## The NORM Report

## Naturally Occurring Radioactive Material Contamination WINTER 1998

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## Regulations for the Control of NORM - Update

The status of regulations for the control of NORM is summarized below for 16 states, the EPA, Canada, and the CRCPD. NORM contamination is not limited to the petroleum industry and several non-petroleum states are drafting rules for the control of NORM in other industries. Each regulatory agency was contacted during January and February, 1998.

The last state to enact NORM regulations was Ohio. Ohio's regulations became effective June 9, 1997, and were summarized in the Spring 97 issue of **The NORM Report**. The New Mexico and South Carolina regulations were summarized in the Summer 1995 issue of The NORM Report. Louisiana, Mississippi, Arkansas, Texas and Georgia have previously enacted regulations for the control of NORM. Oregon enacted regulations in January 1990. Although the Oregon regulations were specifically written for control of NORM in zircon sands, the Oregon regulations do apply to all NORM contamination in the state. The Oregon regulations were summarized in the Winter 1996 issue of The NORM Report.

There currently are no federal regulations specifically for the control of NORM.

Several other countries have NORM regulations, especially the European countries. It is planned to summarize the status of NORM regulations in these countries in the Spring 98 issue of The NORM Report.

Enactment of regulations specifically for the control of NORM requires compliance by industries and companies with NORM contamination and NORM waste materials. Companies should also be in compliance with state general regulations for the control of radiation and the OSHA radiation regulations.

The status of NORM regulations in 16 states, the EPA, Canada and the

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#### <u>ALASKA</u>

Alaska is currently working on regulations to implement the state's participation in the Northwest Interstate Compact for low-level radioactive wastes disposal. The regulations will be sent out for public comment in early 1998. NORM is not considered to be covered in the Compact's responsibilities.

A commitment has been received

for drafting a white paper on the need for NORM regulations in Alaska and what the next step should be. When the paper is completed in 1998, the timetable for the development of regulations for the control of NORM will depend on future budgets.

#### **ARKANSAS**

The revisions to the Arkansas

(Continued on page 2)

### **ARKANSAS** (continued)

NORM regulations have been completed and certified. The revised regulations are now available to the public.

The Arkansas NORM regulations constitute Section 7 of the Arkansas Rules and Regulations for Control of Sources of Ionizing Radiation. The revised regulations were summarized in the Fall 96 issue of The NORM Report.

Currently a nitrogen products plant at West Helena, Arkansas is being remediated.

### **FLORIDA**

A study of radiation exposures resulting from technologically enhanced concentrations of NORM in the phosphate industry has experienced delays, but is making progress. Initiated at Department of Health's request and funded by the Florida Institute of Phosphate Research, the study has so far concentrated on wet phosphoric acid plant maintenance activities that present the highest potential for radiation exposures. However, researchers will investigate all major exposure pathways in an effort to assist the state's effort to determine what revisions to regulatory oversight of phosphate TE-NORM may be appropriate. A draft report should be ready in June 1998 and finalized in July.

In its continuing effort to characterize TE-NORM within the state, site visits to oil fields located in southern Florida were conducted in July. The inspections verified that TE-NORM concentrations at the sites are minimal. The highest recorded gamma reading was 80 µR/hr, taken at the base of a saltwater storage tank that had been accumulating particulates for at least ten years. No other readings exceeded one-half that total. Analytical sam-

ple results are expected to confirm the low radium content of oilfield pipe scales in the South Florida fields.

The Florida NORM Advisory Committee presented their recommendations to the state Advisory Council on Radiation Protection at the Council's October 1997 meeting. The recommendations were accepted by the Council. (Editor's note: It is hoped to summarize the recommendations in the next issue of The NORM Report.)

#### **GEORGIA**

Georgia's regulations for the control of NORM became effective in October 1994. There have been no changes in the rules since. Revisions to the general rules and regulations for the control of radiation have been drafted and were adopted by the Board. The revisions became effective May 6, 1997. However, there are no changes in the NORM rules in this revision.

### **ILLINOIS**

Illinois does not yet have a draft of NORM regulations. Drafting of NORM rules are being delayed until the CRCPD releases the final Part N Suggested State Regulations for the Control of NORM.

The regulations, when drafted, will probably focus on areas where NORM problems exist with the expectation that revisions to the rules will be made when new NORM problem areas are recognized.

There have been meetings with some of the industries who have the potential to be contaminated with NORM.

### **LOUISIANA**

An oil company in Louisiana has

applied for a license to dispose of their NORM wastes in their own injection well. The license has been issued. Injection of the wastes should have already begun, Several pits are being remediated. The NORM concentrations are relatively small, 60 to 70 picocuries per gram. The pits will be excavated; the wastes will be ground and pumped into the injection well.

Meetings continue to be held with the Hazardous Waste Division to discuss the disposal of NORM contaminated mixed wastes in a hazardous waste landfill. One problem is that the hazardous waste disposal regulations in Louisiana prohibithe disposal of RCRA hazardous wastes containing NORM in a hazardous waste landfill.

The Louisiana regulations are based upon federal regulations. There has been some contact with the EPA in an attempt to determine the intent of the federal regulations. Knowing the intent of the federal regulations may suggest some options which can be used for the disposal of the hazardous wastes containing small concentrations of NORM. The federal regulations do allow some radioactivity, e.g. cesium-137, in the wastes to be disposed of in a hazardous waste landfill. Up to 100 picocuries cesiu. per gram can be disposed of in a hazardous waste landfill.

#### **MICHIGAN**

There have been no changes in the draft of the Michigan guidance documents for the control of NORM.

Most attention at present is still focused on radium luminous products of military origin and radium contaminated warehouses. The EPA has allotted over 12 million dollars toward the cleanup of two

(Continued on page 3)

#### MICHIGAN (continued)

warehouses and other contaminated buildings. It is expected that after the removal of the gauges the building contamination will be small and much of the remaining debris might be able to be disposed of in a landfill under new landfill guidelines. The Michigan guidelines for disposal in a type 2 municipal solid waste landfill allow up to 50 pCi/gm radium-226 to be disposed.

This can be a large cost saving. Analysis has shown that this level shows insignificant risk to the public.

The Belding site is now totally clean and returned to the ware-house owner for unrestricted use. The Benton Harbor site is undergoing clean up. The clean up will continue for another year. The worst of the materials have been containerized but are still stored at the site.

Michigan continues to find high concentrations of NORM in pipe scale. Concentrations over 100,000 pCi/gm are commonly seen. The highest level seen has been 200,000 pCi/gm.

#### **MISSISSIPPI**

Responsibility for NORM in Mississippi is currently divided between the Department of Health and the Oil and Gas Board. The Oil and Gas Board has authority for NORM at the wellsite (effective July 1, 1995). After the petroleum leaves the wellsite the Department of Health has jurisdiction for any NORM contamination.

However, the Mississippi legislature has enacted legislation that gives the Oil and Gas Board jurisdiction over <u>all</u> oil and gas wastes. The Oil and Gas Board's NORM rules which became effective July 1, 1995 assumes jurisdiction only

over NORM at the wellsite.

The Division of Radiological Health within the Department of Health continues to receive inquiries concerning jurisdictional matters. The Division of Radiological Health continues to process licenses for NORM remediation contractors.

Complaints are being received concerning health problems associated with exposures to NORM. However, very little is being done about the complaints since the Department of Health has been told they have no jurisdiction over NORM. The attorney for the Department of Health believes that any commercial remediation, etc. will still have to be licensed by the Department.

On August 11, 1995, the Oil and Gas Board issued a proposed Rule 69: Control of Oil Field NORM. The rule provides the regulations for the control of oil field NORM to ensure that radiation exposures of workers and members of the general public are negligible. The rule applies to NORM that has been derived from the exploration and production activities of oil and gas operations within Mississippi.

