

Approved By  
**Clifton L. Buck**

**Vogtle Electric Generating Plant**



Procedure Number Rev  
**36221-C 13.1**

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**CONTROL, HANDLING AND DISPOSAL OF HAZARDOUS  
WASTE**

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**CONTROL, HANDLING AND DISPOSAL OF HAZARDOUS WASTE**

<b>PROCEDURE USAGE REQUIREMENTS-</b>	<b>SECTIONS</b>
<b>Continuous Use:</b> Procedure must be open and readily available at the work location. Follow procedure step by step unless otherwise directed.	<b>NONE</b>
<b>Reference Use:</b> Procedure or applicable section(s) available at the work location for ready reference by person performing steps.	<b>ALL</b>
<b>Information Use:</b> Available on plant site for reference as needed.	<b>NONE</b>



**REFERENCE USE**

**1.0 PURPOSE**

To provide guidelines for controlling hazardous waste and mixed waste at Plant Vogtle. This procedure serves as a standard for compliance with the codes and regulations promulgated by Federal, State, and Local Regulatory Agencies.

**2.0 PRECAUTIONS AND LIMITATIONS**

Extreme care should be used when handling hazardous waste. Hazardous waste can be toxic, flammable, reactive, or oxidizing or any combination of these. Proper safety equipment is required.

**3.0 DEFINITIONS**

**3.1 WASTE**

A waste is any solid, liquid, or contained gaseous material which can no longer be used for its intended purpose and is either recycled, discarded, or stored for disposal.

**3.2 HAZARDOUS WASTE**

A waste is considered to be hazardous if it exhibits any of the characteristics of hazardous waste identified in Subpart C of 40 CFR Part 261 (Ignitability, Corrosivity, Reactivity, Toxicity) or it is specifically listed in Subpart D of 40 CFR Part 261.

**3.3 CHARACTERISTIC HAZARDOUS WASTE**

A waste which exhibits one or more of the following Characteristics:

**3.3.1 IGNITABILITY**

A waste exhibits the characteristic of ignitability if a representative sample of the waste displays any of the following properties:

- (1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol, and has a flashpoint of less than 140 degrees F.
- (2) It is not a liquid and is capable under standard conditions of causing fire through friction, absorption of moisture, or spontaneous combustion.
- (3) It is an ignitable compressed gas as defined in 49 CFR 173.300.
- (4) It is an oxidizer as defined in 49 CFR 173.151.



**3.3.2 CORROSIVITY**

A waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:

- (1) Is aqueous and has pH less than or equal to 2 or greater than or equal to 12.5.
- (2) Is a liquid and corrodes steel (SAE 1020) at a rate greater than 0.250 inches per year at test temperature of 130 degrees F.

**3.3.3 REACTIVITY**

A waste exhibits the characteristic of reactivity if a representative sample of the waste has any of the following properties:

- (1) Is normally unstable and readily undergoes violent change without detonation
- (2) Reacts violently with water
- (3) Forms potentially explosive mixtures with water
- (4) Generates potentially toxic gases when mixed with water
- (5) Is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate potentially toxic gases,
- (6) Is capable of detonation when subjected to strong force or heat
- (7) Is capable of detonation or explosive decomposition under standard conditions
- (8) Is a forbidden explosive defined in 49 CFR 173.51, a Class A explosive as defined in 49 CFR 173.53, or a Class B explosive as defined in 49 CFR 173.88.

**3.3.4 TOXICITY**

A waste exhibits the characteristic of toxicity if the extract from a representative sample contains any of the constituents listed in Table 1 of 40 CFR 261.24 at values greater than or equal to the regulatory levels listed in the table.

**3.3.5 UNIVERSAL WASTE**

Universal Waste is a subset of Hazardous Waste that is subject to the requirements of 40 CFR Part 273. Universal Waste includes batteries, pesticides, mercury thermostats, and lamps as described in parts 273.2 through 273.5 of the code.

**3.4 LISTED HAZARDOUS WASTE**

A waste specifically listed in one of the four hazardous waste lists noted below and contained in Subpart D of 40 CFR Part 261.

**3.4.1 Wastes from non-specific sources ("F-List")**

**3.4.2 Wastes from specific sources ("K-List")**

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3.4.3	Wastes from discarded or off-specification commercial chemical products, container residues, or spill residues which have been designated by EPA as acutely hazardous wastes ("P-List").	
3.4.4	Wastes from discarded or off-specification commercial chemical products, container residues, or spill residues which have been designated by EPA as toxic ("U-List").	
3.5	<p><b>HAZARDOUS WASTE MIXTURES</b></p> <p>If a listed hazardous waste is mixed with a non-hazardous waste the entire mixture is considered hazardous waste. If a waste which is considered hazardous because it displays one or more of the hazardous waste characteristics defined in 5.1 is incidentally mixed with a non-hazardous solid waste, the resulting mixture is considered to be hazardous waste only if the entire mixture displays the characteristic. F003 listed waste that is mixed with used oil may not be a hazardous waste. Contact the Chemistry Nuclear Specialist prior to mixing a hazardous waste with any other waste.</p>	
3.6	<p><b>EMPTY CONTAINERS</b></p> <p>A container is considered empty and non-hazardous if less than 1 inch of material remains after all wastes have been removed by conventional means such as pumping or pouring. Containers which held acutely hazardous waste (P-listed materials) must be triple rinsed with an appropriate solvent to render them non-hazardous. The rinseate must be managed as hazardous waste. Empty containers may be disposed as solid waste.</p>	
3.7	<p><b>RADIOACTIVE MIXED WASTE</b></p> <p>Those wastes which contain both radioactive wastes subject to the Atomic Energy Act and constituents that are either specifically listed as a hazardous waste in Subpart D of 40 CFR Part 261 or exhibit any of the hazardous waste characteristics identified in Subpart C of 40 CFR Part 261.</p>	
3.8	<p><b>OVERPACK DRUM</b></p> <p>An 85 gallon drum, with a removable head in which a leaking 55 gallon drum can be placed for transport to a disposal site.</p>	
3.9	<p><b>SPCC CONTINGENCY PLAN</b></p> <p>Plan of specific actions to be taken in the event of a spill of oil, hazardous materials, or hazardous waste. Refer to VEGP Procedure 94001-C.</p>	
3.10	<p><b>RESTRICTED WASTE</b></p> <p>Any RCRA hazardous waste that has an established treatment standard.</p>	

**3.11 LAND DISPOSAL RESTRICTION**

The LDR Program consists of three components: the disposal prohibition, the dilution prohibition and the storage prohibition.

- (1) Disposal prohibition prohibits the land disposal of hazardous waste that has not been adequately treated to reduce the threat posed by such waste.
- (2) Dilution prohibition forbids dilution in order to reduce the concentrations of hazardous waste.
- (3) Storage prohibition prevents the indefinite storage of untreated hazardous waste for reasons other than the accumulation of quantities necessary for effective treatment or disposal.

**4.0 RESPONSIBILITIES**

**4.1 CHEMISTRY MANAGER**

Responsible for the overall administration of this procedure.

**4.2 CHEMISTRY NUCLEAR SPECIALIST**

Responsible for the day-to-day implementation and administration of this procedure. Must be familiar with the applicable regulations to implement and administer this procedure. Coordinates with Environmental Affairs for hazardous waste pickup and shipments. Maintains the written operating record for the temporary storage facility including the hazardous waste manifest forms.

**4.3 CHEMISTRY TECHNICIANS**

Perform weekly inspections of the Temporary Hazardous Waste Storage facilities when wastes are in storage and satellite accumulation areas. May handle duties associated with handling, packaging, and shipping of hazardous waste. Call immediate attention to the Chemistry Supervisor, Laboratory Supervision, or Chemistry Nuclear Specialist of any accidental or threatened release, spill, or leak.

