

Table 1. Typical Errors (RSWOG & HWOG)

<b>Control Point (CP) 1. RFD Paperwork/Waste Package Reviewed by GI or GIE (Mandatory)</b>		
Error Type (Block No. from Forms)	Error Disposition	Error Report WCC*
Generator does not have current awareness training (W1)	Generator to take current awareness training	N
Charge number invalid (W5)	Generator to provide valid number	N
Physical form incorrect (16)	Generator correct physical form on the WID	N
Waste description listed incorrectly (W29)	Generator correct waste description on the WID	N
Origin date is in the future (I2)	Generator correct the origin date to be in the present (or past)	N
HP instrument ID not listed on WID (I16) (if required)	Generator request ORP to provide instrument numbers.	N
Signatures missing on WID. (S1, S3)	Generator and/or ORP to sign WIDs.	N
PK Form out of date (greater than 1 year old). (R3)	Generator update PK form or Waste Stream Profile sheets.	N
Fissile content not listed. (R4) (Rad only)	Generator calculate fissile content for fissionable isotopes.	N
Enrichment not listed. (R5) (Rad only)	Generator calculate enrichment wt% if U-234, U-235, or U-238 is listed.	N
Incorrect radioisotopes listed (mis-characterization of waste). (R7, R8, R9) (Rad only)	Generator correct the characterization method and list proper radioisotopes and quantities.	N
Underlying Hazardous Constituents (s) not listed if present. (T14) (RCRA or RCRA-treated)	Generator evaluate material for UHC and list if appropriate.	N
Incorrect Waste Certification Procedure . V1(1)	Generator change WCP number.	N
Analytical data incomplete or missing.	Generator complete or supply missing data.	N

**Control Point (CP) 2. RFD Paperwork Reviewed by WM Waste Acceptance Personnel**

Error Type (Block No. from Forms)	Error Disposition	Error Report WCC*
Generator does not have current awareness training. (W1)	WM/GI/GIE: Request generator to take current awareness training. Generator: Take required awareness training.	Y
Charge number invalid. (W5)	WM: Inform generator of error, request valid charge number, and correct WID forms. Generator/GI/GIE: Provide valid charge number to WM and change WID template to prevent future errors.	N
Waste description listed incorrectly or not enough detail (i.e., "excess chemical"). (W29)	WM: Inform generator of error, request proper information, and correct WID forms. Or return to generator for correction Generator/GI/GIE : Provide adequate waste description and change WID template to prevent future errors.	N
"WASTE MEETS NO RAD ADDED REQUIREMENTS" statement not entered in block W29 when Attachment C is used and waste is no-rad added.	WM: Request signed verification from generator to confirm "no rad added". Generator/GI/GIE : Provide no-rad added verification and change WID template to prevent future errors.	N
Origin date is in the future. (I2)	WM: Inform generator of error, request proper date from generator and correct WID forms. Generator/GI/GIE: Provide proper date to WM and change WID template to prevent future errors.	N
Container number not provided for waste submitted to HWOG. (I5)	WM: Inform generator of error, request container number from generator and correct WID forms. Generator/GI/GIE : Provide container number to WM for 30 gallon or larger. (Note: waste container not overpacked need to be in DOT containers and be labeled with a container number.	N
HP instrument ID not listed on WID, if required (I16)	WM: Request generator to provide information. Generator/GI/GIE : Provide WM with instrument numbers.	N
Signatures missing on WID. (S1, S2, or S3 if required)	WM: Request Generator/GI/GIE to sign documents, return RFD if not signed within two working days. Generator/GI/GIE: Sign documents (provide HP signatures if needed)	Y
Blocks S2, S3, or S4 have "NA" entered in the name, badge, or date field.	WM: Inform generator of the error, remove "NA" entry from the WID fields. Generator/GI/GIE: Change WID template to not enter "NA" into fields S2, S3, S4. (These fields must be blank when no information is needed.)	N

**Control Point (CP) 2. Paperwork Reviewed by WM Waste Acceptance Personnel (continued)**

Error Type (Block No. from Forms)	Error Disposition	Error Report WCC*
PK Form or waste stream profile sheet out of date (greater than 1 year old). (R3)	WM: Request generator update PK form or Waste Stream Profile Sheet. Generator/GI/GIE: Update PK form or Waste Stream Profile Sheets.	Y
Fissile content not listed. (R4) (Rad only)	WM: Calculate fissile content, correct forms, and notify generator of correction. Generator/GI/GIE: Correct WID template calculate fissile content for future waste streams.	Y
Enrichment not listed. (R5) (Rad only)	WM: Calculate enrichment percent and correct forms, notify generator of correction: Generator/GI/GIE: Correct WID template enrichment percent for future waste streams.	Y
Mischaracterization of rad waste, incorrect characterization method used. (R7, R8, R9) - Large items with surface contamination characterized using method 4. - Waste item with nonstandard geometry characterized using method 4. - Alpha contaminated waste classified as TRU waste. - TRU waste and S LLW packaged in the same container. (Rad only)	WM: Request generator to update characterization method. Generator/GI/GIE: Correct the characterization method and list proper radioisotopes and quantities.	Y
Mischaracterization of haz waste (Attachment C T3-T9) - RCRA or TSCA determination - PCB concentration (Note: excludes simple coding errors)	WM: Request generator to update characterization method. Generator/GI/GIE: Correct the characterization method and list proper components and quantities.	Y
Mischaracterization of mixed waste (Attachment D R7-10, T3-T9) - Radioisotopes incorrectly identified - RCRA or TSCA determination - PCB concentration (Note: excludes simple coding errors)	WM: Request generator to update characterization method. Generator/GI/GIE: Correct the characterization method and list proper radioisotopes and quantities.	Y
Incorrect EPA waste code (Attachments B, C, D - T13)	WM: Inform the generator of the error, identify correct EPA waste code and correct forms. Generator/GI/GIE: Correct WID template to prevent future errors.	Y
Incorrect attachment used for waste stream - Attachment A used for TRU waste - Attachment B used for mixed waste	WM: Request generator submit waste on proper form. Generator/GI/GIE: Complete proper form.	Y

