

<u>SUBJECT</u>		<u>DATE</u>
1253. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1254. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1255. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1256. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1257. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1260. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2018
1261. Conservative Declaration that Material is a Hazardous Waste	ENCORE	JAN 11, 2018
1262. Defining Criteria for Household Waste Exclusion	ENCORE	JAN 18, 2018
1263. The Household Waste Exclusion and Renovation Debris	ENCORE	JAN 25, 2018
1264. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	FEB 1, 2018
1265. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 8, 2018
1266. Spent Lead-Acid Batteries and Secondary Containment	ENCORE	FEB 15, 2018
1267. Spent Lead-Acid Batteries and Accumulation Time Limits	ENCORE	FEB 23, 2018
1268. CERCLA Hazardous Substances – A Brief Definition	ENCORE	MAR 1, 2018
1269. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 8, 2018
1270. RCRA Treatment and the Two-Part Definition	ENCORE	MAR 15, 2018
1271. Who Wants to be a Generator!!!	ENCORE	MAR 22, 2018
1272. Who Wants to be a Generator Part 2!!!	ENCORE	MAR 29, 2018
1273. "No Smoking" Signs and Tobacco-Free Facilities		APR 5, 2018
1274. Aqueous Solutions and the Characteristic of Corrosivity	ENCORE	APR 12, 2018
1275. Aqueous Solutions and the Characteristic of Ignitability	ENCORE	APR 19, 2018
1276. PCB Bulk Product Wastes and the One Year Disposal Requirement	ENCORE	APR 26, 2018
1277. PCB Radioactive Wastes and Exception Reporting	ENCORE	MAY 3, 2018
1278. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date	ENCORE	MAY 10, 2018
1279. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	MAY 17, 2018
1280. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation		MAY 24, 2018
1281. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	MAY 31, 2018
1282. Universal Waste and Basis for the One Year Accumulation Time Limit	ENCORE	JUN 7, 2018
1283. F001 Degreaser versus F002 Solvent	ENCORE	JUN 14, 2018
1284. Hazardous Waste Determinations and Phase Separation	ENCORE	JUN 20, 2018
1285. PCB Certificates of Disposal and Manifesting Between Related Facilities		JUN 28, 2018
1286. PCB Concentrations and 10,000 PPM	ENCORE	JUL 5, 2018
1287. PCB Concentrations and 1,000 PPM	ENCORE	JUL 12, 2018
1288. Satellite Accumulation Containers and the Date of Accumulation Marking		JUL 19, 2018
1289. Satellite Accumulation Requirements in Washington State	ENCORE	JUL 26, 2018
1290. Satellite Accumulation Areas and Under the Control of the Operator		AUG 2, 2018
1291. Exceptions to Free Liquids in Landfills Prohibition	ENCORE	AUG 9, 2018
1292. Ampules and the Exception to Free Liquid in Landfills Prohibition		AUG 16, 2018
1293. Overpacks vs. Salvage Drums	ENCORE	AUG 23, 2018
1294. Universal Wastes - Recycling versus Disposal	ENCORE	AUG 30, 2018
1295. Universal Waste One Year Accumulation and Multiple Handlers	ENCORE	SEP 6, 2018
1296. Universal Waste and Multiple Handlers at One Facility		SEP 13, 2018
1297. Universal Waste, Satellite Accumulation and Centralized Collection Areas		SEP 20, 2018
1298. Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements	ENCORE	SEP 27, 2018
1299. Satellite Accumulation and the One Year LDR Prohibitions on Storage	ENCORE	OCT 4, 2018
1300. Purpose of the ≤90-day Hazardous Waste Accumulation Conditional Exclusion	ENCORE	OCT 11, 2018
1301. Regulatory Status of Used Oil Mixed with Diesel Fuel		OCT 18, 2018
1302. Recyclable Chemicals and Zombie Destruction	ENCORE	OCT 25, 2018
1303. Empty Containers and the "Empty" Label		NOV 1, 2018
1304. Manifest Exception Report Submittal Timeframes – RCRA vs. TSCA		NOV 8, 2018
1305. Smoke Detector Disposal and the NRC	ENCORE	NOV 15, 2018
1306. Smoke Detector Disposal and Well-Meaning Waste Minimization	ENCORE	NOV 21, 2018

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CHPRC Environmental Protection, Hanford, WA

SUBJECT: SMOKE DETECTOR DISPOSAL AND WELL-MEANING WASTE MINIMIZATION

DATE: NOVEMBER 21, 2018

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Jim Leary Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Smoke Detector Disposal and Well-Meaning Waste Minimization

Q: In last week's Two Minute Training (2MT), it was stated that domestic manufactured smoke detectors can be disposed as ordinary trash per an NRC exemption. As an attempt at waste minimization, could a person with numerous exempt smoke detectors, separate the smoke detector components from the radioactive source (americium) and dispose of the components in a sanitary landfill and return the americium to the manufacturer?

A: Yes, but...the NRC exemption for the americium would be lost and the person's manufacturer receiving the waste americium would have to be an NRC licensed disposal facility.

Per [10 CFR 30.20](#), it basically states that any person is exempt from the requirements for an NRC license and from the NRC regulations in 10 CFR parts 20 and 30 through 36 and 39 to the extent that such person receives, possesses, uses, transfers, owns, or acquires byproduct material, in gas and aerosol detectors designed to protect life or property from fires and airborne hazards. This means that as long as the americium is contained within a smoke detector, the exemption applies. If the americium is removed, it must be managed like any other radioactive source subject to full NRC regulation.

As poignantly stated in response to a DOE Oak Ridge National Laboratory question concerning smoke detector disposal:

"The one thing to be careful of is to avoid any disassembly of the devices. Some well-meaning, but clueless individual may decide to remove the sources as a volume reduction effort. If you do this, you lose the exemption, and will probably have to ship the sources in a Type B cask to a licensed disposal facility."

Note: The source of this quote has been lost to antiquity. [PWMartin comment]

SUMMARY:

- Discarded American-made smoke detectors are NRC exempt concerning disposal.
- The exemption applies to the radiation source within the smoke detector.
- Removing the radiation source, even if attempted as waste minimization, removes the exemption.

10 CFR 30.20 is attached to the e-mail. If you have any questions, contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 11/21/18

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Smoke Detector Disposal and Well-Meaning Waste Minimization

10 CFR 30.20 Gas and aerosol detectors containing byproduct material.

(a) Except for persons who manufacture, process, produce, or initially transfer for sale or distribution gas and aerosol detectors containing byproduct material, any person is exempt from the requirements for a license set forth in section 81 of the Act and from the regulations in parts 19, 20, 21, and 30 through 36 and 39 of this chapter to the extent that such person receives, possesses, uses, transfers, owns, or acquires byproduct material in gas and aerosol detectors designed to protect health, safety, or property, and manufactured, processed, produced, or initially transferred in accordance with a specific license issued under §32.26 of this chapter, which license authorizes the initial transfer of the product for use under this section. This exemption also covers gas and aerosol detectors manufactured or distributed before November 30, 2007, in accordance with a specific license issued by a State under comparable provisions to §32.26 of this chapter authorizing distribution to persons exempt from regulatory requirements.

(b) Any person who desires to manufacture, process, or produce gas and aerosol detectors containing byproduct material, or to initially transfer such products for use under paragraph (a) of this section, should apply for a license under §32.26 of this chapter and for a certificate of registration in accordance with § 32.210 of this chapter.

FROM: Paul W. Martin

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