

WP 05-WH1010

Revision 5

Container Overpacking

Technical Procedure

EFFECTIVE DATE: 12/14/05

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APPROVED FOR USE

CONTINUOUS USE PROCEDURE

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INTRODUCTION ^{1,2}

This procedure provides instructions for overpacking damaged and/or contaminated waste containers into 85-gallon overpacks, standard waste boxes (SWBs), and ten-drum overpacks (TDOPs). This procedure also provides operating and inspection instructions for the Mechanical Upender.

Performance of this procedure may generate the following records:

- Attachment 1, 85-Gallon Drum Overpack Data Sheet
- Attachment 2, Standard Waste Box Overpack Data Sheet
- Attachment 3, Ten-Drum Overpack Data Sheet
- Mechanical Upender Equipment Logbook

REFERENCES

BASELINE DOCUMENTS

- 40 CFR Part 761, Subpart C, "Marking of PCBs and PCB Items"
- 40 CFR Part 761, Subpart D, "Storage and Disposal"
- 40 CFR Part 761, Subpart G, "PCB Spill Cleanup Policy"
- DOE Standard 1090-04, *Hoisting and Rigging*
- Hazardous Waste Facility Final Permit, Waste Isolation Pilot Plant, Permit No. NM4890139088 - TSDF, issued by the New Mexico Environment Department
- DOE/WIPP 02-3122, *Contact Handled (CH) Waste Acceptance Criteria for the Waste Isolation Pilot Plant*
- DOE/WIPP 95-2065, *WIPP Contact Handled (CH) Documented Safety Analysis*
- DOE/WIPP 95-2125, *Waste Isolation Pilot Plant Contact Handled (CH) Technical Safety Requirements*
- NRC Docket Number 71-9218, *Safety Analysis Report for the TRUPACT-II Shipping Package*
- *Handling & Maintenance Manual for TRUPACT-II Ten-Drum Overpack - TDOP, 2-4-94*

- Mechanical Upender Owners Operating, Service, and Parts Manual, 1-27-97
- WP 13-1, Washington TRU Solutions LLC Quality Assurance Program Description
- WP 12-HP1100, Radiological Surveys
- WP 12-HP3600, Radiological Work Permits

REFERENCED DOCUMENTS

- WP 05-WH1011, CH Waste Processing
- WP 05-WH1101, Surface Transuranic Mixed Waste Handling Area Inspections
- WP 05-WH1810, Underground Transuranic Mixed Waste Disposal Area Inspections
- WP 05-WH4401, Waste Handling Operator Event Response
- WP 12-HP4000, Emergency Radiological Control Responses

EQUIPMENT

- Noncombustible, 85-gallon drums, meeting U.S. Department of Transportation (DOT) Type A packaging requirements, approximate tare weight 85 lb.
- Noncombustible, 55-gallon drums, meeting DOT Type A packaging requirements for dunnage.
- Noncombustible, SWB, meeting DOT Type A packaging requirements, approximate tare weight 680 lb.
- Noncombustible, TDOP, meeting DOT Type A packaging requirements, approximate tare weight 1,600 lb.
- Carbon filters (one per 85-gallon drum; two per SWB; nine per TDOP)
- 3/4-in. NPT plugs
- Calibrated torque wrench, 10 to 80 ft/lb, or equivalent
- Calibrated torque wrench, 10 to 200 in./lb, or equivalent
- Loctite 262, or equivalent

- Ladder
- Hand tools
- Rigging
- Mechanical Upender
- Plastic liners and/or bags
- Hazardous waste labels
- Radiological labels
- Slip sheets
- Bar code labels
- PCB (polychlorinated biphenyls) warning labels, if applicable
- Portable Continuous Air Monitor (CAM)
- Portable Air Sampler (PAS)
- Massilin or herculite (for equipment and tool drop)
- Drum carrier rotator (41-H-047)

