EP/WS R4 7/29/02

Instructions: Non-Hazardous/NonPCB Waste Item Process Knowledge Worksheet

PK Documentation No.= number assigned by WA after approval.
Bldg. No./ Rm. No. = number assigned to the biulding and room for the waste being addressed/documented by the PK form.
GI Name of submitter: _____ Date submitted: _____
WA Name of approver (submittal and approval only required when PK form is required for documentation purposes, see specific documentation required in items 2, 3, 5, 6). Date approved: _____

1. Evaluate wastes that are discarded commercial chemicals, nonempty containers, spill residues, or are commercial products where "sole active ingredients" may be present. Use CAS nos. to verify chemicals are not on the EPA's P and U-lists. Consider sending small volumes of non-regulated, solid chemicals with low hazards to the Y-12 landfill, via Sanitary/Industrial Waste Program. Consult IWC, if applicable.

Confirm waste is excess or unused and state so on W29 of WID or on Attachment Z, T15, or on container log-in sheet.

Determine if the waste is a PCB-containing lab standard or commercial product containing PCBs (e.g., microscope immersion oil)? If yes, use Haz/PCB Process Knowledge Worksheet.

2. Evaluate mixtures of used chemicals or spill residues of used chemicals or nonrecyclable used oil, including bulked items or labpacked items, for the presence of F-listed solvents or other listed (other F- or K-listed) wastes.

Confirm that RCRA-regulated solvents are not present, determine if "spent" vs "other use" and that sole use/mixture rules do not apply. (Other use may be as product ingredient or not used as solvent, i.e., possibly used as refrigerant.) If listed, then use Haz/PCB Process Knowledge Worksheet.

Confirm that waste generation process is not covered by another RCRA-listed waste code (other F-listed, i.e., electroplating, unused chlorophenols, or K-listed wastes). If listed, then use Haz/PCB Process Knowledge Worksheet.

Address known chemical constituents present (percentages or ppm or other units) on Attachment Z, T10 thru T15.

Verify generators accounting of contents. Resolve any discrepancies in that accounting.

If the waste is bulked or labpacked, ensure no waste codes apply to the items bulked or labpacked. If based on generator records, identify record type (logbook, e-mail, etc.) and location.

Confirm that PCBs are not present. If PCBs present, then use Haz/PCB Process Knowledge Worksheet. For multiphasic wastes, evaluate PCBs for each phase.

3. Evaluate manufactured products or debris against existing RCRA exemptions and/or exclusions for such wastes. Note: lamps, circuit boards, batteries, scrap metal being disposed of are not exempt. If excluded, then it is not a RCRA hazardous waste. Provide reg. cite for exclusions/exemptions on WID, in W29.

Confirm that the waste is not contaminated with RCRA-listed waste or PCBs.

If the waste includes wipes contaminated with F003 solvents only, then confirm the waste is dry at the point of generation and that no other waste codes apply. Obtain generator signature to document (dry) basis.

4. Determine if the waste is an unknown and if yes, determine if any RCRA characteristics or PCBs can be ruled out based on physical properties/appearance. If the waste is an unknown, have the waste sampled and analyzed to determine RCRA/PCB waste status. Manage unknowns as RCRA waste until proven non-RCRA.

5. Determine whether any RCRA characteristics apply. Do not use MSDS alone to rule out absence of TC constituents unless MSDS accounts for 100% of constituents. Call manufacturer or sample and analyze for any properties/constituents where PK basis is weak. If a RCRA exemption applies, list the exemption on the WID, see W29. If based on analyses, list sampling and analysis identification numbers on Attachment Z, T1.

6. Confirm if the waste is a treatment residue of a RCRA waste. If the waste is a treatment residue of a RCRA waste, then determine if UHCs are present that require treatment. Use 40 CFR 268.40 and 268.48 tables, latest version, as basis. If yes (UHCs present) or no (UHCs not present or don't require treatment), document basis for UHC determination. If based on analyses, list sampling and analysis identification numbers on Attachment Z, T1.

7. Document basis for NRA determination. If NRA determination is based on green-tag or NRA analysis per Haz/Mixed Subject area, then note on WID, see W29. If based on generator determination, document generator's basis (personal knowledge, internal procedure, etc.) on PK form. If waste is known to have been DOE rad-added, but is green-taggable now, it can not be declared NRA: note on WID, W29, as "not NRA" see also ORNL Subject Area for Hold-for-Decay. If rad waste, use WSPS to document radiological PK. If applicable, document sampling and analysis identification numbers on Attachment Z, T1.

