



TITLE

**WASTE ANALYSIS AND CHARACTERIZATION PLAN FOR
MMTS**

REV. 4

PAGE 1 OF 18

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APPROVAL SIGNATURES		
PREPARED/REVIEWED BY <i>Christina Holloway</i> CHRISTINA HOLLOWAY, EXECUTIVE ASSISTANT SOC BASE OPERATIONS	DATE 5/14/18	
PREPARED, REVIEWED & APPROVED BY <i>Kristi Lammel</i> KRISTI LAMMEL-SCHILLING ASSISTANT MANAGER SOC ENVIRONMENTAL SERVICES	DATE 3/7/18	
APPROVED BY <i>T. Erickson</i> TOM ERICKSON, MANAGER SOC ENVIRONMENTAL SERVICES	DATE 3/7/18	
APPROVED BY <i>Burton Packard</i> BURTON PACKARD, DIRECTOR SOC BASE OPERATIONS	DATE 3/2/18	
APPROVED BY <i>Jason Boynton</i> JASON BOYNTON, MERCURY PROGRAM MANAGER DLA STRATEGIC MATERIALS FACILITY	DATE 4/24/18	
APPROVED BY <i>Rob Mathias</i> ROB MATHIAS, MANAGER DLA STRATEGIC MATERIALS FACILITY	DATE 4/24/18	
APPROVED BY <i>Charles King</i> CHARLES KING, ENVIRONMENTAL PROTECTION SPECIALIST ADMINISTRATIVE CONTRACTING OFFICE	DATE 5/17/18	
<input type="checkbox"/> INITIAL RELEASE <input type="checkbox"/> REVIEW, NO REVISION REQUIRED <input checked="" type="checkbox"/> REVIEW - REVISION REQUIRED (SEE HISTORY BELOW)		

REVISION HISTORY			
REV	CHANGE DESCRIPTION	AUTHOR	DATE
4	Annual review, Updated signatory authority to reflect current required signatures.	Christina Holloway	04/2018
3	Annual review, Updated signatory authority to reflect current required signatures.	Christina Holloway	05/2017
2	<ul style="list-style-type: none"> Updated Header and Approval Signatures, added DLA Environmental Office and Facility Manager Formatting, spelling, and grammar corrections throughout Corrected Reference Documents number references and added QP.BOP.ENV.0003 Hawthorne Army Depot Waste Analysis Plan Added "when established." to instructions related to the 90-day Accumulation Site. In 6.5.7.3, changed "2014-MMTS-7" to "established operating procedures" In 6.5.7.5, changed "2014-MMTS-9" to "established operating procedures" In 6.5.8.1, changed "2014-MMTS-25" to "established operating procedures" In 6.5.8.4.1, changed "a 1 Liter/quart sample jar." to "a sample jar of appropriate size." 	K Lammel-Schilling	

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TITLE

**WASTE ANALYSIS AND CHARACTERIZATION PLAN FOR
MMTS**

REV. 4

PAGE 2 OF 18

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	<ul style="list-style-type: none"> In 6.5.9.6.1, changed “a 1 Liter/quart sample jar.” to “a sample jar of appropriate size.” In 6.5.9.6.2, Change “the beginning of filling of the drum, a small piece of each waste items type at the half way full mark of filling of the drum, and a small piece of each waste items type at the end of filling of the drum.” to “from each drum on the chosen pallet of 5 drums.” Added “The MMTS staff will also include samples of disposable PPE and cleanup materials used during the day that the pallet was finished.” In 6.5.9.7, changed “50 drums generated” to “10 Pallets of 5 drums processed” In 6.5.10.1 added “As a Best Management Practice, this waste stream will be emptied no less than once each year, full or not.” 		
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REFERENCE DOCUMENTS