**5.0**      **PROCEDURE**

**5.1**      **IDENTIFICATION OF HAZARDOUS WASTE**

**5.1.1**      Materials or chemical products which no longer have any beneficial use and require disposal must be reviewed against the requirements of the EPA Hazardous Waste Regulations to determine if they meet the regulatory definition of a hazardous waste. All excess, surplus, damaged, or contaminated materials which require disposal should be brought to the attention of the Chemistry Nuclear Specialist. To determine if a waste material meets the definition of a hazardous waste, the Chemistry Nuclear Specialist must first determine if it is listed on the "F", "K", "P", or "U" list in 40 CFR 261 Subpart D. If the waste is not listed by name, the Chemistry Nuclear Specialist must determine, by chemical analysis or by knowledge of the waste, if the material meets one of the hazardous characteristics listed below.

**NOTE**

Shop rags or other solids which have absorbed a listed hazardous waste are considered by the State of Georgia to be a hazardous waste. These materials must be stored as hazardous waste in drums and kept wet, as necessary, to avoid spontaneous combustion. An approved laundry service may be utilized for cloth rags in lieu of disposal.

**5.1.2**      **Ignitable Waste - (EPA Number D001)**

- a.      It is a liquid, other than an aqueous solution containing less than 24 percent alcohol, and has a flash point less than 60°C (140°F).
- b.      It is not a liquid and is capable under standard conditions of causing fire through friction, absorption of moisture, or spontaneous combustion.
- c.      Is an ignitable compressed gas as defined in 49 CFR 173.300.
- d.      Is an oxidizer as defined in 49 CFR 173.151.

**5.1.3**      **Corrosive Waste - (EPA Number D002)**

- a.      Is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.
- b.      Is a liquid and corrodes steel (SAE 1020) at a rate greater than .250 inches per year at a test temperature of 55°C (130°F).

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5.1.4 Reactive Wastes (EPA Number D003)

- a. Is normally unstable and readily undergoes a violent chemical change without detonation.
- b. Reacts violently with water,
- c. Forms potentially explosive mixtures with water,
- d. Generates potentially toxic gases when mixed with water,
- e. Is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate potentially toxic gases,
- f. Is capable of detonation when subjected to strong force or heat,
- g. Is capable of detonation or explosive decomposition under standard conditions,
- h. Is a forbidden explosive defined in 49 CFR 173.51, a Class A explosive as defined in 49 CFR 173.53, or a Class B explosive as defined in 49 CFR 173.83.

5.1.5 Toxicity Characteristic Wastes (EPA Number D004-D043)

The extract from a representative sample, analyzed using the toxicity characteristic leaching procedure (TCLP) contains any of the constituents listed in Table 1 of 40 CFR 261.24 at values greater than or equal to the regulatory levels listed in the table.

5.2 SAMPLING OF UNKNOWN WASTE

**NOTE**

Materials which cannot be classified by Generator knowledge and are potentially hazardous waste must be sampled and identified prior to disposal.

5.2.1 All samples should be representative of the entire contents of the container. You must ensure that your sample contains material from the top, middle and bottom of the container.

5.2.2 Glass 1000 ml containers are typically used for liquid samples and sludge samples.



5.2.3 Each sample container should be labeled with the following information:

- a. Southern Nuclear Operating Company
- b. Plant Name
- c. Date of Sampling
- d. Sample location (Drum Identification No.)
- e. Type of Sample
- f. Time of Sampling

5.2.4 The sample should be shipped to the following address:

Alabama Power Company  
General Test Lab  
Bldg #8 General Services Complex  
I-65 Exit #234 City Road #187  
Varnons, Al 35040

**6.0 DETERMINATION OF GENERATOR STATUS**

Plant Vogtle currently maintains small quantity generator (SGQ) status for hazardous waste. The chart in Figure 4 summarizes the definition of and requirements for each generator status. A notification to the State using EPA form 8700-12 is required if the generator status changes. Environmental Affairs should be notified if any of the criteria for small quantity generator are exceeded.

**7.0 REQUIREMENTS FOR HAZARDOUS WASTE GENERATORS**

**7.1 TEMPORARY HAZARDOUS WASTE STORAGE AREA (Storage Area B)**

**NOTE**

The temporary storage area is located southwest of the plant, outside of protected area, near the construction warehouse.

7.1.1 Facilities may not hold hazardous waste in temporary storage for a period of time longer than:



**NOTE**

The clock starts when waste is moved into the Temporary Storage Area even if the drum is not completely full.

7.1.1.1 90 days for Large Quantity Generators (LQG).

7.1.1.2 Small Quantity Generators (SQG)

- a. 180 days for if the waste is shipped less than 200 miles.
- b. 270 days for if the waste must be shipped greater than 200 miles.

7.1.2 Storage areas must be located at least 50 feet from property line.

7.1.3 The storage area must have an impervious surface (e.g., sealed concrete) and must be surrounded by containment which is sized to contain 110 percent of the maximum liquid storage capacity or the volume of the largest container, whichever is greatest.

**NOTE**

If a collection system is installed, all collection sumps must either have NO drains or if they do, the drains must be valved and locked.

7.1.4 Storage area should be covered to keep out rainfall.

7.1.5 Access to the temporary storage area must be controlled and limited to personnel who have responsibility for management of hazardous waste. Other personnel should be allowed in the area only under the direct supervision of personnel with designated hazardous waste management responsibility. All personnel working in the hazardous waste temporary storage area must be trained in hazardous waste management procedures and emergency response.

7.1.6 The storage area must be marked with applicable caution signs. For example: "AUTHORIZED PERSONNEL ONLY", "KEEP OUT HAZARDOUS WASTE", "NO SMOKING";

7.1.7 Only hazardous waste may be stored in the area (exception being that an area may be taped or roped off for temporary storage of PCBs).

7.1.8 A distance of 25 feet on any side of the drum storage lot shall be maintained reasonably free of grass, weeds, and foreign combustibles.

7.1.9 The temporary storage must be noted in the VEGP SPCC plan and appropriate guidance for spill response must be in place.

**NOTE**

When hazardous waste is suspected to be in water to be drained notify the Chemistry Nuclear Specialist prior to draining the water from the temporary storage area. A log must be kept of each draining event noting the amount drained and the date the draining occurred. The log should also note that no waste material was present in the drained material. See Data Sheet 3 for an acceptable log.

**7.2 MANAGEMENT OF CONTAINERS**

**NOTE**

All containers used to store hazardous waste must meet DOT requirements for packaging and transport of hazardous material.

7.2.1 While in storage, each container shall be labeled (see Figure 1, or 2) or clearly marked with the words "Hazardous Waste" and the EPA Waste Code for the material.

7.2.2 The date upon which each container is placed in temporary storage shall be clearly marked and visible on each container.

7.2.3 If a container holding hazardous waste is not in good condition, or (e.g. leaking, bulging, rusting, damaged, or dented), the waste must be immediately transferred to a container in good condition.

7.2.4 A container must be compatible with the hazardous waste stored in it. Waste also must not be placed in an unwashed container that previously held incompatible waste.

7.2.5 A container holding hazardous waste must not be opened during storage except when it is necessary to add or remove waste, nor may it be handled or stored in such a way as to cause it to leak or rupture.

7.2.6 Appropriate aisle space shall be maintained between hazardous waste containers to ensure access during an emergency condition.

