

Texas Perspective on Blending Low-Level Radioactive Waste

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Radioactive Material Licensing

Texas Commission on
Environmental Quality

Texas Prohibition of Dilution

Title 30 Texas Administrative Code 336.229

No person shall reduce the concentration of radioactive constituents by dilution to meet exemption levels established under the Texas Health and Safety Code, Chapter 401, 401.106, or change the waste's classification or disposal requirements. Radioactive material that has been diluted as a result of stabilization, mixing, or treatment, included but not limited to, Resource Conservation and Recovery Act (RCRA) Land Disposal Restrictions (LDR) treatment, or for any other reason, shall be subject to the disposal regulations it would have been subject to prior to dilution.

Texas Policy Issues

- Blending LLRW is not consistent with long-standing Texas rules and policies.
- Recent blending discussions focus on intent to alter waste classification for disposal site access.
- For states with disposal sites, this changes rules of engagement with regard to 10 CFR Part 61 approach and impacts impressions of stakeholders.

Texas Policy Issues

- Attribution issues – Texas, as disposal site owner, needs complete pedigree of waste known.
- Inconsistent with previous state and federal position discouraging both dilution and blending, since distinction between the two is new to the discussion.
- Blending GTCC allowed?

Questions?

