP-041, Rev. 2, dated 2/3/2015. Finding This Plan references the March 25, 2003 issue for 49 CFR part 172 Subpart I Security Plans. This section of the regulation was updated on March 9, 2010. Specifically, the applicability section 172.802 (b) Applicability has significant changes which render the reference and the applicability statements in section 7 of the Procedure obsolete. These three requirements are not listed in the 2010 version. Section 7.0 Risk Assessment states that 49 CFR part 172.800(b) identifies seven criteria that may require a company to develop and implement a Transportation Security Plan. Unitech Services Group, Inc. (Unitech) qualifies under three of the seven sub item criteria: (4) bulk hazardous material shipments, (5) non-bulk hazardous materials shipments exceeding 5000 pounds, and (7) Placarded Hazmat Shipments The 2010 updated version has been revised. The subsections referenced in Section 7.0 of the Procedure have been removed. There are now 16 subsections. The subsections that could apply: 115) International Atomic Energy Agency Code of Conduct , Category 1 and 2 materials, Nuclear Regulatory Commission Category 1 and 2 radioactive materials as listed in Table I , appendix A to 10 CFR part 37, and Highway Route Controlled quantities as defined in 49 CFR 173.403. The facility seems to be aware, based on comments in last years checklist, that the requirements from 2003 are not in 172.800 (b) and that technically the facility is not required to have a transportation security plan.

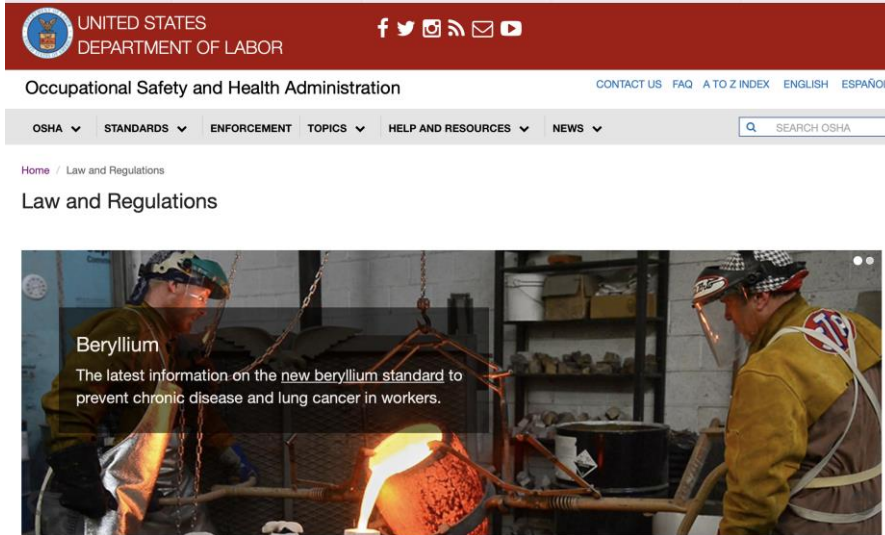


# Comments vs. Notes

## Current vs. Prior Auditor

LOI	Section	Sub Section	LOI Description	Frequency Identifier	Prior Site Response (Read Only)	Current Site Response	Prior Auditor Comments (Read Only)	Current Auditor Comments	Prior Notes (Read Only)	Current Notes
Waste Operations	14.1 (a) General	14.1 (a)	Does the facility have the necessary and applicable permits and licenses to perform the DOE operations for which they support? EC Primary (RCRA, TSCA, Radioactive Material License)	I				has two radioactive material licenses WN-10393 and WN-10508, both are in timely review. RCRA permit also in timely review.		
Waste Operations	14.1 (b) General	14.1 (b)	Does the facility control entry to the active portion of the facility at all times? Does the TSDF have a combination of adequate fencing, natural barriers, guarded gates, and/or 24-hour surveillance systems to guard against unknowing/unauthorized entry to the facility? 40 CFR 264.14	S				Acceptable. Guard controlled access. Fencing present around facility. LLOP-112, Facility Security, rev. 8/5/27/21. PFNW is surrounded by chain-link fence. Security Guard is on duty 24 hours a day, 7 days a week. Access Control is located near the main access gate. During times when the guard is making rounds, this gate is locked. MWOP 306, Rev 9. Mixed Waste Facility Inspections the weekly and monthly inspections include facility security and signs.		
Waste Operations	14.1 (c) General	14.1 (c)	Does the facility have "Danger – Unauthorized Personnel Keep Out" (or similar wording) signs at each entrance and at any other locations necessary that are visible from any approach and are legible from at least 25 feet away? 40 CFR 264.14	D	Yes	Yes	The permits and documents require Danger Unauthorized Personnel Keep Out signs, which have been evaluated in the past and noted to be visible from 25 feet. This was not evaluated during this remote audit.	Acceptable. Signs present and legible. Facility inspection items include signs and fencing.		

