

Waste Acceptance Guidelines

Revision 15

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- Non-Proprietary
- Proprietary
- Restricted Information
- Safeguards Information
- Sensitive Security Information

- New
- Title Change
- Revision
- Rewrite
- Cancellation

Reason for Cancellation: _____

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1 RADIOACTIVE WASTE MANAGEMENT

1.1. Purpose and Scope

This document provides Waste Acceptance Guidelines (WAG) for the EnergySolutions (ES) Bear Creek and Gallaher Road Commercial Waste Processing (CWP) facilities located in Oak Ridge, Tennessee. The WAG provides minimum requirements the domestic generator must meet to ship radioactive waste to these facilities.

Mixed waste, defined as waste that contain both a radiological and a hazardous component, is not accepted for processing or storage unless it meets the requirements of WAG-501A, Mixed Waste Acceptance Guidelines. Wastes that are considered as hazardous are defined in 40 CFR 261, Identification and Listing of Hazardous Wastes (Reference 2.1.3) and Tennessee Rule Chapter 0400-11-.01, Solid Waste Processing and Disposal (Reference 2.1.6).

A summary of the criteria for determining if a waste is hazardous is provided in Attachment 2.

The Shipment Summary Form (WAG-501-F1) contains a shipment waste/material characterization certification statement that must be completed and signed by a knowledgeable individual. The Form shall accompany each shipment of waste or material to the Bear Creek and Gallaher Road CWP facilities.

Radioactive waste that does not meet the WAG may be accepted after evaluation of data **PRIOR** to the shipment of waste to the ES facilities. The radioactive waste received at ES that does not meet the WAG and has not been evaluated and approved by ES may be subject to additional processing surcharges and/or returned at the generator's expense.

- Radiological waste criteria are provided in Table 1 – General Radiological Criteria
- Special radioactive waste types requiring prior ES evaluation and approval before shipping are listed in Table 2 – Radioactive Waste Requiring Prior Approval and Possibly Special Pricing
- Specific radioactive waste packaging guidelines are defined in Attachment 1-Specific Waste Packaging and Shipping Guidelines

ES conducts routine review of radioactive waste that does not meet the WAG during our daily “Out-of-WAG” meetings. If the radioactive waste is approved, additional instructions for packaging, shipping, and scheduling will be provided as required.

Requests for OOW review of materials that do not meet the WAG are performed upon receipt of a completed Form CP-WM-PR-102-F-1, Nonstandard Material Approval – Domestic.

1.2. OOW Expiration

OOW approvals generally expire one year after approval and will need to be re-evaluated by both the customer and OOW Committee after one year.

1.3. EnergySolutions Facility Information

<i>Facilities</i>	<i>Main Office</i>
EnergySolutions Services, Inc. Bear Creek Operations (BCO) 1560 Bear Creek Road Oak Ridge, TN 37830	Phone Number: 865-481-0222 Customer Service: 865-220-1230 Customer Service Fax: 865-220-1612
EnergySolutions Services, Inc. Gallaher Road Facility (GRF) 628 Gallaher Road Kingston, TN 37763	Phone Number: 865-481-0222 Customer Service: 865-220-1230 Customer Service Fax: 865-220-1612

2. REFERENCES AND FORMS

2.1. References

- 2.1.1. Tennessee Rule, Chapter 0400-10-.32, Licensing of Shippers of Radioactive Material Into or Within Tennessee
- 2.1.2. 40 CFR 268.7, Testing, Tracking, and Record Keeping Requirements for Generators, Treaters, and Disposal Facilities
- 2.1.3. 40 CFR 261, Identification and Listing of Hazardous Wastes
- 2.1.4. 40 CFR 279.11, Used Oil Specifications
- 2.1.5. 40 CFR 761, Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions
- 2.1.6. Tennessee Rule Chapter 0400-11-.01, Solid Waste Processing and Disposal
- 2.1.7. 10 CFR 37 Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material
- 2.1.8. ES Tennessee Radioactive Material Licenses (current amendments)

2.2. Forms (These forms can be found in the ES Customer Portal)

- 2.2.1. [WAG-501-F1, Shipment Summary Form](#)
- 2.2.2. [WAG-501-F2, Bulk Waste Assay Program Profile](#)
- 2.2.3. CP-WM-PR-102-F-1, Nonstandard Material Approval - Domestic

3. SHIPPING, PACKAGING, AND DOCUMENTATION REQUIREMENTS

- 3.1. Radioactive waste shipments to ES Tennessee-based processing facilities require the following:
 - Compliance with the WAG (including requirements in Attachment 1, Specific Waste Packaging and Shipping Guidelines);
 - Valid contract mechanism established with EnergySolutions and return clause; and
 - Shipment scheduling through the designated Account Executive, regardless of carrier.

- 3.2. Radioactive waste is subject to special packaging and shipping requirements as described in Attachment 1.
- 3.3. A completed Shipment Summary Form (WAG-501-F1) shall accompany all RAM shipments.
- 3.4. A completed Bulk Waste Assay Program (BWAP) Profile, WAG-501-F2. This form is needed for waste described in Section 4.17.
- 3.5. A valid Category 2 Tennessee Radioactive Materials License-for-Delivery is required unless ES or another broker acts as a broker on behalf of the generator (Reference 2.1.1).
- 3.6. Asbestos Waste Shipment Record Form accompanying shipment of asbestos waste.
- 3.7. Uniform Low-Level Radioactive Waste Manifest (540/541 forms) accompanying shipment, except UN2908.
- 3.8. DOE/NRC Form 741 for quantities of Special Nuclear Material (SNM) exceeding 0.49 grams per shipment or source materials exceeding 0.49 kilograms per shipment.
- 3.9. If the radioactive waste is to be transshipped any packaging test documentation and certification must accompany the shipment.
- 3.10. For shipments of PCB waste/items there must be a unique identification number for each item/container. The following information must be provided for each container: the PCB removal-from-service dates, type of PCB, and weight in kilograms. Bear Creek is authorized to receive bulk product metal for recycle only. All PCB shipments shall include a hazardous waste manifest (US EPA Form 8700-22). See Section 4.16. NOTE: Bear Creek is not authorized to receive PCB waste i.e., capacitors, ballasts, articles, items, or remediation waste. Materials that are discovered or appear to be PCB containing will be segregated and an unmanifested PCB report submitted to EPA per 40 CFR 761.216. Items will not be returned.
- 3.11. Disposal site documentation (see Section 6).
- 3.12. For shipments involving multiple manifests (Broker Shipments) include a Consolidation Sheet (NRC Form 542) that summarizes each Generator's waste and provide the following for each generator: number of packages, weight, volume, total activity, total SNM and total Source Material. A sample Consolidation Sheet can be provided upon request.
- 3.13. For shipments containing refrigeration equipment, refrigerant and oil must be verified as drained.
- 3.14. For shipments containing Formerly Characteristic Hazardous Waste a Land Disposal Restriction (LDR) Form or a Certification in accordance with 40 CFR 268.7 (Reference 2.1.2).
- 3.15. RCRA hazardous waste shipments must comply with the requirements in Appendix A, Mixed Waste Acceptance Guidelines.