PRECAUTIONS AND LIMITATIONS

- Only personnel qualified as a Waste Handling Technician/Engineer/ Radiological Control Technician/Radiological Control Engineer (WHT/WHE/RCT/RCE), or trainees operating under the direct supervision of a qualified WHT/WHE/RCT/RCE, are authorized to perform the waste handling (WH) and radiological control (RC) activities specified in this procedure.
- Response to abnormal or emergency events requiring cessation of this procedure are to be performed in accordance with WP 05-WH4401 and WP 12-HP4000 concurrently.
- Maximum container weights shall not exceed the following:
 - 1,000 lb per 85-gallon drum
 - 4,000 lb per SWB
 - 6,700 lb per TDOP

- The Mechanical Upender is rated for lifting 8,000 lb. Exceeding the weight rating can cause injury and/or equipment damage.
- The Mechanical Upender lock pin must be installed before transporting the unit.
- The local disconnect must be open when connecting Mechanical Upender power cable.
- The Mechanical Upender power cable **MUST NOT** be handled when the Mechanical Upender is energized.
- Storage of overpacked waste containers containing PCBs in the Waste Handling Building (WHB) shall not exceed 60 days. The 60-day time period begins as soon as waste is placed into the overpack container.
- If the original waste container is contaminated with PCBs, the overpack container shall be labeled as containing PCBs as soon as waste is placed into the overpack container.
- Caution must be used when operating the Mechanical Upender. When in operation, hands, feet, and other body parts must be kept away from Mechanical Upender.
- Personnel **MUST NOT** walk on or drive over control or power cables.
- The overpack container identification number will be assigned by affixing the WIPP designator (WI) in front of the original container number (container to be overpacked).

EVALUATION PHASE

NOTE

This procedure may be used in conjunction with job-specific work instructions, if required, due to complexity or uniqueness of event.

- 1.0 WH, evaluate conditions and determine best approach for overpack operations based on existing conditions.
- 2.0 WH, review WIPP Waste Information System (WWIS) data to determine drum weights, packaging method used, etc., to preplan overpack operations.
- 3.0 WH, determine appropriate equipment needs and method of container retrieval based on conditions.
- 4.0 WH, determine appropriate rigging methods to perform overpack operations.
- 5.0 Waste Handling Manager (WHM), authorize overpack operations based on evaluation phase results.

6.0 WH, determine overpack containers to be used for overpack operations and **GO TO** the applicable section or job-specific work instruction after completing prerequisite actions:

- Section 1.0 when using 85-gallon drum for overpacking
- Section 2.0 when using SWB for overpacking
- Section 3.0 when using TDOP for overpacking

PREREQUISITE ACTIONS

1.0 WHE, verify adequate Waste Handling Operations (WHO) staff is available to support the overpacking activities, and record on applicable attachment.

SIGN-OFF

2.0 Verify that the applicable sections of WP 05-WH1101, or WP 05-WH1810, have been completed.

3.0 WHE, verify surface and/or underground (U/G) is configured for WH mode by contacting the Central Monitoring Room Operator (CMRO), and record on applicable attachment.

SIGN-OFF

4.0 WHE, obtain job-specific Radiological Work Permit prior to starting overpacking activities.

5.0 WHE, obtain new identification (ID) labels (bar codes).

6.0 Obtain new hazardous waste labels from the Transportation Engineer (TE).

7.0 Obtain PCB warning labels, if applicable.

8.0 Verify the applicable equipment preoperational inspections have been completed.

9.0 Stage equipment as required for overpack operations.

10.0 WH, perform Attachment 4, Mechanical Upender Preoperations and Operational Inspection, prior to operating the Mechanical Upender, **AND** document completion in the Equipment Logbook.

PERFORMANCE

1.0 OVERPACKING INTO 85-GALLON DRUMS

1.1 WH, prepare 85-gallon overpack for use as follows:

- Remove outer lid.
- Apply thread locking compound to the threads on a carbon filter.
- Install carbon filter in outer lid **AND** torque to 150 in./lb (\pm 30 in./lb).
- Install plastic liner/bag, if applicable.

1.2 WH, install bar code labels, hazardous waste labels, and PCB warning labels, if applicable, on overpack as follows:

- Place three bar code labels on overpack side approximately 120 degrees apart.
- Place hazardous waste labels as directed by TE.
- Place PCB warning labels as directed by WHM, if applicable.