# Online Regulatory References



UNITED STATES DEPARTMENT OF LABOR

Occupational Safety and Health Administration

OSHA STANDARDS ENFORCEMENT TOPICS HELP AND RESOURCES NEWS

Home / Law and Regulations

Law and Regulations

**Beryllium**  
The latest information on the [new beryllium standard](#) to prevent chronic disease and lung cancer in workers.



U.S. Department of Transportation

ABOUT DOT PRIORITIES CONNECT

PIA - Pipeline and Hazardous Materials Safety Administration (PHMSA)

PIA - Pipeline and Hazardous Materials Safety Administration (PHMSA) PRIVACY IMPACT ASSESSMENT

Hazardous Materials Information System (HMIS)

March 29, 2006

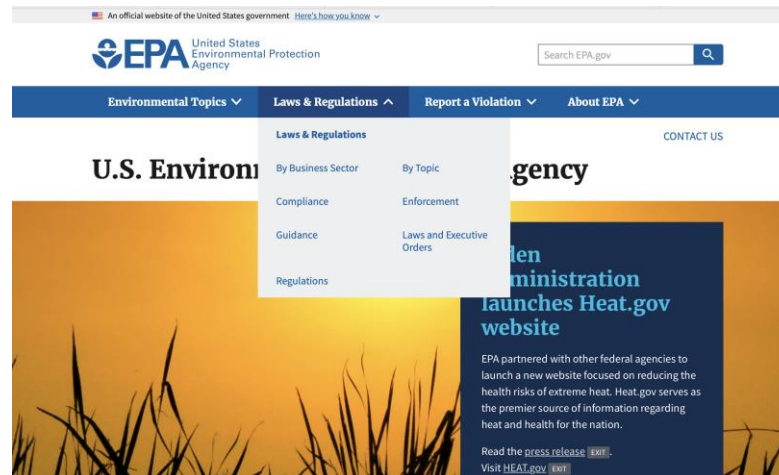
Overview of Pipeline and Hazardous Materials Safety Administration (PHMSA) privacy management process for HMIS

The Pipeline and Hazardous Materials Safety Administration (PHMSA), within the Department of Transportation (DOT), is the federal agency charged with the safe and secure movement of almost 1 million daily shipments of hazardous materials by all modes of transportation. The agency also oversees the nation's pipeline infrastructure which accounts for 64 percent of the energy commodities consumed in the United States. The Office of Hazardous Materials Safety (OHMS) is the federal safety authority for the transportation of hazardous materials by air, rail, highway and water.

This website includes OHMS guidance documents, hazmat carriers' special permits and approvals information, reports and incidents summaries, penalty action reports, registration information and forms, the Emergency Response Guidebook for First Responders, Freedom of Information Act requests, and the Hazardous Materials Emergency Preparedness (HMEP) grants program. This site also provides the ability for the public to use electronic files and reduce the amount of data entered manually from spreadsheets, license data, and record the

**Contact Us**

Claire Barrett  
Chief Privacy Officer  
1200 New Jersey Ave, SE  
Washington, DC 20590  
United States



United States Environmental Protection Agency

Environmental Topics Laws & Regulations Report a Violation About EPA

U.S. Environmental Protection Agency

agency

U.S. Environmental Protection Agency launches Heat.gov website

EPA partnered with other federal agencies to launch a new website focused on reducing the health risks of extreme heat. Heat.gov serves as the premier source of information regarding heat and health for the nation.

