

**U.S. Department of Energy
Scrap Metal Management
Overview - General Facility Information**

Line of Inquiry and Source	Comments
1. List all operational processes to be reviewed	
2. List all permits/approvals/exemptions held by the facility. List the permit number, the location of the facilities covered, the processes covered and the issuing agency's contact, phone and address. Most importantly, list the expiration date of each permit.	
3. Identify the location of records such as inspections, manifests, permits, training, etc., as applicable.	
4. Identify and list contacts for each regulatory area and operational process at the facility.	
5. Review the compliance record for the previous five years. Determine the number and type of noncompliances, responses and actions taken by the facility to correct and any changes or systems put into place to prevent reoccurrence.	
6. Examine closely all permits, approvals, etc., to insure the materials/waste being sent to the facility by DOE is covered by the conditions and requirements of the documents. For example, if shipping PCB remediation waste, make sure the TSCA approval does not contain language based on the concentration of the original source of the PCBs.	
7. Identify parameters used by the facility to determine compliance with permit conditions and the basis the facility would use to determine acceptance or rejection of a shipment to the facility.	
8. Determine the method used by the facility to remain up to date with changing regulations and requirements (i.e, Internet, environmental compliance update service, etc.) Also, determine the frequency of the updates.	
9. List residuals from each operation. Determine the disposition methods and facilities used.	

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10. Determine the method used by the facility to select disposition methods and facilities for residuals generated (e.g., audit program, phone audit, regulatory agency conversations, etc.)	
11. Document all conversations with regulators including their overall impression of the facility.	
12. Record the overall condition of the facility including cleanliness, traffic flow, maintenance and adequacy of personnel resources to perform consistently and responsibly.	