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<p><b>7.3            STORAGE AREA LOG</b></p> <p>7.3.1            A storage area log shall be maintained which identifies each drum in storage with a unique number, the date the drum was placed in the temporary storage area, and, upon shipment, the date shipped and disposal vendor. See Data Sheet 2 for an acceptable log.</p> <p><b>7.4            GENERAL INSPECTION REQUIREMENTS OF HAZARDOUS WASTE TEMPORARY STORAGE AREAS</b></p> <p>7.4.1            The temporary storage area shall be inspected at least weekly for leaks or deterioration when containers are stored in these locations. The inspections should be performed during daylight hours.</p> <p>7.4.2            Corrective action shall be taken immediately upon discovery of leaks or deterioration. Leaks shall be evaluated for reportability to determine if a reportable quantity (RQ) was released to the environment.</p> <p>7.4.3            Inspections must be documented in an inspection log or on a data sheet and must include at a minimum:</p> <p>7.4.3.1            Inspection date.</p> <p>7.4.3.2            Inspector's name or initials.</p> <p>7.4.3.3            Observations made.</p> <p>7.4.3.4            Nature of any repairs made or corrective actions taken.</p> <p>7.4.4            To comply with the inspection requirements, complete Data Sheet 1 and file in Document Control.</p> <p><b>7.5            PREPAREDNESS AND PREVENTION</b></p> <p>7.5.1            Temporary hazardous waste storage areas must contain the following equipment or the equipment must be readily available at a nearby location:</p> <p>7.5.1.1            An internal communication device or alarm system capable of providing emergency warning to personnel near the temporary storage area in the event of an emergency. VEGP will utilize the emergency fire alarm system and public address system to warn employees, if necessary, of an emergency in the hazardous waste storage area.</p> <p>7.5.1.2            A telephone or two-way radio which may be used to summon emergency assistance. The VEGP Chemistry vehicle is equipped with a two-way radio. A telephone is located in a nearby warehouse (Construction Warehouse).</p>		

- 7.5.1.3 Portable fire extinguishers, fire control equipment, spill control equipment, and appropriate personal protective equipment are located at the hazardous waste storage area.
- 7.5.1.4 Water at adequate volume and pressure is available from a nearby fire hydrant.
- 7.5.1.5 Adequate aisle space shall be maintained between containers to allow unobstructed movement of personnel or equipment in the event of an emergency.
- 7.5.2 The above equipment is tested and maintained as necessary to ensure proper operation in emergencies. Spill control equipment and personnel protective equipment is inspected weekly to ensure availability.

**7.6 SATELLITE ACCUMULATION FOR HAZARDOUS WASTE**

**NOTE**

Satellite accumulation areas are located north of the Maintenance Building, on the west side of the radwaste solidification building, and west of the Admin. Support Building.

- 7.6.1 Each facility may accumulate up to fifty-five (55) gallons of hazardous waste or one (1) quart of acutely hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, provided the following conditions are met:
  - 7.6.1.1 The wastes are placed in containers that are in good condition.
  - 7.6.1.2 The wastes are compatible with their containers.
- 7.6.2 While in satellite accumulation, container shall be labeled with the words "Hazardous Waste" or other words identifying the waste. See Figure 1 for example. Drums containing materials which have been sampled should be marked with the words "Pending Analysis".
- 7.6.3 The containers shall be kept closed except when adding or removing waste material.
- 7.6.4 Once fifty-five (55) gallons of hazardous waste or one (1) quart of acutely hazardous waste has been accumulated, the container must be marked with the date it was filled and the container must be transferred to the temporary storage area within seventy-two (72) hours.



7.6.5 "Temporary" satellite accumulation areas may be set up to support jobs of short duration which produce hazardous wastes. These areas must be approved by Chemistry Supervision prior to collection of wastes. Contact the Chemistry Nuclear Specialist to arrange approval.

**7.7 ACCUMULATION OF UNIVERSAL WASTE**

**NOTE**

Universal waste may not be accumulated for greater than one year unless the generator can prove a longer accumulation time is necessary to facilitate proper recovery, treatment, or disposal.

**7.7.1 BATTERIES**

7.7.1.1 Universal Waste rules apply only to batteries that are considered to be hazardous waste. Batteries in this category include lead-acid, nickel iron, nickel metal halide, cadmium, mercury oxide, silver oxide, and are disposed of as hazardous waste. Alkaline batteries are not considered to be universal waste or hazardous waste and can be disposed of in the regular trash.

7.7.1.2 Universal waste batteries showing evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions must be stored in a container. The container used to store a universal waste battery must be kept closed while batteries are being stored, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage while batteries are stored in them.

7.7.1.3 A container must be marked with the date the first battery is placed in it. The container must be sent for disposal not more than one year from this date.

7.7.1.4 Universal waste batteries or containers used to store waste batteries must be marked clearly with any of the following phrase:

- a. Universal Waste Battery(ies)
- b. Waste Battery(ies)
- c. Used Battery(ies)

7.7.2 LAMPS

7.7.2.1 Universal waste rules apply to waste mercury containing lamps. A mercury containing lamp becomes a waste on the date it is discarded or is permanently removed from its fixture and can no longer be used to provide lighting.

**CAUTION**

***DO NOT INTENTIONNALLY BREAK OR CRUSH LAMPS.***

7.7.2.2 Any universal waste lamp that is damaged or broken must be cleaned up immediately and placed in a proper storage container.

7.7.2.3 Containers or packages containing waste lamps must be kept closed unless lamps are being actively added to the container. They must be structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage, or damage that could result in leakage of the contents to the environment.

7.7.2.4 The container must be marked with the date the first lamp is placed in the container. The container must be disposed of within one year of this date.

7.7.2.5 Universal waste lamps or the containers or packages which waste lamps are stored in must be labeled or marked clearly with one of the following phrases:

- a. Universal Waste – Lamp(s)
- b. Waste Lamp(s)
- c. Used Lamp(s)

7.7.3 THERMOSTATS

7.7.3.1 Universal waste rules apply only to waste mercury-containing thermostats.

7.7.3.2 Containers or packages containing waste thermostats must be kept closed unless thermostats are being actively added to the container. They must be structurally sound, compatible with the contents of the thermostats, and lack evidence of leakage, spillage, or damage that could result in leakage of the contents to the environment.

7.7.3.2 The containers must be marked with the date the first thermostat is placed in the container and must be disposed of within one year of this date.

7.7.3.3 Universal waste thermostats or containers holding waste thermostats must be labeled with one of the following phrases:

- a. Universal Waste – Thermostat(s)
- b. Waste Thermostat(s)
- c. Used Thermostat(s)

7.7.4 PESTICIDES

7.7.4.1 Universal waste rules apply to pesticides that are considered to be hazardous waste and have been included in a voluntary or mandatory recall program.

7.7.4.2 Containers or packages containing waste pesticides must be kept closed unless pesticides are being actively added to the container. They must be structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage that could result in leakage of the contents to the environment.

7.7.4.3 The containers must be marked with the date waste pesticide is placed in the container and must be disposed of within one year of this date.

7.7.4.4 Containers or packages holding waste pesticide must be labeled with one of the following phrases:

- a. Universal Waste- Pesticide
- b. Waste Pesticide
- c. Used Pesticide

7.7.5 Any questions concerning universal waste and its disposal should be referred to the Environmental Specialist or Chemistry Supervision.

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**8.0**      **PERSONNEL TRAINING**

**NOTE**

VEGP typically maintains Small Quantity Generator (SQG) status. The status could change to Large Quantity Generator (LQG) due to episodic generation; therefore the training of personnel should comply with the standards for LQG. All personnel associated with hazardous waste management are subject to the RCRA training required by 40 CFR 265.16 (LQG) and summarized in sections 8.1 through 8.4 below. All personnel who directly affect hazardous materials transportation safety are also subject to the DOT training required by 49 CFR Subpart H and summarized in sections 8.6 through 8.9 below.