DOCUMENT NUMBER	DOCUMENT TITLE
Various	Tier 1 CAPP2 Transfer Operating Procedures
NEVHW0023	Hawthorne Army Depot Main Base RCRA Permit
40 CFR part 261	Identification and Listing of Hazardous Waste
40 CFR Part 264	Standards For Owners & Operators of Hazardous Waste Treatment Storage & Disposal Facilities
40 CFR Part 268	Land Disposal Restrictions
SW-846	Test Methods for Evaluating Solid Waste, Physical/Chemical Methods
SOC.QP.ENV.0001	SOC Environmental Management Plan
QP.BOP.ENV.0003	Hawthorne Army Depot Waste Analysis Plan
QP.QMS.0001	SOC Quality Manual
SOC.QP.QMS.0001	SOC Quality Plan – Control of Documents
SOC.QP.QMS.0002	SOC Quality Plan – Control of Quality Records

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SOC.QP.QMS.0003	SOC Quality Plan – Internal Quality Audits
SOC.QP.QMS.0004	SOC Quality Plan – Control of Non-Conforming Products/Services
SOC.QP.QMS.0005	SOC Quality Plan – Corrective & Preventative Action

DOCUMENTS REFERENCED IN THIS PROCEDURE ARE APPLICABLE TO THE EXTENT SPECIFIED HEREIN.

1. PURPOSE AND SCOPE

- 1.1 The purpose of this document is to describe and provide guidance on the sampling, laboratory analysis, waste characterization, and disposal for each waste stream expected from Mobile Mercury Transfer System (MMTS), including the Rationale for choosing the methods that have been chosen. It will also describe the Waste Drum Management and Accumulation Site Standards for HWAD.
- 1.2 This document applies to Mercury Transfer Project at the Mobile Mercury Transfer System site, and to wastes generated by the execution of that project.

2. LEGAL REQUIREMENTS

2.1

3. DEFINITIONS AND ACRONYMS

- 3.1 90 Day Accumulation AreasA site designated for the accumulation of wastes in high volume generation sites. These sites are specified in the Hazardous Waste Permit.
- 3.2 Satellite Accumulation Areas (SAA) A site that waste is accumulated at the site of waste generation not to exceed 55 gallons.
- 3.3 Empty Container.....A container that contains nothing other than air at atmospheric pressure.
- 3.4 TCLP.....Toxicity Characteristic Leaching Procedure is a soil sample extraction method for chemical analysis employed as an analytical method to simulate leaching through a landfill.



TITLE

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MMTS**

REV. 4

PAGE 4 OF 18

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4. RESPONSIBILITIES

4.1 SOC Environmental Personnel shall:

- 4.1.1 Provide training to MMTS staff on the contents of this IOP.
- 4.1.2 Inspect 90-Day Accumulation Site each week, when established.
- 4.1.3 Provide appropriate labels for the waste drums.
- 4.1.4 Provide sampling jars and instructions for sampling.
- 4.1.5 Provide lab results for waste streams to the Facility Manager..
- 4.1.6 Provide timely removal of waste from site.
- 4.1.7 Provide notification of waste shipments and copies of manifests and certificates of disposal/destruction to the Facility Manager
- 4.1.8 Maintain all official records as detailed in Section 8 of this document.

4.2 MMTS Staff Shall:

- 4.2.1 Maintain Satellite Accumulation Areas and 90-day sites in accordance with HWAD standards.
- 4.2.2 Grant SOC Environmental access to 90-Day Site for weekly inspection, when established.
- 4.2.3 Sample in accordance with established procedures/guidance.
- 4.2.4 Inspect all waste and segregate waste with visible mercury contamination from other waste
- 4.2.5 Label Containers in accordance with standards.
- 4.2.6 Consult with SOC Environmental for any environmental issues that may impact compliance.

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5. PROCEDURE 1

5.1 Standards for Satellite Accumulation Areas

- 5.1.1 The site or proposed site must have controlled access – it must be under lock & key with limited accessibility (Inside a building or at a site with controlled access)
- 5.1.2 Each SAA must be identified and marked. The container(s) must be labeled.
- 5.1.3 Multiple waste streams must be separated by space and markings.
- 5.1.4 Containers must be **Closed** when not adding waste materials
- 5.1.5 Each container must be in serviceable condition and must not be leaking or have the potential to leak its contents. It must also be closable.
- 5.1.6 You may not have more than 55 gallons of waste in an SAA.
- 5.1.7 A full SAA container must be labeled with the date that it is full.
- 5.1.8 The area must be emptied within three (3) days when full. It is Best Management Practice at HWAD to empty SAA every 365 days, full or not. It may be moved to 90-Day accumulation in Building 110-66 or turned over to SOC Environmental for management and disposal.

