

When a waste shipment arrives on-site for treatment, storage, or disposal, a determination has usually been made by the generator that the waste is either:

- Excluded as a solid waste under IDAPA 58.01.05.005 [40 CFR 261.4(a)];
- A listed hazardous waste, as defined in Subpart D of IDAPA 58.01.05.005 [40 CFR Part 261];
- A characteristic hazardous waste, as defined in Subpart C of IDAPA 58.01.05.005 [40 CFR Part 261];
- A solid waste, which is not hazardous waste, as defined by IDAPA 58.01.05.005 [40 CFR 261.4(b)]; and
- A Corrective Action Management Unit (CAMU)-eligible waste, as defined by IDAPA 58.01.05.008 [40 CFR 264.552(a)(1) & (2)].

## **C.3 Waste Acceptance Criteria**

### **C.3.1 Pre-acceptance Review**

The pre-acceptance protocol has been designed to ensure that only hazardous and radioactive material that can be properly and safely stored, treated and/or disposed of by USEI are approved for receipt at the facility. A two-step approach is taken by USEI. The first step is the chemical and/or radiological and physical characterization of the candidate waste stream by the generator. The second step is the pre-acceptance evaluation performed by USEI to determine the acceptability of the waste for receipt at the facility. Figure C.2 presents a logic diagram of the pre-acceptance protocol that is utilized at the facility.

### **C.3.2 Radioactive Material Waste Acceptance Criteria**

The following waste acceptance criteria are established for accepting radiological contaminated waste material that is not regulated under the Atomic Energy Act of 1954 ("AEA"), as amended. This may be accomplished by the following regulatory mechanisms: use of a general or specific exemption from regulation by the Nuclear Regulatory Commission (NRC) or an Agreement State; a Release from Radiological Control declaration by the Department of Energy (DOE); or a determination that 91(b) radioactive material is no longer regulated by the Department of Defense (DoD). Material may also be accepted if it is not regulated or licensed by the NRC or Agreement State or has been authorized for disposal by the IDEQ and is within the numeric waste acceptance criteria. Waste acceptance criteria are consistent with these restrictions.

The following five tables establish types and concentrations of radioactive materials that may be accepted. These tables are based on categories and types of radioactive material not regulated by the NRC, an Agreement State, the DOE, or the DoD for alternate disposal. The criteria are consistent with these restrictions and detailed analyses set forth in *Waste Acceptance Criteria and Justification for FUSRAP Material*, prepared by Radiation Safety Associates, Inc. (RSA) as subsequently refined, expanded and updated in *Waste Acceptance Criteria and Justification for Radioactive Material*, prepared by USEI.

Material may be accepted if the material has been specifically exempted from regulation by rule, order, license, license condition, letter of interpretation, or specific authorization under the following conditions: Thirty (30) days prior to intended shipment of such materials to the facility, USEI shall notify IDEQ of its intent to accept such material and submit information describing the material's physical, radiological, and/or chemical properties, impact on the facility radioactive materials performance assessment, and the basis for determining that the material does not require disposal at a facility licensed under the AEA. The

IDEQ will have 30 days from receipt of this notification to reject USEI's determination or require further information and review. No response by IDEQ within thirty (30) days following receipt of such notice shall constitute concurrence. IDEQ concurrence is not required for generally exempted material as set forth in Table C-4a.

Based on categories of waste described in the waste acceptance criteria, the concentration of the various radionuclides in the conveyance (e.g., rail car gondola, other container etc.) shall not exceed the concentration limits established in the WAC without the specific written approval of the IDEQ unless generally exempted as set forth in Table C-4a. Radiological surveys will be performed as outlined in Exempt Radiological Materials Procedure-01 (ERMP-01) to verify compliance with the WAC. If individual "pockets" of activity are detected indicating the limits may be exceeded, the Radiation Safety Specialist (RSS), Radiation Safety Officer (RSO), or Radiation Protection Specialist (RPS) shall investigate the discrepancy and estimate the extent or volume of the material with the potentially elevated radiation levels. The RSS, RPS or RSO shall then make a determination on the compliance of the entire conveyance load with the appropriate WAC limits. If the conveyance is determined not to meet the limits, USEI will notify IDEQ's RCRA Program Manager within 24 hours of a concentration based exceedance of the facility WAC to evaluate and discuss management options. The findings and resolution actions shall then be documented and submitted to the IDEQ.

