

Petition to Export Low-Level Radioactive Waste

1. Petitioner: Bionomics, Inc. of behalf of:

Alcon Fort Worth, Texas

2. Persons to be contacted:

Bionomics, Inc. John McCormick 865-220-8501

3. Proposed out of Compact Disposal Facility: Waste will be incinerated at the Energy Solutions facility in Oak Ridge, Tennessee with the ash shipped to Energy Solutions burial site in Clive, Utah.

4. Entity who generated the waste: Alcon

5. Effective Period: One Time

6. Specified Amount: approximately 20 pounds of Liquid in Vials

7. Description of the wastes: Vials containing proprietary liquids in amounts of 40 ml or less per Vial which may be mixed in with small amounts of dry waste.

8. Reason that petition should be granted:

Vials contain proprietary material that needs to be destroyed prior to burial. Additionally the WCS burial site regulations require that all waste must have less than 1% free standing liquids and this waste contains more that 1% free standing liquid.

There are numerous health and safety risks associated with sorting through this waste in order to make it meet the burial site requirements. Each vial would need to be removed from the commingled waste and each Vial opened and the liquid removed. Incineration of this waste stream would eliminate the need to sort through the waste and would reduce the volume of waste sent for final disposal to much less than 1 cubic foot. It would satisfy the need to the generator to ensure their proprietary property is destroyed.

9. Certifications:


- I hereby certify that the Petitioner is licensed (for radioactive materials) and/or permitted (for hazardous wastes), if applicable, and agrees to receive back the waste if its management or disposal is not allowed at the proposed disposal facility.
- I hereby certify that to the best of my knowledge the information provided herein is accurate and correct and that the low-level radioactive waste for which this Export Petition is submitted will be packaged and shipped in accordance with

applicable state and federal regulations and is acceptable for disposal at the intended disposal facility.

- I hereby certify that I am authorized by my company, facility, or agency to commit it to each and every obligation and condition set forth herein.

10. Authorization for Bionomics to act on Behalf

Bionomics is contracted to provide LLRW services to Alcon and as part of those services is authorized to act on our behalf in this matter before the Compact Commission.

Generator Alcon Laboratories, Inc.
Authorized Person Frederick D. Fenner
Signature 
Date 12/18/2013
Contact Information 6201 South Freeway
Fort Worth, TX 76134
Email: frederick.fenner@alcon.com
Phone: 817-551-8151

Commission Action

- Approved
- Disapproved
- Approved, subject to the following conditions (if the conditions are not accepted by the Applicant within the time periods set out in Subsection (e)(1) of Rule 675.2, Part 21, Title 31, Texas Administrative Code, the permit is void:)

Conditions of Approval

The commission hereby certifies that proposed Rule 675.2 to be added to Chapter 675, Part 21, Title 31, Texas Administrative Code has been reviewed by legal counsel and found to be within the Commissions legal authority to adopt.