5.2 Standards for 90-Day Accumulation Sites, when established.

- 5.2.1 The 90-day site is required to be marked as a 90-Day Hazardous Waste Accumulation area.
- 5.2.2 The site must have controlled access – it must be under lock & key with limited accessibility
- 5.2.3 Each 90 Day Accumulation Site will be inspected by Environmental Services at a minimum of once per week.
- 5.2.4 Each container must be in serviceable condition and must not be leaking or have the potential to leak its contents It must also be closable.



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5. PROCEDURE 1 (CONTINUED)

- 5.2.5 Containers must be **Closed** when not adding waste materials.
- 5.2.6 Containers must be placed in such a way so that they may be inspected – label side to the inspection aisle(s)
- 5.2.7 There needs to be an inspection aisle at least 36 inches wide between waste rows
- 5.2.8 Each drum must be labeled with a completed Waste Label, either Hazardous Waste or Non-Regulated Waste according to the characterization. (see below)
- 5.2.9 90 Day Sites will be emptied every 90 days – whether they are full or not.

5.3 General Waste Container Marking Instructions

- 5.3.1 ALL containers must be marked with their contents.
- 5.3.2 Empty Containers must be Labeled “EMPTY”
 - 5.3.2.1 An Empty Container/Drum contains nothing other than air at atmospheric pressure.
 - 5.3.1.1 Multiple drums stored in staging areas must be individually labeled as “EMPTY”
- 5.3.2 At a minimum, containers in Satellite Accumulation Area that contain something must be marked as follows:

Contents of Drum (Be reasonably descriptive)
MMTS
START: (Accumulation Start Date)
 When Your Drum is Full.....
End: (Accumulation End Date)

- 5.3.3 If the waste in Satellite Accumulation Area has been characterized as Hazardous Waste and has a code, then the container must be marked as follows:



DOCUMENT No. QP.EMS.H0012
REV. 4
PAGE 7 OF 18

TITLE WASTE ANALYSIS AND CHARACTERIZATION PLAN FOR MMTS

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5. PROCEDURE 1 (CONTINUED)

<p align="center">HAZARDOUS WASTE (EPA Waste Codes) Contents of Drum (Be reasonably descriptive) MMTS START: (Accumulation Start Date) When Your Drum is Full..... End: (Accumulation End Date)</p>
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- 5.3.4 All containers in the 90-Day Site must be marked with the appropriate completed label that SOC Environmental will provide.
- 5.3.5 Trash Cans and Containers for recyclables will be clearly labeled with contents, but do not need any other information.

5.4 Container Closure Requirements

- 5.4.1 All hazardous waste containers must be closed when waste is not being added to them.
- 5.4.2 Closed is defined as the lid in in place, the ring is snapped closed or wrench tight, and the bung is in place and wrench tight.
- 5.4.3 If a Self-closing lid is approved for the waste type, then the lid must be in complete contact with the rim on all sides.
- 5.4.4 Trash cans do not require a cover. It is Best Management Practice to have them covered if they are outside.

5.5 Waste Streams from the MMTS.

- 5.5.1 Spent Aerosol Cans
 - 5.5.1.1 The MMTS will produce approximately 20 lbs per year of this stream.
 - 5.5.1.2 This waste stream includes all aerosol cans that are no longer useable.
 - 5.5.1.3 Spent Aerosol Cans are a declared hazardous waste with codes D001 and D003.



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5. PROCEDURE 1 (CONTINUED)

5.5.1.4 If the drum is located in an satellite accumulation site, The accumulation drum must be labeled as follows:

**HAZARDOUS WASTE
D001/D003
Spent Aerosol Cans
MMTS
START: (Accumulation Start Date)
When Your Drum is Full.....
End: (Accumulation End Date)**

5.5.1.5 An inventory of the Spent Aerosol Cans will be kept and turned over to SOC Environmental when the Drum is picked up. A Safety Data Sheet may be requested.

5.5.1.6 If the accumulation drum is in the 90-day site, then it must be labeled with the appropriate completed Hazardous Waste Label that SOC will provide.