NonHazardous/NonPCB Waste Item Process Knowledge Worksheet

PK Documentation No._____ Bldg. No./ Rm. No._____
GI_____ Date_____
WA_____ Date_____

1. Does the waste contain a RCRA-listed discarded commercial chemical, an off-specification product, a container residue, or a spill residue of such a product, or a formulation in which the chemical is the sole-active ingredient in a commercial product (including a lab standard)?	Yes	No	If no, list any nonRCRA chemicals present on Attachment Z, T10 thru T15, and skip to 2. If yes, use Haz./PCB Process Knowledge Worksheet.
Examples: chemicals in manufacturer's original container with appropriate label, appropriate physical appearance, etc.			
Is the waste a PCB-containing lab standard or commercial product containing PCBs?	Yes	No	If yes, use Hazardous/PCB PK worksheet.
2. Is the waste a mixture of used chemicals (e.g., lab pour up bottle), a spill of a used chemical, or a nonrecyclable used oil?	Yes	No	If no, skip to 3.
Are any RCRA-regulated solvent(s) (F001 to F005) used for their solvent properties present? (Cleaner, degreaser, extractant, diluent, etc.)	Yes	No	If yes, use Haz./PCB Process Knowledge Worksheet.
Verify sole use of RCRA solvents (F001 to F005) and/or solvent mixture rule percentages in products based on before use composition do not apply.			Explain basis if not F-listed:
Verify waste generation process is not covered by another RCRA-listed waste code (other F or K).	Yes, listed	No, not listed	If yes, use Haz./PCB Waste Process Knowledge sheet.
Evaluate chemical constituents added and type of reactions/treatment/contamination introduced in the lab use/generation process to determine possible/known constituents.	Yes, addressed	No, not addressed	Address chemical constituents (percentages or ppm) on Attachment Z (T10 thru T15). Generator record location:
Verify amount (volume/percentages) in container is comparable to the generator's accounting of contents.	Ok	Not ok	Explain resolution of inconsistencies.

If the waste is bulked or labpacked, then ensure no waste codes apply to any internal containers/items.	Ok	Not ok	If no waste codes, go on to 5. Explain resolution of inconsistencies.
Confirm whether any PCBs are present.	Yes, present	No, not present	If yes, use Haz/PCB Process Knowledge Worksheet.
3. Is the waste a manufactured product or debris?	Yes	No	If no, skip to 4.
Check against exclusions for: arsenical treated wood; treated leather; circuit boards; recyclable batteries, lamps, scrap metal; etc.			If excluded provide reg. cite on WID, in W29:
Is it contaminated with a listed waste (such as F001, 2, 4 or 5 spent solvent) including wipes?	Yes	No	If yes, then use Haz./PCB Waste Process Knowledge Worksheet.
Is it a wipe contaminated with F003 spent solvent?	Yes	No	If yes, then verify "dry" at point of generation. Generator signature: If not contaminated, then skip to 5
Is it contaminated with PCBs?	Yes	No	If yes, then use Haz/PCB Waste Process Knowledge Worksheet
4. Is the waste an unknown?	Yes	No	If yes, manage as RCRA until proven otherwise. Use Haz./PCB Waste Process Knowledge Worksheet
5. Evaluate waste for characteristics: flashpoint, corrosivity, reactivity (pyrophorics/oxidizers/explosives/ shock sensitive), and toxicity characteristics.	Yes, characteristic	No, not characteristic	If yes to any, then use Haz./PCB Waste Process Knowledge Worksheet.
Use MSDS, generator knowledge of ingredients and their percentages, and/or prior analyses as basis. (Provide MSDS no., or analytical results id no. on 2109 form and/or generator record location.)			Manufacturer or generator record location:
If aqueous alcohol solution, is alcohol < 24%, if yes, then not D001.	Yes	No	List 40 CFR 261.21(a)(1) on WID, see W29.

Is there a RCRA exemption/exclusion for the waste (e.g., fly ash, special nuclear material, empty container, UST spill clean up wastes or TSCA-regulated dielectric fluid)?	Yes	No	If yes, give reg. cite on WID, see W29.
6. Is any generator treatment of this waste conducted (solidification, neutralization, etc.)?	Yes	No	If yes, describe treatment process and purpose.
If treatment removes RCRA characteristic, then determine if UHCs require treatment.	Yes, UHCs present	No, UHCs not present or don't require treatment	If yes, identify UHCs on 2109 form. If either yes or no, document basis.
7. Is it NRA (in NRMMA and no history of rad. or potential for rad. according to the generator)? If green-tagged, retain copy. If based on generator knowledge, document generator basis. If based on NRA analysis, give analytical results no.	Yes	No	Document generator or green-tag basis on WID, see W29. If applicable, document NRA analyses on Attachment Z, T1. If no, then use Rad. Waste Process Knowledge Worksheet.