4. WASTE ACCEPTANCE GUIDELINES

NOTE

See Table 2 for waste that requires advance approval from ES prior to shipment. Contact your Sales Director or Account Executive regarding advance approval and receipt schedules.

4.1. **Non-Infectious Biological Waste**

4.1.1. Non-infectious animal/biological waste is acceptable. These wastes are NOT capable of causing infection/illness via viruses, bacteria and other infectious agents to humans). These wastes are not regulated as medical waste and do not contain blood borne pathogens.

4.1.2. Non-hazardous rags, wipes, or absorbent materials that may contain minimal amounts of biological material that do not meet the definition of bio hazardous or biological waste. The shipment notes shall identify that the shipment includes a biological waste package, with a basic description of the biological waste packaging.

4.2. **Previously Infectious/Medical Waste**

4.2.1. Wastes previously characterized as “infectious/medical” may be accepted if rendered non-infectious after sterilization or other treatment by the generator such as autoclaving or use of bleach. Infectious and potentially infectious wastes are materials that are:

- Generated in the diagnosis, treatment, or immunization of humans or animals, or
- Generated through research involving such beings (including the production or testing of biologicals) that are contaminated or potentially contaminated with infectious agents known or suspected to cause human illness.
- Sharps as defined by 49 CFR 173.134 means any object contaminated with a pathogen or that may become contaminated with a pathogen through handling or during transportation and also capable of cutting or penetrating skin or a packaging material. Sharps includes needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, and exposed ends of dental wires. Sharps will require out of WAG approval prior to shipment.

4.3. **Small Sharp Objects**

Small sharp objects such as broken glass, knives, scalpel blades, and other small sharp metal objects will require out of WAG approval prior to shipping.

4.4. **Aqueous Liquids, Sludges, and Resins**

4.4.1. Aqueous liquids are acceptable and must meet the following parameters:

Descriptor (Note 1)	Processing Operations			
	Incineration	Waste Water Evaporator	Liquid Evap System	Drum Oven

pH	5 to 9	>2 and <12.5	>2 and <12.5	>2 and <12.5
Solids Content by Volume excluding settled sludge	<1.0%	<1%	<1.0%	<1.0%
Oil Content by Volume	<1.0%	No visual sheen	<1.0%	<1.0%
Chelating Agent by Volume	<1.0%	<1.0%	<1.0%	<1.0%
Flash Point °F	>140	>250	>200 (Note 2)	>200 (Note 2)
Oil (mg/L)	N/A	N/A	N/A	N/A
Gross Beta-Gamma (µCi/ml)	N/A	<1.0E-3	<1.0E-3	N/A
Gross Alpha (µCi/ml)	N/A	<1.0E-5	<1.0E-6	N/A
Beryllium (mg/L)	<0.02	<0.02	<0.02	<0.02

Note 1: Chemical agents present in the waste stream shall be identified.

Note 2: Actual Flash Point result needed to determine proper processing plan.

4.4.2. Aqueous liquids not meeting the above solids criteria are considered sludges because of the special incineration handling requirements.

4.4.3. Aqueous liquids not meeting the above pH criteria may meet the Mixed Waste acceptance criteria set in Appendix A.

4.4.4. Packages shall not arrive bulging and under pressure. If any package arrives bulging or under pressure, additional pricing to handle the container may be required.

4.4.5. Resins with container contact exposure rates in excess of 80 mR/hr require prior approval.

4.5. Asbestos

Asbestos is accepted in various forms, however asbestos for compaction must be sized by the generator to dimensions not to exceed 30"W×38"L×44"H. Asbestos shall be wetted, double-bagged, and marked with the required asbestos warning labels (see Attachment 1 for additional details).

4.6. Dewatered Liquid Cartridge Filters

Dewatered liquid filters maybe acceptable for receipt, however require the following documentation:

4.6.1. A summary included on the Shipment Summary Form detailing the filters being shipped and how they are packaged in the inbound shipment. This includes notification of bagged or packaged filters in a sea land of Bulk DAW or packaged exclusively in a liner/box/drum, etc. for processing.

4.6.2. Total count of filters on a shipment and an isotopic for each filter. Data for each filter should also include weight, dose rate, and volume or dimensions.

4.7. Metals

4.7.1. Bulk Metals

- a. Bulk metals may be processed through decontamination, volume reduction for burial, or melted for recycling.
- b. Metal pieces larger than 16 ft. × 8 ft. × 8 ft. per individual piece or combination of integral pieces require approval prior to shipping.
- c. Metal pieces heavier than 20,000 lbs. per single piece require approval prior to shipping.
- d. Materials for mandatory recycling require special approval.
- e. The following metals require out-of-WAG approval prior to shipment.

Not Candidates for Melting	Not Candidates for Volume Reduction
Non-ferrous metals such as brass, bronze, aluminum, cadmium, copper, Inconel, monel, nickel, and chromium (>15 lbs per item). Note that the weight limit is specific to the non-ferrous components rather than the weight of the item that contains the non-ferrous item.	Lead/lead alloys
Molybdenum	Cadmium
Uranium metals	Chromium/chromium alloys (excluding stainless steel)
Tantalum	Metals that have residues of oils and solvents that can potentially combust during melting process
Zirconium	Titanium
Metals that have residues of oils and solvents that can potentially combust during melting process	Magnesium thorium
Titanium	Mercury items of mercury-contaminated metal
Magnesium thorium	Metal items containing/coated with 50 ppm or greater levels of PCBs i.e. coatings, fixtures, gaskets etc.
Metals exceeding 20 mR/hr contact	Circuit boards
Metals coated with asbestos	
Lead	
Galvanized metal	
Stellite	
Tin	
Crushed metal items that contain nonmetallic materials	
Bulk metals containing >2% incinerable by weight (e.g. wire insulation, paint, other coatings)	
Metal items containing/coated with 50 ppm or greater levels of PCBs must have coating removed	
Circuit boards	
Mercury items or mercury contaminated metal	

4.7.2. Lead (Pb)

- Lead bricks, sheets, or shapes are accepted for recycling through casting. Lead shot and wool are not accepted for recycle but may be acceptable for Mixed Waste treatment under Mixed Waste acceptance criteria set in Appendix A.

