



COPY



ESHID-601172-01

Environment Safety & Health
PO Box 1663, MS K491
Los Alamos, New Mexico 87545
(505) 667-4218/Fax (5005) 665-3811

Los Alamos Field Office, A316
3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 665-5658/Fax (505) 606-2132

Date: FEB 03 2016

Symbol: ADESH-16-010

LA-UR: 15-29668

Locates Action No.: n/a

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

RECEIVED

FEB - 3 2016

NMED
Hazardous Waste Bureau

RECEIVED

NMED
Hazardous Waste Bureau

Dear Mr. Kieling:

Subject: Response to Ordered Action 5, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20

This letter responds to Ordered Action (OA) No. 5, page 10 in Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Paragraph 35 of the SFO requires the Respondents to complete corrective actions (called "Ordered Actions" in the "Topic" column of Attachment A of the SFO) and submit required Evidence of Completion to NMED for approval by the deadlines specified in SFO Attachment A, unless an alternate date is approved in accordance with SFO paragraph 58. Ordered Action No. 5 requires that

"No later than 15 days after this Order becomes final, Respondents shall submit to NMED for review the methodology by which Respondents conduct their annual reevaluation of all hazardous waste streams."

The reporting requirements for the completed corrective action, as specified in the "Response Actions" column of Attachment A, are addressed in Enclosure 1 to this letter. The Respondents' Documentation to Provide as Evidence of Completion for Ordered Action No. 5 is included as Attachments to Enclosure 1 and in Enclosure 2.





Environment Safety & Health

PO Box 1663, MS K491
Los Alamos, New Mexico 87545
(505) 667-4218/Fax (5005) 665-3811

Los Alamos Field Office, A316

3747 West Jemez Road
Los Alamos, New Mexico, 87545
(505) 665-5658/Fax (505) 606-2132

Date: FEB 03 2016
Symbol: ADESH-16-010
LA-UR: 15-29668
Locates Action No.: n/a

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Dear Mr. Kieling:

Subject: Response to Ordered Action 5, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20

This letter responds to Ordered Action (OA) No. 5, page 10 in Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. Paragraph 35 of the SFO requires the Respondents to complete corrective actions (called "Ordered Actions" in the "Topic" column of Attachment A of the SFO) and submit required Evidence of Completion to NMED for approval by the deadlines specified in SFO Attachment A, unless an alternate date is approved in accordance with SFO paragraph 58. Ordered Action No. 5 requires that

"No later than 15 days after this Order becomes final, Respondents shall submit to NMED for review the methodology by which Respondents conduct their annual reevaluation of all hazardous waste streams."

The reporting requirements for the completed corrective action, as specified in the "Response Actions" column of Attachment A, are addressed in Enclosure 1 to this letter. The Respondents' Documentation to Provide as Evidence of Completion for Ordered Action No. 5 is included as Attachments to Enclosure 1 and in Enclosure 2.

The Respondents would be pleased to meet with NMED upon request to discuss and explain the documentation included herein. If you have comments or questions regarding this submittal, please contact Mark P. Haagenstad (LANS) at (505) 665-2014 or David Nickless (EM-LA) at (505) 665-6448.

Sincerely,



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety & Health
Los Alamos National Security, LLC

Sincerely,



For Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy

MTB:KDL:MPH/lm

Enclosures: (1) Response to Ordered Action No. 5, Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (with attachments)
(2) Electronic copies of LANL documents MAN-5004, R3 and WM-SVS-AP-201 (on CD)

Cy: Ryan Flynn, NMED, Santa Fe, NM, (E-File)
Kathryn M. Roberts, NMED, Santa Fe, NM, (E-File)
Siona Briley, NMED/HWB, Santa Fe, NM, (E-File)
Neelam Dhawan, NMED/HWB, Santa Fe, NM, (E-File)
Todd Shrader, Manager, CBFO, (E-File)
J.R. Stroble, National TRU Program, CBFO, (E-File)
Douglas E. Hintze, EM-LA, (E-File)
Peter Maggione, NA-LA, (E-File)
Jody Pugh, NA-LA, (E-File)
Lisa Cummings, NA-LA, (E-File)
David Nickless, EM-LA, (E-File)
Jordan Arnsward, NA-LA, (E-File)
Ben Underwood, EM-LA (E-file)
Kirsten M. Laskey, EM-LA, (E-File)
Craig Leasure, PADOPS, (E-File)
Amy E. De Palma, PADOPS, (E-File)
Randall M. Erickson, ADEP, (E-File)
David Funk, ADEP, (E-File)
Enrique Torres, ADEP, (E-File)
Cheryl D. Cabbil, ADNHHO, (E-File)
Michael T. Brandt, ADESH, (E-File)
Raeanna R. Sharp-Geiger, ADESH, (E-File)