- 8.1**      All VEGP personnel associated with hazardous waste management must successfully complete a program of classroom instruction or on the job training that trains the individual on proper performance of all required duties and ensures they are able to adequately respond to emergencies.
- 8.2**      The training program will be administered by personnel in the VEGP training department who have been properly trained in hazardous waste management. The training program includes instruction in fundamentals of hazardous waste management and contingency plan implementation which are consistent with the duties of personnel associated with hazardous waste management at VEGP.
- 8.3**      Initial training in hazardous waste management should be provided within six months for new employees associated with hazardous waste management at VEGP. Personnel will not work unsupervised in jobs requiring hazardous waste management until they have successfully completed the appropriate training.
- 8.4**      All personnel involved in hazardous waste management must participate in annual review of initial hazardous waste training. This training will be administered by the VEGP training department. This annual training will ensure personnel are familiar with current hazardous waste management practices and implementation of the hazardous waste contingency plan.
- 8.5**      Training records will be maintained by the VEGP Training Department and shall include at a minimum:

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<p>8.5.1</p> <p>8.5.2</p> <p>8.5.3</p> <p>8.5.4</p> <p>8.5.5</p> <p>8.5.6</p> <p>8.6</p> <p>8.7</p> <p>8.8</p> <p>8.9</p> <p>8.9.1</p> <p>8.9.2</p> <p>8.9.3</p> <p>8.9.4</p> <p>8.9.5</p>	<p>The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;</p> <p>Employee number;</p> <p>A written job description for each person listed above. The description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;</p> <p>Course Title Description – A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed above;</p> <p>Dates of attendance – Records that document that the training or job experience required above has been given to, and completed by, facility personnel;</p> <p>Training on current personnel associated with hazardous waste management at VEGP must be kept until closure of the facility. Training records of former employees associated with hazardous waste management at VEGP must be kept for a minimum of five years from the date the person last worked at the facility.</p> <p>All personnel who directly affect hazardous materials transportation safety (loading/unloading, marking containers, prepares shipments, etc) shall be provided general awareness training designed to provide familiarity with DOT requirements and to enable the employee to identify hazardous materials.</p> <p>Employees shall be provided function specific training. Each employee shall be provided safety training. Initial DOT training will be provided within 90 days of an employee being placed in a position to perform a hazmat job function. Prior to the training the employee may perform the hazmat job functions under the direct supervision of a properly trained hazmat employee.</p> <p>Employees will receive the DOT training at least every three years.</p> <p>A record of DOT training will be kept for as long as the employee is employed as a hazmat employee and for 90 days thereafter. The record will include at a minimum:</p> <p>Employee name</p> <p>Most recent training completion date</p> <p>A description, copy or the location of the training materials used</p> <p>Name and address of person providing training</p> <p>Certification that the hazmat employee has been trained and tested</p>	

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**9.0            HAZARDOUS WASTE CONTINGENCY PLAN**

The VEGP Hazardous Waste Contingency Plan is incorporated in the VEGP Spill Control and Countermeasure Plan (SPCC). The SPCC should be referenced as appropriate to determine actions required in the event of emergencies involving hazardous waste at VEGP. Arrangements made with outside authorities are documented in the SPCC.

**10.0            HAZARDOUS WASTE DISPOSAL (Preparation for shipment off-site).**

Hazardous waste generated at Plant Vogtle must be shipped to a permitted hazardous waste disposal site using a permitted transporter (the EPA ID # is required for all transporters and disposal facilities). The packaging, marking, labeling and transportation of hazardous waste must conform to the following:

**10.1            PACKAGING**

10.1.1            Liquid waste must be packaged in an appropriate DOT specification drum.

**NOTE**

There shall be no more than one (1) inch of sludge in any drum containing liquid waste, otherwise a surcharge will be affixed to the drum by the disposal vendor.

10.1.2            Solid or semi-solid waste must be packaged in appropriate DOT specification packaging.

10.1.3            Drums containing liquids or sludges should have at least two (2) inches for expansion of liquid.

10.1.4            Drum lid gaskets should be checked to ensure the gaskets are in good condition prior to closing.

10.1.5            All drums must be dry, in good condition, and not leaking.

**NOTE**

No damaged or leaking drums nor drums without proper lids, bungs, or caps; or drums with free standing liquids on the top may be transported offsite. Overpacks may be used to meet this requirement.

**10.2 MARKING AND LABELING**

Before transporting hazardous waste, ensure that each drum is marked and labeled.

10.2.1 Ensure drums are filled at designated storage area and are marked with a label indicating the contents are hazardous waste, the DOT shipping name, accumulation date, and drum number. Before offering a hazardous waste for transportation mark each drum as described below. Refer to 49 CFR 172.101 Hazardous Materials Table for the Proper DOT shipping name and the DOT ID number.

10.2.2 A shipping label that contains the following information:

- a. Proper DOT shipping name
- b. DOT I.D. number (UN or NA number)
- c. Name of plant and address.
- d. Vogle's EPA I.D. number.
- e. Manifest Document Number (Item 1 in the uniform hazardous waste manifest, See Figure 5).

Example of Manifest Document Number: CO191. Where CO is Company, 1 is first shipment, 91 is the year.

10.2.3 A proper DOT Hazard Warning Label (see Figure 2).

10.2.4 The profile number must be printed or stenciled on top of the drum. Also, the word "Liquid" or "Solid" (whichever is applicable) **MUST BE** printed or stenciled on the top of each drum.



**10.2.5** Markings or labels must:

- a) Be durable (not water soluble) printed or affixed to the surface of the package.
- b) Be displayed on a background that contrasts with the color on which the markings are printed.
- c) Not be obscured by labels or attachments.
- d) Be located away from any other marking that could reduce its effectiveness.

**10.3** **LOADING OF TRANSPORT VEHICLE**

10.3.1 The Chemistry Nuclear Specialist or someone properly trained in shipment of hazardous wastes per Section 8.0 of this procedure should supervise loading of the transport vehicle and ensure that drums are not damaged during loading and ensure that steps 10.4 - 10.7 are properly completed.

**10.4** **VEHICLE PLACARDING**

10.4.1 The Generator is responsible for providing the transporter with placards or arranging for appropriate placards with the transporter prior to moving any hazardous waste from the facility.

10.4.2 Placards will indicate the type of hazard and will be placed on each end and each side of the vehicle. Refer to 49 CFR 172 Subpart F for appropriate placarding requirements.

10.4.3 Any packaging container of 119 gallons or less, that contains only a residue of a hazardous material, need not be included in determining the applicability of the placarding requirements.

10.4.4 If a vehicle contains non-bulk packages with two or more categories of 49 CFR 172.504 Table 2 hazardous materials that require different placards then the placard indicating "DANGEROUS" may be used rather than two separate placards. However, if a vehicle has 2205 pounds or more of one category loaded at one facility, the specific class placard must be displayed.

**10.5 HAZARDOUS WASTE MANIFEST**

10.5.1 Prior to the transportation of hazardous waste the Uniform Hazardous Waste Manifest must be completed and accompany the shipment.

10.5.2 The Uniform Hazardous Waste Manifest consists of two forms: A basic manifest that is to be used for all shipments, and a continuation sheet to be used if:

- a) More than two transporters are to be used to transport the waste, or
- b) More than four different types of hazardous waste materials are shipped (See Figure 4)

**10.6 INSTRUCTIONS FOR COMPLETION OF UNIFORM HAZARDOUS WASTE MANIFEST.**

10.6.1 ITEM 1. Generator's EPA ID No. -Manifest Document No.  
Enter the generator's EPA twelve digit number and the unique five digit number assigned to this Manifest by the generator. For Plant Vogtle the number is GAD094066321.