The radioactive material waste acceptance criteria, when used in conjunction with an effective radiation monitoring and protection program as defined in the USEI *Radioactive Material Health and Safety Plan* and *Exempt Radioactive Materials Procedures* provides adequate protection of human health and the environment. Included within this manual are requirements for USEI to submit a written summary report of all radioactive material waste receipts showing volumes and radionuclide concentrations and total activities disposed at the USEI site on a quarterly basis. The 4<sup>th</sup> quarter report of each year will also include an updated analysis of the cumulative impact on the facility performance assessment based upon the previous year's waste receipt.

These criteria and procedures are designed to assure that the highest potential dose to a worker handling radioactive material at USEI shall not exceed 400 mrem/year TEDE dose, and that no member of the public is calculated to receive a potential post closure dose exceeding 15 mrem/year TEDE dose, from the USEI program. TEDE is defined as the "Total Effective Dose Equivalent", which equals the sum of external and internal exposures. The public dose limit during operation activities is limited to 100 mrem/yr TEDE dose. An annual summary report of environmental monitoring results will be submitted to IDEQ by June 1<sup>st</sup> for the preceding year.

Materials that have a radioactive component that meets the criteria described in Tables C-1 through C-4c and are RCRA regulated material will be managed as described within this WAP for the RCRA regulated constituents.

**Table C-1: Unimportant Quantities of Source Material Uniformly Dispersed\* in Soil or Other Media\*\***

	Status of Equilibrium	Maximum Concentration of Source Material	Sum of Concentrations Parent(s) and all progeny present
a	Natural uranium in equilibrium with progeny	<500 ppm / 167 pCi/g ( <sup>238</sup> U activity)	≤ 3000 pCi/g
	Refined natural uranium	<500 ppm / 167 pCi/g ( <sup>238</sup> U activity)	≤ 2000 pCi/g
	Depleted Uranium	<500 ppm / 169 pCi/g	≤ 2000 pCi/g
b	Natural thorium	<500 ppm / 55 pCi/g ( <sup>232</sup> Th activity)	≤ 2000 pCi/g
	<sup>230</sup> Th (with no progeny)	0.1 ppm / ≤2000 pCi/g	
	Any mixture of Thorium and Uranium	Sum of ratios ≤ 1****	≤2000 pCi/g

\*Refined Uranium includes <sup>238</sup>U, <sup>235</sup>U, <sup>234</sup>U; <sup>234</sup>Th, <sup>234m</sup>Pa, <sup>231</sup>Th

**Table C-2: Naturally Occurring Radioactive Material Other Than Uranium and Thorium Uniformly Dispersed\* in Soil or Other Media\*\***

	Status of Equilibrium	Maximum Concentration of Parent Nuclide	Sum of Concentrations of Parent and All Progeny Present
a	<sup>226</sup> Ra or <sup>228</sup> Ra with progeny in bulk form <sup>1</sup>	500 pCi/g	≤ 4500 pCi/g
b	<sup>226</sup> Ra or <sup>228</sup> Ra with progeny in reinforced IP-1 containers <sup>1</sup>	1500 pCi/g	≤ 13,500 pCi/g
c	<sup>210</sup> Pb with progeny( Bi & <sup>210</sup> Po)	1500 pCi/g	≤ 4500 pCi/g
	<sup>40</sup> K	818 pCi/g	N/A
	Any other NORM		≤ 3000 pCi/g

<sup>1</sup> Any material containing <sup>226</sup>Ra greater than 222 pCi/g shall be disposed at least 6 meters from the external point on the completed cell.

**Table C-3: Particle Accelerator Produced Radioactive Material**

Acceptable Material	Activity or Concentration
Any particle accelerator produced radionuclide.	All materials shall be packaged in accordance with USDOT packaging requirements. Any packages containing iodine or volatile radionuclides will have lids or covers sealed to the container with gaskets. Contamination levels on the surface of the packages shall not exceed those allowed at point of receipt by USDOT rules. Gamma or x-ray radiation levels may not exceed 10 millirem per hour anywhere on the surface of the package. All packages received shall be directly disposed in the active cell. All containers shall be certified to be 90% full.

\*Average over conveyance or container. The use of the phrase "over the conveyance or container" is meant to reflect the variability on the generator side. The concentration limit is the primary acceptance criteria.