Cy (continued):

John McCann, ENV-DO, (E-File)
Andrew Montoya, WM-DO, (E-File)
Justin Tozer, WM-DO, (E-File)
Jackie Hurtle, WM-DO, (E-File)
David E. Frederici, WMD, (E-File)
Mark P. Haagenstad, ENV-CP, (E-File)
Deborah Woitte, LC-LESH, (E-File)
Susan McMichael, LC-LESH, (E-File)
Deborah L. Guffee, SI-DC, (E-File)
Yvette S. Branch, SI-DC, (E-File)
Luciana Vigil-Holterman, ENV-CP, (E-File)
lasomailbox@nnsa.doe.gov, (E-File)
emla.docs@em.doe.gov, (E-File)
locatesteam@lanl.gov, (E-File)
env-correspondence@lanl.gov, (E-File)
rcra-prr@lanl.gov, (E-File)

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Michael T. Brandt, DrPH, CIH
Associate Director
Environment, Safety, and Health
Los Alamos National Security, LLC
Los Alamos National Laboratory
Operator

1/29/16

Date Signed



For _____
Kimberly Davis Lebak
Manager
Los Alamos Field Office
U.S. Department of Energy
Owner/Operator

2/3/2016

Date Signed

ENCLOSURE 1

Response to Ordered Action No. 5, Attachment A to the Settlement Agreement and Stipulated
Final Order HWB-14-20

ADESH-16-010

LA-UR-15-29668

Date: FEB 03 2016

List of Attachments

- Attachment A** WSP Annual Review Methodology (Excerpt from *LANL Waste Compliance and Tracking System (WCATS) User's Manual*, MAN-5004, R3, Section 4.3.1.4, *Extending a Waste Stream Profile*)
- Attachment B** Summary of the process to enter and review new Waste Stream Profiles (WSPs) in the LANL Waste Compliance and Tracking System (WCATS)
- Attachment C** Summary of the procedure, *Reviewing and Approving Waste Stream Profiles (WSP) in WCATS*, WM-SVS-AP-201
- Attachment D** Excerpt from *LANL Waste Compliance and Tracking System (WCATS) User's Manual*, MAN-5004, R3 (Section 4.2.1.24, Reviewers/Signatures)

Enclosure 1

Response to Ordered Action 5, Attachment A to Settlement Agreement and Stipulated Final Order HWB-14-20

INTRODUCTION:

This document provides the LANL Respondents' submittal in response to Ordered Action (OA) No. 5, page 10 in Attachment A to the Settlement Agreement and Stipulated Final Order HWB-14-20 (SFO) entered into by the New Mexico Environment Department (NMED) (Complainant) and the U.S. Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) (Respondents) on January 22, 2016. The SFO was entered into to resolve ACO HWB-14-20, issued to Respondents on December 6, 2014.

The requirements for the Respondents' submittals in response to each of the NMED's Ordered Actions are specified in the "Response Actions" column of Attachment A to the SFO. The documentation to be submitted as Evidence of Completion for OA No. 5 is listed below. Ordered Action No. 5 states that

"No later than 15 days after this Order becomes final, Respondents shall submit to NMED for review the methodology by which Respondents conduct their annual reevaluation of all hazardous waste streams."

The Respondents have included the documentation to provide as Evidence of Completion as required by OA No. 5 in Attachments A through E to this Enclosure, and in Enclosure 2. In addition, as described below, the Respondents have explained how the corrective actions and documentation address the violations under the ACO.

VIOLATIONS ADDRESSED:

As specified in Attachment A to the SFO, Ordered Action No. 5 addresses the following violations (as listed in Attachment A by paragraph number in the December 6, 2014 ACO).

120. Respondents accepted waste streams for storage and treatment at permitted units at the Facility that were not fully characterized...