1.3 WH, record shipment number on Attachment 1.

SIGN-OFF

1.4 WH, record ID number of drum to be overpacked on Attachment 1.

SIGN-OFF

1.5 WH, record ID number of 85-gallon overpack (WI affixed in front of original container number) on Attachment 1.

SIGN-OFF

1.6 WH, attach drum handling rigging between the lifting device and drum to be overpacked.

1.7 WH, place drum into overpack.

1.8 WH, tape plastic liner/bag closed using the J-seal method, if applicable.

1.9 WH, install lid on overpack.

1.10 Torque bung ring to 35 to 44 ft/lb.

1.11 RCT, perform contamination smears of exterior surface of overpack.

- 1.12 RCT, verify activity on exterior surface of the overpack is below acceptable limits.

SIGN-OFF

- 1.13 RCT, perform dose rate survey of overpack container.

NOTE

Eighty-five-gallon drum overpacks are disposed singly, or in a 4-pack configuration (four drums). If four overpacked drums are **NOT** available, then empty (dunnage) 85-gallon drums, labeled "EMPTY," can be used to make up the required configuration.

- 1.14 WH, indicate on Attachment 1 if waste contains PCBs by circling appropriate result.

SIGN-OFF

- 1.15 For 4-pack configuration, WH, place four 85-gallon drums on a slip sheet.

1.15.1 WH, install cribbing between drums, if applicable.

1.15.2 WH, install reenforcement plate on top of drums.

1.15.3 WH, band or stretch wrap drums together.

- 1.16 WH, perform the following:

1.16.1 Place 4-pack, or single drum, on facility pallet.

1.16.2 Secure 4-pack, or single drum, to facility pallet.

- 1.17 WH, **IF** loaded facility pallet is to be shipped U/G, **THEN GO TO** WP 05-WH1011, download as directed, and **RETURN TO** Step 1.19.

- 1.18 WH, **IF** loaded facility pallet is to be stored on surface, **THEN** place in Northeast Storage Area.

- 1.19 Performers, print name, sign, date, and initial on Attachment 1.

- 1.20 **GO TO** Section 4.0.

2.0 OVERPACKING INTO STANDARD WASTE BOXES

2.1 WH, prepare the SWB for use as follows:

- Remove outer lid.
- Apply thread locking compound to the threads on two carbon filters.
- Install two carbon filters on SWB body **AND** torque to 150 in./lb (\pm 30 in./lb).
- Apply thread locking compound to the threads on two 3/4-in. NPT plugs.
- Install two 3/4-in. NPT plugs on SWB body **AND** torque to 150 in./lb (\pm 30 in./lb).
- Inspect SWB gasket seal and replace as required.
- Install plastic liner/bag, if applicable.

2.2 WH, install bar code labels, hazardous waste labels, and PCB warning labels, if applicable, as follows:

- Place bar code labels centered on SWB flat sides.
- Place hazardous waste labels as directed by TE.
- Place PCB warning labels as directed by WHM, if applicable.

NOTE

An SWB can hold up to four 55-gallon drums.

2.3 WH, record shipment number on Attachment 2.

SIGN-OFF

2.4 WH, record ID number(s) of drum(s) to be overpacked on Attachment 2.

SIGN-OFF

2.5 WH, record SWB ID number (affix WI in front of original container number) on Attachment 2.

SIGN-OFF

- 2.6 WH, attach drum handling rigging between the lifting device and damaged drum(s).
- 2.7 WH, place damaged drum(s) into SWB.
- 2.8 WH, tape plastic liner/bag closed using the J-seal method, if applicable.
- 2.9 WH, install SWB lid by aligning the serial numbers (SNs).
- 2.10 WH, secure SWB lid as follows:

NOTE

Attachment 5, Screw Installation Sequence, can be used to identify the installation and tightening sequence for screws 1 through 14.

- 2.10.1 Use Loctite 262, or equivalent, on each screw just prior to installation.
- 2.10.2 Install first screw at position 1 (the corner where the SWB SN is located) **AND** tighten until it is approximately 1/4 in. into SWB threads.
- 2.10.3 Install screws 2 through 14, approximately 1/4 in. into SWB threads.
- 2.10.4 Tighten screws 1 through 14 hand-tight.
- 2.10.5 Install remaining screws hand-tight.