Read the [press release](#) [here](#).

Visit [HEAT.gov](#) [here](#).

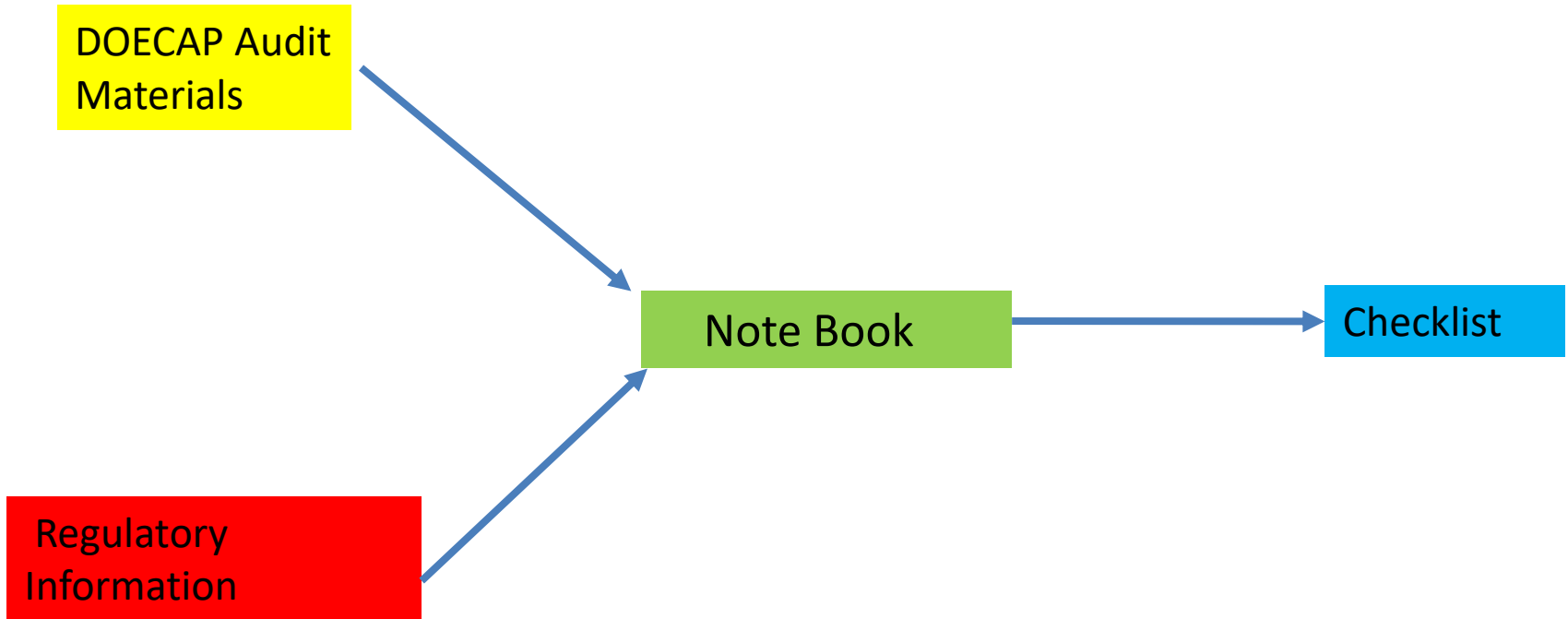
# Audit Preparation Sessions

For each Document of interest

Harvest information in Notebook :

- Document ID and location in sharepoint
- For Procedures: Name, ID#, revision number, and issue date
- Any questions or pertinent information for the facility
- Regulatory reference

# Moving Key Information to Checklist



# Checklist Navigation Frequency Identifier

ECAP - 2022\_ASP\_TSDF\_Training\_Workshop\_Agen... | grade school matching columns test example - Googl... | Tips For Writing Matching... | PIA - Pipeline and Hazardous Materials Safety Adminis... | Checklist

Audit Information Findings Observations Close Finding Interviews Site Sheets In Form Cost Tracking Audit Report Logout

Logged In As: Auditor - Patty Hunt Selected Audit: Clean Harbors Colfax, LLC (220427 - COL)

