

Washington River Protection Solutions

Please see attached comment regarding identification of hazards for radioactive mixed waste where radioactivity is the predominant risk.

Sections: WAC 173-303-171(1)(e)(ix)(C); WAC 173-303-172(9)(a)(iii); WAC 173-303-172(9)(b)(ii); WAC 173-303-173(3)(f)(i)(C); WAC 173-303-173(3)(f)(ii)(B); WAC 173-303-173(4)(f)(i)(C); WAC 173-303-173(4)(f)(ii)(B); WAC 173-303-174(1)(f)(ii); WAC 173-303-200(6)(b)(ii); WAC 173-303-200(7)(a)(iii); WAC 173-303-200(7)(b)(ii); WAC 173-303-200(13)(a)(iv)(C)(III); WAC 173-303-395(6); WAC 173-303-630(3)(ii); WAC 173-303-640(5)(d)(iii)

Comment: The draft regulations at these locations require labeling to identify the hazards of wastes stored or accumulated in containers, tanks, or containment buildings. Please confirm that, in situations where radioactive hazards represent the predominant risk associated with a waste, radioactive hazard labels may be used to convey the hazard even though radionuclides are outside the scope of dangerous waste regulations. Radioactive mixed waste (i.e., waste consisting of both radioactive and nonradioactive dangerous waste components) may carry dangerous waste codes in situations where, for example, the waste has contacted an F-listed dangerous waste and the waste hasn't been formally delisted, but where the concentration of F-listed constituent is very low or nondetectable. In such situations, the hazard associated with the radionuclide content may far exceed any hazard resulting from F-listed constituents, and labeling the waste to imply a dangerous waste hazard as a "major risk" would be highly misleading to employees, emergency responders, waste handlers, the public, or visitors to the site. For the major risk labels to be meaningful the actual significant risks should be identified, and not minor or comparatively insignificant risks.