5.5.1.7 Sampling and testing is not necessary as the SDS for each product provides the necessary information.

5.5.2 Cardboard and Plastic Wrap from Metric Ton Containers.

5.5.2.1 The MMTS will produce approximately 150 lbs per year of this stream.

5.5.2.2 HWAD does not have an outlet for recycling these commodities at this time; therefore it will be disposed as ordinary refuse. Place in appropriate refuse bin for disposal.

5.5.2.3 Rationale: This waste stream is a solid waste that is produced in the warehouse which is clean, and therefore would never be exposed to mercury except in the case of a spill.

5.5.3 Recyclable Metal, including steel banding and other metals with no contact with mercury.

5.5.3.1 The MMTS will produce approximately 500 lbs per year of this stream.

5.5.3.2 Place in appropriate container for transfer to SOC Property Reutilization Office (PRO) for sale. The container will be labeled



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5. PROCEDURE 1 (CONTINUED)

“Recyclable Metal”

5.5.3.3 Rationale: This stream is excluded from the definition of a solid waste as defined by RCRA because it will be sold as scrap metal and recycled.

5.5.4 Wood and pallets with no contact with mercury

5.5.4.1 The MMTS will produce approximately 600 lbs per year of 2x4 lumber and 360 pallets per year. Approximately 290 pallets per year will be reused in the process.

5.5.4.2 Transfer unused wood and pallets to SOC PRO for resale.

5.5.4.3 Rationale: This stream is not a solid waste. This stream contains items that that will be used in the process or elsewhere on HWAD for their intended purpose. Any unused items will be sold.

5.5.5 Drip Pans

5.5.5.1 The MMTS will produce approximately 290 per year of this stream.

5.5.5.2 This stream will be visually inspected for mercury contamination.

5.5.5.3 Drip Pans with no visible mercury contamination will be reused in the process. Offer unused drip pans to SOC Environmental Services for reuse. Excess Drip Pans will be transferred to SOC PRO for resale.

5.5.5.4 Consult with SOC Environmental for handling of Drip pans with visible mercury contamination.

5.5.5.5 Rationale: This Stream is not solid waste because it is a reusable item that will be used for its intended purpose. Any unused items will be sold.

5.5.6 30-Gallon drums, empty

5.5.6.1 The MMTS will produce approximately 1500 drums per year. 1100 of these will be directly reused in the process.



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5. PROCEDURE 1 (CONTINUED)

- 5.5.6.2 This stream is not waste because it is a reusable item used for its intended purpose.
- 5.5.6.3 This stream will be visually inspected for mercury contamination.
 - 5.5.6.3.1 Drums with no visible mercury contamination may be reused for any waste stream. Excess drums will be transferred to SOC Environmental Services.
 - 5.5.6.3.2 Drums with visible mercury contamination meet the requirements for empty containers under 40 CFR 261.7(b) (1). These drums will **ONLY** be reused for **Debris with Visible Mercury Contamination**.
- 5.5.6.4 Empty drums will be clearly labeled as “Empty” until they are reused.
- 5.5.6.5 Rationale: This stream is not a solid waste. This stream contains items that that will be used in the process or elsewhere on HWAD for their intended purpose. Any unused items will be sold.
 - 5.5.6.5.1 Drums with visible mercury contamination meet the requirements for empty containers under 40 CFR 261.7(b) (1). As a best management practice, Drums with visible mercury contamination will be used for high mercury wastes, which will be treated at a permitted Hazardous Waste Mercury Retort Facility.

5.5.7 Flasks, RCRA Empty

- 5.5.7.1 The MMTS will produce approximately 100,000 lbs per year of this stream. This is approximately 715 drums per year.
- 5.5.7.2 This Waste stream is a Non-Regulated Industrial Waste.
- 5.5.7.3 This waste stream will be emptied in accordance with 2014-MMTS-7.
- 5.5.7.4 This waste stream does not require sampling and may be characterized on processor knowledge.
- 5.5.7.5 This waste stream will be packed in a reused 30 gallon drum in accordance with 2014-MMTS-9 and labeled as follows:

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**WASTE ANALYSIS AND CHARACTERIZATION PLAN FOR
MMTS**

REV. 4

PAGE 11 OF 18

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5. PROCEDURE 1 (CONTINUED)

**Flasks, RCRA Empty
MMTS
(Accumulation Date)**

5.5.7.6 This waste stream will be transferred to SOC Environmental Services for disposal in a permitted hazardous waste disposal landfill.