- All lead shapes shall be packaged separately from non-lead materials and labeled as containing lead.
- Lead-encased metal shapes (LEMS) are accepted for removal of the encasing material and survey and recycling. All LEMS are considered out of WAG and require approval prior to shipment.
- Where possible schematic diagrams should be provided for all LEMS prior to shipping.

4.8. Dry Active Waste (DAW)

Waste consisting of paper, plastic, cloth, rubber, wood, and light gauge and small metal pieces are acceptable.

4.9. Explosives

Waste cannot be accepted that is readily or potentially capable of detonation or explosive decomposition/reaction at normal temperature and pressure; detonation or explosive reaction if subjected to a strong initiating source or heat under confinement; explosive reaction with water; or defined as an explosive by 49 CFR 173.50.

4.10. Compressed Gases

Containerized compressed gases and containerized gasses are not accepted for processing. Cylinders must be empty, have valve stem removed or a hold drilled in the container. Aerosol cans that are empty, punctured, and at atmospheric pressure are acceptable for processing.

4.11. Hazardous Waste

Hazardous waste as identified in 40 CFR 261 (Reference 2.1.3) is acceptable if it meets the requirements of WAG-501A, Mixed Waste Acceptance Guidelines.

4.12. Hot Particle Waste

Hot particle waste shall be double bagged or wrapped in plastic, and marked (see Attachment 1 for additional details). The waste generator must reduce hot particle packages to less than 30"W×38"L×44"H for waste designated for compaction.

4.13. Lead-Acid Batteries

Sealed batteries that are not internally contaminated are accepted for decontamination and recycling. See Attachment 1 for packaging details.

Broken and/or leaking batteries are not eligible for recycle. However they may be eligible for mixed waste treatment under the criteria outlined in Appendix A, Mixed Waste Acceptance Guidelines.

4.14. Oil

Oil is accepted for energy recovery via incineration provided it meets the definition of *On-Specification Used Oil* (listed below and as provided in 40 CFR 279.11, (Reference 2.1.4) or is non-hazardous. Oils for incineration will require submission of analytical data or a process knowledge statement. Account Executives/Customer Reps will assure the data/oil info is put in BCO network folder:

O:\BCTN\MANIFESTS\Oil Data and PK Statements

On-Specification Used Oil Table

On-Specification Used Oil	
Constituent/Property	Allowable Level
Arsenic*	5 ppm or less
Cadmium*	2 ppm or less
Chromium*	10 ppm or less
Lead*	100 ppm or less
Flashpoint***	100° F or higher***
PCBs	Less than 2 ppm
Total Halogens**	1,000 ppm or less

Used Oil (as defined by 40 CFR 279.11) means any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities.

*This specification is for Total Metals (per above specifications), not TCLP.

**Total halogen concentrations 1,000 ppm but less than 5,000 ppm may be acceptable provided the presumption of mixing has been successfully rebutted.

***Flashpoint $\geq 100^\circ$ F and $< 140^\circ$ F require prior approval due to increased storage requirements.

- 4.14.2. Direct Processing - Oils such as diesel, #4, #6, etc. and lubricating oils meeting the above specifications for used oil or is non-hazardous are accepted for direct processing if they meet the following criteria.

Solids content	$\leq 10\%$ by volume
Aqueous liquid content	$\leq 10\%$ by volume

- 4.14.3. Synthetic Fluid - Most synthetic fluids, including Fyrquel electro-hydraulic control (EHC) fluid and Mobil SHC lubricating fluids are acceptable as undiluted but must be labeled SYNTHETIC FLUID. All Synthetic Fluid must meet the On-Specification Oil Criteria or be non-hazardous.

4.15. **Paint Chips**

Confirmed non-hazardous, non-TSCA (through TCLP and PCB analysis) paint chips are accepted for processing. Hazardous paint chips may meet the Mixed Waste criteria in Appendix A, Mixed Waste Acceptance Guidelines.

4.16. **Polychlorinated Biphenyls (PCBs)**

- All PCB shipments to ES require OOW approval. The OOW approvals need to be submitted a minimum of 180 days prior to 1 year after the out-of service date.
- Metallic items (except lead) with PCB-containing coating(s) or defined as PCB bulk product waste per 40 CFR 761 (Reference 2.1.5) are acceptable for processing.
- The PCBs must be part of the original product. Materials that have been decontaminated in accordance with a valid EPA PCB disposal approval, 40 CFR 761.79 (Reference 2.1.5), or applicable EPA PCB spill cleanup policies are acceptable.

If not previously decontaminated, PCB items meeting an applicable decontamination standard of 40 CFR 761.79(b) (Reference 2.1.5) are accepted. Decontaminated items

may require additional approval. PCB shipments to ES shall include a hazardous waste manifest.

4.17. Bulk Waste Assay Program

4.17.1. All BWAP processing requires a full isotopic distribution, including a 10 CFR 61 profile, for all waste and a TCLP analysis for each campaign of sludge, paint chips, and grit. Use the WAG-501-F2 form (Bulk Waste Assay Program Profile) to communicate waste matrices to the account executive. All wastes to be processed through BWAP must have an approved Bulk Waste Assay Profile form (WAG-501-F2). This form requires approval by TDEC and BCO Environmental Compliance.

4.17.2. Radioactive waste forms specifically excluded from BWAP processing include:

- Tires
- PCBs equal to or greater than 50 ppm Hazardous wastes identified per 40 CFR 761 (Reference 2.1.5) or Tennessee Rule Chapter 0400-11-.01, Solid Waste Processing and Disposal (Reference 2.1.6).

4.17.3. Radioactive liquids are accepted if shipped in bulk volumes of 5,000 gallons or greater. There is no minimum volume for absorbed liquids.

4.17.4. Specialty metals (e.g., brass or bronze), computer terminals (CRTs), circuit boards, and universal waste (e.g. lead-acid batteries, fluorescent tubes, mercury switches, etc.) may be accepted for recycle with prior approval provided they are properly identified and segregated from other waste. All items for recycle must be intact.

4.18. Pyrophoric Material

Pyrophoric materials require OOW approval for processing.

4.19. Sealed Sources

Sealed sources may be acceptable after evaluation and OOW approval. The following information is required prior to processing approval:

- Isotopic information and corrected activity
- Physical description, e.g. plastic disc, metal cylinder, etc.
- Size and dimensions

4.20. Tanks and Other Closed Vessels

Tanks and other closed vessels may be accepted for processing after evaluation and provided that they are completely empty, non-RCRA, and non-TSCA regulated.

4.21. Trans-Shipments for Direct Disposal

Waste that meets low-level radioactive waste package and waste form disposal requirements is accepted, after evaluation, for trans-shipment from the facility directly to a licensed low-level radioactive waste disposal site. Appropriate inspection criteria will be developed based on waste-streams, profile, and disposal destination.

