

**ENVIRONMENTAL MANAGEMENT WASTE
MANAGEMENT FACILITY**
Physical Waste Acceptance Criterion Blanket Variance Approval

Blanket Variance No: EMWMF-BV-07-02

Revision No: 1

Effective Date: 04/01/2011


Approval Signature

Blanket Variance Applicable to: Metal piping, conduit, or tubing with internal diameter up to 6 inches in diameter that is intact and between 6 inches and 12 inches that has been crushed, shredded, or filled to minimize void space.

1. Physical Waste Acceptance Criterion No.: 7

Requirement: Piping shall be segregated from other wastes and shall be placed in haulage containers to avoid bridging or otherwise wedging during unloading. Pipe and tubing less than 6-in. diameter is accepted without further restrictions. Pipes between 6-in. and 12-in. diameter shall be crushed, shredded, or filled to minimize void spaces. Pipes 12-in. diameter and greater shall be split longitudinally.

Basis: Issued for Construction Operations Plan, December 2000.

2. Variance:

Commingled pipe, conduit, and tubing from decommissioning and demolition (D&D) projects with other debris for direct disposal in the EMWMF.

Justification: Operational experience has shown that piping, conduit, and tubing makes up a small percentage of the total amount of D&D debris, and when adequately size reduced, may be mixed with other debris in approved waste conveyances for disposal at EMWMF.

3. Conditions of Variance:

- a. This variance only applies to debris waste streams with commingled pipe, conduit, and tubing that are placed in bulk disposal areas at EMWMF.
- b. Pipe, conduit, or tubing commingled with debris shall be limited to internal diameter of up to 12 inches.
- c. Pipe, conduit, or tubing up to 6 inches in internal diameter shall be:
 1. Cut to nominal 6 ft. maximum lengths.
- d. Pipe, conduit, or tubing with internal diameter between 6 inches and 12 inches shall be:
 1. Cut to nominal 6 ft. maximum lengths;

2. Cut to remove elbows, angles, flanges, valves, and other fittings in order to facilitate crushing; and
3. Crushed to the maximum extent practicable.

Note: Elbows, angles, flanges, valves, or other junctions removed from pipe with internal diameter between 6 inches and 12 inches are not part of this blanket variance and shall meet applicable void space requirements or conditions of a separate variance request.

- e. Pipe, conduit, or tubing shall make up no more than nominally 5% of the total volume of waste within a conveyance.
 - f. Conveyances covered under this variance without further restrictions include rear dump trucks.
 - g. Conveyances covered under this variance with restrictions include intermodal containers with the following restrictions:
 - The volume of D&D waste placed into an intermodal container shall be limited to nominally one-half the volume of that container; and
 - Internal hooks and other features that could cause the debris to hang-up inside the container shall be removed.
4. Application of Blanket Variance:
- a. Certification of full compliance with the conditions of this blanket variance, as stated herein, by the waste generator of a specific, approved waste lot fulfills the requirements of a variance to the physical waste acceptance criterion in accordance with *Attainment Plan for Risk/Toxicity-Based Waste Acceptance Criteria at the Oak Ridge Reservation, Oak Ridge, Tennessee (DOE/OR/01-1909&D3)*.
 - b. Generator shall reference Blanket Variance EMWMF-BV-07-02 in required sections of the Waste Profile and attach a hard copy when submitting the waste profile to the Waste Acceptance Criteria (WAC) Attainment Team.
5. Revocation of Blanket Variance:
- a. Upon discovery of waste from a specific waste lot that is not in full compliance with the conditions stated herein, this blanket variance may be revoked by written communications to the generator's BJC responsible contact and the waste declared to be anomalous waste.
 - b. Upon identification that the dumping and/or material handling of waste packaged and shipped in accordance with this blanket variance presents a safety or health hazard to personnel at the EMWMF during or following dumping, this blanket variance may be revoked by written communications to generator's BJC responsible contact.