A public hearing on Rule 69 was to have been held in January 1996. This was postponed until March and at the request of attorneys on both sides of the issue, the hearing was again postponed until April 2-4, 1996. The changes made to the August 1995 draft were summarized in the Winter 96 issue of The NORM Report.

Rule 69 is being implemented. Oil and gas operators are conducting NORM surveys on all their properties. About 1,400-1,500 survey data have been entered in a computer. Once all the surveys submitted have been put in the data base, it

will be determined which oil and gas sites have not submitted survey data.

The data will be analyzed to determine how many sites are over a selected concentration level of NORM contamination. In the absence of a resolution of the jurisdictional conflict between the Department of Health and the Oil and Gas Board, the latter is assuming responsibility for every oil and gas site in the state.

#### **NEW JERSEY**

The Bureau of Environmental Radiation continues to address the comments received on the interested party draft of N.J.A.C. 7:28-12, Remediation Standards for Radioactive Materials. Publication of the rule proposal in the New Jersey Register is planned for late 1998.

#### **NEW MEXICO**

The New Mexico NORM regulations, Subpart 14: Naturally Occurring Radioactive Materials (NORM) in the Oil and Gas Industry became effective August 3, 1995.

Rule 714, Disposal and Transfer of Regulated NORM for Disposal provides the regulatory framework for the disposal options addressed in the Part 14 NORM regulations. Rule 714 became effective July 15, 1996. Rule 714 was summarized in the Summer 96 issue of The NORM Report.

Comments have been received from several oil and gas companies on the guidance document draft for use with the NORM regulations. The document is being finalized and will be available shortly. The guidance document will be summarized in the Spring 98 issue of The NORM Report.

(Continued on page 4)

#### **NEW MEXICO** (continued)

The New Mexico NORM regulations allow for down-hole injection of NORM waste in a company's own wells. However, the Rocky Mountain Board, one of the Low-Level Radioactive Waste regional compacts, considers NORM to be a low-level radioactive waste and subject to their regulations and the Compact has refused to give approval for the injection of NORM wastes in private wells in New Mexico.

The governor of New Mexico has sent a letter to the Rocky Mountain Compact requesting that this issue be put on the agenda for the next meeting of the Compact Board and urging approval by the Board. The delay is causing problems for the oil and gas industry in New Mexico. Measures have to be taken to allow for the safe disposal of NORM under New Mexico regulations without the issue of the disposal well being declared a regional disposal facility. (The Rocky Mountain Compact claims jurisdiction over NORM. New Mexico is asking the Compact to reinterpret their rules to say that NORM falls under the mining exclusion. The date of the governors letter was February 4, 1998.)

The state has issued its second NORM decontamination license.

#### <u>OHIO</u>

The revised Ohio regulations for the control of radiation, including NORM and NARM, were summarized in the Spring 97 issue of The NORM Report. The regulations were revised to agree with the federal regulations as an initial step in Ohio's application to become an Agreement State. The initial application should have been submitted to the NRC in January, 1998. The recently revised radiation regulations will be revised again later

using the Ohio numbering system rather than the NRC system now in the revised rules.

#### **OKLAHOMA**

The Oklahoma Radiation Management Advisory Council has prepared a draft of proposed NORM regulations for discussion at its March, 1998 meeting. The draft will be summarized in The NORM Report after the public hearing.

The Department of Environmental Quality (DEQ)'s position statement on NORM is:

The DEQ will attempt to incorporate contemporary technical and scientific information in decision-making related to Subchapter 19. The DEQ understands that certain aspects of the NORM issue are unique and often demand case by case attention and evaluation. The disposition, including disposal, may vary from site to site. Evaluation criteria may include location, topography, ground and surface waters, accessibility, and other criteria.

The concepts of the International Radiation Commission on Protection (ICRP) and the National Radiation Commission on Protection (NCRP) will be incorpo rated into decisions regarding NORM. The ICRP has emphasized that adaptive approaches are indis pensable in remediating wastes In NORM. containing Publication 60, 1990, page 51, the ICRP states:

- \* The necessary remedial actions vary greatly in complexity and scale and may themselves give rise to problems of occupational exposure and waste disposal.
- \* The need for and extent of reme dial action has to be judged by

comparing the benefit to the reductions in dose with the detriment of the remedial work. No general solutions are available, but the methods recommended for the optimization of protection can be used to give guidance in each individual case.

The NCRP has also made recommendations regarding non-controlled practices associated with NORM. In a 1993 report, the NCRP stated that "It is recommended that remedial action be undertaken when continuous exposures from natural sources, excluding radon, are expected to exceed five times the average background or 5 mSv [500 millirem] annually.

Some of the pertinent features of the proposed rules are:

#### Exempt Levels

- (a) 30 picocuries per gram or less (average) of technologically enhanced radium-226 or radium-228 in substances;
- (b) 30 picocuries per gram or less of technologically enhanced radium-226 or radium-228 in soil, averaged over 100 square meters and averaged over a 15 centimeter layer of soil below the surface;
- (c) Activities involving impacte—substances and equipment containing TE-NORM in which the maximum radiation exposure level does not exceed 50 microroentgens per hour including the background radiation level at any accessible point.

## Management and Storage Standards.

Norm impacted substances, equipment and sites must be managed in compliance with applicable radiation protection standards of Subchapters 9 and 20. Permittees

(Continued on page 5)

### **OKLAHOMA** (continued)

must:

- (a) Store impacted waste in closed containers and inspect regularly for leakage.
- (b) Store impacted equipment, pipe and drummed waste in areas away from routine activities and general public access.
- (c). Cordon off TE-NORM impacted land and pits.
- (d) Store impacted substances in loose piles only if the area is cordoned off, easily seen notice has been posed limiting entry, erosion-prevention measures are in place and the substances are moved in no more than three (3) months.
- (e) Cap impacted pipe, tubing and drums containing impacted substances.
- (f) Document the radioactivity of all impacted waste.

**Final Disposition** 

No person may dispose TE-NORM in the state unless specifically authorized by the DEQ.

Proposed disposal methods include:

- 1. Plugging and abandonment
- 2. Burial of impacted equipment
- 3. Underground injection
- 4. Soil farming

#### **Remediation and Closure**

In no case shall the licensee vacate a facility or release areas or equipment for unrestricted use until the level of TE-NORM remaining at the site is at or below exempt levels.

#### **SOUTH CAROLINA**

Part IX-Licensing of Naturally Occurring Radioactive Material (NORM) became effective June 30,

1995 in South Carolina. There have been no changes in the regulations and none are proposed at the present time. Part IX was summarized in the Summer 95 issue of **The NORM Report.** 

#### **TEXAS**

The Texas Department of Health has jurisdiction for NORM except for the disposal of NORM. The Railroad Commission has jurisdiction for the disposal of oil and gas industry NORM wastes, while the Texas Natural Resource Conservation Commission has responsibility for the disposal of NORM wastes not associated with oil and gas exploration and production.

The Department of Health is still planning to make some modifications to their NORM rules. The changes will primarily be in classifications of NORM and adding some requirements for processing of NORM from other persons. The Department is waiting for the new CRCPD Part N draft before proposing changes. The revisions will be coordinated with the Railroad Commission, particularly where they concern jurisdictional issues.

The Texas Railroad Commission's Statewide Rule 94: Disposal of Oil and Gas NORM Wastes took effect February 1, 1995. This rule sets forth requirements for the safe disposal of NORM that constitutes, is contained in, or has contaminated oil and gas wastes. Rule 94 was summarized in the Winter 95 issue of The NORM Report. There are no plans at present to revise Rule 94.

The Texas Department of Health is cooperating with the Railroad Commission in setting up training for radiation surveyors.