NOTE

Screws can be torqued in any sequence.

- 2.10.6 Pretorque all screws to 30 ft/lb (-0, +10 ft/lb).
- 2.10.7 Torque all screws to 50 ft/lb (-0, +10 ft/lb).
- 2.11 RCT, perform contamination smears of exterior surface of overpack.
- 2.12 RCT, verify activity on exterior surface of the overpack is below acceptable limits.

SIGN-OFF

- 2.13 RCT, perform dose rate survey of overpack container.

- 2.14 WH, indicate on Attachment 2 if waste contains PCBs by circling the appropriate result.

SIGN-OFF

- 2.15 WH, perform the following:

2.15.1 Place SWB on facility pallet.

2.15.2 Secure SWB to facility pallet.

- 2.16 WH, **IF** loaded facility pallet is to be shipped U/G, **THEN GO TO** WP 05-WH1011, download as directed, and **RETURN TO** Step 2.18.

- 2.17 WH, **IF** loaded facility pallet is to be stored on surface, **THEN** place in Northeast Storage Area.

- 2.18 Performers, print name, sign, date, and initial on Attachment 2.

- 2.19 **GO TO** Section 4.0.

3.0 OVERPACKING INTO TEN-DRUM OVERPACKS

- 3.1 WH, install bar code labels, hazardous waste labels, and PCB warning labels, if applicable, on TDOP as follows:

- Place three bar code labels on overpack side approximately 120 degrees apart.
- Place hazardous waste labels as directed by TE.
- Place PCB warning labels as directed by WHM, if applicable.

NOTE

A TDOP can hold ten 55-gallon drums or one SWB.

- 3.2 WH, record shipment number on Attachment 3.

SIGN-OFF

- 3.3 WH, record ID number of each drum **OR** SWB to be overpacked on Attachment 3.

SIGN-OFF

- 3.4 WH, record TDOP ID number (affix WI in front of original container number) on Attachment 3.

SIGN-OFF

- 3.5 WH, **IF** overpacking 55-gallon drums into TDOP, **THEN** perform the following:
- 3.5.1 Remove the TDOP lid screws and remove the lid.
- 3.5.2 Prepare TDOP for use as follows:
- Apply thread locking compound to the threads on nine carbon filters.
 - Install nine carbon filters inside TDOP body **AND** torque to 80 in./lb (\pm 15 in./lb).
 - Apply thread locking compound to the threads on a 3/4-in. NPT plug.
 - Install one 3/4-in. NPT plug inside TDOP body **AND** torque to 80 in./lb (\pm 15 in./lb).
 - Inspect TDOP gasket seal for damage and replace as required.
- 3.5.3 Attach drum handling rigging between the lifting device and each drum to be overpacked.
- 3.5.4 Place drums into TDOP.
- 3.5.5 WH, install TDOP lid aligning to the alignment stripe.
- 3.5.6 **GO TO** Step 3.8.
- 3.6 WH, **IF** overpacking an SWB into a TDOP, **THEN** perform the following:
- 3.6.1 Verify all personnel are clear of Mechanical Upender prior to and during rotation operation.
- 3.6.2 Perform Mechanical Upender Preoperations Inspection (Attachment 4).
- 3.6.3 Verify lock pin is removed.
- 3.6.4 Rotate Mechanical Upender to the vertical position.

- 3.6.5 Place TDOP on Mechanical Upender.
- 3.6.6 Remove TDOP lid screws.
- 3.6.7 Remove outer lid.
- 3.6.8 Secure TDOP to Mechanical Upender using ratchet straps.
- 3.6.9 Rotate Mechanical Upender to the horizontal position.
- 3.6.10 Prepare TDOP for use as follows:
- Inspect TDOP gasket for damage and replace as required.
 - Apply thread locking compound to the threads on nine carbon filters.
 - Install nine carbon filters inside TDOP body **AND** torque to 80 in./lb (\pm 15 in./lb).
 - Apply thread locking compound to the threads on a 3/4-in. NPT plug.
 - Install one 3/4-in. NPT plug inside TDOP body **AND** torque to 80 in./lb (\pm 15 in./lb).
- 3.6.11 Place SWB into TDOP.
- 3.6.12 Rotate Mechanical Upender to the vertical position.
- 3.7 WH, install TDOP lid aligning to the alignment stripe.
- 3.7.1 Remove TDOP ratchet straps.
- 3.7.2 Remove TDOP from Mechanical Upender.
- 3.8 WH, secure TDOP lid as follows:

NOTE

The 36 screws used to secure TDOP lid can be installed and finger tightened in any sequence.