121. Respondents failed to ensure that initial characterization of waste streams LA-MIN02-V.001, LA-CIN01.001, LA-MIN04-S.001, and LA-MHD01.001 was reviewed or repeated to verify that the characterization was accurate and updated...

122. Respondents failed to annually reevaluate waste streams LA-MIN02-V.001, LA-CIN01.001, LA-MIN04-S.001, and LA-MHD01.001 to verify the accuracy of initial and subsequent characterization results...

123. Respondents failed to reevaluate waste streams LA-MIN02-V.001, LA- CIN01.001, LA-MIN04-S.001, and LA-MHD01.001 to assess the accuracy of the initial waste characterization regarding EPA HWN assignments...

124. Respondents failed to perform reevaluation of initial characterization information and annual verification of waste streams LA-MIN02-V.001, LA- CIN01.001, LA-MIN04-S.001, and LA-MHD01.001...

RESPONSE:

Ordered Action No 5 requires the Respondents to provide to NMED the methodology used for annual waste stream reevaluations. Section 2.4.7(1), *Waste Characterization Review*, of the LANL Hazardous Waste Facility Permit (“the Permit”) requires the annual reevaluation of all hazardous waste streams to verify the accuracy of initial and subsequent characterization results. As specified in SFO Attachment A, the documentation to provide as evidence of completion for OA No. 5 is listed below.

Documentation to Provide as Evidence of Completion (per SFO Attachment A)	Location in this Enclosure
Summary of Waste Stream Profile (WSP) Annual Review Methodology per the <i>LANL Waste Compliance and Tracking System (WCATS) User’s Manual</i> , MAN-5004, R3, Sections 4.3.1.4 and 4.2.1.24.	<ul style="list-style-type: none"> • Attachment A (MAN-5004, R3, Section 4.3.1.4) (the document text is being provided in lieu of a summary) • Attachment D (MAN-5004, R3, Section 4.2.1.24) (the document text is being provided in lieu of a summary)
Summary of procedure, <i>Reviewing and Approving Waste Stream Profiles (WSP) in WCATS</i> , WM-SVS-AP-201, and <i>WCATS User’s Manual</i> to describe the process to enter new and review WSPs, (Sections 4.2.1 and 4.2.2).	<ul style="list-style-type: none"> • Attachment C (Summary of WM-SVS-AP-201) • Attachment B (Reference to MAN-5004, R3, Sections 4.2.1 and 4.2.2, pages 51-99 is being provided in lieu of a summary)
Provide electronic access to the current document revision.	Enclosure 2 (Electronic copies of MAN-5004, R3 and WM-SVS-AP-201 are provided on a CD)
Provide periodic [Semi-annually, or upon NMED request] listing of document revisions.	To be provided semi-annually (first submittal scheduled for July 22, 2016).

The following discussion briefly describes the annual waste stream reevaluation process and explains how the attachments satisfy the Ordered Action.

1. Introduction and Background

LANL policy and guidance direct that waste is not to be generated until a Waste Stream Profile (WSP) has been prepared and approved. The initial characterization of each waste stream at LANL is documented via a WSP, which is intended to contain all the information necessary to fully characterize each waste stream in accordance with LANL and DOE procedures, NMED regulations under the New Mexico Hazardous Waste Act (HWA), and the Permit. WSP information is maintained in a LANL database called the Waste Characterization and Tracking System (WCATS), which contains most of the facility Operating Record information documenting the characterization of each waste stream, including the records of the annual

reevaluations. The generator and the assigned waste management coordinator (WMC) are responsible for the initial creation of a WSP for each new waste stream at LANL. The WCATS *User's Manual* provides step-by-step instructions to generators for preparing a new WSP and seeking review and approval. The process for creating a WSP for a new waste stream is described in Sections 4.2.1 and 4.2.2 of the WCATS *User's Manual*, pages 51-99 (in lieu of a summary, a reference to Sections 4.2.1 and 4.2.2 is provided in Attachment B to this Enclosure). An electronic copy of the WCATS *User's Manual* is provided in Enclosure 2.