The Texas Natural Resource Commission has not started drafting rules for the disposal of NORM wastes not associated with oil and gas exploration and production. Although there is no firm schedule yet, the drafting of specific NORM disposal rules could begin later in 1998.

#### **UTAH**

NORM is considered to be included in Utah's comprehensive radiation control regulations. No specific NORM regulations have been proposed at the present time in Utah.

There is a proposal for a new NORM and low-level waste disposal facility, Laidlaw Environmental currently has a hazardous waste facility ten miles north of Envirocare's NORM site and wants to convert one of their industrial waste cells to a low-level NORM cell. Laidlaw must submit a siting criteria document, get local approval, go through the licensing process and get the governor's and legislative approval.

A preliminary decision has been made that Laidlaw meets the siting criteria which is step one in their application process. A public comment period began February 12.

Envirocare is still under investigation. Semnani, the president and owner of Envirocare resigned from the company for a period of at least three years and also resigned from the Utah Radiation Council. Envirocare remains in operation and continues to pass all regulatory inspections.

The time for Envirocare's relicensing is getting closer.

#### WASHINGTON

The Department of Health and (Continued on page 6)

**WASHINGTON** (continued)

Ecology have reviewed the environmental checklists and supporting information for three upcoming actions related to US Ecology's commercial low-level radioactive waste disposal facility located near Richland, Washington.

The three actions are: renewal of the facility operating license, approval of a closure plan, and a rule making establishing an annual disposal limit for naturally occurring and accelerator produced radioactive materials (NARM). In making the determination of significance, the two agencies have found that among the proposed actions, there are several probable direct or indirect impacts to elements of the environment such as air quality, soils, groundwater, and habitat. When considered together, these impacts may be significant. Therefore, an Environmental Impact Statement (EIS) must be prepared before any of the actions may be taken.

The scoping process for the EIS was scheduled to begin February 26, 1997. Public comments were accepted on the scope of the analysis until March 27, 1997. Following that, a draft and final EIS will be prepared; a process expected to take one to two years to complete. While the EIS is in preparation, US Ecology may continue to operate under the timely renewal provisions of its license.

Us Ecology has always met state regulations. The Environmental Impact Statement will evaluate the effects of the three actions to show that the site will be safe for at least 1,000 years.

The Department of Health has finished scoping the EIS and is waiting for the Department of Ecology to give their blessing to the draft. The annual limit for NARM has been retained at 100,000 cubic feet. The scoping document from the Department of Health has been ready since May. After the Department of Ecology agrees with releasing the document, public hearings must be held. It was originally thought the final EIS would be ready in 1998, but it now appears it will be at least 1999.

#### **WISCONSIN**

Wisconsin has no specific regulations for the control of NORM, except those imposed by the Department of Natural Resources for the disposal of materials containing radium-226. The state does have general regulations for the control of radiation.

Wisconsin has been drafting an enforcement standard for radioactive contaminants in ground water with the primary isotope being radium-226. The main purpose was to establish a ground water enforcement standard for use in monitoring, controlling, and if necessary, limiting human exposure to radioactive materials introduced into ground water by regulated human activities.

Activities on this enforcement standard have ended and it is not going to be implemented at this time.

### FEDERAL ACTIONS

### ENVIRONMENTAL PRO-TECTION AGENCY (EPA)

The EPA is revising the draft report Diffuse NORM Wastes - Waste Characterization and Preliminary Risk Assessment issued in April 1993. That draft was reviewed by the Radiation Advisory Committee (RAC) of the Science Advisory Board (SAB). The RAC issued their report A SAB Report: Review of the Diffuse NORM Draft Scoping Document, Review of the

Draft Document of Diffuse Naturally Occurring Radioactive Material (NORM): Waste Characterization and Preliminary Risk Assessment in May 1994. The revised report will respond to the comments detailed in the RAC report.

S. Cohen and Associates has prepared a revision of the waste characterization portion of the study. The U.S. Geological Survey is providing further input to the report sections on metal and mining processing industries. After completion of the NAS study (see next paragraph) and with the assistance of TechLaw Inc., EPA expects to issue a final diffuse NORM repolater this year.

At the mandate of Congress in 1996 and 1997, EPA contracted with the National Academy of Sciences for a study on the scientific bases for EPA guidance on NORM. The NAS study was begun in 1997, and should be published by this summer.

There are currently two subcommittees which are working on NORM in the Interagency Steering Committee on Radiation Standards (ISCORS). ISCORS is a committee chaired by EPA and the NRC with participation from several oth federal agencies which have radiation programs. The first subcommittee is looking at NORM and other radionuclides in sewage sludge and ash generated at publicly owned treatment facilities. A questionnaire will be sent to approximately 600 of these facilities nationwide to request information about their waste processing and disposal practices. From the respondents, approximately 300 will be asked to provide samples for radionuclide laboratory analysis. The results of this study,

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**EPA** (continued)

expected to be completed in 1999 or 2000, will be used by the NRC to evaluate their regulatory control over discharges by nuclear licensees into sewer systems, and by the EPA to evaluate their need to develop radiation standards for sewage sludge and ash.

The second ISCORS subcommittee which is currently being organized will focus on just NORM issues.

EPA is also working on a draft rule for very low-level and mixed waste disposal. The draft would be directed primarily at commercial wastes and provide a means to utilize hazardous waste site technology for licensed AEA material disposal.

#### **CANADA**

The Guidelines for the Handling **Occurring** Naturally Radioactive Materials (NORM) in Western Canada was released in August 1995. There are no plans to make the guidelines into regulations at the present time. It is expected that the oil and gas and fertilizer industries will use the NORM guidelines to develop their own code of operating practices in order to give their front-line workers specific guidelines to enable them to work with NORM safely. Some of the rationale used in developing the guidelines was given in the Spring 96 issue of The **NORM** Report.

National NORM guidelines are being drafted for Canada. The national guidelines are expected to be similar to the Western Canadian guidelines. The national guidelines are being pushed with the assistance of three industries: oil and gas, fertilizer, and recyclers. The guidelines are expected to be somewhat generic allowing industries using the guidelines to develop their own code of safe practices for

working with NORM.

The Federal/Provincial Radiation Protection Committee met on October 17, 1997 to consider accepting the national draft of NORM guidelines. The Board did not accept the draft, primarily because of concerns about release limits, i.e., NORM concentrations in materials and land released for unrestricted use.

Health Canada has formed a Working Group to complete the development of the Canadian NORM guidelines. The Board has recommended that the release limits be in alignment with the International Atomic Energy Agency values. The Working Group met February 6, 1998 and it is expected that a new draft document will be completed by summer. This new draft will then be submitted to the Board with the expectation that it will be approved sometime in the fall.

The guidelines will represent a consensus of provincial and federal regulatory agencies in partnership with oil and gas, fertilizer and metal recycling industries.

Conference of Radiation
Control Program
Directors (CRCPD)

The new draft of Part N; Regulation and Licensing of Technologically Enhanced Naturally Occurring Radioactive Materials was released in March 1997 for comments. This draft was summarized in the Spring 97 issue of The NORM Report.

Many comments were received by the NORM Commission and considered for revisions to the draft. A summary of the comments received was presented to the CRCPD Board on October 24, 1997. At the October 24 meeting the Board decided to have two national stakeholder meetings to allow attendees another opportunity to present comments on the Part N draft.

The first meeting will be in Washington, D.C. on July 24 and 25, 1998. The second meeting will be September 11 and 12 in Dallas. The office of the Executive Director of the CRCPD is sending out invitations and announcements. The meetings are open to all interested parties. It is hoped to get broad input from those interested in the Part N suggested regulations. Nothing will change in the Part N draft until after the meetings.

#### **CRCPD Commission on NORM**

Ray Paris, Chair, Oregon Tommy Cardwell, Texas Sam Finklea, South Carolina Walter Cofer, Florida

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Sixty years ago I knew everything; now I know nothing; education is a progressive discovery of our own ignorance.

