

Changes, Rev 5:

Experimental Research Project:

- Added an "x" under Atm. Discharges to represent non-significant discharges from hoods.
- Removed "a" & "c" under Liquid Discharges. These aspects were associated with the discharge of the gamma pool. This project has been completed.
- 830 Storage/ Former Hot Cell: Added "a" & "b" under atmospheric discharges to represent HEPA filtered emissions exhausting through the HFBR stack, which is covered by NESHAPs permit #BNL-288-01.
- 801 Metallurgy Hot Cell:
 - Added "a" & "b" under atmospheric discharges to represent HEPA filtered emissions exhausting through the HFBR stack, which is covered by NESHAPs permit #BNL-288-01.
 - Added "f" under Chem/Rad Storage to represent minor spill potential associated with the storage of chemicals/radioactive material in the cells.

Changes, Rev 6:

- Added potential waste significant aspects, and PAF ID#581 to 801 Hot Cell. Also expanded notes.
- Added notes to Asbestos Activity to explain that this process is currently on standby and not operating.
- Removed footnote 5 regarding Phase II corrective actions, as the corrective actions have all been closed.
- Added B. 555 to Glassware Cleaning Activity. Also added Rad Waste as a significant aspect, and note explaining what aspect refers to. Removed PAF#299 reference, as it has been combined into PAF #209.
- Removed 901W from PCB aspect, as we do not own this area and have no responsibility.

Changes, Rev 7:

- The activities "PCB Equipment Storage, Bldg 480" and "Asbestos Research Program" have been removed. All the PCB articles in B. 480 have been disposed of, and the Asbestos Test Facility has been decommissioned.
- There are no longer any PCB articles on EENS's inventory and no research involving asbestos.
- Updated the activity "Facility Review Project (FRP)" based on issues closed: Removed the waste aspects, and also removed "a" under Atmospheric, "e" under Storage or Use, and "a" under Soil Activation.

Changes, Rev 8: Significant changes.

Changes, Rev 9:

- Rev # and date change
- Backflow Devices removed as a separate activity and subsumed into experimental research projects. This is done because the aspect applies to sink faucets in labs that are part of experimental work and monitored via Tier I inspections.
- Photography Developing is marked as inactive.
- Bldg. 830 is added onto the activity for Art. XII registered storage areas

Changes, Rev 10: Minor editorial changes in comments section.

Changes, Rev 11: Minor editorial changes in comments section.

Changes, Rev 12: Bldg. 703 laser work terminated and Bldg 937 turned over to EP. Bldg. 487 added (new facility)

Changes, Rev 13: Removed 703 active operations

Changes Rev. 14: Added nanomaterial work under "Other" sign. aspect.

Rev. 15

- Added RAP Program under Facility Related Issues
- Removed 703 from Historic Facility Related Issues

Rev. 16:

- Removed PAF ID# for closed PAF's
- Moved PAF # 208 from Industrial Type Processes to Facility Related Issues - 526 Storage Areas
- Removed Atmospheric Discharges from Staff Shops Aspects
- Removed B487 Rad Waste and Soil Activation from Aspects
- Moved projects involving nanomaterials from "Other Aspects" to "Engineered Nanomaterial Aspect"
- Added Bldg 490 to Laser Systems Activity
- Added Bldgs 815 & 526 to Small Scale Glassware Cleaning
- Modified aspects for Industrial Processes (Staff Shops & Sm. Scale Glassware Cleaning
- Modified aspects for Facility Related Issues (830 & 801 Hot Cells & Operations - All Bldgs)

Rev 17:

- Added TRU Waste to Experimental Research Projects
- Added Bldg. 526 to RAP Program

Rev. 18:

- Changed Directorate Name from EENS to GARS
- Removed 490D from Staff Shops
- Removed 490D from Small Glassware Cleaning Operations
- Removed Asbestos Floor Tile in Bldg. from Other Compliance Requirements column title
- Removed "a" from Other Compliance Requirements for Historic Bldg. Issues
- Removed "a" from TRU Waste for Experimental Projects
- Removed Bldg. 130 from Historic Bldg. Issues

Rev. 19:

Used new template

Added ST Dept.

Experimental Research Projects:

Removed "a" from Rad & Mixed Waste, currently there are no active Rad experiments

Added "x" to Rad column for use of Rad Material, due to use of RMA labeled equipment in B. 490A

Glassware Cleaning Ops

Removed "a" from Rad Waste, cleaning of Rad contaminated glassware is no longer done

Storage/Former Hot Cells

Removed "a" & "b" from Atm. Discharges, there are no air emissions associated with these hot cells

Metallurgy Hot Cell

Removed "a" from all Waste columns, Remove "f" & "x" from Storage/Use column, hot cell has been cleaned out

Storage Areas under Article XII

Added "a" to Regulated Industrial Waste due to generation of oily rags in B. 526

Added "f" to Chemical Storage/Use due to potential for oil spill in B. 526 storage area

Rev 20:

Experimental Research Projects: Removed "a" from Rad waste, current there are no active Rad Experiments

Facility Related Issues: Modified "Permitted Bulk Storage Areas" Title

Aspect Key:

Any generation of the below waste streams will be coded with an "a":

Industrial Waste

Hazardous Waste

Radioactive Waste

Mixed Waste

Medical Waste

Atmospheric Discharge

a: Any process that requires a point source air permit or inclusion in the Title V permit as an emission unit, or contributes to a regulated emission point. □

b: Operations or activities that use engineering controls to reduce hazardous air pollutant or radionuclide emissions. □

Liquid Discharge

a) Radionuclides that are detectable at the point of discharge from the facility.

b) Discharges of any of the chemicals listed on the BNL State Pollutant Discharge Elimination System (SPDES) Permit Chemicals exhibit.

c) Operations or activities that use engineering controls to reduce the quantity or concentration of pollutant.

d) Existence of underground injection control devices under the responsibility of the owner organization as specified in the Underground Injection Control subject area.

Chemical Storage/Use or Radioactive Material

a) Storage or use of chemicals or radioactive materials requiring engineering controls specified in the Storage and Transfer of Hazardous Materials subject area.

b) System configuration requires back-flow prevention in accordance with the protection of the Drinking Water subject area.

c) Transportation of chemicals or dispersible radioactive materials.

d) Storage or use of PCBs as specified in the Oils/PCB Management subject area.

e) Any underground pipes or ducts that contain chemical and/or radioactive material/contamination.

f) Storage or use in quantities capable of resulting in a spill, as defined in the Spill Response Subject Area.

Water Consumption

a) Total organization water consumption greater than 650,000 gallons per day

b) Continuous (24/hrs/day), permanent (to continue for the foreseeable future) once-through water use greater than 4 gpm that discharges to the sanitary sewer system.

c) Daily (8 hrs/day), permanent, once-through water use greater than 10 gpm that discharges to the sanitary sewer system.

d) Continuous use greater than 10 gpm, or daily use greater than 15 gpm for a period greater than 60 days that discharge to the Sanitary Sewer System.

Historical Contamination

a) Pre-existing contamination (radiological or nonradiological) causing remedial activities resulting in costs in excess of \$50,000.

Soil Activation

a) Any soil activation.

Engineered Nanomaterials

a) Any air, liquid, or solid waste discharge of engineered nanomaterials.

Other

a.) Asbestos-containing floor tiles in bldgs.

b.) FRDP "Significant Finding"