Before a new WSP is activated, the waste generator and WMC must certify the information, and the WSP is reviewed and approved by LANL technical reviewers who ensure that the waste has been sufficiently and accurately characterized to ensure proper classification in accordance with DOE, LANL, state, and federal regulations and requirements. This technical review process for a new WSP is summarized in Attachment C to this Enclosure. An electronic copy of the technical review procedure is provided in Enclosure 2.

A number of signatures are required for final approval, as outlined in Attachment D. After it has been approved and activated, a new WSP for a waste stream is considered valid for use for a period of one year, as long as the information remains accurate, complete, and up-to-date.

2. Annual Reevaluation Process

The annual reevaluation of all hazardous waste streams, as required by Permit Section 2.4.7(1), is accomplished via the annual reevaluation of each WSP. The generator of a particular waste stream and the assigned WMC are responsible for the annual reevaluation of the WSP. Profiles which have been expired for less than two years or which will expire within two months may be extended within WCATS by an authorized user, provided that the waste characterization information is still accurate, complete, and up-to-date. If an expired WSP is not extended within 2 years, it can no longer be used to characterize the waste. In WCATS, additional waste of that type cannot be generated until a new WSP has been approved and activated. (Note that for purposes of maintaining the Operating Record, WCATS retains the records of all expired and voided waste profiles and of waste containers that were previously shipped or are still at LANL. WSP information for individual waste containers must reflect their current (or revised) WSP identifier.)

The procedure followed by the generator for the annual WSP reevaluation process is found in section 4.3.1.4 of the *User's Manual*, called *Extending a Waste Stream Profile* (see Attachment A to this submittal). However, the WCATS *User's Manual* does not describe the overall methodology followed by LANL for review and approval of the annual extension. The overall process, as described in a presentation to NMED-HWB staff on May 27, 2015, begins when the profile users (i.e., the generator and assigned waste management coordinator) receive expiration notices from the WCATS automatic notification system. Notices are sent 60 days, 30 days, 10 days, and 1 day before the expiration of the WSP, signaling the need to review the profile. The user opens the profile and reviews its status (active, expired, voided, etc.) and expiration date.

The generator and WMC then decide the path forward for the WSP. They can extend the profile as-is if the same waste stream will continue to be generated unchanged; void it completely if this waste stream will not continue to be generated; or void the profile and initiate a new profile if waste stream information has changed or needs to be updated. If the waste characterization or the

waste generating process has changed, the existing WSP is no longer valid and a new profile must be created. The new WSP must be approved and active before the changed waste can be generated and/or managed. To extend the profile, the user must confirm that:

- The generator is correctly identified.
- The WMC is correctly identified.
- The waste generating process has not changed in a way that would affect the validity of the waste characterization.
- The generator's and WMC's training are current.

Once an extension request is submitted, the WCATS data system automatically checks all sections of the profile using a set of built-in "business rules" to confirm that the fields have been filled out correctly and one field does not have data conflicting with another field. Upon approval, both the generator and WMC are notified of the new expiration date, and the profile may be used to manage waste for an additional year.

Attachment A

WSP Annual Review Methodology (Excerpt from *Waste Compliance and Tracking System (WCATS) User's Manual*, MAN-5004, R3, Section 4.3.1.4, *Extending a Waste Stream Profile*)

7. In the input request dialog box, enter a valid reason for requesting authority to alter the profile.
8. Click ok to submit the request and unlock the profile.

Note:

- If access has been authorized, the lock icon will now be seen as a green open lock and all editable attributes will be enabled.
- If access has been denied, an error message will appear stating the user is not authorized to edit the open profile. If access has been denied, contact Waste Help for more information at 5-2494 or at wastehelp@lanl.gov.

4.3.1.3 Sharing a Waste Stream Profile

To share a waste stream profile with other users, see section 2.1.6.1.

4.3.1.4 Extending a Waste Stream Profile

The WPF waste stream is considered valid for use for a period of one year after it has been fully activated. Profiles which have been expired for less than two years or which will expire in the next two months may be extended within WCATS by an authorized user as long as the information remains accurate, complete, and up-to-date.

Note: Only generators or waste management coordinators who are authorized in the waste profile form's facility may extend profiles.

