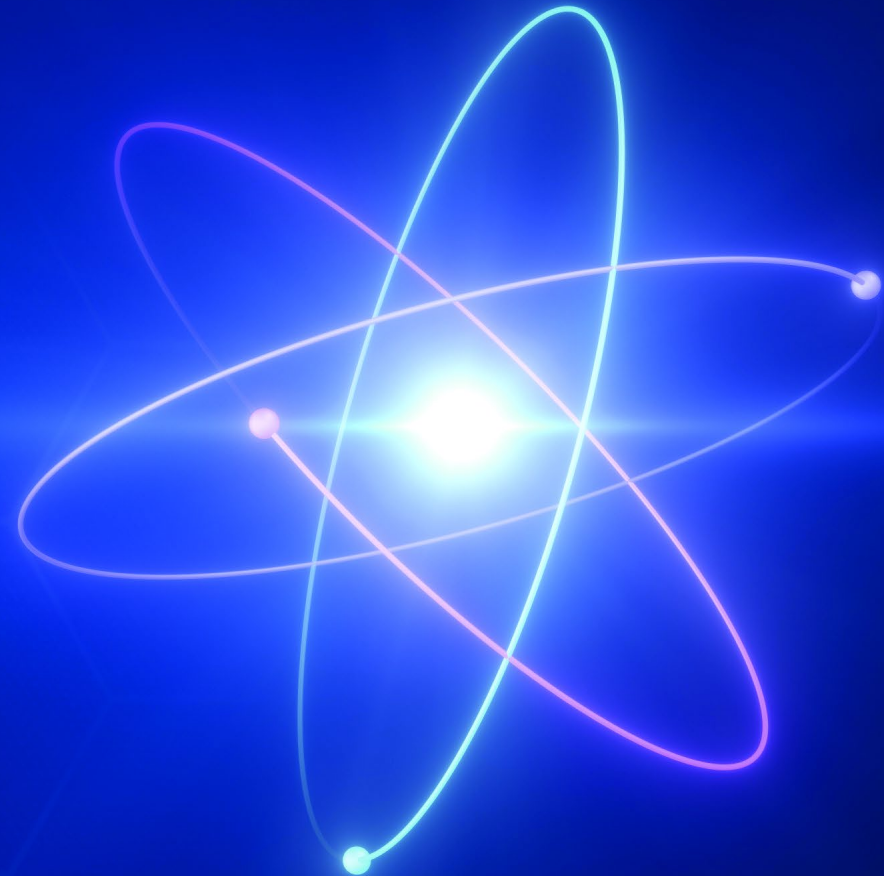


WASTE BROKER AND PROCESSOR PROSPECTIVE

TEXAS COMPACT WASTE FACILITY SHIPMENTS

John McCormick, Bionomics



REFRESHER ON BIONOMICS

- Provide the pickup and disposal of low-level waste to generators across the country
- Our own trucks and long-term hire technicians/drivers
- Processing limited to Sealed Sources
- Turnkey assistance and services from LLRW generation to disposal
- Utilize Energy Solutions, Perma-Fix , Andrews, Barnwell and Richland for processing and final disposal
- First drum shipment to WCS in 2012