--- Will Durant

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## Israeli Court Rules Cancer Caused by Radiation

Jerusalem, October 12 (AFP) - An Israeli court has ordered the government to pay 700,000 dollars compensation to the family of a victim of radiation at one of the country's nuclear plants, the Yediot Aharonot Daily said Sunday. The Tel Aviv court accused the management of the Dimona nuclear centre in the southern Negev desert of "having treated the needs of employees for protection with contempt," describing their attitude as "revolting," said the paper.

It ruled during the past week that the cancer which killed Haim Ita, who died in 1989, had been caused by radiation and that his family should be compensated.

Relatives of Ita and other employees who contracted

illnesses while working in the Jewish state's nuclear industry have been fighting a battle for compensation against the state for several years.

The court's ruling goes against the judgment of Israel's Atomic Energy Commission, which has consistently ruled that all secrecy measures surrounding the Dimona plant should be maintained for security reasons.

Israel has never admitted to possessing nuclear weapons, but according to foreign military analysts between 100 and 200 nuclear bombs have been made at Dimona.

## **NORM** in the Literature

# Radioactive Materials — An Emerging Environmental Problem for Petrochemical Plants Using Light NGLs as Feedstocks

Peter Gray

Naturally occurring radionuclides are widespread in the environment. Many geological formations contain uranium, radium, radon and other radioactive elements together with oil and gas. When oil and gas are produced, traces of these radioactive elements are also produced.

Over time, radioactive elements are deposited in scale and sludges, thus contaminating equipment, vessels and other facilities in the industry.

Copies available from Peter Gray (918) 492-5250.

Health Physics. 72(1): 97-99; 1997

#### **Healthful Radiation**

E. Theodore Agard

Abstract- The title of this article sounds paradoxical to most people because the general public is not fully aware of the many benefits radiation has brought to people's healthcare. Radiation has provided the most effective means of noninvasive diagnosis of many diseases, thus reducing the need for exploratory surgery, at significantly reduced risks. Furthermore, radiotherapy has been effective in treating many diseases without surgical removal of the diseased part. The breast is one excellent example of the benefits of radiation in both diagnosis and treatment with preservation. Yet the public still regards radiation as mysterious and dangerous, while trained experts regard it as beneficial with manageable risks. This article suggests ways of presenting this material to the public in a manner that is interesting and informative.

### Bibliography Of Reports, Papers, and Presentations On Naturally Occurring Radioactive Material (NORM) In Petroleum Industry Wastes

A NORM Report by K.P. Smith M.L. Wilkey R.D. Hames DOE/BC/W-31-109-Eng-38-1, July, 1997

Available to the public from the National Technical Information Service, U.S. Department of Commerce, 5285 Port Royal Rd., Springfield VA 22161.

Health Physics 72(1): 92-96; 1997

## Gamma Doses from Phospho-Gypsum Plaster-Board

R.S. O'Brien

Abstract- The use of phospho-gypsum plaster-board and plaster cement in buildings as a substitute for natural gypsum may constitute an additional source of radiation exposure to both workers and members of the public; both from inhalation of radon progeny produced from radon which is exhaled from the plasterboard and from beta and gamma radiation produced by radioactive decay in the plaster-board. The calculations presented in this paper indicate that if phospho-gypsum sheets 1 cm thick containing a Ra-226 concentration of 400 Bq/kg are used to line the walls and ceiling of a room of dimensions up to 5 m X 5 m X 3 m, the annual effective dose from gamma radiation for a person continually occupying the room should not exceed approximately 0.13 mSv. This compares with a measured annual average effective dose from gamma radiation in Australian homes of 0.9 mSv. The annual effective dose form such thin sheets is directly proportional to the Ra-226 concentration in the plaster-board.

### Non-Hazardous Oilfield Waste Disposal Into Sub-Pressured Zones

by Stephen A. Marinello, Newpark Resources, inc. William T. Ballantine, Newpark Resource, inc.

AIChE 1996 Spring Meeting, New Orleans, LA Abstract: 61c Session 61: Deep Well Infection Issues. February 26, 1996.

The problem of non-hazardous oilfield waste (NOW) disposal is a critical, consideration in the oil and gas industry. It becomes even more critical when that

(continued on page 10)



## NORM INSTRUMENTS AND SERVICES, INC.

## New Radiation Detector Reduces Sampling Costs for Ra-226!

There is now a way for you to get reliable field estimates of equivalent radium-226 in soil within minutes! No more costly waiting for laboratory results that can take weeks for data you need today. It's the RadlnSoil, an improved version of an earlier instrument used in the U.S. Department of Energy's Uranium Mill Tailings Remedial Action (UMTRA) Program. It will be available soon from NORM Instruments and Services, Inc. Some of the RadlnSoil's features are:

- Measures Equivalent Radium-226 in Soil within Minutes
- Measurement Costs are Lower than Laboratory Sample Analysis
- Minimal Operator Training Required; Key Functions are Password Protected
- ✓ Easy-to-Use Keypad Interface
- ✓ Weighs 30 lbs (13.5 kg); W: 17" (43cm); D: 11.5" (29cm); H: 7" (18cm)
- ✓ Sturdy Water-Resistant Case; Uses Standard D-Cell Batteries

- ✓ Corrects for soil moisture, radon escape, Thorium-232, and Potassium-40
- ✓ Automatic Readout in Picocuries per Gram or Bq per Gram
- Default Parameters Provided User
   Can Input Site-Specific Parameters
- Can Count Benchtop Samples with Additional Calibration

Contact: NORM Instruments and Services, P.O. Box 3936, Grand Junction, CO 81502; (970) 243-9163; Home Page: www.normis.com E-Mail: info@normis.com

## NORM in the Literature (continued)

waste contains naturally occurring radioactive material (NORM). The primary concern here is the disposal of the waste solids, predominantly from drilling operations or site remediation efforts. Many companies have investigated the injection of slurried solid waste for disposal into depleted production boreholes. They have all included the need for controlled fracturing, either classic, dissolution or both, in order to provide a conduit for waste passage and the storage volume in which to place the waste. This requires that the operator exceed the fracture pressure and cause the formation to part to allow fluid passage. Regulatory agencies are very concerned with such efforts due to the perceived potential for "uncontrolled" fractures intersecting USDW aquifers or other boreholes and allowing contamination, directly or indirectly, of those aquifers.

This paper describes a concept and process by which

sub-pressured or underpressured zones are utilized to take slurried waste at pressures below the theoretical fracture pressure. As such, the required injection pressure is often provided by the head of the fluid in the borehole. In oilfield vernacular, the well takes the fluids "on vacuum". Under this scenario, the likelihood of the formation being hydraulically fractured is very low due to the inability for pressure to build to the frac gradient. The chance of injected fluids migrating back to the surface is also extremely low as a subpressured zone exists due to isolation/compartmentalization through structural seals (such as well sealed fractures). Additionally, the hydraulic head of the normally pressured formations geologically above the disposal zone is greater than the injection pressure and provides a secondary impediment to upward mobility

(continued on page 11)

## NORM in the Literature (continued)

### Naturally Occurring Radioactive Material (NORM) Contamination and Control in a World Scale Olefins Manufacturing Complex

by Gordon Taylor, Novacor Chemicals Ltd. Mike Cleghorn, Novacor Chemicals Ltd.

1996 Spring Meeting, New Orleans, LA Abstract: 21d Session 21: Effect of Contaminants in Ethylene Plants. February 28, 1996.