4.22. Treated Formerly Characteristic Hazardous Waste and RCRA Exempt Materials

Characteristically hazardous wastes that have been rendered non-hazardous by treatment and containers that qualify as Resource Conservation and Recovery Act (RCRA) empty are acceptable. Shipment paperwork for hazardous wastes that have been rendered non-hazardous by treatment shall include a completed Land Disposal Restriction (LDR) Form **OR** a Certification in accordance with 40 CFR 268.7 (Reference 2.1.2).

4.23. Non-RCRA-Liquid Scintillation Vials (LSV)

LSVs are acceptable for processing provided that they are packaged in accordance with the requirements of Attachment 1. There are three LSV categories:

- Plastic vials **ONLY** packaged for direct incineration (most preferred/cost effective)
- Glass and Plastic vials packaged for direct incineration
- Glass or Plastic vials in metal drums for incineration

NOTE: Glass is not acceptable for incineration except for glass liquid scintillation vials. Any glass thicker than a liquid scintillation vial is unacceptable for incineration without prior approval.

4.24. Category 1 and 2 Quantity of Materials

Shipment of radioactive waste in quantities in excess of the table below must be approved in advance of shipment. In addition, the shipper of record shall contact ES at ShipmentNotification@energysolutions.com prior to shipment's departure to coordinate expected arrival time of the shipment in accordance with **10 CFR 37 Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material** (Reference 2.1.7).

Category 1 and 2 Quantity of Materials³

Radionuclide ¹	TBq ²	Curies ²
Co-60	0.3	8.1
Cs-137	1	27
Gd-153	10	270
Ir-192	0.8	22
Pu-238	0.6	16
Ra-226	0.4	11
Se-75	2	54
Sr-90 (Y-90)	10	270
Yb-169	3	81

¹ If more than one radionuclide is being shipped, the sum of fractions rule applies.

² The primary values used for compliance with this Order are TBq. The curie (Ci) values are rounded to two significant figures for informational purposes only.

³ The Table is abbreviated based on site possession limits.

4.25. Non-Conforming Material

If ES identifies any non-conforming material, the customer will be contacted for proper disposition. The radioactive waste will be put in dispute. Additional charges may apply based on the dispute resolution path.

4.26. Controlled Substances

Controlled substances listed in 21 CFR 13 Subchapter I Part B Section 812 Schedules of Controlled Substances require OOW approval. Requests for approval should be submitted to ES a minimum of 14 calendar days prior to scheduled shipment.

4.27 Engineered Nanomaterials

Engineered nanomaterials are not acceptable for inspection or processing at the ES Tennessee facilities. An Engineered nanomaterial is any intentionally produced material that has a size in 1, 2, or 3 dimensions of typically between 1-100 nanometers (example: carbon nanotubes or ultrafine particulates). Bucky balls are also included even though they have a size <1nm. Aggregates and agglomerates with size >100nm are included if breakdown may occur creating particles in the 1-100 nm range during the lifecycle.

4.28 Beryllium Contaminated Waste

4.28.1 Beryllium contaminated waste may refer to

- Isotopic beryllium
- Elemental beryllium
- Beryllium compounds (beryllium oxide, beryllium fluoride, etc.)

4.28.2 Radioactive waste for processing will be considered as beryllium contaminated if either of the following criteria are exceeded.

Descriptor	Criteria
Loose contamination	0.2 µg/100cm ² elemental, or 30,000 dpm/100cm ² radiological
Solid wastes (DAW, metal, building rubble, etc.)	0.1% by weight
Soil contamination	0.01 mg/m ³
Liquid contamination	0.02 mg/L

4.28.3 Any shipment, package, or container that arrives with beryllium placarding, labelling, markings, etc., without prior approval will be placed on hold and investigated prior to processing.

4.29 Stored or Residual Energy

All potentially hazardous stored or residual energy present in any waste for processing, and especially equipment that has not been disassembled, must be identified. Systems, components, or equipment, including batteries which have energy must be relieved, drained, disconnected, restrained, and otherwise rendered

deactivated and stable. Hazardous energy items shall be marked as “deactivated” or be marked “Danger- hazardous energy” if hazardous energy has not been addressed.

Potential stored energy would include electrical, mechanical, pneumatic (air), hydraulic, steam, gravity, etc. Examples include springs, static eliminators, capacitors, batteries, elevated movable machine parts, hydraulic systems, pressurized liquid/gas systems, etc.

Information such as technical manuals, drawings, or manufacturer information related to equipment with stored or residual energy must be provided to ES OOW for evaluation prior to the shipment of waste or equipment with stored or potential energy. Any removal, disabling, or by-passing of a barrier or safety device intended to protect individuals from stored or residual energy shall be identified.

If the potential energy cannot be released by the customer, then a Special Quote shall be required prior to receipt of the waste or equipment.

4.30 Mercury Contaminated Waste

Mercury contaminated waste is not acceptable for processing at the Bear Creek and Gallaher Road facilities unless it has been approved for receipt in accordance with WAG-501A, Mixed Waste Acceptance Guidelines. On a case-by-case basis waste streams arriving at the Bear Creek or Gallaher Road facilities may be sampled and analyzed for the presence of mercury as part of the waste receipt process.

5. RADIOLOGICAL GUIDANCE

General radiological criteria are defined in Table 1.

6. SPECIAL DISPOSAL-SITE REQUIREMENTS

6.1. Clive, Utah

For low-level radioactive waste (LLRW) and mixed waste to be disposed of at EnergySolutions disposal facility in Clive, the generators must ensure that the radioactive waste in the LLRW shipment are compliance as Class A waste per 10 CFR 61.55.

ES requires approval from the LLRW Compact of origin, or for states unaffiliated with a LLRW Compact, the state of origin, to the extent a State can exercise such approval. Prior to receiving an initial LLRW shipment for disposal from a generator, ES requires documentation that the LLRW has been approved for export.

6.2. Barnwell, South Carolina

Atlantic Compact generators with LLRW designated for disposal at the ES Barnwell Disposal Facility in Barnwell must possess a valid South Carolina Radioactive Waste Transport Permit.

6.3. Richland, Washington

For LLRW to be disposed of at the U.S. Ecology commercial disposal facility in Richland, generators must possess a valid Washington Site Use Permit and a U.S. Ecology generator number. NORM/NARM waste must have prior approval from the

State of Washington. All Washington Dangerous Material must be identified and are subject to pre-approval.

6.4. Compacts

Generators in the Southwest Compact, Rocky Mountain Compact, and Texas Compact are required to have export permits.

6.5. Andrews, Texas

If the generator chooses not to utilize the ES import agreement with Texas and contract with WCS, the generator must possess a generator certification issued by WCS, an import agreement with Texas, if not already located in either Texas or Vermont, and a valid contract set up with WCS.