**Control Point (CP) 2. Paperwork Reviewed by WM Waste Acceptance Personnel (continued)**

Error Type (Block No. from Forms)	Error Disposition	Error Report WCC*
Underlying Hazardous Constituents (s) not listed if present. (T14) (RCRA only)	WM: Inform the generator of the error and document, change "UHC" to indicate present in waste, and correct forms. Generator/GI/GIE: Correct WID template to prevent future errors.	Y
Incorrect Waste Certification Procedure. V1 (1).	WM: Correct Waste Certification Program number to ORNL/TM-13288 on WIDs and notify generator of the error. Generator/GI/GIE: Correct WID template to prevent future errors.	N
Errors on "Container Packing List". - Block I5, Container ID Number, listed incorrectly. - Block I16, HP Tag number, dose rate at surface and 1 meter left blank. - Block P5, Pickup Facility left blank.	WM: Inform generator of the error, correct paperwork if possible. Return RFD if not signed within two working days. Generator/GI/GIE: Correct paperwork and change WID template to prevent future errors.	N
Errors on Waste Pickup Request. - Block S0, Pickup Requestor, no signature entered	WM: Inform generator of the error, correct paperwork if possible. Return RFD if not signed within two working days. Generator/GI/GIE: Correct paperwork and change WID template to prevent future errors.	N

### Control Point (CP) 3. Hazardous Container Waste Package Reviewed by RSWOG WM Field Personnel

Error Type (Block No. from Forms)	Error Disposition	Error Report WCC*
Gasket not in place or incorrectly installed on boxes	WM: Notify generator of problem, repair gasket if minor, if not request generator to fix. Generator/GI/GIE: Repair/install gasket, inspect future boxes for proper gasket installation.	Y
55-gallon drum bolt not torqued to 45 ft lbs +/- 5 lbs.	WM: Notify generator of problem, torque drum if possible, if not, request generator to torque drum(s). Generator/GI/GIE: Torque drum(s), inspect future drums for proper torque.	N
Lock nut improperly placed on drum ring bolt.	WM: Notify generator of problem, properly install lock nut on outside of drum lid ring if possible, if not, request generator to install nut. Generator/GI/GIE: Properly install lock nut on drum ring bolt, inspect future drums for proper lock nut placement.	N
Rad tag missing or out of date on rad-waste box or drum.	WM: Notify generator of missing or out-of-date rad tag. Generator/GI/GIE: Request HP to provide rad tag for the waste container and inspect future containers for proper rad tag placement.	Y
Physical integrity of waste container not acceptable, excess corrosion, rust, dents, or damage.	WM: Notify generator of problem. Generator/GI/GIE: Repair or repackage waste into acceptable container. Inspect future containers to verify physical integrity is acceptable.	Y
Paperwork does not match waste container.	WM: Notify generator of problem. Generator/GI/GIE: Correct paperwork to match waste container.(i.e., wrong container type).	Y
Drum does not meet DOT spec. UN 1A2/X or UN 1A2/Y	WM: Notify generator of problem. Generator/GI/GIE: Repackage waste into acceptable container.	Y
Container bar codes not on opposing sides (drums) Container bar codes not on four sides (boxes).	WM: Notify generator of problem. Generator/GI/GIE: Replace bar codes onto proper location.	Y

**Control Point (CP) 3. Hazardous Container Waste Package Reviewed by RSWOG WM Field Personnel**

Error Type (Block No. from Forms)	Error Disposition	Error Report WCC*
Container description or physical contents does not match paperwork (i.e., paperwork indicates solid when waste is actually liquid, or paperwork indicated powder when waste is actually solids).	WM: Correct paperwork to match container characteristics. Notify generator of problem. Generator/GI/GIE: Ensure future waste package paperwork submitted match actual waste container physical characteristics.	Y
Aerosol cans partially full and paperwork indicates empty.	WM: Notify generator of problem. Generator/GI/GIE: Segregate empty aerosol cans from partially full and generate paperwork for cans containing material.	Y
Containers of liquids or solids not listed on the paperwork, (and not evaluated by WM chemists), that are placed inside of packages labeled plastic, rags, paper.	WM: Notify the generator of the problem. Generator/GI/GIE: Segregate and identify waste items and list on WID forms for evaluation by WM prior to submitting for disposal. Inspect container contents prior to submitting to ensure all waste is identified and characterized.	Y
Out-of-date drums, DOT 17H, 17C, 17 E, 6D, are being used to package hazardous/mixed waste after October 1, 1996 instead of the new "UN" spec. Drums.	WM: Notify the generator of the problem. Generator/GI/GIE: When using steel drums to package hazardous waste, use only the drums which have the newer UN numbers stamped or stenciled on them. Drums of hazardous/mixed waste that are packaged AFTER October 1, 1996 that have the old style spec numbers (i.e. 17H, 6D, 17E, etc.) are no longer acceptable.	Y
Lids are taped onto containers.	WM: Notify the generator of the problem. Generator/GI/GIE: Repackage the waste into a container that has a tightly sealing lid. Inspect future waste container to ensure container has a tightly sealing lid.	Y

\*Use error tracking form attached to WCP.

**Control Point (CP) 3. Hazardous Container Waste Package Reviewed by RSWOG WM Field Personnel**