This presentation represents survey data from ethylene manufacturers in North America. The survey addresses the timely topic of oxygenate contaminants in various ethylene feedstocks that are of concern to ethylene producers. The survey's concept is based on the prevalence of motor gasoline additives and other oxgenates in the marketplace. This paper follows on the 1992 work of the Ethylene Producers Committee: Subcommittee on Feedstock and Product Issues which identified various impurities as topics for study. It is the intent of this sub-committee to present survey results, rather than interpretation, for the benefit of our industry, suppliers and customers.

67 p., 7 tables, 1 app., 1995. GC9503, \$6.50

Geological Circular 95-3. Naturally
Occurring Radioactive Materials
(NORM) in Produced Water and Scale
from Texas Oil, Gas, and Geothermal
Wells: Geographic, Geologic, and
Geochemical Controls

by R.S. Fisher

Abstract- Water produced from oil, gas, and geothermal reservoirs contains natural radioactivity that ranges from background levels to levels found in uranium mill tailings. Radioactivity in fluids and in the scale that forms in oil-producing and gas-processing equipment increases concerns for workers and public safety as well as costs of handling and disposing of naturally occurring radioactive materials (NORM), which include water, sludge, scale, and affected equipment. This study explored natural controls on such radioactivity to identify screening criteria by which

high NORM activity can be anticipated on the bases of geologic of geochemical information. Such criteria can help State and Federal agencies target disposal regulations for situations likely to incur high radioactivity levels and can also prevent operators from making costly measurements if the likelihood of encountering elevated NORM activity is low. NORM in oil and gas operations is caused mainly by radium-226 (226Ra) and radium-228 (228Ra), daughter products of uranium-238 (238U) and thorium-232 (232Th), respectively, in barite scale. To explore natural controls on radioactivity, we considered the (1) geographic distribution of NORM in oil-producing and gas-processing equipment, (2) geologic controls on uranium, thorium, and radium in sedimentary basins and reservoirs, (3) mineralogy of NORM scale, (4) potential of Texas formation waters to precipitate barite scale, (5) radium activity in Texas formation waters, and (6) geochemical controls on radium isotope activity in barite scale. Our approach combined compilations of published data, collection and analysis of new water and scale samples, and geochemical modeling of scale precipitation and radium incorporation in barite.

### Naturally Occurring Radioactive Material (NORM) Contamination Encountered During Propylene Fractionator Modifications

by
Joseph G. Berret, Union Texas Petrochemicals,
Geismar, LA

AIChE 1997 Spring Meeting Session 34 Paper 34b March 12, 1997.

### NORM Disposal by Well Injection with Cement Stabilization

Steven Wood

Many companies and regulating authorities have wondered what is the best method for disposing of Naturally Occurring Radioactive Material (NORM). This paper covers a process which grinds and slurries this material then combines it with cement to provide a slurry acceptable for injection into a well

The process consists of (1) classification of material. (continued on page 12)

## NORM in the Literature

(continued)

(2) bulk breakdown, (3) grinding and slurrying to a consistency which keeps the particles suspended in solution until time for (4) cement slurry preparation for well injection.

Well injection involves the placing of the NORM cement slurry into a non-producing zone in a reservoir during a plug and abandonment operation.

In conclusion, the philosophy of the process is to take the NORM generated through the production of oil and gas and place it back into -a reservoir similar from which it came, with the added stabilization of cement.

This paper was presented at the 89th Annual meeting at Air & Waste Management Association in Nashville, Tennessee, 1996, paper #96-TP58.07.

The following papers were presented at the Forty-Second Annual Meeting of the Health Physics Society in San Antonio, June 29 - July 3, 1997

## MPM-A.25 Sensitivity Analysis of the Leaching Model in Resrad

by
M.H. Ebinger
(Environmental Science Group, Los Alamos National
Laboratory, Los alamos, NM 87545)

## MPM-B.1 Should Diogenes Drop His Lantern?

ty
T.L. Aldridge
(Department of Energy—Richland Operations,
Richland, WA 99352)

## MPM-E.3 Developing Release Standards and Criteria for Scrap Metal

by

(continued on page 13)

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## NORM in the Literature (continued)

J.M. Karhnak (U.S. Environmental Protection Agency, 401 M Street SW, 6602J, Washington, DC 20460)

## MPM-F.1 ANSI/JPS NORM Standard—Update of Development Activities

J-C. Dehmel<sup>1</sup> and S.Y. Chen<sup>2</sup> (<sup>1</sup>S. Cohen & Associates, Inc., 1355 Beverly Road, McLean, VA 22101; <sup>2</sup>Argonne National Laboratory, 9700 S. Cass Avenue, Argonne, IL 60439)

MPM-F.2
A Suggested Series of Protocols for Dealing with Radionuclide Contamination Under the Comprehensive Environmental Response Compensation and Liability Act

by
P.A. Giardina and E.J. Stamataky
(U.S. Environmental Protection Agency, Region 2, 290 Broadway, New York, NY 10007-1866)

# TAM-C.4 Release Criteria: A Need for Consistent Radiation Standards and Policy

by
R.E. McBurney
(Texas Department of Health, 1100 West 49th Street,
Austin, TX 78756)

## TAM-C.5 Clearance of Metals Containing Residual Radioactivity

J.A. MacKinney (U.S. EPA, 401 M Street SW, 6602J, Washington, DC 20460)

# TAM-C.6 Development of Environmental Remediation Standards by the HPS Standards Committee

by
S.Y. Chen<sup>1</sup> and J.R. Stencel<sup>2</sup>
(<sup>1</sup>Argonne National Laboratory, Argonne, II 60439;
<sup>2</sup>Princeton University, Princeton, NJ)

## TPM-F.4 Radon: Update on Dose and Risk

N.H. Harley
(New York University School of Medicine, Nelson
Institute of Environmental Medicine, 550 First
Avenue, New York, NY 10016)

## WPM-A.1 The Origin, Goals, and Future of the Radiation Safety Officer Section

R.H. Johnson, JR. (CSI-Radiation Safety Training, 3827 Farragyt Avenue, Kensington, MD 20895)

# WPM-C.2 Reconcentration of Radioactive Material at a Very Small Sanitary Sewerage System

J.D. Kinneman and E. Ullrich (U.S. Nuclear Regulatory Commission Region I Office, 475 Allendale Road, King Of Prussia, PA 19406)

### WPM-C.7 NORM Waste Characterization—Update of a U.S. EPA Study

by
W. Russo<sup>1</sup> and J.-C. Dehmel<sup>2</sup>
(<sup>1</sup>U.S. Environmental Protection Agency, 401 M
(continued on page 14)

## NORM in the Literature (continued)

Street, SW, Washington, DC 20460; <sup>2</sup>S. Cohen & Associates, Inc., 1355 Beverly Road, McLean, VA 22101)

## WPM-F.6 Sampling and Analysis of Natural Po210 From Industrial Processes

by
J.L. Alvarez, <sup>1</sup> J.E. Rice, <sup>2</sup> and R.A. Seiler <sup>3</sup>
(<sup>1</sup>Auxier & Associates; <sup>1</sup>FMC Corporation; <sup>3</sup>Institute
for Regulatory Science)

## WPM-C.4 Establishing Alara Levels for Residual Radioactivity in Soil

by G.C. Chapman, T.E. Huston, J.W. Nagy, and R.A. Moore (Nuclear Fuel Services, Inc., 1205 Banner Hill Road, Erwin, TN 37650)

# WPM-C.5 Development of DOE Handbook for Reuse or Recycling of Radioactive Properties

by
S.Y. Chen, N. Ranek, S. Kamboj, J. Hensley, D. Burns, R. Flemming, S. Warren, and A. Wallo (Argonne National Laboratory, Argonne, IL 60439; Trinity Environmental Services, Cincinnati, OH; Ju.S. Department of Energy, Washington, DC)