\*\*Unless otherwise authorized by IDEQ, other Media does not include radioactively contaminated liquid (except for incidental liquids in materials). See radioactive contaminated liquid definition (definition section of Part B permit).

$$*** \frac{\text{Conc. of U in sample}}{\text{Allowable conc. of U}} + \frac{\text{Conc. of Th in Sample}}{\text{Allowable conc. of Th}} \leq 1$$

**Table C-4a: NRC Exempted Products, Devices or Items**

Exemption 10 CFR Part*	Product, Device or Item	Isotope, Activity or Concentration
30.15	As listed in the regulation	Various isotopes and activities as set forth in 30.15
30.14, 30.18	Other materials, products or devices specifically exempted from regulation by rule, order, license, license condition, concurrence, or letter of interpretation	Radionuclides in concentrations consistent with the exemption
30.19	Self-luminous products containing tritium, <sup>85</sup> Kr, <sup>3</sup> H or <sup>147</sup> Pm	Activity by Manufacturing license
30.20	Gas and aerosol detectors for protection of life and property from fire	Isotope and activity by Manufacturing license
30.21	Capsules containing <sup>14</sup> C urea for <i>in vivo</i> diagnosis of humans	<sup>14</sup> C, one μCi per capsule
31.12	General License for certain items and self-luminous products containing Radium 226	As set forth in 31.12 and see #4 under Additional information below
40.13(a)	Unimportant quantity of source material: see Table C-1	≤0.05% by weight source material
40.13(b)	Unrefined and unprocessed ore containing source material	As set forth in rule
40.13(c)(1)	Source material in incandescent gas mantles, vacuum tubes, welding rods, electric lamps for illumination	Thorium and uranium, various amounts or concentrations, see rules
40.13(c)(2)	(i) Source material in glazed ceramic tableware  (ii) Piezoelectric ceramic  (iii) Glassware not including glass brick, pane glass, ceramic tile, or other glass or ceramic used in construction	≤20% by weight  ≤2% by weight  ≤10% by weight
40.13(c)(3)	Photographic film, negatives or prints	Uranium or Thorium
40.13(c)(4)	Finished product or part fabricated of or containing tungsten or magnesium-thorium alloys. Cannot treat or process chemically, metallurgically, or physically.	≤4% by weight thorium content.
40.13(c)(5)	Uranium contained in counterweights installed in aircraft, rockets, projectiles and missiles or stored or handled in connection with installation or removal of such counterweights.	Per stated conditions in rule.
40.13(c)(6)	Uranium used as shielding in shipping containers if conspicuously and legibly impressed with legend "CAUTION RADIOACTIVE SHIELDING – URANIUM" and uranium incased in at least 1/8 inch thick steel or fire resistant metal.	Depleted Uranium
40.13(c)(7)	Thorium contained in finished optical lenses	≤30% by weight thorium, per conditions in rule.
40.13(c)(8)	Thorium contained in any finished aircraft engine part containing nickel-thoria alloy.	≤4% by weight thorium, per conditions in rule.

**Table C-4b: Materials Specifically Exempted by the NRC or NRC Agreement State**

Exemption	Materials	Isotope, Activity or Concentration*
10 CFR 30.11**	Byproduct material including production particle accelerator material exempted from NRC or Agreement State regulation by rule, order, license, license condition or letter of interpretation may be accepted as determined by specific NRC or Agreement State exemption.***	Byproduct material at concentrations consistent with the exemption
10 CFR 40.14**	Source material exempted from NRC or Agreement State regulation by rule, order, license, license condition or letter of interpretation may be accepted as determined by specific NRC or Agreement State exemption.***	Source material at concentrations consistent with the exemption.
10 CFR 70.17	Special Nuclear Material (SNM) exempted from NRC regulation by rule, order, license, license condition or letter of interpretation may be accepted as determined by specific NRC or Agreement State exemption.***	SNM at concentrations consistent with the exemption.

\*Sum of all isotopes up to a maximum concentration of 3,000 pCi/gm.

\*\* Alternate disposals authorized by Agreement States also require an NRC exemption for the purposes of disposal in the State of Idaho.

\*\*\* Similar material not regulated or licensed by the NRC may also be accepted. Sum of all isotopes up to a maximum concentration of 3,000 pCi/gm. IDEQ shall be notified prior to the receipt of Special Nuclear Material not regulated or licensed by the NRC.

**Table C-4c Material Released by Other Government Agencies**

Exemption	Materials	Isotope, Activity or Concentration*
US DOE	Radioactive materials that have been released or cleared from radiological control	Radioactive materials at concentrations consistent with the Release**
US DoD	Radioactive materials determined not to be regulated under the AEA under authority granted to the DoD in Section 91(b) of the AEA of 1954, as amended	Radioactive materials at concentrations consistent with the Authorization**

\*Sum or all isotopes up to a maximum of 3,000 pCi/gm.