10.6.2 ITEM 2. Page 1 of  
Enter the total number of pages used to complete this manifest, i.e., the first page plus the number of continuations sheets, if any.

10.6.3 ITEM 3. Generator's Name and Mailing Address  
Enter the name and mailing address of the facility. The Plant Vogtle mailing address is:  
Southern Nuclear – Plant Vogtle  
7821 River Road  
Waynesboro, GA 30830

10.6.4 ITEM 4. Generator's Phone Number  
Enter a telephone number where a person completing manifest may be reached in the event of an emergency. Typically this will be the Chemistry Nuclear Specialist.

10.6.5 ITEM 5. Transporter 1 Company Name  
Enter the company name of the first transporter who will transport the waste.

10.6.6 ITEM 6. EPA ID Number  
Enter the EPA twelve digit identification number of the first transporter (identified in Item 5).

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10.6.7 ITEM 7. Transporter 2 Company Name

If applicable, enter the name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use the Continuation Sheet and list the transporters in the order they will be transporting the waste.

10.6.8 ITEM 8. EPA ID Number

If applicable, enter the EPA twelve digit identification number of the second transporter (identified in Item 7).

10.6.9 ITEM 9. Designated Facility Name and Site Address

Enter the name and address of the facility designated to receive the waste listed on this manifest. The address must be the site address, which may differ from the company mailing address. This information is pre-printed on CWM manifests.

10.6.10 ITEM 10. EPA ID Number

Enter the EPA twelve digit identification number of the designated facility identified in item 9. This information may be pre-printed.

10.6.11 ITEM 11. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number (UN/NA, and Packing Group)

Enter the proper DOT shipping name, Hazard Class, ID Number and Packing Group for each waste. Where a hazardous material is identified with a generic description(e.g., "Combustible Liquid, N.O.S.", "Flammable Liquid N.O.S."), the technical name of the material must be entered in parentheses in association with the basic description. If the hazardous material is a mixture or solution of two or more hazardous materials, the technical names of at least two components most predominately contributing to the hazards must be entered in the parentheses. If the hazardous material is a quantity in one package which equals or exceeds the Reportable Quantity listed in Appendix A to 49 CFR 172.101 then the letters "RQ" must be entered either before or after the basic description. For Hazardous wastes, the word "Waste" must precede the proper DOT shipping name.

For example: A paint waste might be described as "Waste Flammable Liquid, N.O.S., 3, UN1993, PGI (Contains MEK, Toluene)".

Additionally, enter the Profile Number in the space provided.



10.6.12 ITEM 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviations (below) for the type of container.

- DM = Metal drums, barrels, kegs
- DM = Wooden drums, barrels, kegs
- DF = Fiberboard or plastic drums, barrels, kegs
- TP = Tanks Portable
- TT = Cargo Tanks (tank trucks)
- TC = Tank Cars
- DT = Dump Truck
- CY = Cylinders
- CM = Metal boxes, cartons, cases (including roll-offs)
- CW = Wooden boxes, cartons, cases
- CF = Fiber or plastic boxes, cartons, cases
- BA = Burlap, cloth, paper or plastic bags

10.6.13 ITEM 13. Total Quantity

Enter the total quantity of waste described on each line (gallons, pounds, tons, etc.).

10.6.14 ITEM 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation (below) for the unit of measure.

- G = Gallons (liquids only)
- P = Pounds
- T = Tons (2,000 lbs.)
- Y = Cubic Yards
- L = Liters
- K = Kilograms
- M = Metric tons (1,000 Kilograms)
- N = Cubic Meters

**NOTE**

Chemtrec is to be used as the emergency contact for all hazardous waste shipments. Their phone number is **1-800-424-9300**. The telephone number should be in bold print, colored print, or otherwise highlighted so as to be clearly visible.

10.6.15 ITEM 15. Special Handling Instructions and Emergency Response Information

The facility may use this space to indicate special transportation, treatment, storage, disposal, and emergency response information. Contact the Chemistry Nuclear Specialist for the following Emergency Response Information: DOT Emergency Response Guidebook (ERG as referenced on this manifest) and a 24-hour Emergency Response Telephone Number.

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- 10.6.16 ITEM 16. Generator's Certification  
A qualified person must (i.e., DOT Hazardous Material Training or Hazardous Waste training) read, sign (by hand), and date the certification statement.
- 10.6.17 ITEM 17. Transporter 1 Acknowledgment of Receipt of Materials  
Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.
- 10.6.18 ITEM 18. Transporter 2 Acknowledgment of Receipt of Materials  
If applicable, the name of the person accepting the waste on behalf of the second transporter must be entered and that person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.
- 10.6.19 ITEM 19. Discrepancy Indication Space  
The authorized representative of the disposal site's owner or operator must note in this space any significant discrepancy between the waste described on the manifest and the waste actually received at the disposal site.
- 10.6.20 ITEM 20. Site Owner or Operator: Certification of Receipt of Hazardous Materials Covered by this Manifest Except as Noted in ITEM 19  
The name of the person accepting the waste on behalf of the owner or operator of the disposal site must be printed or typed and that person must acknowledge acceptance of the waste described on the manifest by signing and entering the date of receipt.
- 10.7 **OPTIONAL STATE INFORMATION (Shaded Area)**
- 10.7.1 ITEM A. State Manifest Document Number  
This number is pre-printed on CWM manifests.
- 10.7.2 ITEM B. State Generator's ID  
Not required in Georgia.
- 10.7.3 ITEM C. State Transporter's ID  
Not required in Georgia.
- 10.7.4 ITEM D. Transporter's Phone  
Enter a telephone number where an authorized agent of Transporter 1 may be reached in the event of an emergency.

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10.7.5  10.7.6  10.7.7  10.7.8  10.7.9  10.7.10  10.7.11  10.7.12  10.7.13	<p><u>ITEM E. State Transporter's ID</u> Not required in Alabama.</p> <p><u>ITEM F. Transporter's Phone</u> Enter a telephone number where an authorized agent of Transporter 2 may be reached in the event of an emergency.</p> <p><u>ITEM G. State Facility's ID</u> Not applicable.</p> <p><u>ITEM H. Facility's Phone</u> Enter the disposal facility phone number. This number is pre-printed on CWM manifests.</p> <p><u>ITEM I. Waste Number</u> Enter the four digit EPA profile Code Number applicable to the waste (e.g., D001, F003, etc.). This section is required by the state of Alabama.</p> <p><u>ITEM J. Additional Descriptions for Materials Listed Above</u> This space is designated specifically for data used to describe the waste, which may be either required by the State or voluntarily included by the generator. CWM requires physical state of material to be shown here. Emergency response information from IERG (Emergency Response Guidebook) should be cross referenced to the manifest by the Dot ID No. of the material from the shipping description.</p> <p>For example: A "Flammable Liquid, N.O.S., UN1993" relates to Guide #128 in the ERG. Item J would then include (ERG Guideline #128).</p> <p><u>ITEM K. Handling Codes for Wastes Listed Above</u> The disposal site will enter the appropriate EPA handling code (e.g., D81) in the spaces provided.</p> <p>Each transporter must then sign the manifest sheet to signify shipment acceptance. The Chemistry Nuclear Specialist keeps the bottom copy of the manifest sheet (bottom sheet labeled in red ink Generator No. 1). Transporter retains all other copies.</p> <p>Emergency response information must be available during the transportation process. The DOT Emergency Response Guidebook (ERG) will be used to satisfy this requirement.</p>	

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**NOTE**

If Southern Nuclear Operating Company is the shipper and some other company is the transporter, Southern Nuclear Operating Company must ensure that the transporter is carrying the required information on the vehicle. This may mean that a copy of the applicable ERG Guide be attached to the manifest.