# WPM-C.6 Preliminary Risk Assessment for Recycling NORM Contaminated Concrete and Steel

by
W.H. Johnson, <sup>1</sup> J.V. Marsicek, <sup>2</sup> and M.J. Rudin <sup>1</sup>
(<sup>1</sup>Department of Health Physics, University of
Nevada Las Vegas, Las Vegas, NV 89154-3037; <sup>2</sup>
Stan A. Huber Consultants, Inc., 200 N. Cedar Road,
New Lenox, IL 60451-1751)

# Regulation of Naturally Occurring Radioactive Material (NORM) - An International Perspective

by Mitchell W. Davis

Naturally Occurring Radioactive Material (NORM) was first recognized as a potential problem as long ago as 1904 in the oil fields of Canada. NORM later became an issue in the North Sea oil and gas production facilities in the early 1980's and became more widely recognized in the United States in 1986 during a routine well workover in the state of Mississippi. NORM contamination of oil and gas industry production equipment has since been identified world wide. The United states, including Alaska and the Gulf of Mexico region, the North Sea region, the Unite Kingdom, Canada, Australia and several Middle Eastern countries have all reported NORM contamination. The purpose of this paper is to discuss some of the international regulations or guidelines that have been promulgated concerning NORM in the oil and gas industry. Additionally, the impact of these regulations or guidelines on non-oil and gas industries will also be discussed. A comparison of these regulations or guidelines to those generally found in the United States shall be drawn.

Presented as Paper 97-MP23.01 at the Air & Waste Management Association's 90th Annual Meeting & Exhibition, June 8-13, 1997, Toronto, Ontario, Canada

## Basic Safety Standards on Diskette

The IAEA has announced release of the International Basic Safety Standards for Protection against Ionizing Radiation and for the Safety of Radiation Sources as Windows based software on diskette. The Standards, published in hardcopy in 1996, are jointly sponsored by the Food and Agriculture Organization of the United Nations (FAO), the International Atomic Energy Agency (IAEA), the International Labour Organisation (ILO), the Nuclear Energy Agency of the Organisation for Economic Co-operation and Development (OECD/NEA), the Pan American Health Organization (PAHO) and the World Health

(continued on page 15)

# NSG

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## **NORM** in the Literature

(continued)

Organization (WHO).

The Windows based software program contains text and data from the English version of Safety Series No. 115. The program is intended for use in conjunction with the Basic Safety Standards and assumes that the user is generally familiar with their organization and content. This software program enables the user to search for and retrieve any topic directly through the Table of Contents Tree, with access based on keyword searches, a subject index or crossreferencing. The definitions of the main concepts can be found in the "glossary" list. The software was developed for the agency by Dr. Nicolae Mocanu, Romania.

Information: International Atomic Energy Agency, Wagramer Strasse 5, P.O. box 100, A-1400 vienna, Austria. Fax: +43-1-2060 29302. Email. sales.publication@iaea.org

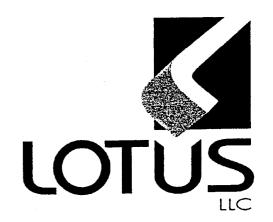
### GTS Duratek/Canberra

GTS Duratek signed a memorandum of understanding September 15, 1997 with Canberra Industries calling for the two companies to team to pursue radioactive waste characterization, waste processing and radioactive facility decommissioning and decontamination services for government and commercial clients. GTS Duratek, Columbia, Maryland, is the largest U.S. commercial processor of low-level radioactive waste. The company also provides radioactive waste transportation services and radiological services for facility decommissioning and decontamination. Canberra, Meriden, Connecticut, manufactures analytical instruments and systems to detect, identify and quantify radioactive materials. Contact: Robert Price, President and CEO, GTS Duratek, 10100 Old Columbia Road, Columbia, MD 21046; (410) 312-5100.

A bureaucrat's idea of cleaning up his files is to make a copy of every paper before he destroys it.

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## **NORM Manual Available**

The manual which I use in teaching my course NORM Contamination - An Emerging Environmental Problem is available. The manual contains over 600 copies of the slides used in the course. Although designed originally for the oil and gas industry, the manual offered contains material about NORM contamination in other industries with NORM contamination problems.

In addition to being an inclusive text on NORM, the manual can be easily used to structure inhouse information or training courses on NORM.

The Table of Contents shown below indicates the range of topics in the manual.

- 1. Fundamentals of Radiation Protection
- 2. Radiation / Radioactivity Units
- 3. Biological Effects of Radiation
- 4. Radiological Protection
- 5. Introduction to NORM Contamination
- 6. NORM Contamination Radium

- 7. NORM Contamination Radon
- 8. NORM in Oil & Gas & Other Industries
- 9. Fundamentals of Radiation Detection
- 10. NORM Surveys
- 11. Disposal of NORM Wastes
- 12. Regulations General
- 13. Federal Regulations
- 14. State Regulations
- 15. Regulations Conclusions
- 16. Recommended Industrial Hygiene
- 17. Program Suggestions for NORM Control
- 18. Radiation Litigation & Minimization
- 19. Conclusions
- 20. Glossary

For further information contact:

Peter Gray P.O. Box 470932 Tulsa, OK 74147 TEL (918) 492-5250

FAX (918) 492-4959

E-mail: pgray@normreport.com

## **Meetings Calendar**

### **CRCPD 1998 Annual Meeting**

The 1998 National Conference on Radiation Control will be held on May 17-20, 1998, in Mesa, Arizona, at the Sheraton Mesa Hotel and Mesa Convention Center. Packets of information on the meeting are scheduled to be mailed no later than mid February.

#### 1998 Health Physics Society Summer School

Management and Administration of Radiation Safety Programs, July 6-10, 1998. University of Wisconsin - River Falls, River Falls, Wisconsin. For more information contact:

Health Physics Society 1998 Summer School Tel:(703) 790-1745 Fax: (703) 790-2672

### The 43rd Annual Meeting of the Health Physics Society

Minneapolis, Minnesota July 12-16, 1998

#### Post-Emergency Response Issues Conference

On September 9-11 1998, the U.S. Environmental Protection Agency is sponsoring a Radiological Post-Emergency Response Issues Conference at the Washington Sheraton Hotel, Washington, D.C. This Conference is an international forum that will focus on issues of concern to emergency respondents following significant radiological releases that impact public health welfare and the environment. The focus of this Conference is on issues related to the post-emergency phase of the response.

To obtain more information contact:

EPA Post-Emergency Response Conference Sarah Wallis SciComm, Incorporated Phone: 301-652-1900, Fax: 301-652-7001

E-Mail: EPAConference@scicomm.com

5th Annual International Petroleum Environmental Conference: Issues and Solutions in Exploration, Production and Refining

> Albuquerque Hilton Albuquerque, NM October 20-23, 1998

The South-central Environmental Resource Alliance (SERA), The University of Tulsa Division of Continuing Education, and the National Petroleum Technology Office of the U.S. Department of Energy will sponsor the Fifth Annual International Petroleum Environmental Conference: Issues and Solutions in Exploration, Production and Refining. Our objective in this conference is to bring you together with other professionals in the oil and gas industries and academia to seek solutions to environmental problems of a technical, legal, and regulatory nature. The conference will feature an excellent series of plenary lectures featuring leading experts in which a number of timely petroleum-related environmental problems will be explored in some depth. There will also be eighteen technical sessions with individual presentations where specific solutions to these problems will be discussed, a poster session and exhibits. The formal program and informal discussions with your colleagues will combine to give you the kind of up-to-date information that you expect from a major conference of this type.