- 3.8.1 Install **AND** finger-tighten 36 screws.
- 3.8.2 Tighten all screws, using a "crisscross" pattern, 1-1/2 turns.
- 3.8.3 Torque all screws, using a "crisscross" pattern, to 50 ft/lb (-0, +5 ft/lb).

- 3.9 RCT, perform contamination smears of exterior surface of TDOP.
- 3.10 RCT, verify activity on exterior surface of the overpack is below acceptable limits.

SIGN-OFF

- 3.11 RCT, perform dose rate survey of overpack container.
- 3.12 WH, indicate on Attachment 3 if waste contains PCBs by circling appropriate result.

SIGN-OFF

- 3.13 WH, perform the following:
 - 3.13.1 Place TDOP on facility pallet.
 - 3.13.2 Secure TDOP to facility pallet.
- 3.14 WH, **IF** loaded facility pallet is to be shipped U/G, **THEN GO TO** WP 05-WH1011, download as directed, and **RETURN TO** Step 3.16.
- 3.15 WH, **IF** loaded facility pallet is to be stored on surface, **THEN** place in Northeast Storage Area.
- 3.16 Performers of procedure print name, sign, date, and initial on Attachment 3.

4.0 REVIEW

- 4.1 WHE, verify appropriate attachment(s) is completed properly.
- 4.2 WHE, print name, sign, and date on the REVIEW/VALIDATION line on completed attachment(s).
- 4.3 WHE, if job-specific work instructions were used, attach to data sheets.
- 4.4 Waste Operations Engineer, enter overpack data into WWIS.
- 4.5 WHE, send original completed attachment(s) to Records Coordinator.

Attachment 1 - 85-Gallon Drum Overpack Data Sheet

STEP NO.	DESCRIPTION	INITIAL
PREREQUISITE ACTIONS		
1.0	Adequate WHO staff available.	_____ WHE
3.0	Surface and/or U/G is configured for Waste Handling Mode.	_____ WHE
PERFORMANCE		
1.3	Shipment number: _____	_____ WH
1.4	ID No. of drum to be overpacked: _____	_____ WH
1.5	ID No. of 85-gallon overpack: _____	_____ WH
1.12	Activity on smears verified below acceptable limits.	_____ RCT
1.14	Waste contains PCBs: Yes No	_____ WH

Performers responsible for step completion, enter initials, printed name, signature, and date below:

REMARKS: _____

REVIEW: _____

WHE (Printed Name)	Signature	Date
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Attachment 2 - Standard Waste Box Overpack Data Sheet

STEP NO.	DESCRIPTION	INITIAL
PREREQUISITE ACTIONS		
1.0	Adequate WHO staff available.	_____ WHE
3.0	Surface and/or U/G is configured for Waste Handling Mode.	_____ WHE
PERFORMANCE		
2.3	Shipment number: _____	_____ WH
2.4	ID No. of drums to be overpacked: (1) _____ (2) _____ (3) _____ (4) _____	_____ WH
2.5	ID No. of SWB: _____	_____ WH
2.12	Activity on smears verified below acceptable limits.	_____ RCT
2.14	Waste contains PCBs: Yes No	_____ WH

Performers responsible for step completion, enter initials, printed name, signature, and date below:

Initials	Printed Name	Signature	Date
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REMARKS: _____

REVIEW: _____

WHE (Printed Name)	Signature	Date
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Attachment 3 - Ten-Drum Overpack Data Sheet