Table 1 – General Radiological Criteria

A. RADIATION AND CONTAMINATION LEVEL OF WASTE		
Waste Type	Contact Exposure Rate of Waste	Contamination, Fixed or Removable (dpm/100cm ²)
Dry Active Waste (DAW)	≤ 200 mR/hr	Not Applicable
Metal	≤ 200 mR/hr	See Table 1 B. below
Metal for Melt Only	≤ 20 mR/hr	≤ 50,000 βγ
Bulk Waste Assay	≤ 50 μR/hr	Not Applicable
Aqueous liquids, sludges, and resins	≤ 20 mR/hr	Not Applicable
Lead for Casting	< 5 mR/hr	1,000 α for Uranium and daughters, 500 α for transuranics and Thorium, and less than 25,000 βγ

B. REMOVABLE EXTERNAL CONTAMINATION (Note 1)			
Radiation Type	Package dpm/100 cm ²	Radioactive Waste (dpm/100 cm ²)	
		Average	Maximum
β-γ <i>except</i> for Sr, I, and Ra	≤ 1,000	≤ 500,000	1,000,000
β-γ for Sr-90, I-126, I-131, and I-133	≤ 100	≤ 50,000	100,000
β-γ for I-125, I-129, and Ra-228	≤ 20	≤ 5,000	10,000
α <i>except</i> for TRUs, Ac, Ra, and Th	≤ 100	≤ 50,000	100,000
α for TRUs, Ac-227, Ra-226, Th-228/230	≤ 20	≤ 5,000	10,000

Note 1: Generator shall provide notification when the specified contamination levels may be exceeded based on qualitative or quantitative data if available. EnergySolutions does not assume or expect that generators conduct external contamination swipes on all waste types.

C. RADIONUCLIDE CONCENTRATION (Note 2)	
Radionuclide concentration per package (e.g., drum or inner-pack box) shall not exceed the following group or individual limits.	
Radionuclides	Limiting Values
Total, all radionuclides with >5-yr half-lives <i>except</i> H-3, C-14 and Tc-99	≤ 0.3 μCi/cm ³
Total, H-3 and C-14	≤ 0.03 μCi/cm ³
I-125	≤ 1 mCi/package
Other mixed fission and activation products, Z < 84	≤ 25 mCi/ft ³
Tc-99	≤ 100 μCi/ft ³
Be	Special approval required
Th-232	≤ 5 mCi/ft ³ or 100 lb. Th/ft ³ waste
U-238 as metal or oxide	≤ 15 mCi/ft ³ or 100 lb. U/ft ³ waste
Depleted Uranium contaminated materials	≤ 18 nCi/g
α for TRUs, Ac, Ra and Th for processing (unless otherwise listed)	≤ 0.1 nCi/g and less than 1% of activity
α for TRUs, Ac, Ra and Th for trans-shipment (unless otherwise listed)	≤ 10 nCi/g
Special Nuclear Material (Pu, U-233 and uranium enriched in U-233 or U-235)	≤ 0.49 g
Source Material (Th, U(NAT) and U(DEP))	≤ 0.49 kg

Note 1: Sr-90 and I-129 must be < 2% of the total β-γ activity

Note 2: Disposal sites may have more restrictive concentration limits

7. WASTES REQUIRING PRIOR APPROVAL

The items listed in Table 2, on the following page, require advance approval from ES prior to shipment. Additionally, these items shall be specifically identified on the Shipment Summary Form (WAG-501-F1), which is to be included with the shipment. Contact your

Waste Acceptance Guidelines

account executive regarding advanced approval and receipt schedules. If the following material is shipped to ES without prior approval, it will be subject to waste processing surcharges or returned at the generator's expense.

Table 2 – Waste Requiring Prior Approval and Special Pricing Consideration

Ref. Section	Requirement
General	Non-radiological hazards shall be identified
General	Due to the non-routine nature of the types of wastes generated during decommissioning projects, ES reserves the right to review for approval radioactive wastes that originate from decommissioning projects
General	All cask/OOW shipments (minimum of 3 days prior to arrival of shipment)
General	Wooden or fiber outer containers and poly-wrapped flatbed loads
General	Shipments requiring disposal at Richland, WA, Barnwell, SC, or Andrews, TX
General	Shipments requiring specialty container or dunnage returns
General	Waste material generated in the Northwest Compact
All	Waste that does not meet the ES WAG or requires expedited processing
4.2.1	Sharps as defined in 49 CFR 173.134 (3rd Bullet)
4.3	Small Sharp Objects
4.4.5	Resins with exposure rates greater than 80 mR/hr
4.7	Metal pieces larger than 16 ft. × 8 ft. × 8 ft. per individual piece or combination of integral pieces
4.7	Metal pieces heavier than 20,000 lbs. per single piece
4.7.1	Bulk Metals that require special evaluation
4.7.2	Lead & LEMS
4.11	Hazardous waste as identified in 40 CFR 261
4.12	Hot Particle waste
4.13	Lead-Acid batteries
4.14	Oil – Used Oil Flashpoint ≥ 100°F and < 140° F
4.15	Paint Chips (requires TCLP and PCB analysis)
4.17	BWAP
4.18	Pyrophoric Material
4.19	Sealed sources
4.20	Tanks and other closed vessels
4.21	Trans-shipments for direct disposal
4.22	Treated Formerly Characteristic Hazardous Waste and RCRA Exempt Materials
4.23	Non-RCRA-Liquid Scintillation Vial – Glass for incineration that is thicker than liquid scintillation vials.
4.24	Category 1 and 2 Quantities of Material. Please Note: manifests for exceeding these quantities must be submitted 5-days prior to the actual shipment arriving at the facility.
4.25	Non-Conforming Material
4.26	Controlled Substances
4.27	Engineered Nanomaterials
4.28	Beryllium Contaminated Waste
4.29	Stored or Residual Energy
Table 1	When levels in Table 1 are exceeded
Appendix A	Mixed Waste

8. ATTACHMENTS

Attachment 1, Specific Waste Packaging and Shipping Guidelines

Attachment 2, Summary of the Criteria for Determining if a Waste or Material is Hazardous

Waste Acceptance Guidelines

ATTACHMENT 1, Specific Waste Packaging and Shipping Guidelines

All wastes shipped to ES, shall be delivered in a manner consistent with the requirements of 49 CFR. Wood, fiberboard, or super-sack containers require special coordination for storage purposes.

Unless prior written approval is provided, all containers without lifting devices over 75 lb must be palletized, excluding standard drums (i.e. 30, 55, or 85-gal). Cu. Yd. boxes may be double stacked provided they contain legs or have 2"x 4" wood spacer boards sized to fit the containers placed vertically on the floor and between the boxes in order to be removed by a Fork Lift without manual lifting. The boards will be considered sacrificial and incinerated with the boxes, unless requested to be returned with the conveyance.