**10.8 ADDITIONAL MANIFEST REQUIREMENTS**

**10.8.1** All manifests must be accompanied by the appropriate waste management form. A copy of the form and any supporting data must be maintained on-file with the manifest for a period of (5) years. Due to these forms changing on a frequent basis, Environmental Affairs will supply generators with the appropriate forms.

**NOTE**

This form is two sided; use care when copying form.

**10.8.2** Once the waste is delivered and accepted by the disposer, Plant Vogtle should receive the manifest copy within 30 days or 45 days for SQG, (sheet labeled in red ink Generator No. 2). A tickler card, action item, or other appropriate means will be used to track receipt of the manifest copy.

**10.8.3** This manifest copy will be forwarded to Document Control. If this copy is not received within 30 days contact Environmental Affairs to trace the manifest. The facility shall maintain, chronologically all land disposal ban forms and manifests for a period of not less than five years.

**11.0 MIXED WASTE**

Mixed waste is currently subject to dual regulation by the NRC and EPA. The guidance provided in Section 11.3 below applies only to regulation of the hazardous waste component of the mixed waste. The radiological component must be managed in strict compliance with NRC regulations. Reference VEGP Health Physics low-level radwaste procedures for guidance on management requirements for the radiological component of mixed waste.

Mixed waste may be exempted from the regulatory definition of hazardous waste if it meets the criteria and conditions outlined in 40 CFR Subpart N. Claiming a conditional exemption requires a written notification. Contact Environmental Affairs immediately if mixed waste is or will be generated. Step 11.1 describes the Storage and Treatment Conditional Exemption for mixed waste and Step 11.2 describes the Transportation and Disposal Conditional Exemption for mixed waste.

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## **11.1 MIXED WASTE STORAGE AND TREATMENT CONDITIONAL EXEMPTION**

Mixed waste that has a Storage and Treatment Conditional Exemption may be accumulated on site beyond the 90/180(270) day RCRA limit and may be handled in accordance with NRC regulations and the requirements listed below.

- 11.1.1 Contact Environmental Affairs when a storage unit is first used to store conditionally exempt Low Level Mixed Waste (LLMW). A written notification must be sent to the Georgia EPD within 90 days to claim the conditional exemption for storage and treatment.
- 11.1.2 Store the waste in tanks or containers in compliance with NRC license requirements that apply to the proper storage of Low Level Waste (LLW).
- 11.1.3 Store the waste in tanks or containers in compliance with chemical compatibility requirements of the tank or container.
- 11.1.4 Certify that VEGP personnel managing and storing conditionally exempt LLMW are trained in chemical waste management and hazardous materials incidents response that at a minimum meet the personnel training standards of a SQG.
- 11.1.5 Conduct an inventory of stored conditionally exempt LLMW at least annually and inspect it at least quarterly for compliance with these rules.
- 11.1.6 Maintain an emergency plan as described in Section 9.0 of this procedure.
- 11.1.7 If the conditional treatment exemption is claimed, then the LLMW may be treated in a tank or container in accordance with NRC license.
- 11.1.8 Maintain the following records for three years beyond the time the storage and treatment exemption is being claimed (or in accordance with NRC regulations, whichever is longer)
  - 11.1.8.1 Initial notification of claiming the exemption and any follow-up notifications
  - 11.1.8.2 Personnel training certification
  - 11.1.8.3 Emergency plan.
  - 11.1.8.4 Records of LLMW annual inventories and quarterly inspections required by Section 11.1.5.

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11.1.9 If any of the above listed conditions are not met, the conditional exemption can be lost and the waste must be managed as a RCRA hazardous waste. A notification must be made to the Georgia EPD and to the NRC within 30 days. Contact Environmental Affairs for assistance.

11.1.10 The Storage and Treatment conditional exemption no longer applies when:

11.1.10.1 The waste has met the NRC requirements for decay-in-storage and can be disposed of as non-radioactive waste. On the date that the waste is again subject to hazardous waste regulation, the RCRA time period for accumulation (90/180(270)) begins.

11.1.10.2 The waste is removed from storage.

## 11.2 MIXED WASTE TRANSPORTATION AND DISPOSAL

11.2.1 Contact Environmental Affairs for assistance on mixed-waste disposal. A one-time written notification to the Georgia EPD claiming the conditional exemption is required prior to the first shipment of a conditionally exempted waste. A notification to the Low Level Radioactive Waste Disposal Facility (LLRWDF) is required before the shipment of each exempted waste.

11.2.2 Eligible wastes must be LLMW that meet the waste acceptance criteria of a LLRWDF and the following conditions:

11.2.2.1 Meet or be treated to meet the LDR treatment standards

11.2.2.2 Manifested and transported in accordance with NRC regulations

11.2.2.3 Exempted waste must be in specified containers when it is disposed of in the LLRWDF. Specified containers are 1) a carbon steel drum; or 2) an alternative container with equivalent containment performance in the disposal environment as a carbon steel drum; or 3) a high integrity container as defined by NRC.

11.2.3 Maintain the following records for three years after the last waste is sent for disposal:

11.2.3.1 Records demonstrating that the waste has met LDR treatment standards prior to claiming the exemption.

11.2.3.2 Notifications and return receipts required for a loss of exemption or reclaiming an exemption

11.2.3.3 Notifications and return receipts required for notifying the Georgia EPD of the claim of conditional exemption.

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11.2.3.4 Notifications and return receipts required for notifying the LLRWDF of the claim of conditional exemption.

11.2.3.5 All other documents related to tracking the exempted waste as required by NRC.

11.2.4 If any of the above requirements are not met, the transportation and disposal conditional exemption may be lost. A notification must be made to the Georgia EPD within 30 days of learning of the failure. Contact Environmental Affairs for assistance

### 11.3 MANAGING MIXED WASTE WITHOUT A CONDITIONAL EXEMPTION

Identification and classification of the hazardous waste component of mixed waste is essentially the same as identification of hazardous waste. The mixed waste is characterized based on the composition of the hazardous waste component. Mixed waste may be identified and characterized by using either generator knowledge of the waste or process generating the waste, or by chemical analysis. Refer to Section 5.1 for guidance on identification of hazardous waste.

#### 11.3.1 Sampling and Analysis of Mixed Waste

When possible, generator knowledge should be used to determine if a material meets the regulatory definition of mixed waste. Sampling and analysis should be used only in situations where the material is suspected to be contaminated with hazardous waste, but confirmation using knowledge of the waste stream is not possible. Mixed waste samples must be sent to a facility capable of managing and analyzing both the hazardous waste component and radiological component of the waste. Due to the nature of the material special sampling and shipping requirements are often required. Environmental Affairs should be contacted for support in identification and classification of mixed waste.

#### 11.3.2 Storage of Potential Mixed Waste Pending Identification

Waste which has been sampled to determine if it meets the definition of mixed waste should be labeled as "Potential Mixed Waste - Pending Analysis" and stored in an area meeting the temporary storage requirements provided in Section 7.1. The 90/180(270) day storage limitations do not begin for the waste until identification as mixed waste has been confirmed.

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#### 11.4 ACCUMULATION AND TEMPORARY STORAGE OF MIXED WASTE

##### 11.4.1 Satellite Accumulation of Mixed Waste

As much as 55 gallons of mixed waste may be accumulated in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste without being subject to the 90/180(270) day storage provisions provided the following conditions are met.

11.4.1.1 The waste is placed in containers which are in good condition

11.4.1.2 The waste is compatible with the storage container.

11.4.1.3 The container must be clearly marked with the words "Hazardous Waste" or with other words that clearly identify the contents of the container. The preprinted diamond "Potential Mixed Waste" label is acceptable. Additional marking (such as Waste MEK, etc.) should be provided to identify the contents of the container.