STEP NO.	DESCRIPTION	INITIAL
PREREQUISITE ACTIONS		
1.0	Adequate WHO staff available.	_____ WHE
3.0	Surface and/or U/G is configured for Waste Handling Mode.	_____ WHE
PERFORMANCE		
3.2	Shipment number: _____	_____ WH
3.3	ID No. of SWB to be overpacked: _____ ID No. of drums to be overpacked: (1) _____ (2) _____ (3) _____ (4) _____ (5) _____ (6) _____ (7) _____ (8) _____ (9) _____ (10) _____	_____ WH
3.4	ID No. of TDOP: _____	_____ WH
3.10	Activity on smears verified below acceptable limits.	_____ RCT
3.12	Waste contains PCBs: Yes No	_____ WH

Performers responsible for step completion enter initials, printed name, signature, and date below:

Initials	Printed Name	Signature	Date
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REMARKS: _____

REVIEW: _____

WHE (Printed Name)	Signature	Date
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Attachment 4 - Mechanical Upender Preoperations and Operational Inspection

PREOPERATIONS INSPECTION

1. Review Equipment Logbook for any outstanding deficiencies and/or Action Requests (ARs). Notify WHE if any deficiency or AR has **NOT** been resolved.
2. Verify Mechanical Upender is secured to facility pallet.
3. Perform visual inspection for any debris/foreign material that could hinder Mechanical Upender operation. Remove and dispose of any debris/foreign material found.
4. Inspect the following Mechanical Upender components:
 - Rotator chain
 - Bogey wheels
 - Cradle
 - Base platform
 - Power cable
 - Control cable
 - Ratchet straps
5. **IF** deficiencies detected during inspection cannot be corrected, **THEN** notify WHE prior to operating Mechanical Upender.

Attachment 4 - Mechanical Upender Preoperations and Operational Inspection

OPERATIONAL INSPECTION

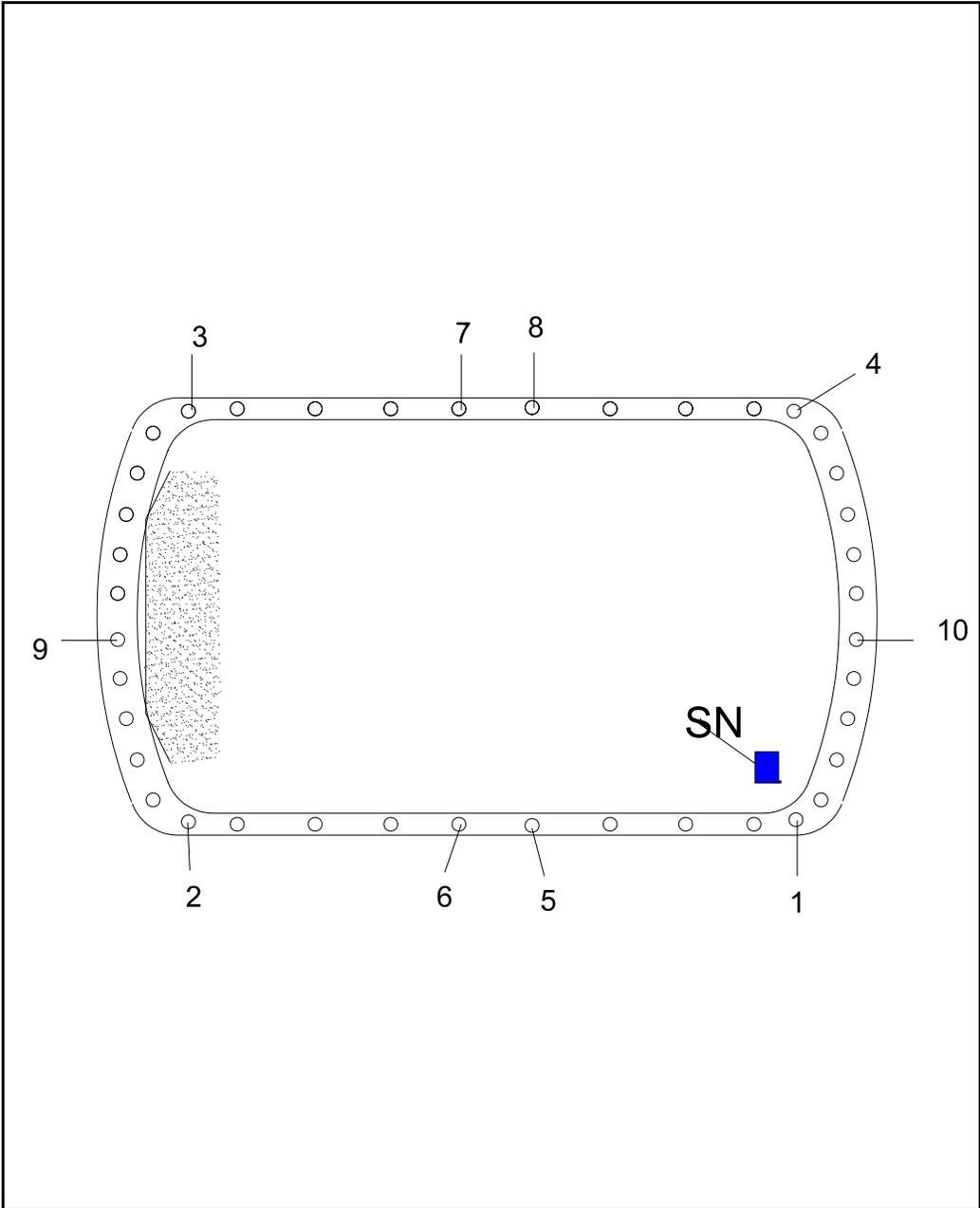
1. Verify local disconnect 41P-RP04/25 (West Dock) or 41P-RP04/26 (East Dock) is in the OFF position.
2. Connect the grounding strap securely to building ground.
3. Plug power cord into receptacle.
4. Place local disconnect 41P-RP04/25 (West Dock), or 41P-RP04/26 (East Dock), in the ON position.
5. Verify safety pin is removed.
6. Press the UP button **AND** verify the Mechanical Upender travels to the vertical position.
7. Press the DOWN button **AND** verify the Mechanical Upender travels to the horizontal position.