Any equipment not shipped in its original or intended configuration should be noted on manifest additional notes page or the OOW form. An example would be a compactor or baler that was normally operated in a vertical configuration and now being shipped in a horizontal configuration possibly creating additional pressure applied to certain components.

Waste Types

The guidance provided in this attachment applies to packaging for the following waste types. See ES WAG for waste form guidance and required documentation.

- DAW for Direct Compaction
- DAW in Bulk Containers for Sorting, Compaction, and Incineration
- DAW in Non-Bulk Containers for Direct Incineration
- Oil for Direct Incineration
- Aqueous Liquids for Direct Incineration
- Animal/Biological Waste for Direct Incineration
- Resins and Sludges for Drying/Incineration
- Potentially Clean Waste for BWAP
- Sealed Sources for Encapsulation
- PCB Bulk Product Metal
- Cask Shipments
- Non-RCRA Liquid Scintillation Vials Shipments
- Mixed Waste
- Small Sharp Objects

DAW for Direct Compaction

1. ES requires the customer ensure waste packaged for direct compaction has been sorted to remove non-conforming materials.
2. Package DAW for direct compaction in 55-gal or ES provided inner-pack (IP) boxes.

NOTE

Waste Acceptance Guidelines

ES does not consider inner-pack boxes strong-tight containers. Therefore, inner-pack boxes must be shipped inside another qualified outer container.

3. Do not place large metal pieces, such as piping, rods, or steel bars, in the drum or inner-pack box vertically. Place other miscellaneous metal pieces either horizontally or diagonally in the inner-pack box or drum.
4. **Asbestos (friable and non-friable) material** received for compaction in packages other than 55-gal drums or ES inner-pack boxes must be size reduced prior to receipt to less than 30"Wx38"Lx44"H. Asbestos shall be double bagged using six mil polybags, and marked with the required asbestos warning labels. In addition, a Waste Shipment Record per 40 CFR 61.150(d) must accompany the shipment.

DAW in Bulk Containers for Sorting, Compaction, and Incineration

1. Place waste to be sorted inside poly-bags and load the poly-bags into bulk containers.

NOTE

Bulk containers larger than 100 ft³ containers shall be capable of being off-loaded through the end. Also note that large cargo containers of DAW accepted at EnergySolutions are limited to top and end-loading sealand type containers. Intermodals may be acceptable with prior approval.

2. Segregate materials with different radionuclide content or total activity from the remaining materials. Identify these materials separately on the manifest.
3. **Hot particle waste** received in packages other than 55-gal drums or EnergySolutions inner-pack boxes must be size reduced prior to receipt to less than 30"Wx38"Lx44"H. Hot particle waste shall be double bagged, or wrapped in plastic, and marked on the outermost container:

CONTAINS HOT PARTICLE WASTE—DO NOT OPEN

4. **High Exposure Rate Waste >200 mR/hr** received in packages such as bags, boxes or other discrete items shall be clearly marked and visible upon opening and unloading of bulk waste containers. The use of colored tape, paint or other clearly marked identifier may be used.
5. **Co-mingled incinerable/compactable waste** for sorting shall be positioned in the bulk container to allow off-loading first. DAW for compaction or incineration which is packaged within the same bulk container (e.g., metal boxes, cargo containers) as wastes that require other processing methods (i.e., metals processing, BWAP) shall be either segregated by use of partitions or placed in separate containers within the bulk package and must be clearly labeled. Materials needing other processing methods that are packaged within the same bulk container as wastes for sorting and incineration are also subject to the specific waste packaging guidelines for the applicable processing method.

Waste Acceptance Guidelines

DAW in Non-Bulk Containers for Direct Incineration

1. ES requires the customer ensure waste packaged for direct incineration has been sorted to remove non-conforming materials.
2. Place waste to be incinerated in clear poly-bags and place the bags in strong tight cardboard boxes or strong tight fiberboard drums. If fiber drums are used, do not include any non-incinerable material (e.g., metal). Metal or poly outer containers are not required.

NOTE

The package is limited to one cubic yard with no single dimension greater than 36" and 300 lb gross weight per package. Wood cribbing and/or pallets may be required as specified by the beginning of Attachment 1 for containers over 75 lb. Excessive package weights may incur additional charges. Use of other packaging configurations requires special approval from EnergySolutions.

3. Clearly mark each package with the generator's name, address, and number the package to correspond with the manifest entry. Each package shall contain only one generator's waste.
4. Glass is not acceptable for incineration except for glass liquid scintillation vials. Any glass thicker than a liquid scintillation vial is unacceptable for incineration without prior approval.

Oil for Direct Incineration

1. Synthetic fluids, including electrohydraulic (EHC) fluids and synthetic hydrocarbon (SHC) lubricating fluids, must be packaged in separate shipping containers from petroleum-based oils.
2. Use 55-gal non-leaking steel or polyethylene containers for oil. In addition, ensure the containers are compatible with the oil being transported.
3. Put the primary containers in steel or poly outer-packs to provide double containment in the event of leakage or spillage from the primary container.
4. Over-packed packages containing oil may be packaged within the same bulk container as wastes that require other processing methods; however, the packages need to be segregated by use of partitions. Oils should be positioned in the bulk container to allow off-loading first.
5. Drums shall not be double stacked unless palletized and secured to prevent shifting during transport.

Aqueous Liquids for Incineration (Non-Hazardous Only)

1. Put the primary containers in over-packs to provide double containment in the event of leakage or spillage from the primary container.
2. Over-packed packages containing aqueous liquid may be packaged within the same bulk container as wastes that require other processing methods; however, the packages need to be segregated by use of partitions. Materials for sorting and incineration should be positioned in the bulk container to allow off-loading first.
3. Drums shall not be double stacked unless palletized and secured as to prevent shifting during transport.

Waste Acceptance Guidelines

4. Bulk quantities of aqueous liquids are acceptable in DOT-certified tankers and DOT-certified portable tanks designed with forklift pockets compatible with standard fork trucks.

Biological Waste for Direct Incineration

1. **Inner Wrapping:** Double wrap animal/biological waste that contains liquids or could decompose to produce liquids/fluids using two 4-mil clear poly-bags. Close each bag by heat sealing or taping. Put the bag into a cardboard box or fiberboard drum, with a minimum of 2 in. of incinerable absorbent in the bottom. In all instances, use boxes/drums with no metal parts.

Wrap other animal/biological waste, including contaminated nonmetal laboratory equipment and trash, in one 4-mil clear poly-bag. Heat seal or tape the bag prior to placing it into the cardboard box or fiberboard drum. Biological wastes shall not be mixed with non-incinerables in the same container.

