

# Rocky Mountain Low-Level Radioactive Waste Board

Member States: Colorado, Nevada, and New Mexico

Leonard C. Slosky • Executive Director

## **NOTICE TO WASTE GENERATORS AND TREATMENT/DISPOSAL FACILITIES**

### ROCKY MOUNTAIN LOW-LEVEL RADIOACTIVE WASTE COMPACT REGULATION OF OIL AND GAS NORM/TENORM

The Rocky Mountain Low-Level Radioactive Waste Board (Board) is an interstate government agency that administers the Rocky Mountain Low-Level Radioactive Waste Compact (Compact). The Compact was created by legislation passed by the member states of **Colorado, Nevada, and New Mexico**, and subsequently approved by Congress via the Omnibus Low-Level Radioactive Waste Interstate Compact Consent Act, PL. 99-240. The Rocky Mountain Compact Statute is available at <http://www.rmlwb.us/documents/rocky-mtn-compact-statute.pdf>.

The Compact regulates certain aspects of low-level radioactive waste management, including both the import into and export from the three-state Compact region of low-level waste for treatment and/or disposal. Low-level radioactive waste regulated by the Compact includes both naturally occurring radioactive material (NORM) and technologically-enhanced naturally occurring radioactive material (TENORM). Import of these materials into or export of these materials from the Compact region requires authorization of the Board. Board Rule 7.1 and Board Rule 6.1 respectively. Failure to obtain Board authorization for these activities is a violation of the Compact and Board Rules, and may result in administrative penalties.

**NORM/TENORM FROM OIL AND GAS.** Oil and gas operations can, but do not always, generate waste materials that may contain NORM or TENORM. Examples of these waste materials include pipe scale, used processing or production equipment, and sludge.

The Board has received information indicating that low-level radioactive waste in the form of NORM or TENORM from oil and gas operations may be coming into or being removed from the Compact region to be treated and disposed of at landfills and other facilities without authorization from the Board. Import and management or disposal of this waste into the Compact region requires authorization of the Board. Board Rule 12.2.

NORM and TENORM waste generated within the Compact region that is disposed within the Compact region in accordance with state policies and regulations regarding the disposal of such waste is not subject to regulation by the Board. Board Rule 12.2.

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The process for obtaining Board authorization to either import waste into the Compact region, or export waste from the Compact region is explained in Board Rule 7 or Board Rule 6 respectively. The complete Board Rules may be found at [http://www.rmlwb.us/documents/Rules\\_12-3-10.pdf](http://www.rmlwb.us/documents/Rules_12-3-10.pdf).

**REGIONAL FACILITY.** Currently, the **Clean Harbors facility located in Deer Trail, Colorado** is the only Compact-designated Regional Facility within the Compact region that is authorized to receive NORM and TENORM from outside the Compact region. Information about that facility is found at [http://www.cleanharbors.com/browse\\_by\\_industry/utilities/hazardous\\_waste\\_transportation\\_and\\_disposal.html](http://www.cleanharbors.com/browse_by_industry/utilities/hazardous_waste_transportation_and_disposal.html).

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