Section 1: Generator & Billing Information

EPA ID

Generator Name
US EPA Region 6

Technical Contact
Pieczynski, Todd

Physical Address
3400 Block of Lowerline Street

E-Mail
todd@securllc.com

City, State, Zip
New Orleans | LA | 70125

Office Phone
432-557-3708

Mobile Number
432-557-3708

Generator Certification ID:

Billing Company
Secur LPT, LLC

Billing Contact
Cliff Bright

Mail Address
409 Broad Street

E-Mail
Cliff.Bright@securllc.com

City, State, Zip
Sewickly | PA | 15143

Office Phone
888-484-4031 x108

Mobile Number

Section 2: Attachments

Name	File Type	Nickname	Uploaded On
RAD data.pdf	Radiological Data	WP-9001 Rad data	6/18/2019
RCRA Analytical.pdf	RCRA Data	WP-9001 RCRA data	6/18/2019

Section 3: Radioactive Waste Regulatory Status at the time of shipment to WCS (check only one option)

- [ ] Waste is NOT regulated as NORM, TENORM, exempt radioactive waste or licensed radioactive waste. If Section 13 is not applicable, check this box.
- [x] Licensed Low Level Radioactive Waste (includes LLMW) that is considered:
  - [x] Commercial Waste generated in:
    - [ ] Texas and/or
    - [ ] Vermont
    - [x] Any other state
  - [ ] Federal Facility Waste
- [ ] Radioactive Byproduct Material [11.e(2)] as defined by THSC §401.003(3)(B)
- [ ] Waste will be radiologically exempt PRIOR to shipment (including exempt NORM)
- [ ] Oil field NORM waste regulated by the Texas Railroad Commission that meets their exemption requirements

Section 4: Hazardous Waste Status (Check only one option)

- [x] Waste **is not** considered RCRA Hazardous or Mixed Waste
- [ ] Waste **is** considered RCRA Hazardous or Mixed Waste, and is
  - [ ] Hazardous Waste that meets applicable 40 CFR 268 standards prior to receipt at WCS
  - [ ] Hazardous Waste that will require treatment (check only one):
    - [ ] Waste is subject to the treatment standards found in 40 CFR Part 268.40
    - [ ] Waste meets the definition of debris or lead per 40 CFR Part 268 - Macroencapsulation is a viable treatment method for this waste
    - [ ] Waste subject to the LDR alternative treatment standards for soil (40 CFR Part 268.49)

Section 5: Other Regulatory Statuses of Waste (check all that apply)

- [ ] PCB Waste regulated under TSCA: If checked, list maximum concentration of PCBs:
- [ ] Waste contains asbestos: If Checked, Is Asbestos Friable Non-Friable
- [ ] Waste contains beryllium; list maximum beryllium concentration:

Section 6a: Requested Processing Services

- [x] Direct Disposal - Waste will not require any processing prior to disposal
- [ ] RCRA Treatment
- [ ] WCS Dewatering / Void-Fill process
- [ ] Other Processing (Please describe the processing you are requesting):
- [ ] Other (Please describe):

Section 6b: Final Disposal Facility

- [x] Subtitle C RCRA Disposal Facility (No licensed Radioactive Waste at the time of disposal)
- [ ] Federal Disposal Facility
- [ ] Compact Disposal Facility

Generator Certification Name:	Waste Control Specialists LLC
Certification Expiration Date:	12/31/2019 12:00:00 AM
Generator Certification Number:	TXWCSTWCS

- [ ] Byproduct Disposal Facility
- [ ] Not Disposed at WCS

Section 7: General Description

Waste Name:	ER - EPA Region 6 Tier 1/Tier2 Soil
Process Generating Waste:	Removal of soils and road base from area prior to new road construction.

Section 8: RCRA Waste Codes

(Not Applicable)

Section 9: EPA Regulated Chemicals

(Not Applicable)

Section 10: Waste Description

- [ ] % by Weight
- [x] % by Volume

Range. Sum of Max Column must be greater than or equal to 100%

Waste Description (ie: soil, debris, etc)	Average	Min %	Max %
Soil	90%	80%	100%
Asphalt	9%	0%	20%
Plastic (liners)	1%	1%	1%

Section 11: Other Physical Characteristics

100 % solid | 0 % sludge | 0 % Liquid | ☐ %by Weight | ☑ %by Volume

Density Range: From: 1.0 To: 1.6 gm/cu cm

Percent Moisture content Range (Bulk Soil Only): From: To:

or ☑ N/A (Not Bulk Soil for Disposal in CWF or FWF)