**\*\* This page is locked. Changes, please contact Donna Joy \*\***

**Checklist**

LOI	Section	Sub Section	LOI Description	Frequency Identifier	Prior Auditor Comments (Read Only)	Current Auditor Comments	Prior Notes (Read Only)	Current Notes
QA Management Systems	12.1.1 (a) Program Management	12.1.1 (a)	Are the responsibilities for the establishment and implementation of the quality assurance program defined? Note: List the document title, number, and section that meets this requirement. NQA-1 Requirement 1, Section 100; individual site Quality Assurance plan; ISO 9001	I		<p>maintains they do not operate under a formal QA management system based on a recognized standard. They work to requirements based on permit requirements. ( SOPs, training, Records and documents corrective actions). not provide written SOPs for these aspects ). Records and documents schedules were not provided based on confidentiality. The Facility does not operate per NQ-1, 14001 or ISO 9001 standards.</p>		<p>There were other LOIs not discussed understood the checklist in the NQA-1 references and indicated N/A when some elements they do perform. Ex. M&amp;TE, assessments, records, approved vendors.. M&amp;TE by permit are equipment requiring calibration for operation. Records are maintained in the operation records as required in Part B permit. Inspections are performed and records are maintained within the operation records. It was stated during interviews that they have approved vendors. But it was not explained if they were corporate or the process for which vendors are evaluated. It was stated in the site information sheet that Internal assessments are not performed. During the safety interviews it was stated that a monthly walkthrough is performed by management. This was not demonstrated by documentation. could not commit if they work to any aspects of the corporate EMS manual. Or if they are required to.</p>
			If the TSDF is a rad facility, does the facility have a documented quality assurance program (QAP) that is planned, implemented, maintained, and consistent with license conditions? If the facility is not a rad TSDF what quality standards are used in					

Search

Check All

D

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N/A

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S

Show rows with value that

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Filter Clear Filter

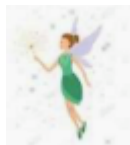
# Unlucky Auditor: WHAT TO DO?

Finding very little information posted on DOECAP website?

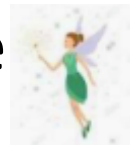
Gather Information from:

- The other functional areas, previous year's audit
- Every permit or license from local regulatory authorities
- Company's website

Generate your own list of requests, based on the information gathered and checklist questions and send it off to Senior Analyst and Audit Support:



Hannah Hidle





# What's on Your List?



- Chemicals in use/storage
- Industrial equipment
- Programs/Procedures
- Records/outputs
- And Photographs!!!



# Chemical Hazards



# Industrial Hazards



# Programs/Procedures

What the auditor will determine:

- Procedure references are correct
- Procedure is implemented
- Training requirements are listed and staff training is current

# Example: The Procedure References are Correct

## Reference section of a Scaffold Safety Procedure

The procedure is applicable to all employees and contractors performing activities at the facility.

### 2.0 REFERENCES

- 2.1 29 Code of Federal Regulations (CFR) 1926, "Subpart L – Scaffolds."
- 2.2 29 CFR 1910.28, "Safety Requirements for Scaffolding."
- 2.3 29 CFR 1910.29, "Manually Propelled Mobile Ladder Stands and Scaffolds (Towers)."
- 2.4 EWOC-QA-003, "Quality Assurance Records."

### 3.0 GENERAL REQUIREMENTS

#### 3.1 Definitions

##### 3.1.1 Competent Person

One who is capable of identifying existing hazards and predictable hazards in the surrounding or working conditions which are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective action to eliminate them

## Change in the OSHA Standard

November 2016 29 CFR Subpart D- Walking Working Surfaces was updated!

The references 1910.28 and 1910.29 were removed!



# Example: The Procedure is Implemented

## Job Safety Analysis (JSA) Procedure Excerpt

## A Completed JSA:

### JSA Process

A JSA consists of:

1. Job Physical Requirements
2. Job Environmental Conditions
3. Personal Protective Equipment required
4. Sequence of Basic Job Steps
5. Potential Accident or Hazards associated with each step
6. Safe Job Practice for each step
7. A unique number identifying the JSA. Each JSA will be numbered as follows:  
Year, e.g. 2020  
JSA  
Next consecutive available number on the JSA log.  
The JSA number shall look like – JSA-2020-001.  
Maintain log electronically.