For information contact:

Dr. Kerry L. Sublette, Director Integrated Petroleum Environmental Consortium The University of Tulsa Tel: (918) 631-3085

Fax: (918) 631-3268

19th U.S. Department of Energy Low-Level Radioactive Waste Management Conference

Downtown Hilton Salt Lake City, Utah November 10-12, 1998

The 19th U.S. Department of Energy Low-Level Radioactive Waste Management Conference serves the needs of LLW managers as a forum for exchange of (continued on page 18)

## Meetings Calendar (Continued)

technical information and assistance with LLW issues and activities. It offers presentations and discussions on problem resolution using the best available technologies, institutional and regulatory standards, risk assessment, performance standards, objectives, and assessment criteria. The conference promotes information exchange among states and compacts, their support contractors, DOE, the Nuclear Regulatory Commission, the Environmental Protection Agency, and the Department of Defense.

The conference features papers presenting technical, institutional and regulatory information, product and service vendor exhibits; and CEU university courses. The conference plays a major role in technical information exchange in the fast-moving waste management environments.

For information contact:

19th LLRWM Conference Donna Lake, Conference Administrator Tel: (208) 526-0234

Fax: (208) 526-9165

The 17th International Symposium on Oilfield Chemistry

Sponsored by the Society of Petroleum Engineers

Houston, Texas February 16-19, 1999

Chemistry plays many important roles in all aspects of the petroleum industry, including exploration, drilling completion, production, transmission and abandonment. Chemistry has allowed improvements in products and processes so that many formerly marginal fields can now be safely and profitably produced. The 17th International Symposium on Oilfield Chemistry provides a forum where these chemical issues may be discussed in depth.

The symposium will be an international chemistry forum for all sections of the petroleum industry. You and your associates are invited to submit papers to the symposium. Preference will be given to papers on new chemical developments with proven application and those furthering chemical understanding of existing issues.

For more information contact:

SPE Office in Dallas Tel: (972) 952-9393 Fax: (972) 952-4393

## **Philip Services Corporation**

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In 1997, Philip merged with Allwaste and Serv-Tech. The operations of Allwaste, Serve-Tech, Philip's Environmental Services and Philip's By-Products Recovery were merged to form Philip's Industrial Services group (ISG). Philip's ISG provides more than 70 service lines and processes to its industrial clients.

These combined organizations are uniquely positioned to help clients fulfill the following objectives:

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- \*Having an on-site service provider
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- \*Achieve economic results through the clients' environmental compliance efforts

If you would like further information about Philip or any of its services, please contact the Lafayette, LA office at (318) 233-4889 or 888-WE'RE NOW 1. Philip is publicly traded on the New York, Montreal and Toronto Stock exchanges under the symbol "PHV".

## **Selective Tools, Inc. (STI)**

STI was incorporated under the laws of Texas in 1986. The primary activities of the company are oil field related and over 100 oil and gas firms have been serviced during the past eight years. On August 20, 1993, STI received the first Specific License granted by the Bureau of Radiation Control, Texas Department of Health for the decontamination of NORM-contaminated equipment, facilities and land including the minimization of NORM wastes. Under their license, STI is authorized to handle NORM as defined in the Texas Regulations for the Control of Radiation, both liquids and solids of unlimited maximum activity. In addition to the petroleum industry, STI has serviced the phosphoric acid industry as well as tanker loading and off loading facilities. Relative to their Specific License, STI services include:

- Soil remediation
- Pipe and equipment decontamination
- Automated tank/enclosed vessel decontamination
- Pipeline descaling

- NORM slurrification and disposal operations
- NORM surveys
- Worker training and certification
- Project and implementation relating to unique NORM problems
- NORM surveys and core analysis

For additional information on these services, please contact our office:

Mike McClure Selective Tools, Inc. 2401 Fountain, Suite 600 Houston, TX 77057 (713) 780-1944 or Fax (713) 780-1964

## **Envirocare Wins DOE's Technology Transfer Approval**

(Salt Lake City, Utah) — The U.S. Department of Energy Office of Science and Technology Mixed Waste Focus Area has approved the transfer of two technologies to Envirocare of Utah, Inc.

The technologies are Polymer Microencapsulation (PM) and Chemically Bonded Phosphate Ceramics (CBPC). The PM technology coats small waste particles in plastic, hindering their leaching characteristics. The CBPC technology binds waste molecules in a ceramic matrix preventing waste from migration. Both of these treatment processes have great environmental advantages by sealing the waste in a liquid impenetrable casing.

The Department of Energy (DOE) has been making these and other technologies available to qualified private companies for full scale commercial application. The concept of technology transfer proved successful when Envirocare commercialized Polymer Macroencapsulation and has been able to successfully treat over 500,000 pounds of radioactively contaminated lead. Envirocare, having once again met DOE's

qualifications, will incur the full cost of operation and capitalization in order to make these two new processes commercially available. As a result, Envirocare expects to increase its competitiveness in the mixed waste market.

"Envirocare values DOE's confidence and will continue to meet and exceed the department's expectations," said Envirocare President Charles Judd. "Providing technological leadership in the environmental industry has been a key mission for Envirocare for several years, and 1997 marks significant accomplishments in this area," said Judd.

Envirocare has become a leader in the radioactive waste treatment field as it continues to attract and commercialize most needed technologies and processes to help complete environmental cleanups around the country.

For more information call:

Charles Judd Envirocare of Utah, Inc. (801) 532-1330

## Stan A. Huber Consultants, Inc. (SAHCI)

Stan A. Huber Consultants, Inc. has specialized for 25 years, in providing nuclear consulting and health physics support services for hospitals, universities, research labs, and a wide variety of manufacturing and industrial facilities that use radioactive materials. Licensing; Regulatory Compliance; Radiation Safety Audits and Training; Nuclear Equipment Calibrations; Leak Tests; Radiation Surveys; Contamination Tests; Radioactive Waste Management Consulting; NORM Consulting; Risk Assessment; Environmental Pathway Analysis; Decontamination and Decommissioning Services; Radiation Safety Training Videotapes; X-Ray Calibrations and related services are also provided. "Regular" or Customized Nuclear Training Courses are available. There is no charge to discuss prospective service needs made by phone/letter or fax and quotations are rapidly issued once the scope of services is defined.

SAHCI has provided radiation safety consulting services to industrial clients for over 20 years. Depending on the size and extent of your operation, a radiation safety consulting program can be tailored to your needs on a onetime or quarterly; semi-annual; or annual visit frequencies. If special needs arise, visits can also be made on call. Radiation safety surveys and evaluation of radiation methods to meet the changing regulatory agency requirements are typical areas of service. Please call for more information or to discuss your needs.

Stan A. Huber Consultants, Inc. 200 North Cedar Road New Lenox, IL 60451-1751 Phone: 1-800-383-0468 or 1-815-485-6161 Fax: 1-815-485-4433

## The Devious Professor

The March 1, 1997 issue of New Scientist carried a story about two undergraduates in chemistry at Newcastle University who were doing extremely well. So confident were they of their chances that they spent the weekend before their final exams living it up in a distant youth hostel. One thing led to another and the pair did not make it back to Newcastle until mid-morning on Monday, by which time their crucial final exam had already started. They could have started the exam late, thus giving up time that might prove to be valuable, but decided instead to have a chat with their professor. They told him feloniously that a tire had gone flat on the drive back from the hostel and that the spare had been no good. The professor agreed to let them take the exam the next day. Greatly relieved, the friends studied hard that night. In the morning they were put in separate rooms and given the exam papers. Question 1 (worth five points) was a simple test of chemical reactions— child's play for this duo, who polished it off and moved enthusiastically to Question 2 (95 points) Which tire?

## **BEIR VI Report Released**

The Health Effects of Exposure to Indoor Radon (BEIR VI) - the latest in a series of reports from the National Research Council on the biological effects of ionizing radiation - was released on February 19, 1997 at a public briefing at the National Academy Sciences (NAS). Jonathan Samet, BEIR VI Committee Chair, and several Committee members discussed the report's findings.