NOTE

If Mechanical Upender does not operate, CB #7 (West Dock) or #8 (East Dock) (41P-DP-04/2) must be verified to be in the ON position.

8. Notify WHE of the operational status of the Upender and of any deficiencies detected **AND** the status of each (deficiencies corrected, AR generated, etc.).
9. Initiate AR if WHO cannot correct any deficiencies detected during inspection.
10. Record the following information in Equipment Logbook:
 - Equipment number
 - Deficiencies noted
 - Corrective actions taken (outstanding/newly generated ARs, etc.)
11. Enter time, date, and signature in Equipment Logbook to document performance of preoperations checks.

Attachment 5 - Screw Installation Sequence



Attachment 6 - Recommended Methods for Overpacking

Case 1: Overpacking as a Precautionary Measure

RCTs should perform surveys of any newly exposed areas throughout the operation.

1. Stage a facility pallet at TRUDOCK.
2. Place 7-pack assembly on the facility pallet and rotate payload so that drum to be overpacked is facing the spare pallet position using ACGLF and Crane.
3. Remove ACGLF.
4. Secure 7-pack using nylon ratchet strap.
5. Remove stretch wrap and reinforcement plate.
6. Use rigging material to tie off to drum(s) to be overpacked.
7. Place 85-gallon lid on spare pallet position.
8. Using crane, slightly raise and move 55-gallon drum and place on top of the overpack lid and remove rigging.
9. Place 85-gallon container over 55-gallon drum and tighten bung ring to a specified torque of 35 to 44 ft/lb.
10. Replace dunnage drum(s) into original 7-pack assembly and rewrap to configure for emplacement.
11. Using the Drum Carrier Rotator or rigging, upright the 85-gallon container.
12. Secure waste to the facility pallet and download as directed.

Attachment 6 - Recommended Methods for Overpacking

Case 2: Overpacking due to an Abnormal Event

RCTs should perform surveys of any newly exposed areas throughout the operation.

1. Review data from Assessment Plan and determine best method for overpack.
2. Develop overpack instructions to minimize spread of contamination and cleanup.
3. Establish an area to overpack containers, preferably on a facility pallet.
4. Use rigging material to tie off to drum(s) to be overpacked.
5. Use crane to move containers to the overpack container.
6. Place container into new overpack container.
7. Remove rigging, and close container.
8. Decontaminate area as required.
9. Secure waste to facility pallet(s) and download when authorized by the WHM.