11.4.1.4 The container must be kept closed except when adding or removing waste.

#### NOTE

A container with a funnel in the top is not considered closed.

11.4.1.5 When the accumulated waste exceeds 55 gallons, the accumulation container(s) must be marked with the date the amount of waste exceeded 55 gallons and moved within 3 days to a temporary storage area.

11.4.1.6 Mixed waste satellite accumulation areas should be inspected, at a minimum, on a weekly basis; daily inspection is recommended.

11.4.1.7 Mixed waste satellite accumulation areas should be located at or near the point of generation. If the waste generating process results in generation of multiple types of waste which are distinctly different from each other (e.g., liquid paint waste and waste rags from paint cleanup), multiple satellite accumulation areas may be set up adjacent to each other to facilitate efficient collection of waste.



**NOTE**

For mixed waste, satellite containers should be located as close to the point of generation as possible, but may be moved a reasonable distance from the process generating the waste to satisfy ALARA concerns or concerns over safety (e.g., fire). The basis for relocation of the container should be appropriately documented and the Chemistry Manager must approve the location.

11.4.1.8 Temporary mixed waste satellite accumulation areas may be set up to support mobile or outage related activities. Contact the Chemistry Nuclear Specialist to coordinate temporary satellite accumulation areas. The area must be approved by the Chemistry Manager prior to use. A record will be kept by Chemistry personnel of the location of the temporary satellite accumulation area, the date the area was placed into service, and the date the area was removed from service.

11.4.1.9 The Chemistry Nuclear Specialist will track the amount of waste accumulated in each satellite area. Disposal arrangements should be initiated for the waste after the drum is approximately ½ full, or sooner if the waste generation process is ongoing and significant amounts of waste are being generated.

11.4.1.10 Projects which have the potential for generation of mixed waste should be discussed in detail to determine ways to minimize the generation of waste. Use of material which has the potential for mixed waste generation should be strictly controlled in accordance with Procedure 00260-C.

11.4.2 Temporary Storage Area Requirements for Mixed Waste

A temporary storage area (<90/180(270) day) for mixed waste may be located in the designated area of the Temporary Hazardous Waste Storage Area (Storage Area B). This area is to be used for storage of waste generated in satellite areas prior to disposal and for storage of suspected mixed waste pending classification by analysis. The Chemistry Nuclear Specialist should be contacted to coordinate placement of material into this area and removal of material from this area. A log of material in inventory shall be kept by the Chemistry Nuclear Specialist. See Section 7.3 for information regarding the storage area log.

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11.4.2.1 The temporary storage area must meet the following design criteria:

- a. The storage area must have an impervious surface (e.g., sealed concrete) and must be surrounded by containment which is sized to contain 110 percent of the maximum liquid storage capacity or the volume of the largest container, whichever is greatest.
- b. The storage area should be located inside or equipped with a roof to keep out rainfall.
- c. Access to the temporary storage area must be controlled and limited to personnel who have responsibility for management of mixed waste. Other personnel should be allowed in the area only under the direct supervision of personnel with designated mixed waste management responsibility. All personnel working in the mixed waste temporary storage area must be trained in mixed waste management procedures and emergency response.
- d. The mixed waste storage area should be posted with appropriate signs indicating "No Smoking", Mixed Waste Temporary Storage Area - Authorized Personnel Only" and any other warnings necessary to preclude accidents.

11.4.2.2 The temporary storage must be noted in the VEGP SPCC plan and appropriate guidance for spill response must be in place.

#### NOTE

The Chemistry Nuclear Specialist must be contacted prior to draining of any liquids (including rainwater) from the temporary storage area. A log must be kept of each draining event noting the amount drained and the date the draining occurred. The log should also note that no waste material was present in the drained material. See Data Sheet 3 for an acceptable log.

11.4.3 Container Management

Containers must be managed in the temporary storage area in accordance with the following:

11.4.3.1 Containers may not be stored for more than 90 days as a Large Quantity Generator and not more than 180 days (270 days if the waste must be shipped greater than 200 miles) as Small Quantity Generator. This requirement does not apply to containers of unknown waste being stored pending analysis. Containers pending analysis are not subject to the storage time requirement until they are confirmed to contain mixed waste.

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11.4.3.2 The date on which the storage began shall be clearly marked on each container. This date will either be the date the container became full in satellite accumulation or the date the container was determined to be a mixed waste and placed into the temporary storage area pending disposal.

11.4.3.3 Each container shall be clearly marked with the words "Hazardous Waste" and the appropriate EPA waste code (e.g., D001). A standard hazardous waste label may be used for this purpose. A "Mixed Waste" label is also acceptable.

11.4.3.4 Containers must be in good condition and compatible with the material being stored.

**NOTE**

If a container is not in good condition, or if a container begins to leak, the material must be immediately transferred to a new container. The Chemistry Nuclear Specialist should be contacted immediately in the event containers are observed to be in poor condition or are leaking.

11.4.3.5 Containers must always be kept closed except when adding or removing waste.

11.4.3.6 Adequate aisle space must be maintained between containers to allow access for emergency equipment.

11.4.4 Emergency Equipment

The temporary mixed waste storage area must be equipped with the emergency equipment necessary to respond to emergencies involving mixed waste. The following equipment shall be available at the temporary storage area:

11.4.4.1 Portable fire extinguishers, fire control equipment, appropriate personnel protective equipment.

11.4.4.2 Water at adequate volume and pressure to supply fire control devices.

11.4.4.3 Spill control and cleanup material.

11.4.4.4 Emergency communication devices (P.A. system, telephone,, etc.) shall be available at or near the area for use to summon help during emergencies.

Emergency equipment must be maintained as necessary to ensure equipment is functional for use in emergencies. Emergency equipment should be inspected as part of the weekly inspection of the temporary mixed waste storage area required in Section 11.4.5 below.

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#### 11.4.5 Inspections

The temporary mixed waste storage area must be inspected on a weekly basis when containers are in storage. The inspection should include the following and will be documented using the inspection form in Data Sheet 1.

- a. Condition of containers;
- b. Containers closed during storage;
- c. Containers labeled with words "Hazardous Waste" or "Mixed Waste" and EPA Waste Code;
- d. Accumulation date clearly visible on all containers;
- e. Incompatible wastes segregated;
- f. Adequate aisle space maintained for emergency access;
- g. Emergency equipment available and operational;
- h. Warning signs visible and in good repair.

#### 11.4.6 Contingency Plan for Mixed Waste

The VEGP Hazardous Waste Plan is contained in The VEGP SPCC. Refer to the SPCC for guidance during emergencies involving mixed waste.

#### 11.4.7 Training

Training for mixed waste management has been incorporated into the VEGP Hazardous Waste training program administered by the Training Department.

### 11.5 DISPOSAL OF MIXED WASTE

The process for approval of mixed waste for disposal is time consuming and should be initiated immediately upon identification of mixed waste requiring disposal. The disposal process for mixed waste in satellite accumulation areas should be initiated when satellite containers are approximately ½ full. The Chemistry Nuclear Specialist should contact SNC Environmental Affairs and the HP Radwaste Shipping Specialist to arrange for approval of mixed waste for disposal. The HP Radwaste Shipping Specialist will coordinate disposal.



**12.0 EMPTY DRUM DISPOSAL**

Prior to the disposal of any empty drums as non-hazardous solid waste, Plant Vogtle must meet certain criteria.

**12.1** Drums must be completely emptied prior to disposal (i.e., contains less than one inch of material).

**12.2** Any drum which contained any chemical product listed on the EPA "P" List, is to be triple rinsed with an appropriate solvent. The drum may then be disposed of as a solid waste. The rinseate is to be used as a P List product or is to be disposed of as a hazardous waste.