Generators can extend a WPF waste stream by performing the following tasks:

1. Within the opened waste stream profile, select options | extend profile to deploy the waste stream extension dialog box.
2. Select the yes button to initiate the extension.
3. Verify that the correct generator is still assigned to the waste stream by selecting the yes radio button.
4. Verify that the correct WMC is still assigned to the waste stream by clicking the yes radio button.
5. Verify that the generating process for the waste stream has not changed by clicking the no radio button.

Note: All steps must be answered as shown above for the extension to be processed. If the user does not respond in this way, the user will be returned to the open waste stream and the extension process will be aborted.

Once this is done, the user is returned to the open profile which now shows the expiration date of one year from the date of the last expiration date. If the expiration date was more than one year ago, the preceding steps may need to be repeated so that the profile will become valid with an expiration date in

the future. If the extension was not processed due to changes in the technical contact information or processes, a new waste stream must be created reflecting all modified data (see section 4.3.1.5).

Note: If the waste stream is no longer valid after reaching its expiration, it must be voided within the system to avoid further use (see section 4.3.1.6).

4.3.1.5 Copying a Waste Stream Profile

Often a waste stream cannot be extended due to minor adjustments to the waste operations. Instead of creating a completely new waste stream profile, WCATS offers a copy function that allows the generator to utilize the preexisting data to create a new waste stream profile. By copying the available profile, generators are then able to update any data and create a new waste stream profile without having to re-enter any unaltered data.

Note: If a similar profile needs to be created for another facility, the copy profile function can be used to save time in completing the profile.

To copy a WPF waste stream profile, perform the following tasks:

1. Within the opened waste stream profile, select options | copy profile.
2. If you wish to create a copy of the open waste stream profile in another facility, select yes and choose the facility. Otherwise, select copy.
3. Once the waste stream copy successful dialog box appears, click ok to open the copied profile. The profile will now be open for editing.

Note: To edit the copied profile, refer to the creating a waste stream profile instructions (see section 4.2).

4.3.1.6 Voiding a Waste Stream Profile

Once a waste stream has is no longer applicable for use, the generator must void the waste stream. Also, if a new waste stream has been created as a copy due to adjustments needing to be made from a previous waste stream, the previous must be then voided to ensure it is no longer available for use.

To void a WPF waste stream profile, perform the following tasks:

1. Within the opened waste stream profile, select options | change status | void.
2. After reviewing the statement provided in the waste stream void dialog box, click the yes button to void the profile.
3. Once the waste stream void successful dialog box appears, click ok to return to the open profile.

Note: Notice, once the profile has been voided, the status within the header bar will show voided.

Attachment B

Summary of the process to enter and review new Waste Stream Profiles (WSPs) in the LANL
Waste Compliance and Tracking System (WCATS)

Attachment B

The process for creating a WSP for a new waste stream is described in Sections 4.2.1 and 4.2.2 of the *WCATS User's Manual*, pages 51-99. An electronic copy of the *WCATS User's Manual* is provided in Enclosure 2.

Attachment C

Summary of the procedure, *Reviewing and Approving Waste Stream Profiles (WSP) in
WCATS, WM-SVS-AP-201*

ATTACHMENT C

Summary of the procedure, *Reviewing and Approving Waste Stream Profiles (WSP) in WCATS*
(LANL Environment, Safety, Health Directorate, Waste Management Services Administrative Procedure No. WM-SVS-AP-201, Revision 0, effective date April 30, 2015)*

This administrative procedure provides guidance to the WSP reviewer who performs technical reviews of WSPs. After the waste generator and Waste Management Coordinator (WMC) have prepared a new (or revised) WSP in the Waste Compliance and Tracking System (WCATS), it is submitted for technical review prior to approval. The guidance helps the technical reviewer to ensure that the appropriate waste classification (i.e., waste type), U.S. Environmental Protection Agency (EPA) hazardous waste numbers, and subcategories are assigned to the waste stream, as applicable. It also helps the technical reviewer to ensure that ancillary waste types (e.g., polychlorinated biphenyl (PCB), beryllium, asbestos, New Mexico Special Waste (NMSW)) are properly assigned to certain wastes where applicable.

The technical WSP reviewer performs the following tasks:

- Reviews WSPs for completeness, consistency, and accuracy of the submitted information, and to ensure the WSP meets regulatory requirements and LANL directives for waste management.
- Works with generators and/or WMCs to resolve discrepancies
- Determines and applies EPA hazardous waste numbers and subcategories to include EPA source and form codes and applicable ancillary waste types.