2. **Outer Container:** Only one generator's waste shall be placed in an individual box/drum. Use cardboard boxes or fiberboard drums with no metal parts. Securely close each box/drum with duct tape so that all edges or flaps are not visible. The box or drum is limited to a maximum of 21"x21"x21" and 75 lb gross weight per package.

Clearly mark each package with the generator's name, and number the package to correspond with the manifested entry. Mark the top of the container, **THIS END UP**. Mark at least two opposite sides of the container:

BIOLOGICAL WASTE — FOR INCINERATION ONLY.

Note: DO NOT mark containers as BIOHAZARDOUS. Biohazardous means the same as infectious at the ES Tennessee Facilities.

Animal carcasses/tissue shall arrive frozen at ES.

3. **Bulk Container Packaging:** All packaging requirements for individual packages apply to each package in the bulk container.

Packages containing animal/biological waste may be packaged within the same bulk container as wastes that require other processing methods; however, the packages need to be segregated by use of partitions. Wastes for sorting and incineration should be positioned in the bulk container to allow off-loading first.

Resins and Sludges for Drying/Incineration

Resins and sludges may be packaged in steel or poly liners provided the liner is overpacked in a cask and the resin/sludge can be transferred directly from the liner while in the cask. Liners placed directly on the floor of the conveyance or bulk container (e.g., Sealand) are strictly prohibited. EnergySolutions will accept DOT drums designed for liquids, DOT portable tanks (with fork pockets), and DOT-certified tankers. Small (<30 gallons) polyethylene containers must be overpacked.

NOTE

The preferred packaging for low-dose-rate *sludges* (<50 mRem/hr) for incineration is steel or poly drums or boxes (preferably 50 ft³ type).

Dewatering laterals that contain multiple-cartridge filters (filter trees) make liners unusually difficult to empty and should be avoided.

Potentially Clean Waste (PCW) for BWAP

1. General PCW Packaging Guidelines

- PCW may be packaged in 55-gal drums. ES prefers that large quantities of drums be banded and placed on pallets for shipping.
- PCW may be packaged in “super sacks,” on pallets, or in B-25 or B-12 type containers. Maximum package size is 4’W× 6’L× 4’H and 9,500 lb net waste weight.
- PCW may be packaged in sealand containers or intermodals. Maximum container weight is approximately 43,000 lb gross weight.

2. “Co-mingled” PCW and Radioactive Waste Packaging Requirements

- Notify an Account Executive prior to a “co-mingled” shipment.
- Do not co-mingle packages and segregate PCW from radwaste inside shipping container (i.e., use cargo nets or equivalent to segregate load).
- Clearly identify PCW by using proper markings, labels, etc.
- Load PCW into shipping container so that it can be unloaded AFTER the radwaste is unloaded.

3. “Special” PCW Packaging Requirements

3.1. *Low-Density Trash PCW*

- Package PCW trash in clear plastic bags (no radiation markings and/or labeling) weighing less than approx. 50 lbs. each.

3.2. *Asbestos PCW*

- Asbestos shall be double bagged using six mil polybags, and marked with the required asbestos warning labels. In addition, a Waste Shipment Record per 40 CFR 61.150(d) must accompany the shipment. (For asbestos waste containing sharp objects that might tear a bag, EnergySolutions recommends that asbestos bags be packaged in super sacks.)
- Each bag must be properly marked for asbestos.
- No other radioactive markings/labels on or in the asbestos waste, since this waste cannot be shredded after bulk assay.
- No yellow “rad” bags.
- Asbestos Waste Shipment Record must accompany shipment.

3.3. *Sludges PCW*

- Package PCW sludges in metal drum, boxes, or equivalent.
- An internal plastic bag or liner should be placed in drum or box before filling.
- Each “batch” of sludge waste must be sampled and analyzed (by TCLP methods) for hazardous metals. This TCLP analysis must be included with each waste shipping manifest.
- No freestanding liquid.

Waste Acceptance Guidelines

3.4. *Paint Chips PCW*

- Package PCW paint chips in metal drums, boxes (or equivalent).
- Each “batch” of paint chip waste must be sampled and analyzed (TCLP) for hazardous metals. This TCLP analysis and/or a Safety Data Sheet (SDS) must be included with each waste shipping manifest.

3.5. *Water-Filtration Media (i.e., resin, charcoal) PCW*

- Package PCW filtration media in metal drums, boxes, or equivalent.
- No freestanding liquid.

3.6. *High-Density (i.e., metals, soil, concrete, asphalt) PCW*

- Package high-density waste in metal drums, boxes, super sacks, sealands, intermodals, or equivalent.
- Notify an Account Executive prior to any shipment of overweight containers or very large metal components (i.e., tanks, equipment).
- Maximum dimensions for large metal components are 5' x 5' x 5'.
- Maximum container weight is 43,000 lbs. gross weight.

3.7. *Lead-Acid Batteries*

- Sealed batteries that are not internally contaminated are accepted for decontamination and recycling.
- Batteries containing electrolyte acid or alkaline corrosive battery fluid (wet batteries) must be packaged to prevent a dangerous evolution of heat and short circuiting. Each battery shall be fully enclosed in inner packaging made of non-conductive materials and separated in a manner to prevent contact with other batteries, devices or conductive materials in the packaging.
- Exposed terminals shall be protected with non-conductive caps, non-conductive tape or by other appropriate means.
- Batteries shall also be packaged to prevent shifting which could loosen the terminal caps.
- Broken and/or leaking batteries are not eligible for recycle. However they may be eligible for mixed waste treatment under the criteria outlined in Appendix A, Mixed Waste Acceptance Guidelines.

Sealed Sources

Sealed sources shall be characterized, packaged and shipped in accordance with DOT regulations. Sealed sources generally do not meet the definition of LSA or SCO, so bulk packaging and mixing with other DAW type materials is discouraged.

PCB Bulk Product Waste for Metals Processing

1. **Bulk Container Packaging:** Use DOT specification bulk containers for PCB-bulk product waste (contaminated metallic items with PCB levels 50 ppm or greater). Clearly mark the package and the PCB item with the PCB “M_L” sticker as required by 40 CFR 761.45 (Reference 2.1.5) and the generator’s name, address, contact name, and phone number.

Waste Acceptance Guidelines

Number the package to correspond with the manifest entry. Each package shall contain only one generator's waste. Each PCB item must be marked with PCB out-of-service date.

2. PCB wastes shall be packaged separately and not co-mingled with non-PCB wastes.
3. All PCB waste/material shall be packaged shall be shipped using an EPA uniform Hazardous Waste Manifest.

