



CERTIFICATION OF WASTE GENERATOR SITES

Requirement for Inspections and EPA Approvals

Waste to be shipped to the Waste Isolation Pilot Plant (WIPP) is characterized by transuranic (TRU) waste generator sites operating under the approval of the U.S. Environmental Protection Agency (EPA). EPA must inspect and approve the waste characterization activities at each site prior to a site being certified (by the DOE Carlsbad Field Office) to ship their EPA-approved TRU waste to WIPP for disposal. As described in the Agency's Final Rule on May 18, 1998, EPA must separately approve the Quality Assurance Programs for generator sites (Condition 2) and the waste characterization system of controls for individual waste streams (Condition 3) before waste may be shipped to WIPP for disposal.

On July 16, 2004, EPA revised its site inspection and approval process under 40 CFR § 194.8. The revised approval process provides an opportunity for the public to comment on the EPA-proposed baseline approval of a site-specific TRU waste characterization program. The revisions to 40 CFR § 194.8 also require that all TRU sites with EPA baseline approvals notify and seek EPA approval of changes to specific waste characterization process components. The site-specific baseline approvals identify which changes must be approved by EPA before their implementation (Tier 1) and those not requiring EPA approval prior to their implementation (Tier 2). When approving a site-specific Tier 1 change, EPA may perform an on-site inspection to evaluate its technical adequacy. TRU sites notify EPA of their Tier 2 changes on a quarterly basis and provide supporting documents for EPA review and concurrence.

Status of EPA Inspections and Approvals

The status of EPA inspections and approvals is described in two parts: (1) through mid-2008, which is consistent with the information in Section 194.8 of the second Compliance Recertification Application (CRA-2009), and (2) the current status of EPA inspections and approvals.

EPA Inspections and Approvals for CH-TRU Generator Sites Through Mid-2008

The sites approved by EPA to ship contact-handled transuranic (CH-TRU) waste to WIPP in accordance with the requirements of 40 CFR § 194.8 are:

- Hanford Site – Richland Operational Office
- Idaho National Laboratory (INL)
- Advanced Mixed Waste Treatment Project (AMWTP) at INL
- Savannah River Site (SRS)
- Oak Ridge National Laboratory (ORNL)
- Los Alamos National Laboratory (LANL)

These sites are identified as yellow circles on the location map on the next page.

The TRU waste sites identified in the CRA-2004 that have shipped CH-TRU waste to WIPP, but are not currently active are:

- Lawrence Livermore National Laboratory (LLNL)
- Nevada Test Site (NTS)
- Argonne National Laboratory-East (ANL-E)

The Rocky Flats Environmental Technology Site (RFETS) was also identified in CRA-2004 as shipping waste to WIPP, but this site has completed shipping all of its TRU waste to WIPP. These inactive sites are identified as green squares on the location map.

EPA Inspections and Approvals for RH-TRU Generator Sites Through Mid-2008

On March 26, 2004, the EPA announced its decision to approve the DOE's *Remote Handled TRU Waste Characterization Program Implementation Plan* and the *Remote Handled Transuranic Waste Characterization Plan* for WIPP. EPA must still perform on-site inspections and give approval for site-specific, remote-handled transuranic (RH-TRU) waste characterization programs at each site, as required by 40 CFR § 194.8.

In compliance with EPA’s site-specific baseline approvals, the Central Characterization Project (CCP) can characterize RH-TRU waste at ANL-E, INL, LANL, and SRS. The EPA conducted a baseline inspection of the RH-TRU waste characterization process at ORNL/CCP in July 2008, but approval was still pending at the time Section 194.8 of the CRA-2009 was prepared.

- Argonne National Laboratory-East (ANL-E)
- Idaho National Laboratory (INL)
- Savannah River Site (SRS)
- Oak Ridge National Laboratory (ORNL)
- Los Alamos National Laboratory (LANL)

AMWTP and Hanford are not approved to characterize RH-TRU waste as of May 2009.

Current Status of EPA Inspections and Approvals

For Further Information

Currently, the CCP can characterize CH TRU waste at ANL-E, INL, LANL, SRS, and ORNL in compliance with EPA’s site-specific baseline approvals. AMWTP and Hanford also characterize their CH-TRU waste in compliance with their respective baseline approvals. The CCP can characterize RH-TRU waste at the following sites in compliance with EPA’s site-specific baseline approvals:

Section 194.8, *Approval Process for Waste Shipment from Waste Generator Sites for Disposal at the WIPP*, and Section 194.24, *Waste Characterization*, in the CRA-2009 provide additional information on the site certification process and the characterization of waste. Appendix AUD in CRA-2009 presents more detailed results from the ongoing inspections and audits of the DOE waste generator sites.

Location Map