In some cases, specific waste streams require additional reviews by LANL subject matter experts (SMEs) relative to their area of expertise. These include PCB, Environmental Restoration (ER), and high explosives (HE) wastes, as well as wastes intended for the High Explosive Water Treatment Facility (HEWTF), Radioactive Liquid Waste Treatment Facility (RLWTF), Sanitary Waste Water Systems (SWWS), or the National Nuclear Security Site (NNSS).

Overview of the Technical Review Process

The procedure provides detailed guidance for each of the major process steps to be performed by the technical reviewer as shown in the attached checklist (excerpted from the procedure).

If there are problems, inconsistencies or inaccuracies, or if the WSP needs clarification regarding waste stream characterization, the technical reviewer contacts the WMC. Depending on the outcome, the technical reviewer may take one of the following actions with the WSP:

- Approve or reject the waste profile
- Request additional information from the generator
- Defer the approval decision to the WM SVS team leader

*An electronic copy of the procedure is provided in Enclosure 2.

Reviewing and Approving Waste Stream Profiles (WSP) in WCATS	No: WM-SVS-AP-201	Page 16 of 19
	Revision: 0	Effective Date: 4/30/15

ATTACHMENT 1 – WSP CHECKLIST
Page 1 of 3

WSP #	Waste Type				
Waste-Specific Destination (On-Site)					
Ancillary Waste Type(s)					
General Information:			Yes	No	N/A
Does waste stream name clearly and concisely describe a unique waste stream and match the waste type?					
Is the waste type consistent with the waste and process description, TC and/or composition panels?					
Process & Waste Description:			Yes	No	N/A
Does the process description identify and support the WSP name, waste type, waste description, and composition?					
Does the waste description identify and support the WSP name, waste type, process description, and composition?					
For RCRA hazardous/mixed waste streams, do the process description and waste description provide adequate information to accurately assign EPA Source and Form codes under the Review – Composition panel?					
Method of Characterization:			Yes	No	N/A
Are appropriate AK and/data identified and referenced to support the waste type, the applicable on-site waste destination WAC, and the process and waste description?					
Documentation:			Yes	No	N/A
Do uploaded documents/data match and support the selected method(s) of characterization?					
Are all detected analytes/contaminants identified in TC and/or composition panels, as well as in applicable on-Site waste destination-specific criteria panels?					
Waste Category:			Yes	No	N/A
Are all applicable waste categories selected to support those identified or described in the Process Description, Waste Description, Composition, and Additional Information?					
If "Other" is checked, is the waste category specifically described under "Response"?					
Chemical/Physical Information:			Yes	No	N/A
Are the Waste Source Type, Radioactive Waste Type, and especially the Waste Matrix consistent with the WSP name, waste type, Waste Description, and Composition?					

Reviewing and Approving Waste Stream Profiles (WSP) in WCATS	No: WM-SVS-AP-201	Page 17 of 19
	Revision: 0	Effective Date: 4/30/15

ATTACHMENT 1 – WSP CHECKLIST (CONT.)

Page 2 of 3

I/C/R Characteristics:	Yes	No	N/A
Does the I/C/R Panel agree with and support the waste matrix, composition, etc.? For example:			
Is an ignitability range specified for organic liquids?			
Is a pH range specified for aqueous liquids?			
Is the BP range specified supported by identified constituents/contaminants?			
Are reactivity selections support constituents/contaminants?			
Are characteristics erroneously identified/ranged in that they are not supported by the waste type, waste matrix, composition, waste description, etc.?			
Toxicity Characteristics:	Yes	No	N/A
Are all TC contaminants described under Documentation, Waste Description, or elsewhere in the WSP identified here?			
Is the appropriate data source checked for each contaminant; AK, TCLP, or Total?			
Is the appropriate columns checked for each TC contaminated, whether detected/present or not?			
Are the min-max ranges identified for detected/identified contaminants consistent with supporting data and AK?			
Are the margins for waste variability appropriate for each contaminant, based on the Process Description, Waste Description, Composition, and Additional Information?			
Composition:	Yes	No	N/A
Are all elements of the waste matrix other than TC contaminants described under Process Description, Waste Description, Additional Information, and Documentation identified and appropriately ranged?			
Are the composition materials and their variability (i.e., ranges) consistent with the I/C/R ranges and selected categories?			
Is the variability of total constituents and contaminants limited sufficiently to ensure the waste characterization and DOT classification remain consistent?			
Additional Information:	Yes	No	N/A
Does this panel include any and all information not found in other panels that is necessary and sufficient to compliantly describe, bound, and manage the waste?			
Review - EPA Codes:	Yes	No	N/A
For RCRA-hazardous/mixed waste streams, are all waste codes, both characteristic and listed, accurately and appropriately assigned based on all information and data in the WSP?			
Review - Composition			
Are EPA Source Code and EPA Form code assigned to match characterization?			
Is Primary Composition accurately assigned, and additional description entered for a Primary Composition of "Other"?			
Review - Classification:	Yes	No	N/A