5.5.7.6 Rationale: These flasks meet the requirements for empty containers under 40 CFR 261.7(b) (1). They will be emptied by suction then by inversion and vibration to reclaim as much of the mercury as possible. This will leave far less than the 1 inch or 3% volume allowed by regulation.

5.5.8 Exhaust Fan Unit Filters

5.5.8.1 The air filters will be changed out based on high pressure drop or quarterly, whichever comes first. The amount of this waste will be variable according to the weather conditions. These filters are changed in accordance with established operating procedures.

5.5.8.2 There are 2 air handling systems at the MMTS, the HVAC and the Exhaust Fan system.

5.5.8.2.1 The HVAC system filters are exposed to outside air only; they are never exposed to mercury vapors. The HVAC Filters are Non-Hazardous Waste and may be disposed as such.

5.5.8.2.2 Only the Exhaust fan system removes air from the processing rooms and is exposed to Mercury vapors. Exhaust fan filters are **Hazardous Waste** with code **U151** for Mercury by the Mixture Rule for Listed Wastes. [40 CFR 261.3(b)(2) and 40 CFR 261.3(c)(1)]

5.5.8.3 While in the SAA, This waste stream will be packed in a box or drum of suitable size and labeled as follows:

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5. PROCEDURE 1 (CONTINUED)

**HAZARDOUS WASTE
U151
MMTS Exhaust Fan Unit Filters
MMTS
(Accumulation Date)**

5.5.8.4 This waste stream does require sampling. A characteristic composite sample of a drum will be obtained by following the below procedures:

5.5.8.4.1 SOC Environmental Services will provide a sample jar of appropriate size.

5.5.8.4.2 If samples are taken, the filters will be placed in a bag when removed and transferred to the drum handling room for sampling under snorkel and monitoring coverage. After sampling they will be packed and labeled as described in 6.5.10.5.

5.5.8.4.3 MMTS staff will place in the sample jar a 3 inch square piece of each filter from the center of each filter, including any dust in that 3 inch piece.

5.5.8.4.4 The Sample Container will be labeled as follows:

**SAMPLE- MMTS Exhaust Fan Unit Filters
(Accumulation Date)**

5.5.8.4.5 The sample container will be transferred to Environmental Services when the box or drum is full.

5.5.8.5 The waste stream will be sampled once the first time the filters are changed, the third time the filters are changed, the fifth time the filters are changed, and then every 12 months thereafter, or every 12 months, whichever is less.

5.5.8.6 The sample will be tested for:

5.5.8.6.1 Total Mercury in solids by Method 7471 from SW-846, AND



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5. PROCEDURE 1 (CONTINUED)

5.5.8.6.2 TCLP Method 1311 followed by Mercury in Liquids by Method 7470 from SW-846

5.5.8.7 This waste stream will be transferred to the 90-day storage site in 110-66 and labeled with the appropriate completed Hazardous Waste Label (supplied by SOC Environmental) or transferred directly to SOC Environmental Services for disposal.

5.5.8.8 Rationale: Sampling and characterization is required for this waste stream to determine if it meets the Treatment Standards for code U151 mercury waste.

5.5.8.8.1 If the waste has more than 260ppm total Mercury, then the waste will be labeled with an additional waste code of D009 and shipped to a permitted Hazardous Waste Mercury Retort Facility for disposal.

5.5.8.8.2 If the waste has less than 260ppm total Mercury but greater than 0.2mg/L Mercury TCLP, then the waste will be labeled with an additional waste code of D009 and shipped to a permitted TSDF for further treatment and then disposal.

5.5.8.8.3 If the waste has less than 260ppm total Mercury but greater than 0.025mg/L Mercury TCLP, then the waste will be shipped to a permitted TSDF for further treatment and then disposal.

5.5.8.8.4 If the waste has less than 0.025mg/L Mercury TCLP, then the waste meets the treatment standards, then it will be shipped a permitted hazardous waste disposal landfill for direct disposal.