REGULATING COMPONENTS

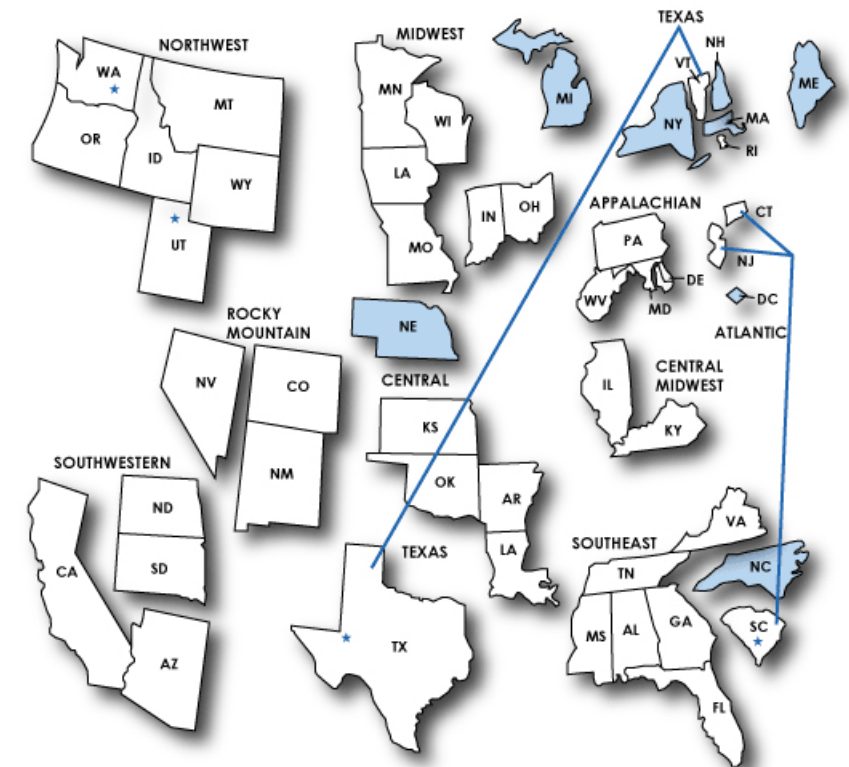
- ▶ Waste Control Specialists (WCS) is the licensee
 - ▶ Texas Commission on Environmental Quality (TCEQ) is the regulating body
 - ▶ Texas Low Level Radioactive Waste Disposal Compact Commission (TLLRWDCC)
 - ▶ Texas Department of State Health Services (DSHS) registration
 - ▶ Other Compacts which require Export authorization
 - ▶ Of course, USDOT regulations
- 
- A series of three parallel white diagonal lines extending from the bottom right towards the center of the slide.

- ▶ Apply for an Import Agreement each year
 - ▶ Agreement valid September 1 to August 31 of following year
 - ▶ Online submittal with questionnaire
- ▶ Identify as Small Generator or Large
- ▶ Estimated Volumes, activities and Waste streams to be Imported
 - ▶ Provide a fairly accurate estimate
- ▶ Identify States of Generation and receive Export permits from the Waste Compact if applicable

IMPORTATION FROM OTHER COMPACTS

- ▶ Some Compacts require Export Authorization
 - ▶ Rocky Mountain Low Level Waste Board
 - ▶ Colorado, New Mexico and Nevada
 - ▶ Southwestern Low-Level Radioactive Waste Disposal Compact
 - ▶ Arizona, California, North Dakota and South Dakota
 - ▶ Northwest Compact
 - ▶ Washington, Idaho, Montana, Oregon, Wyoming, Utah, Alaska and Hawaii

CURRENT COMPACTS



- ★ Active Disposal Site (4)
- Approved Compact (10)
- Unaffiliated (10)

Note: Data as of May 2014

Alaska and Hawaii belong to Northwest Compact.

Puerto Rico is unaffiliated.



Notification to the Broker/Processor that import agreement restrictions have been satisfied



Form signed by each generator that the Broker/Processor is authorized to send waste to the Texas CWF



Collected at the time of pickup or returned with the quote acceptance



Authorizations are consolidated and sent to the Executive Director in an electronic file in advance of the shipment

CONDITIONAL REMOVAL LETTER (CRL)

MEETING THE WASTE ACCEPTANCE CRITERIA

- ▶ Profile submitted/approved
- ▶ Classification under 61.55
- ▶ Meets NRC BTP
- ▶ Meets WCS License
- ▶ Lead Request
- ▶ Encapsulation
- ▶ Certifications
- ▶ Dose Survey
- ▶ Texas Compact Import Agreement



SHIPPING DOCUMENTATION

- ▶ NRC Form 540, 541, 542
- ▶ 5 Day Advance notification, Form 20225
- ▶ Commingling Letter and Lead Approval
- ▶ Conditional Removal Letter (CRL) from TLLRWDCC
- ▶ DSHS Shipper and Transporter Registration
- ▶ Export Permits as required