Reviewing and Approving Waste Stream Profiles (WSP) in WCATS	No: WM-SVS-AP-201	Page 18 of 19
	Revision: 0	Effective Date: 4/30/15

ATTACHMENT 1 – WSP CHECKLIST (CONT.)

Page 3 of 3

Are correct, applicable ancillary waste types selected? (e.g., beryllium-contaminated mixed transuranic waste indicates a Waste Type = Mixed Transuranic Waste with beryllium identified as an ancillary waste type).			
LDR Information (RCRA-Hazardous/Mixed Only):	Yes	No	N/A
Are the LDR category and generator requirements and treatment requirements completely and accurately selected?			
UHCs (RCRA-Hazardous/Mixed Only):	Yes	No	N/A
Are UHCs selected that, at a minimum, match waste codes selected, and all other UHCs identified under Composition, TC Panel, Additional Information and Other (non-TC Characteristic) analytical detects?			
If no UHCs are identified (listed), is the "No UHCs" box checked?			
Waste-Specific Panels:	Yes	No	N/A
Are data input to waste-specific panels supported by attached AK and/or data?			
If one or more waste-specific criteria have not be analyzed for, does waste stream otherwise appear compliant with waste-specific WAC?			
If waste as profiled exceeds one or more waste-specific WAC criteria, has WEF been processed and attached that addresses the non-WAC-compliant criteria?			
Administrative/Minor Reviews:			
Site Area:	Yes	No	N/A
Are all fields, except "SWMU/AOC No.," populated?			
Waste Prevention/Minimization:	Yes	No	N/A
Do selections appear complete, accurate, and appropriate for the waste type?			
Generator Estimates:	Yes	No	N/A
Do data provided appear reasonable and appropriate for waste type and waste description?			
Work Control Documentation:	Yes	No	N/A
Is panel populated and consistent with other information in the WSP?			
Packaging/Storage Control:	Yes	No	N/A
Are both Waste Packaging and Storage Control Measures fields populate/selected?			
Work Path:	Yes	No	N/A
Is at least one work path selected?			
Nuclides:	Yes	No	N/A
Are one or more nuclides identified and ranged for NNSW waste types?			
General Final Review:	Yes	No	N/A
Do all AK documentation, analytical data, and information provided in the WSP provide a complete, accurate, up-to-date, and defensible basis for waste characterization and classification, and demonstrate compliance with the waste destination WAC?			
Are all WCATS fields appropriately completed to facilitate WSP approval and processing in WCATS?			

Reviewing and Approving Waste Stream Profiles (WSP) in WCATS	No: WM-SVS-AP-201	Page 19 of 19
	Revision: 0	Effective Date: 4/30/15

WSP Approval:		
Reviewer Name	Signature	Date

Document: Response to Ordered Action 5, Att. A to SFO HWB-14-20

Date: February 2016

Attachment D

Excerpt from *LANL Waste Compliance and Tracking System (WCATS) User's Manual*,
MAN-5004, R3 (Section 4.2.1.24, Reviewers/Signatures)

- To remove a cost code from the table, select the code desired and click the remove button below the table.

8. Click the save button to save the cost code information in the cost code profile panel.

4.2.1.24 Reviewers/Signatures

To properly activate a waste stream profile, the following signatures and/or reviews must be obtained:

- Waste Generator Certification
- Waste Certifying Official
- Generator Support Services Review
- Generator Support Services QA Review
- ENV-RCRA Review
- (Specific Destination Site) Waste Review

Note: Signature requirements are determined upon waste type selection.

