

ATTACHMENT III-2

WASTE IDENTIFICATION AND TRACKING PLAN

1. PURPOSE, APPLICABILITY, AND SCOPE
 - a. This Attachment describes the procedure for tracking the current location of wastes being managed at the Mixed Waste Facility.
 - b. This Attachment also states how waste is tracked from receipt into permitted management, through applicable treatment, and completion of disposal (management status).
 - c. This Attachment allows for the tracking of containers as a group or as individual containers.
 - d. The requirements of this Attachment shall be met while tracking containers using unique container numbers or tracking codes.
 - e. This Attachment will not provide for a historical log of all movements of waste, but will detail the location and quantity of the waste.

2. GENERAL REQUIREMENTS
 - a. Daily Tracking Document.
 - i. When operations involve changes of location of waste in accordance with this plan, such transfers shall be recorded on the Daily Tracking Document.
 - ii. Daily tracking documents shall be maintained current to the end of the previous calendar week.
 - iii. Transfers and movements of waste during an operating day (calendar date) that result in no change in location shall not require documentation.
 - b. Facility Tracking Record.
 - i. On a weekly basis, information from the Daily Tracking Document shall be used to update the Facility Tracking Record. By the end of each calendar week, the Facility Tracking Record shall be updated at least to the end of the previous calendar week.

- ii. The Permittee may conduct verifications of information on the Facility Tracking Record. As a result of these verifications, a summary of corrections shall be made and the Facility Tracking Record shall be corrected.
- c. Disposition of tracking records.
 - i. Daily tracking documents shall be kept on file for a period of three years.
 - ii. Summaries of corrections made to the Facility Tracking Record shall be kept on file for a period of three years.
 - iii. For each sump closed within the Mixed Waste Landfill Cell, a copy of the associated portion of the Facility Tracking Record shall be submitted to the Director.

3. TRACKING REQUIREMENTS

- a. Tracking information shall be kept as part of the Operating Record. Such recordkeeping shall provide a cross-reference showing when waste from identified shipments are taken to treatment, placed in storage, or disposed.
- b. For wastes received from off-site, a shipment unique tracking number shall be written on each hazardous waste manifest.
- c. The following documents associated with incoming waste shall be filed or indexed in the Operating Record:
 - i. Radioactive waste shipment and disposal record (RSR);
 - ii. Hazardous waste manifest;
 - iii. Waste profile record;
 - iv. Incoming-shipment inspection record; and
 - v. Incoming-shipment on-site fingerprint/acceptance summary.
- d. Containers in storage shall be marked or labeled with the following information:
 - i. unique shipment tracking number;
 - ii. treatment run number; and

- iii. the words “Hazardous Waste”.
- (Note:** A treatment run shall be defined as all waste that is treated during one calendar day of operation. A treatment run number shall be a number used to identify a treatment run at the Mixed Waste Treatment Facility.)
- e. For wastes received from off-site that are managed in permitted storage and disposal areas, the following information shall be kept for each container.
 - i. Unique shipment tracking number;
 - ii. Current type of container;
 - iii. Volume or weight of container and units (lbs., tons, kg, gallons, ft³, yd³);

(Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and the container.)
 - iv. Date waste accepted into permitted management (storage); and
 - v. Current location of waste (e.g., storage area, holding area, cell area).
 - f. Tracking of repackaged waste
 - i. If waste is overpacked or repackaged, updated information for items identified in Condition 3.e. or 3.i. shall be obtained, and the Facility Tracking Record shall be updated accordingly.
 - ii. Where such repackaging involves waste from more than one shipment, notes shall be provided as part of the Facility Tracking Record for the applicable shipment information.
 - g. Non-Treatment disposal tracking
 - i. In addition to the requirements in Condition 3.e., the following information shall be added to the facility tracking record when waste is transferred from storage to disposal management without treatment:
 - A. Date waste transferred to the Mixed Waste Landfill Cell.

- ii. When final placement and disposal management is completed, a reference to the placement location documentation shall be provided on a map or diagram.
- h. When waste is transferred to treatment, the following procedures shall be followed:
 - i. The Facility Tracking Record shall be changed to reflect management in treatment.
 - ii. The following information shall be added to the Facility Tracking Record:
 - A. Date waste transferred to treatment, and
 - B. Treatment method, e.g., stabilization, solidification, etc.
 - iii. If waste that has been transferred to treatment is transferred back to storage without being **treated**, then the treatment area shall be considered a storage area. Therefore, the tracking information required by Condition 3.e. shall be replaced in the storage record, and the added information in Condition 3.h.ii. shall be removed.
 - iv. If a portion of the waste has been removed or repackaged while in treatment and placed back into storage, the requirements of Condition 3.f. shall be followed.
- i. For wastes that have been treated and are transferred from treatment management to management in storage, the following information shall be kept for each container:
 - i. Treatment run number;
 - ii. Current type of container;
 - iii. Volume or weight and units;

(Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and/or the container.)
 - iv. Other treatment runs (any prior unsuccessful runs) and run numbers, if applicable; and

- v. Current location of waste (e.g., storage area, holding area, cell area).

- j. Tracking for wastes that are being macroencapsulated shall be accomplished by tracking containers or groups of containers with the same run number in accordance with the following requirements:
 - i. Containers from which waste is being removed for macroencapsulation shall be tracked as required by Condition 3.e.
 - ii. MACRO Capsules shall be tracked as required by Condition 3.i.

(**Note:** volumes of containers involved in such processes may be used as outlined in required by Condition 3.e. or 3.i., to eliminate the complications of tracking the weights of wastes that are being transferred from container to container.)
 - iii. For each unique shipment tracking number of wastes that are being macroencapsulated, the date treatment began shall be recorded.
 - A. Date Macroencapsulation (MACRO) began.

- k. In addition to the requirements in Condition 3.i. or 3.j., the following information shall be added when waste transfer from storage to disposal management following treatment occurs:
 - i. When final placement and disposal management is completed, the location within the Mixed Waste Landfill Cell shall be documented in the facility tracking record.

- l. Tracking involving transfers from the Mixed Waste Landfill Cell.
 - i. When wastes are removed from the Mixed Waste Landfill Cell, the following information shall be kept in the Operating Record. Other subsequent and applicable information shall also be recorded in accordance with management of the waste and the requirements of this plan:
 - A. unique shipment tracking number;
 - B. treatment run number (if applicable);
 - C. Current type of container;
 - D. Volume or weight in units;

(Note: When a container volume is used, the volume shall be the nominal container volume. When weights are used, weights shall be estimated, averaged, or weighed, including the waste and the container.)

- E. Current location of waste (storage area, cell area, placement reference); and
- F. Reason for removal from the Mixed Waste Landfill Cell.

END OF ATTACHMENT III-2