5.5.8.8.5 The sampling method will provide a composite sample of the items in the drum for testing. The waste stream will be homogenous throughout operations, the frequency meets the requirements of the HWAD RCRA Permit for Main Base (Permit #NEVHW0023)

5.5.9 Debris with no visible mercury contamination

5.5.9.1 The MMTS will produce approximately 20,000 lbs per year of this stream. This is approximately 300 drums per year.



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5. PROCEDURE 1 (CONTINUED)

5.5.9.2 This waste stream must be visually inspected. This waste stream **must** have no visible mercury contamination.

5.5.9.3 This waste stream includes the packaging from around the flasks (plastic bags, pillows, cardboard, and pads), and process consumables, such as Snorkel filters, Tyvek suits, nitrile and leather gloves, safety glasses, shoe covers, Herculite floor covering, the drill bits from Hood 1, Tygon tubing and fittings, that have no visible mercury contamination. This stream also includes the materials used with HgX® solution for routine cleaning in all areas, provided the materials have no visible mercury contamination.

5.5.9.4 This waste stream is **Hazardous Waste** with code **U151** for Mercury by the Mixture Rule for Listed Wastes. [40 CFR 261.3(b)(2) and 40 CFR 261.3(c)(1)]

5.5.9.5 While in the SAA, This waste stream will be packed in a reused 30 gallon drum and labeled as follows:

**HAZARDOUS WASTE
U151
MMTS Process Debris
MMTS
(Accumulation Date)**

5.5.9.6 This waste stream does require sampling. A characteristic composite sample of a drum will be obtained by following the below procedures:

5.5.9.6.1 SOC Environmental Services will provide a sample jar of appropriate size.

5.5.9.6.2 MMTS staff will place a small piece of each waste items type from each drum on the chosen pallet of 5 drums. The MMTS staff will also include samples of disposable PPE and cleanup materials used during the day that the pallet was finished. A small piece will be a 3 inch square piece of any flat material or 3 inches of tubing.

5.5.9.6.3 The Sample Container will be labeled as follows:

**SAMPLE- MMTS Process Debris
(Accumulation Date)**



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5. PROCEDURE 1 (CONTINUED)

5.5.9.6.4 The sample container will be transferred to Environmental Services when the drum is full.

5.5.9.7 The waste stream will be sampled once in the first 3 pallets of the operation to include as many of the waste types as possible, and once every 10 pallets of 5 drums processed thereafter, no less than once per year. The sampling timing will be chosen to include as many of the waste types as possible.

5.5.9.8 The sample will be tested for:

5.5.9.8.1 Total Mercury in solids by Method 7471 from SW-846, AND

5.5.9.8.2 TCLP Method 1311 followed by Mercury in Liquids by Method 7470 from SW-846

5.5.9.9 This waste stream will be transferred to the 90-day storage site, when established, in 110-66 and labeled with the appropriate completed Hazardous Waste Label (supplied by SOC Environmental) or transferred directly to SOC Environmental Services for disposal.

5.5.9.10 Rationale: Sampling and characterization is required for this waste stream to determine if it meets the Treatment Standards for code U151 mercury waste.

5.5.9.10.1 If the waste has more than 260ppm total Mercury, then the waste will be labeled with an additional waste code of D009 and shipped to a permitted Hazardous Waste Mercury Retort Facility for disposal.

5.5.9.10.2 If the waste has less than 260ppm total Mercury but greater than 0.2mg/L Mercury TCLP, then the waste will be labeled with an additional waste code of D009 and shipped to a permitted TSDf for further treatment and then disposal.

5.5.9.10.3 If the waste has less than 260ppm total Mercury but greater than 0.025mg/L Mercury TCLP, then the waste will be shipped to a permitted TSDf for further treatment and then disposal.

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5. PROCEDURE 1 (CONTINUED)

5.5.9.10.4 If the waste has less than 0.025mg/L Mercury TCLP, then the waste meets the treatment standards, then it will be shipped a permitted hazardous waste disposal landfill for direct disposal.

