

**10 -WASTE MANAGEMENT**

**Title:** Waste Management

**Doc. No.** 2015-MMTS-10

**Approval Signatures and Date**

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REVISION 10.4 AND 10.3.2

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Date: 3/11/15

Initial Release     Annual Review No Revision Required     Annual Review Update (see history below)

**NOTE:** This document will be reviewed at least annually to ensure its suitability.

**Revision History**

Rev. No.	Change description	Author
2	Change description Crosswalk Between NDHP CAPP Review Comments (dated 2014-12-09, 2015-01-30 and 2015-02-26) and Mercury Storage and Transfer Program Document Contents March 10, 2015	Burton Packard and Renee Rodriguez
1	Pg. 10-1, added QP FMS.HG.0004 to references. Pgs. 10-2 through 10-4, §§10.3.1 and 10.3.2, changed text to make Proc. 10 consistent with QP FMS.HG 0004; added explanatory text, and deleted text that no longer applies	

**NOTE:** Hard copies of this document may not be the current version. Refer to the "I Am The Key" to verify the current version.

**Reference Documents**

Document number	Document title
TBD	HWAD RCRA Contingency Plan
TBD	HWAD RCRA Part B Permit
QP.FMS.HG.0004	Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System

## 10.1 PURPOSE

This procedure describes how wastes generated during MMTS operations are managed. The MMTS staff minimizes; properly characterizes; packages; labels; and manages hazardous wastes, solid wastes, and recyclables.

## 10.2 SCOPE

This procedure applies only to MMTS operations at HIWAD. To facilitate operations, the MMTS Drum Handling Area should be designated a hazardous waste satellite accumulation area (SAA).

## 10.3 OPERATIONS

### 10.3.1 Required Equipment and Supplies (PPE as specified on page XI of the Executive Summary under General Safety and Health)

- Waste containers
  - Use and position waste containers as directed in Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004).
  - NOTE: *Volume reduction of hazardous waste using a snorkel is an objective that is best met with experience.*
- Container labels for each waste stream
  - Label containers as empty or by waste type as specified in Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004). Use labels provided by SOC as directed in QP.EMS.HG.0004.
- Logbook for each waste stream

**NOTE:** *Hazardous waste containers must be in good condition (without any holes, dents, severe rust, or other faults or structural defects that might impair proper containment). The emptied 30-gallon drums are compatible (made of, or lined with, a material that will not react with the waste to be stored) with the mercury-contaminated hazardous wastes generated within the MMTS. Emptied drums, including those with faults or defects, can also be used for accumulation of solid wastes as long as those faults or structural defects do not impair proper containment.*

**NOTE:** *Seal containers well. A closed container of hazardous waste must not lose its contents if flipped/turned over.*

### **10.3.2 Waste Preparation**

- **Keep containers of hazardous waste closed unless adding hazardous waste. Container closure is defined in Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004). Label containers as directed in QP.EMS.HG.0004.**
- **Label hazardous waste containers with the appropriate waste code and the words “hazardous waste.”**
- **Mark each hazardous waste container with the date it was sealed (waste additions have ended).**
- **Label non-hazardous solid waste containers as “non-hazardous waste” or similar words, such as “non-hazardous trash,” “empty drum” or “nonhazardous emptied flasks.”**
- **Provide sufficient waste characterization information as required by SOC Environmental Services staff to initiate waste pickup in a timely manner. Process knowledge is used to characterize the wastes, therefore, maintain documentation of that process knowledge. Review the waste characterization annually or any time a process change occurs to ensure the waste characterization/process knowledge is still appropriate.**

**For wastes requiring sampling and analysis, the Facility Manager directs sampling and analysis as defined in Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004).**

- **Set up and manage hazardous waste satellite accumulation areas (SAAs) in the MMTS for the visible mercury and non-visible mercury waste streams as directed in Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004). The SAA for aerosol cans will be set up in Building 110-66.**
- **Move sealed, labeled non-hazardous waste containers to Building 110-66. Move and store sealed, labeled hazardous waste containers in the 90-day accumulation area within Building 110-66. Movement, storage and labeling are to be in accord with Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004). Facility Manager contacts SOC Environmental Services staff to coordinate waste pickup.**

**Segregate wastes as directed in Waste Analysis and Characterization Plan for the Mobile Mercury Transfer System (QP.EMS.HG.0004).**

**Facility Manager works with SOC Environmental Services staff to ensure that all wastes and recyclables are picked up in a timely fashion.**

## **10.4 RECORDS**

The following records should be maintained and managed at the MMTS:

- **Log of each waste stream with the following information for each container: start date, end date (date container is closed/sealed), list of contents and date each hazardous waste drum was taken to a site 90-day/180-day area.**