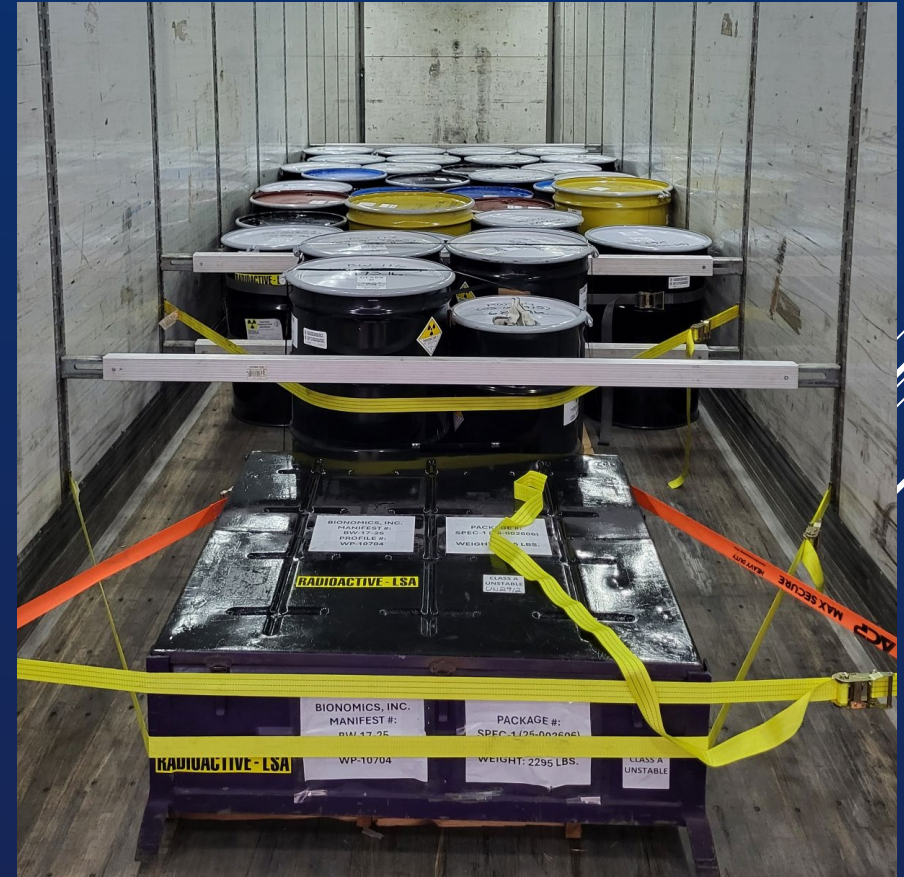


- ▶ Create consolidated manifest – separate; in-compact or out-of-compact, waste type (DAW, sources, etc.), destination (compact site, TSDF)
- ▶ Profile – may need analytical data for first version
- ▶ Profile revisions usually needed for activity level, dose rate. Revisions in ELITE are fairly quick and simple.
- ▶ Any errors at the top in ELITE (red text) are changes needed for profile revision
- ▶ Shipments can be created in ELITE manually or by uploading a file such as a LowTrack file (we use EM Waste)
- ▶ Manually add other information such as import agreement, package size and type, profile, etc. within ELITE. Draft manifest is required.

PAPERWORK PREPARATION

- ▶ Heavy Drums on Metal Pallets and placed for easy removal
- ▶ Ensure all containers are void filled
- ▶ Container Surveys
- ▶ Block and Brace, other DOT functions
- ▶ Hazardous Manifest uploads time consuming
- ▶ Unload at WCS can take most of the day
- ▶ WCS personnel are very supportive

SHIPMENT PREPARATION



DSHS REGISTRATION

- Waste Shipper Registration
 - Business and Financial
 - Emergency Plan
 - Containers and Certifications
 - \$10.00 per FT3 after shipment
 - Waste Transporter Registration
 - Business and Financial
 - Emergency Plan
 - No application Fees
- 
- A series of three parallel white diagonal lines in the bottom right corner of the slide.

- ▶ Licensed manufacturer or a licensed initial distributor is Generator when they accept and then dispose of their sealed source/devices
 - ▶ They are not the Generator if the accepted sources/devices are made or distributed by others
- ▶ Never the Generator at Disposal
 - ▶ Distributor other than the original distributor
 - ▶ Decontamination service provider
 - ▶ Waste Broker or Processor
- ▶ Policy in place since CWF opened in 2012

GENERATOR DETERMINATION
31 TAC 675.20

IMPORTANCE OF SMALL GENERATOR SET ASIDE

- ▶ Small Generators rely upon the CWF to dispose of higher-level wastes that cannot be buried anywhere else.
- ▶ Mainly research, medical and industrial applications
- ▶ Storage at numerous locations is not in the public interest
- ▶ Ensuring these facilities have access promotes research and activities that have positive impacts on Texas/Vermont and the rest of the country