5.5.9.10.5 The sampling method will provide a composite sample of the items in the drum for testing. The waste stream will be homogenous throughout operations, the frequency meets the requirements of the HWAD RCRA Permit for Main Base (Permit #NEVHW0023)

5.5.10 Debris with visible mercury contamination

5.5.10.1 The MMTS will produce approximately 150 lbs per year of this stream. This is approximately 4 drums per year. As a Best Management Practice, this waste stream will be emptied no less than once each year, full or not.

5.5.10.2 This waste stream includes the packaging from around the flasks, and process consumables such as grit, mill scale, oxides, drill shavings from Hood 1, cheesecloth, and other items that have visible mercury contamination. This stream also includes the materials generated in routine cleaning that have visible mercury contamination, and the materials generated in the clean-up of loose mercury within the MMTS.

5.5.10.3 This waste stream is **Hazardous Waste** with code **U151** for Mercury by the Mixture Rule for Listed Wastes. [40 CFR 261.3(b)(2) and 40 CFR 261.3(c)(1)] It will also have a waste code for of **D009** for the Toxic Characteristic for Mercury.

5.5.10.4 While in the SAA, This waste stream will be packed in a reused 30 gallon drum and labeled as follows:

**HAZARDOUS WASTE
U151, D009
Mercury Contaminated Debris
MMTS
START: (Accumulation Start Date)
When Your Drum is Full.....
End: (Accumulation End Date)**



DOCUMENT NO.	QP.EMS.H0012
TITLE	REV. 4
	PAGE 17 OF 18

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5. PROCEDURE 1 (CONTINUED)

- 5.5.10.5 This waste stream does not require sampling and may be characterized on processor knowledge.
- 5.5.10.6 This waste stream can be declared to contain \geq 260ppm Hg and disposed at a permitted Hazardous Waste Mercury Retort facility.
- 5.5.10.7 This waste stream will be transferred to the 90-day storage site in 110-66 and labeled with the appropriate completed Hazardous Waste Label (supplied by SOC Environmental) or transferred directly to SOC Environmental Services for disposal.
- 5.5.10.8 Rationale: It is assumed that the concentration of mercury to produce visible contamination is far greater than 260ppm Hg, designating this as a high mercury waste that must be treated in a hazardous waste mercury retort. Declaring the waste as hazardous at this level without testing limits exposure risks for personnel. There is no advantage in sampling and testing as the test is unlikely to return a result of less than 260ppm.

6. PROCEDURE 2

- 6.1 None

7. PROCEDURE 3

- 7.1 None

8. METRICS

- 8.1 The Metrics will include the total number of drums of each type of waste disposed in a quarter and the approximate weight of each drum as reported in the Hazardous Waste Building Log and on the Hazardous Waste Manifest.
- 8.2 Other metrics may be developed as the program matures.

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	ENVIRONMENTAL MANAGEMENT INSTALLATION PLAN ISO 14001:2015 SOC NEVADA LLC	DOCUMENT No. QP.EMS.H0012
		TITLE WASTE ANALYSIS AND CHARACTERIZATION PLAN FOR MMTS

REV. 4

PAGE 18 OF 18

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9. RECORDS

9.1 The following Quality Records shall be generated and managed in accordance with SOC.QP.QMS.0002

QUALITY RECORDS			
RECORD REQUIRED	CUSTODIAN	RETENTION	DISPOSITION
Spent Aerosol Can Inventory	Environmental Services	5 Years (ENV Records)	Long Term Storage
90-day Site Inspection Checklist	Environmental Services	5 Years (ENV Records)	Long Term Storage
Hazardous Waste Tracking Log (Both Electronic and Hard Copy)	Environmental Services	5 Years (ENV Records)	Long Term Storage
Laboratory Results for Waste Samples	Environmental Services	5 Years (ENV Records)	Long Term Storage
Hazardous Waste Manifests	Environmental Services	5 Years (ENV Records)	Long Term Storage
Certificates of Disposal / Destruction	Environmental Services	5 Years (ENV Records)	Long Term Storage

10. FORMS

10.1 The following forms are applicable to this document

APPLICABLE FORMS	
FORM NUMBER	TITLE
SOC 724	90-day Site Inspection Checklist
108E	Hazardous Waste Tracking Log
NA	Hazardous Waste Manifests

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