\*\*May include byproduct materials, source materials and special nuclear material as defined in the AEA of 1954 as amended. NORM and Particle Accelerator Produced Radioactive Material may also be accepted under Tables C.2 and C.3, as part of these Releases and Authorizations.

**Additional Information for USEI's Waste Analysis Plan**

1. US Ecology Idaho, Inc. (USEI) may receive contaminated materials or other materials as described in Tables C-1 - C-4b above. USEI may not accept for disposal any material that by its possession would require USEI to have a radioactive material license from the Nuclear Regulatory Commission (NRC).
2. Unless approved in advance by USEI and IDEQ, average activity concentrations may not exceed those concentrations enumerated in Tables C-1 and C-2. Additionally, for Tables C-1 and C-2, individual pockets of material may exceed the WAC for the radionuclides present as long as the average concentration of all radionuclides within the package or conveyance remains at or below the WAC and the highest dose rate measured on the outside of the unshielded package or conveyance does not exceed those action levels enumerated in ERMP-01.

3. Other items, devices or materials listed in Table C-4a, which are exempted in accordance with 10 CFR Parts 30, 40 or equivalent Agreement State regulations or 10 CFR Part 70 may be accepted at or below the activities (per device or item) or concentrations specified in those exemptions.
4. 10CFR20.2008 authorizes disposal of certain byproduct material as defined in Section 11.e(3) and 11.e(4) of the Atomic Energy Act, as amended, at disposal facilities authorized to dispose of such material in accordance with any Federal or State solid or hazardous waste law, as authorized under the Energy Policy Act of 2005.
5. The generator of particle accelerator produced waste must specify that the waste meets applicable acceptance criteria.
6. In accordance with permit requirements, notification of any exceedance of the WAC will be provided to the RCRA Program Manager within 24 hours, in accordance with the permit.

## C.4 Sampling Methodology

Sampling is performed by the generator and/or their representatives to make the initial waste determination and/or by USEI to identify incoming waste shipments. Waste generators are referred to IDAPA 58.01.05.005 [40 CFR Part 261], Appendix I, II and III for sampling procedures. IDAPA 58.01.05.005 [40 CFR Part 261, Appendix I, II and III] describes sampling and analysis method selection procedures generators should consult when determining the specific sample analysis situation. Sampling is usually conducted as described in EPA document SW-846.

The sampling strategy employed for a given WAP activity is dependent on the nature of the waste being sampled, the type of container/vehicle in which it has been shipped, or the type of hazardous waste management unit in which the waste resides. Hazardous waste is received at the facility in various containers/vehicles including, but not limited to, bulk tanks, end dump trucks, drums, and boxes. Inside the facility, hazardous wastes are contained in landfills, surface impoundments, tanks, waste bins, containers, and other hazardous waste management units. Access to the container/vehicle or hazardous waste management unit influences sampling strategy.

This section presents sampling methodologies to be utilized by USEI personnel when collecting representative samples for analysis pursuant to IDAPA 58.01.05.008 [40 CFR §§264.13(a), 264.13(b), and 264.13(c)].

The waste shipment is inspected, sampled, and/or analyzed to ensure it matches the overall identity of the waste designated on the accompanying manifest (or shipping paper) and the pre-acceptance paperwork (WPF, etc.). If examination indicates strata in the waste, then each layer may be composited in proportion to its estimated volume or analyzed separately.

The sampling equipment and procedures described in this WAP represent USEI's recommended sampling protocol for general types of waste materials and containment. Specific waste materials or shipments may require different sampling techniques as outlined in the "Waste Analysis at Facilities That Generate, Treat, Store, and Dispose of Hazardous Wastes: A Guidance Manual", USEPA OSWER 9938.4-03, April 1994. Therefore, deviations from the recommended protocol do not constitute violations of acceptable sampling practices or conditions of this WAP. USEI personnel follow the QA/QC procedures outlined in Section C.10 when collecting samples for characterization.

### C.4.1 Sampling Materials

At a minimum, the methodologies utilized for specific materials correspond to those referenced in IDAPA 58.01.05.005 [40 CFR Part 261, Appendix I]. The types of sampling methods and the most common equipment utilized for different materials are presented in the following table