To sign off on a waste stream profile, perform the following tasks:

1. Click reviewers in the navigation panel of the manifest profile form to display the reviewers profile panel. (see Figure 4-34)

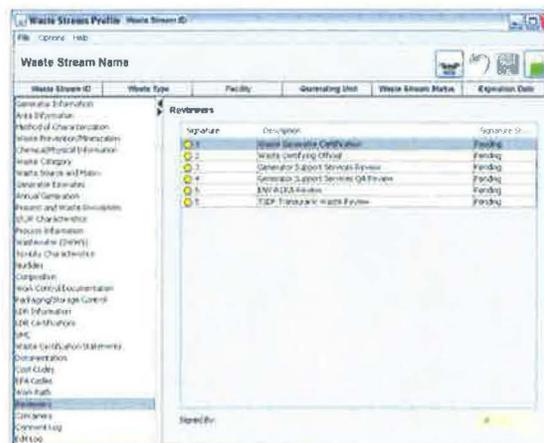
Note: To reopen and unlock a previously created profile, see sections 4.3.1.1 and 4.3.1.2.

2. Before signing, confirm that all information provided in the waste stream profile is correct and has been properly entered into the system.

Note:

- Notice the reviewers table is organized by signature order, description and status.
- Signature order requires that the signatures requested be performed in the order defined.
- Signature statuses are as follows:
Pending – awaiting signature; yellow dot
Approved – signed; green dot
Revoked – signature removed; red dot

Figure 4-34



3. Once confirmed, click the save button to ensure all information has been set in the waste stream profile.
4. Click the lock button to prevent further editing of the waste stream profile and to enable the sign button located on the reviewers profile panel.

5. Select the signature assigned to you and click the sign button below the table.
6. Carefully read the waste stream signature authorization warning and click approve to endorse the waste stream profile.

Note:

- Endorsing a waste stream declares that you have fully reviewed all forms and associated attachments and certifies that all information provided appears to be complete, accurate, and meets WAC requirements.
 - If you do not approve of the waste stream profile, click the revoke button to disapprove the profile.
 - If a profile has been revoked, a comment regarding the revoking action can be entered into the comment log of the waste stream profile. (see section 4.2.1.26)
 - If you do not approve or disapprove at this time, simply click cancel to return to the waste stream profile.
 - If you would like to raise a concern with another WCATS user regarding the open profile, the profile can be shared via file | share profile in the menu bar. (see section 2.1.6.1)
7. Once the approve/revoke button has been clicked, a waste stream validation results dialog box appears providing information regarding the execution of the endorsement.

Note: An endorsement can either pass or fail. If your endorsement has failed, please contact Waste Help at wastehelp@lanl.gov or 5-2494.

8. In the waste stream validation results dialog box, click the ok button to return to the *Signatures* panel of the waste stream profile.

Note: Once a signature has been performed, the status will change within the reviewers table and signatory information is displayed below.

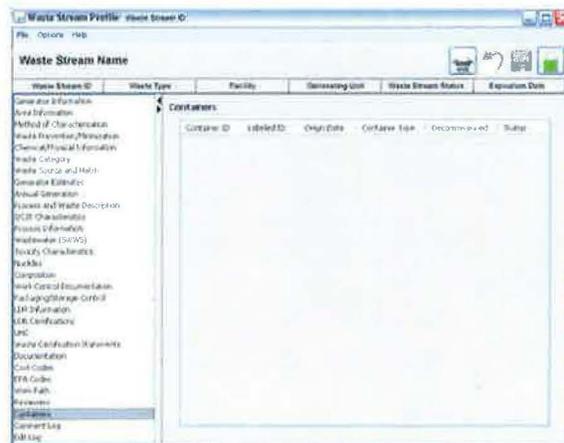
4.2.1.25 Containers

Figure 4-35

The application keeps a log of all WCATS containers assigned to a waste stream. To view the container log for any given waste stream, perform the following tasks:

1. Click containers in the navigation panel of the waste stream profile form to display the container log profile panel. (See Figure 4-35)

Note: To reopen and unlock a previously created profile, see sections 4.3.1.1 and 4.3.1.2.

**Note:**