**12.3** All labels and markings must be removed from the drum prior to disposal (except drums being returned for credit).

**12.4** Drums should only be disposed of through a reputable drum recycling company, returned for credit, sold as scrap, used on site, or crushed and disposed of in a permitted landfill. Plant Vogtle prefers to crush and landfill drums.

**13.0 RECYCLING**

**13.1** Solvents and paint waste may be recycled provided the recycler has been approved by Environmental Affairs prior to any waste being shipped to a particular recycler.

**13.2** Empty Drums may be disposed of through a reputable drum recycling company, returned for credit, sold as scrap, crushed and placed in a permitted landfill or used on site provided the following precautions are taken:

- a. If the drum contained a chemical product listed on the 40 CFR 261.33 P-List it must be triple rinsed with an appropriate solvent. The drum may then be disposed of as a solid waste.
- b. Labels and markings must be removed from the drum prior to disposal (except drums being returned for credit).
- c. Drum recyclers must be approved by Environmental Affairs.
- d. Drums to be reused at a facility must at a minimum be triple rinsed, and all labels and markings removed prior to use (except when the same product is placed back in the drum).
- e. Drums designated for dry trash shall be painted white.

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**13.3** Lead-Acid batteries may either be returned for credit toward the purchase of a new battery or sent to Investment Recovery at Forest Park for recycling. Prior to shipment to Forest Park the batteries must be banded and palletized and non-leaking. If a battery is leaking contact Environmental Affairs. Pallets are to be banded with only one layer of batteries per pallet.

**14.0** **RECORD KEEPING**

**14.1** **BIENNIAL REPORTS**

In even numbered years, a Biennial Hazardous Waste Report must be filed. This report should be completed on forms provided by Environmental Affairs and returned to Environmental Affairs by February 15 to support submittal to the State of Georgia by March 1 of the reporting year. This report is not required when the site maintains SQG status for the entire year preceding the report year.

**15.0** **SPILLS**

Plan of actions to be taken in the event of a spill of hazardous materials or, hazardous wastes is outlined in the VEGP Spill Control and Countermeasure Plan (SPCC).

**16.0** **REFERENCES**

- 16.1** Vogtle Electric Generating Plant (VEGP) Combined Spill Prevention Control Countermeasure, (SPCC).
- 16.2** Procedure 94001-C Spill Prevention Control Countermeasures (SPCC) And Reportability
- 16.3** Department of Transportation Emergency Response Guidebook (ERG)
- 16.4** 40 CFR Parts 261-265, 266 Subpart N, 302, and 355
- 16.5** 49 CFR Parts 171-173
- 16.6** 40 CFR Part 273.

**END OF PROCEDURE TEXT**

Approved By  
**Clifton L. Buck**

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**WEEKLY INSPECTION OF HAZARDOUS-WASTE STORAGE FACILITIES  
COMMENTS:**

	TEMPORARY	SATELLITE LOCATION		
		N of Maint. Bldg	Painter's Area	Radwaste Solid. Bldg
1. SIGNS IN PLACE AND LEGIBLE				
2. PERIMETER FENCE IN GOOD REPAIR				
3. STORAGE DRUMS STORED PROPERLY				
4. NO VISIBLE LEAKS IN GOOD REPAIR				
5. ACCESS IS LOCKED				
6. AREA OUTSIDE PERIMETER FENCE IS FREE OF LITTER OR OTHER STORED MATERIALS				
7. BERM OR OTHER CONFINEMENT IS IN GOOD CONDITION				
8. ALL SECURITY LIGHTING IS FUNCTIONING				
9. EMERGENCY EQUIPMENT IS IN PLACE (FIRE CONTROL, SPILL CONTROL, PPE)				
10. INVENTORY OF HAZARDOUS WASTE IN STORAGE				

REMARKS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CHEMISTRY TECHNICIAN: \_\_\_\_\_ DATE: \_\_\_\_\_

REVIEWED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

**DATA SHEET 1**

Approved By  
**Clifton L. Buck**  
Date Approved  
**6-29-2005**

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**CONTROL, HANDLING AND DISPOSAL OF HAZARDOUS WASTE**

# HAZARDOUS WASTE

## DRUM IDENTIFICATIONS

Facility: \_\_\_\_\_

Originator: \_\_\_\_\_ Phone No.: \_\_\_\_\_

- Contents:  Waste Flammable Liquid N.O.S.,  
UN1993  
 Waste Combustible Liquid N.O.S.,  
NA1993  
 Waste Related Paint  
Material, UN1263  
 Other (Contact Environmental  
Services)

Brand or Trade Name: \_\_\_\_\_

Shipper's No.: \_\_\_\_\_ Accumulation Date: \_\_\_\_\_

Destination: \_\_\_\_\_

FIGURE 1

Approved By  
**Clifton L. Buck**

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# Hazardous Waste

**FEDERAL LAW PROHIBITS IMPROPER DISPOSAL**  
**If Found, Contact the Nearest Police, or Public Safety Authority**  
**or the U.S. Environmental Protection Agency**

Proper D.O.T. Shipping Name \_\_\_\_\_

UN or NA # \_\_\_\_\_

Generator Information		
Name		
Address		
City	State	Zip
EPA I.D. No.	EPA Waste No.	
Accumulation	Manifest Document No.	

**HANDLE WITH CARE**  
**CONTAINS HAZARDOUS OR TOXIC WASTE**

704346

FIGURE 2

Approved By  
**Clifton L. Buck**  
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**6-29-2005**

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**CONTROL, HANDLING AND DISPOSAL OF HAZARDOUS WASTE**

**GENERATOR STATUS SUMMARY**

<b>Hazardous Waste Generated per Month</b>	<b>Generator Status</b>	<b>Accumulation Limits</b>
Greater than 1000 kg of hazardous waste in a month  OR  Greater than 1 kg of acutely hazardous waste in a month	Large Quantity Generator	Less than 90 days in Temporary Hazardous Waste Storage
Less than 1000 kg of hazardous waste in a month  AND  Less than 1 kg of acutely hazardous waste in a month	Small Quantity Generator	Less than 6000 kg of hazardous waste on-site at any time  AND  Less than 180 days (or 270 days if waste must be shipped greater than 200 miles) in Temporary Hazardous Waste Storage

**FIGURE 3**

Approved By  
**Clifton L. Buck**

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# HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, DMB No. 2050-0036, Expires 9-30-91

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address						A. State Manifest Document Number <b>CWMA 730128</b>		B. State Generator's ID			
4. Generator's Phone ( )						C. State Transporter's ID		D. Transporter's Phone			
5. Transporter 1 Company Name			6. US EPA ID Number			E. State Transporter's ID		F. Transporter's Phone			
7. Transporter 2 Company Name			8. US EPA ID Number			G. State Facility's ID		H. Facility's Phone <b>205/652-9721</b>			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459						10. US EPA ID Number		I. Waste No.			
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. Disposal Approval # _____ CWM Profile # _____						No.		Type		Waste No.	
b. Disposal Approval # _____ CWM Profile # _____											
c. Disposal Approval # _____ CWM Profile # _____											
d. Disposal Approval # _____ CWM Profile # _____											
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above					
State of Generation _____						a. _____ c. _____					
15. Special Handling Instructions and Additional Information						b. _____ d. _____					
Purchase Order # _____						EMERGENCY CONTACT.					
Work Order # _____						16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.					
I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name _____						Signature _____		Month Day Year _____			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name _____		Signature _____		Month Day Year _____	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name _____		Signature _____		Month Day Year _____	
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						Printed/Typed Name _____		Signature _____		Month Day Year _____	

EPA Form 700-22 (Rev. 9-86) Previous edition is obsolete.

STATE OF ALABAMA (Must Accompany Shipment)

FIGURE 4