Cask Shipments

1. All cask shipments require prior approval from ES.
2. Customers using an NRC-licensed or other cask not owned by ES or subsidiaries shall ensure that ES is a "Registered User" of the licensed cask prior to shipment to an ES facility.
3. Third-party cask documents (Certificate of Compliance, Safety Analysis Report and handling and maintenance procedures and drawings) shall be made available to ES as the NRC Registered User of the cask prior to shipment of the cask to an ES facility.
4. Individual internal packages need to be clearly marked to match the itemized manifest line items on 541. Additional description of package/loading configuration (e.g. super-sack, drum pallet, rigging) needs to be noted on Shipment Summary Form.
5. Any external smearable levels on packages inside cask exceeding 1,000 dpm/100 cm² beta/gamma and 100 dpm/100 cm² alpha requires prior notification.
6. All shipments shall strictly comply with the applicable Certificate of Compliance for the cask in use (i.e., lid torquing, sealing gaskets, weight restrictions, and shoring requirements).
 - Liners containing "grapple bails" are to be identified on the Waste Manifest Form. If the liners have non-EnergySolutions supplied bails, the customer must provide the proper grapple lifting device and instructions or procedure for its use. These are to be provided prior to or at the time the liner is offered for shipment. The customer-provided grapple lifting device may need to be made available at later times to move the liner within the facility.

NOTE

Liners containing non-EnergySolutions grapple bails must have appropriate lifting cables attached if the above criteria cannot be met.

CAUTION

Customer-provide grapple lifting devices may have to be shipped separate from the liner if liner requires overweight permit.

- All drums shall be palletized and pallets shall have proper lifting devices attached. Boxes shall be equipped with appropriate lifting devices or palletized.
- Disposal container and/or pallet shall have the lifting device secured at the top of the container(s). This is to prevent the cable from becoming caught under or between the container(s) or pallet.

NOTE

Lifting devices shall be of sufficient length to allow retrieval and crane hook-up without physically entering the cask. Ensure lifting devices are secured as to prevent them from getting trapped between packages and cask wall.

Waste Acceptance Guidelines

- Disposal container with wire rope/synthetic slings and shackles shall have the shackle pins zip tied or otherwise secured to prevent loosening or backing out.
- For shipments consisting of high-integrity containers, the pallets on which the containers are placed are considered sacrificial since the pallets are used for proper placement in the concrete vaults.
- When using liners to ship high rad DAW, “wide mouth” liners must be used if the liner is to be returned to the customer. “Small mouth” liners will be cut up and processed as waste.
- When using pallets, the containers shall be positioned to remain balanced and stable on the pallet when lifted clear of the cask.
- When tall, slender containers (i.e., demineralizers) are loaded on a pallet inside a cask, the containers shall be tied or secured together at the tops to prevent containers from falling off the pallets during off-loading. This is not required for a single tier of drums that are placed on a pallet.
- Palletized drums inside a cask shall be loaded to prevent shifting of drums resulting in increased radiation levels measured outside the cask.
- All inner packages, including oft side packages shipped in a cask shall be closed per manufacturer’s specifications and shall include appropriately rated and accessible lifting devices.

Non-RCRA Liquid Scintillation Vials (LSVs) Shipments

LSVs are acceptable only if packaged in accordance with the following.

Fiberboard containers —

- Shall be double-bagged in sturdy and leak-resistant polyethylene liners. Add enough incinerable absorbent in each bag (e.g., saw dust, corn cobs) to absorb double the amount of liquid contained in the package. Non-incinerable absorbent material (e.g., kitty litter and diatomaceous earth or vermiculite) is not accepted without prior approval.
- Must not exceed 110 lb. container gross weight. Wood cribbing and/or pallets may be required as specified by the beginning of Attachment 1 for containers over 75 lb.

Poly or Fiber drums —

- If packaged in open head drum, shall be double-bagged, containing enough incinerable absorbent to absorb double the amount of liquid contained in the package.
- Packages exceeding 75 lb. need to be palletized or loaded with wood runners underneath the packaging.

Poly and fiber drums for direct incineration shall not have a metal closure ring.

Small Sharp Objects

Sharp objects such as broken glass, knives, scalpel blades, and other small sharp metal objects shall be bagged separate from other waste and labelled with “Small Sharp Objects” on the outer packaging.

ATTACHMENT 1, Summary of the Criteria for Determining if a Waste or Material is Hazardous

Characteristic	Test	Liquids or Sludges	Solids		
Ignitability (40 CFR 261.21)	Flash Point	<140° F	Typically N/A but there are some solids with ignitable characteristics such as oxidizers and water reactive solids.		
Corrosively (40 CFR 261.22)	pH	pH is less than or equal to 2.0 or greater than or equal to 12.5	Always N/A		
Reactivity (40 CFR 261.23)	No Test	Is the liquid reactive? (Sulfides and cyanides may cause a waste to be reactive. Sulfites and sulfates are generally OK)	Is the solid reactive? (Metallic sodium and lithium are reactive. Depleted uranium is exempt.		
Toxicity (40 CFR 261.24)	TCLP analysis	Metals (units in mg/l, mg/kg, ppm)			
		Arsenic ≥5.0	Chromium ≥5.0	Lead ≥5.0	Selenium ≥1.0
		Barium ≥100.0	Cadmium ≥1.0	Mercury ≥0.2	Silver ≥5.0
		Organics (units in ppm)			
		Benzene ≥0.5	1,4-Dichlorobenzene ≥7.5	Methyl ethyl ketone (MEK) ≥200.0	
		Carbon Tetrachloride ≥0.5	1,2-Dichloroethane ≥0.5	Nitrobenzene ≥2.0	
		Chlordane ≥0.03	1,1-Dichloroethylene ≥0.7	Pentachlorophenol ≥100.0	
		Chlorobenzene ≥100.0	2,4-Dinitrotoluene ≥0.13	Pyridine ≥5.0	
		Chloroform ≥6.0	Endrin ≥0.02	Tetrachloroethylene (perchloroethylene) ≥0.7	
		o-Cresol ≥200.0	Heptachlor ≥0.008	Toxaphene ≥0.5	
		m-Cresol ≥200.0	Hexachlorobenzene ≥0.13	Trichloroethylene ≥0.5	
		p-Cresol ≥200.0	Hexachlorobutadiene ≥0.5	2,4,5-Trichlorophenol ≥400.0	
		Cresol ≥200.0	Hexachloroethane ≥3.0	2,426-Trichlorophenol ≥2.0	
		2,4-D ≥10.0	Lindane ≥0.4	2,4,5-TP (Silvex) ≥1.0	
			Methoxychlor ≥10.0	Vinyl Chloride ≥0.2	
Listed	No Test	Does waste contain material from non-specific sources? (40 CFR 261.31 spent solvents)	Does waste contain material from specific sources? (40 CFR 261.32 K-listed)	Does waste contain unused chemical products? (40 CFR 261.33 discarded commercial chemical products/residues)	
PCB	Gas Chromatography	≥2.0 ppm			