Job Safety Analysis Worksheet	
Number: JSA-2020-002	Task: <b>Cutting and Sizing</b> Effective Date: 7/20/2020 # of Pages 1 of 2 Department: Operations/Compliance

**1. Equipment Operated:** Diamond Wire Saw, Thermal Torches, Plasma Cutter, Welders

**2. Environmental Conditions:**

Inside  Outside  Cold  Heat  Wet  Dust  Vapors/Mist  
 Noise  Vibration  Other \_\_\_\_\_

**3. Primary Job Functions & Position:**

Lifting  Grasping  Pushing  Sitting  Reaching  Bending  
 Kneeling  Standing  Pulling  Squatting  Other \_\_\_\_\_

**4. Physical Demands:** Continuously (C) 67-100% Frequently (F) 34-66%  
Occasionally (O) 1-33% Not Applicable (N) 0%

Standing O Walking O Sitting N Pushing N  
Pulling N Climbing O Stooping O Bending F\_\_  
Kneeling O Reaching O Carrying 20 lbs. 50 ft distance)

**5. Potential Hazards:** **Controlled By:**

<input checked="" type="checkbox"/> Impact	<input checked="" type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Caught on or between	<input type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Fall or Slip	<input type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Over Exertion	<input type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Burns	<input checked="" type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Respiratory	<input checked="" type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Heat Stress	<input checked="" type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards
<input checked="" type="checkbox"/> Eyes	<input checked="" type="checkbox"/> PPE	<input type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Training	<input type="checkbox"/> Guards

# Example Records/Outputs

## Completed

- Hot work permits
- Confined Space Permits
- Inspections
- Maintenance

**Laboratory Inspection Form**

Test Performed By: \_\_\_\_\_ Date: 5/6/21

**I. Test Loc** \_\_\_\_\_

Building Administration Laboratory El Dorado, AR

Hood # 1-17 Hood Functioning Properly?  Y  N

**II. Fume Removal Hoods:** Inspect and test to ensure that all fume removal hoods are functioning properly.

Minimum Velocity readings on all hoods: 100 ft/min  
Readings will be taken at the center position from the left, middle and right side of each vent hood.

Hood Name	Velocity			Lights
	Left	Middle	Right	
Organic Hood #1	205	215	211	<input checked="" type="radio"/> Y <input type="radio"/> N
Organic Hood #2	180	175	168	<input checked="" type="radio"/> Y <input type="radio"/> N
Water Lab #5	302	328	315	<input checked="" type="radio"/> Y <input type="radio"/> N
RCRA Lab #7	180	176	184	<input checked="" type="radio"/> Y <input type="radio"/> N
RCRA Lab #14	218	202	220	<input checked="" type="radio"/> Y <input type="radio"/> N
RCRA Unpacking #15	—	428	—	<input type="radio"/> Y <input checked="" type="radio"/> N
RCRA Calorimeter #16	—	295	—	<input type="radio"/> Y <input checked="" type="radio"/> N
RCRA Calorimeter #17	207	266	190	<input type="radio"/> Y <input checked="" type="radio"/> N
Instrument #8	—	522	—	<input type="radio"/> Y <input checked="" type="radio"/> N
Inorganic #10	233	260	261	<input checked="" type="radio"/> Y <input type="radio"/> N
Inorganic #11	172	185	160	<input checked="" type="radio"/> Y <input type="radio"/> N
Inorganic #12	180	194	179	<input checked="" type="radio"/> Y <input type="radio"/> N
Inorganic #13	184	181	187	<input checked="" type="radio"/> Y <input type="radio"/> N

Comments: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# Training Records

Training Records that the lucky auditor requests.

- For the procedures reviewed, ask for examples of staff training records- Risk Based
- If you have a completed confined space permit- ask for the training records for those listed
- Remember to ask about staff turnover impact on training



# Final Thoughts

- Preparation Time is key
- Get assistance early for requests
- Time is short! You have a 30-minute interview for a two day audit
- Use the checklist to make your interview flow
- Watch your tone of voice and attitude