



NORM Disposal Documentation Checklist

What an operator should be able to show for every load of non-hazardous NORM/TENORM E&P waste that leaves a site. Federal NORM Services, Andrews, Texas · federalnormservices.com · (214) 934-8010

Texas Railroad Commission Chapter 4 waste-management rules tightened what operators must be able to document. Regulatory requirements vary by state and change over time; confirm current rules with your regulator or counsel. This checklist supports your records; it does not replace them.

Before the waste leaves your site

- ☐ **1. Survey results**
Radiation survey of the material and the equipment it came from, with date, instrument, and who performed it. Contaminated equipment is tagged as required.
- ☐ **2. Analytical results**
Lab characterization (radium-226, radium-228, lead-210 as applicable) supporting how the waste is classified.
- ☐ **3. Waste profile**
Description of the material, media type (scale, sludge, tank bottoms, filter media, soil, equipment), estimated volume, and generating location.
- ☐ **4. Participants**
Names and roles of everyone involved: generator, surveyor, packager, carrier, receiving facility.
- ☐ **5. Vendor qualifications**
Copies of the carrier's RRC waste-hauler and DOT authorizations and the receiving facility's permit and license.

In transit

- ☐ **6. Chain of custody or possession**
A signed record for every hand-off, with packaging, labeling, and the manifest for each load.

After disposal

- ☐ **7. Proof of authorized final disposal**
The receiving facility's confirmation that the waste was placed at an authorized disposal facility, matched to the manifest.

Keep it

Store all seven together, per load, for at least the retention period your permits and the RRC require, and in a form an auditor can read without your help.

Federal NORM Services, LLC operates under authorization from the Texas Railroad Commission to manage non-hazardous NORM/TENORM E&P waste streams. We provide permitted disposal, transport coordination through approved third-party carriers, and remediation support. Send us your survey results to start a waste profile: federalnormservices.com/contact-us