



Exempt Waste Disposal at WCS's Sub-Title C Facility

WCS has a new service to better serve the nations waste disposition needs. Based on proven risk-based analysis, Low-Activity waste can be disposed as exempt waste at WCS's sub-title C RCRA facility.

Program Overview

- Isotopic concentrations significantly above BSFR limits
- Pre-established exemption levels – approximately 10% of Class A limits
- No compact importation required
- No Generator Certification required
- WCS approves the generator developed waste profile and sampling plan
- Waste received as licensed waste and exempt determination performed by WCS at our licensed facility
- WCS accepts waste by rail or truck in standard DOT compliant containers
- Dose rate limited to 2 mR/hr at one meter on waste packages

Profile and Sampling Requirements

Generator must submit to WCS:

- Completed Waste Profile Record
- Characterization Plan or Justification
- Analytical Results

Generator Sampling Requirements:

- 1-10 containers:1 sample required
- 10 containers to 500 cubic yards:3 samples required
- > 500 cubic yards:1 sample for every 500 cubic yards required, with a minimum requirement of 3 samples

Acceptable Analysis:

- Direct Sampling: packaged waste shall be analyzed using Gamma Spec, Alpha Spec, or Liquid Scintillation as appropriate for the waste and shall be performed by an accredited lab per 30 TAC 25.6.
- In-Situ: ISOC's or NDA

Tiered Classification Approach

- Tier 1 - As profiled, the average concentration sum of fractions shall be less than 0.25 (<25%) and the maximum concentration sum of fractions shall not exceed 0.30 (30%). **Tier 1 requires WCS approval only.**
- Tier 2 - As profiled, the average concentration sum of fractions shall be between 0.25 (25%) and 0.75 (75%) and the maximum concentration sum of fractions shall not exceed 0.80 (80%). **Tier 2 requires WCS approval only.**
- Tier 3 - As profiled, the average concentration sum of fractions is greater than 0.75 (>75%). **Tier 3 requires Texas regulatory approval.**