Color: brown/grey Odor: none

pH: ☐ 0-2 ☑ 2.1-4 ☑ 4-10 ☑ 10-12.4 ☐ >12.4 Measured pH Value: 0.0

Flashpoint: ☑ N/A (Waste is solid) Actual: ☐ >200 ☐ >140-200 ☐ <140

Is Waste considered biohazardous?	☐ YES	☒ NO
Does waste contain Sharps?	☐ YES	☒ NO
Is waste considered putrescible?	☐ YES	☒ NO
Are waste containers pressurized or contain radioactive gases under pressure?	☐ YES	☒ NO

Section 12: Chelating Agents

Chelating Agents: Are any chelating agents present? ☐ Yes ☒ No

Section 13: Radioactive Constituents

Waste class: ☐ A (Stable) ☑ A (Unstable) ☐ B ☐ C ☐ >C ☐ N/A (Exempt at the time of shipment)

(see Title 10 CFR 61.55 and 30 TAC 336.363(a))

NOTE: Radium-226 is a class driver in Texas and shall be considered in waste class determinations
NOTE: WCS is not licensed to accept >Class C waste for disposal

☐ Waste contains Source Material (Thorium or Uranium that is not SNM)

☐ Waste is considered Depleted Uranium (Do not check for waste contaminated with depleted uranium)

☐ Waste contains Sealed Sources (Do not check if this is a check source less than 100 uCi total activity)

☐ Is waste Special Form?

Does the waste contain Special Nuclear Material (SNM)? ☐ Yes ☒ No

If yes, list the grams of SNM (total for waste stream) Pu ____ U-233 ____ U-235 ____

Does the waste contain Special Nuclear Material (SNM)? ☐ < 10% enriched ☐ > 10% enriched

Highest unshielded package dose rate in mR/hr: On contact 10 @ 30 cm 4

Will at least 90% of the containers shipped on this profile have a dose rate less than 100 mr/hr at 30 cm? ☐ Yes ☒ No

List all radionuclides present in the waste and the concentration in ☑ pCi/gm ☐ mCi/gm

Name	Max Concentration	Avg Concentration
BI-214	2.00E+02	1.50E+02
CO-60	3.00E-01	1.40E-01
K-40	1.5E+01	6.67E+00
PB-210	6.00E+02	4.13E+02
PB-214	4.00E+02	2.21E+02
RA-226	5.00E+02	3.11E+02
SC-46	1.50E-02	7.16E-03
TH-234	1.20E+01	4.16E+00
U-235	1.00E+00	5.01E-01
U-238	1.20E+01	4.16E+00

Section 14: Shipping Information

- [x] Shipments of this waste will NOT be DOT regulated
- [ ] Shipments of this waste WILL be DOT regulated but are NOT Class 7 radioactive shipments
- [x] Shipments of this waste WILL be DOT Class 7 shipments

Shipments of this waste be received via: [ ] Rail [x] Highway

[ ] Waste shipped in a DOT Cask [ ] Type A and/or [ ] Type B

List Model Numbers:

Description of the lifting mechanism for removal of the internal containers/liners (i.e. slings, groppies, etc)

Packaging Information

Container Category	Container Type Description
CM	25 cu yd intermodal

If container Category "XX" was chosen please describe "Unspecified Container Type"

[ ] Containers are over packed. Package description:

If waste is LLMW or LLRW being shipped for disposal in the RCRA/TSCA cell, will containers have less than 10% void space? [ ] Yes [x] No

Estimated Number of Containers: 6

Estimated Volume: 150 cu yd

Section 15a: Certification

N/A (IF ANY of the waste associated with this profile will be disposed in the Federal Waste Disposal Facility or the Compact Waste Disposal Facility, check N/A and complete the certification found in Section 15b. If NONE of your waste will be disposed in the Federal Waste Disposal Facility or the Compact Waste Disposal Facility, complete this certification.)

(Certification must be signed by a company officer or an authorized agent of the company)

The information contained herein is based on ☑ generator's knowledge and/or ☑ analytical data.

I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine that no deliberate or willful omissions of composition properties exist and that all known or suspected hazards have been disclosed. I certify that the sample(s) provided to WCS is representative of all materials described by this document, that the materials tested are representative of all materials described by this document, and that the methods of analysis used are the appropriate analytical methods as specified in the current editions of EPA (SW-846) or equivalent methods and HASL-300 or equivalent methods as applicable.

Authorized Signature [signature] Date 10/19/20

Printed Name Gregory E Fife Title OSC

Section 15b: Licenses and Certifications for CWF

☑ **N/A (If NONE of the waste associated with this profile will be disposed in the Federal Facility Waste Disposal Facility or the Compact Waste Disposal Facility, check N/A and complete the certification found in Section 15a. If ANY of your waste will be disposed in the Federal Facility Waste Disposal Facility or the Compact Waste Disposal Facility, complete this certification.)**