The public summary and executive summary of the report can be viewed on the NAS Web site <a href="https://www.nas.edu">www.nas.edu</a>. The entire report is expected to be available on the Web site by early March and can also be ordered from:

National Academy Press (202) 334-3313.

Middle age is when you still believe you will feel better in the morning.

- Bob Hope

## The Department of Defense Policy on Recycling Radioactively Contaminated Carbon Steel

Effective immediately, it is the policy of the Office of Environmental Management of the Department of Defense that, to the degree that it is economically advantageous and protective of worker and public health, radioactively contaminated carbon steel (RCCS) either in storage or to be generated should be recycled. This Environmental Management policy will be in place for three years from the date of this memorandum, September 20, 1996, at which time it will be reevaluated. This policy is fully supportive of the various site-specific recycling initiatives underway or planned.

Specifically, the policy for radioactively contaminated materials, including radioactively contaminated carbon steel, generated by the Environmental Management Program, shall be: survey, decontaminate as necessary and appropriate (in compliance with Department of Energy Orders), and release for unrestricted use any material that meets the applicable criteria. If decontamination for release for unrestricted use is not economically feasible, then the radioactively contaminated carbon steel that is recycled shall be fabricated into one-time-use containers for disposal of low-level wastes generated by the Environmental Management Program, consistent with radiological guidance. More information is available from:

S. Warren (301) 903-7673

## The NORM REPORT A NORM Contamination Newsletter

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> > Published Quarterly Editor: Peter Gray, Ph.D.

## Low-Level Radiation Regulations: Costs Far Outweighing Benefits

Controversy continues over the effects of exposure to low levels of radiation. Regulations are currently driven by the linear no-threshold theory and collective dose assumptions that adverse effects do occur at low levels. As a consequence, costs of using radiation have increased to the point that the benefits, including the saving of lives, are not being realized.

Within the scientific community, this controversy is between those who believe there is a threshold below which exposure to radiation poses no additional harm and those who believe that any exposure to radiation carries with it additional risk. Adherents to the linear, no-threshold model note that cancer induction is linked to genetic damage within a cell and any interaction within a cell's DNA may lead to cancer. Proponents of a dose-response threshold do not dispute this, but also point out that cancer induction is a multistage process that can be interrupted by the body's natural mutation repair mechanisms.

Recent research suggests that the Earth's background radiation field was nearly 10 times higher in the geologic past when life evolved, suggesting there may be excess capacity to repair damage from radiation exposure grater than current background levels. In addition, data from Japan and Chernobyl also seem to show lower-than-expected cancer incidence at low dose levels.

While this scientific scrutiny is important, it should not distract us from this fact: Regardless of the dose-response model that may some day be proven, the observable risks from exposure to low doses of radiation are much less than other risks we face daily. If we spend large amounts of money, time, and effort to mitigate or reduce risks that are less than those we face on the roads, at home, or in the workplace, we are short-changing ourselves and society.

Dr. Bernard Cohen has determined that exposure to 10mSv/yr (1 rem/yr), using the BEIR V linear nothreshold model, carries with it virtually the same risk (in terms of loss of life expectancy) as going to work, and one-fourth the risk as driving. Dr. Tammy Tengs has shown that \$10 million invested in smoking cessation or alcohol safety programs can save 10,000 years or 500 years, respectively, of life expectancy, but only a few if invested in radiation protection.

## Defining Oilfield Services

oil·field ser·vic·es — see "Allwaste", a Philip Services Company, defining oilfield services for 16 years. all·waste — synonymous with pride, quality and safety.



- State-of-the-art NORM facility
- · Highly trained professionals
- Turnkey capabilities
- Disposal Management
- · Regulatory interface
- Direct access to rail spur
- Wet & dry method of pipe decon available
- Trained in DOT shipping requirements
- Pb210 Po210 decon via chelation

- Licensed in LA & TX with reciprocal agreements in other states
- 6 Onsite Radiation Safety Officers
- Direct access to navigable waterway
- · Isolated work bays
- · Waste minimization and consolidation
- Offer pipe-in-trade options
- Offsite remediation & surveying
- Pipe & equipment decontamination

MORGAN CITY OFFICE 9743 Highway 90 East Morgan City, Louisiana 70380 Phone: (504) 631-3325

Fax: (504) 631-2817

MORGAN CITY NORM FACILITY
138 Tiger Court
Morgan City, Louisiana 70380
Phone: (504) 631-3973
Fax: (504) 631-0209

GOLDEN MEADOW OFFICE 21148 Highway 1 Golden Meadow, Louisiana 70357 Phone: (504) 475-7770 Fax: (504) 475-5916 VENICE OFFICE 40360 Hwy 23 South Boothville, Louisiana 70038 Phone: (504) 534-2008 Fax: (504) 534-2876

24-Hour Spill Response — 1-800-797-9992



LAFAYETTE OFFICE 543 Renaud Road Lafayette, Louisiana 70507 Phone: (318) 233-4889 Fax: (318) 233-4106 (888) WE'RE NOW 1 Website: www.philipinc.com

## The Barnwell Disposal Site

Chem-Nuclear Systems, Inc. has postponed indefinitely its 25-year, \$1 billion tax plan to satisfy the South Carolina thirst for \$100 million in annual payments for their educational funding in

exchange for keeping open the Barnwell, South Carolina, waste disposal facility. Low-level radioactive waste disposal services will apparently continue to be available at Barnwell.

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## The NORM Report

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## **WEB SITES**

Web Site	Description	Web Address
EPA	Office of Radiation and Indoor Air	http://www.epa.gov/oar/oarhome.html
EPA	Entire site searches	http://www.epa.gov/epahome/search. html
EPA	Home Page	http://www.epa.gov
EPA	EPA related rules, regulations and legislation can be found	http://www.epa.gov/epahome/rules.html
EPA	Subset of the Federal Register	http://www.epa.gov/fedrgstr/search.htm
EPA	CFR dealing with radiation protection programs	http://www.epa.gov/docs.epacfr40/chapt -I.info/subch-F/
EPA	Software	http://www.epa.gov/radiation/modeling/
EPA	Scrap Metal	http://www.epa.gov/radiation/scrap
DOE	Department of Energy	http://www.doe.gov
DOT	Department of Transportation	http://www.dot.gov/affairs/index.htm
IAEA	International Atomic Energy Agency	http://www.iaea.org
ISRI	Institute of Scrap Recycling Industries	http://www.isri.org
NIOSH	National Institute for Occupational Safety and Health	http://www.cdc.gov/niosh/homepage. html
NRC	NRC forms 3,4,5 and several regulatory guides	http://www.saic.com:80/home/nrcrad/ regnews.htm
NRC	Some of the newer NUREGs	http://www.nrc.gov/NRC/news.html
NRC	NRC's web site has a News and Information as it becomes available	http://www.nrc.gov
NCRP	Web Site for NCRP Comments to Cindy O'Brien. ncrp@ncrp.com	http://www.ncrp.com
Office of Air and Radiation searches		http://www.epa.gov/oar/oarsrch.html
Office of Radiation Protection Cleanup		http://www.epa.gov/radiation/cleanup/
OSHA	Occupational Safety and Health Administration	http://www.osha.gov
	(continued on page 24)	

WEB SITES (continued)

Colorado

http://www.cdphe.state.co.us/lr/lrhom.

htm

Illinois

Illinois Department of Nuclear Safety

Information, regulation (downloadable),

and other information.

http:/.deq.state.la.us

http://www.state.il.us/idns/

Louisiana

Maine http://www.state.me.us/dhs/eng/rad/rad.

Maine htm

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Nevada http://.state.nv.us/health/bhps/

North Dakota RCP http://.ehs.health.state.nd.us/ndhd/index

.html-ssi

Texas http://www.tdh.state.tx.us/ech/rad/pages

/brc.htm

Texas State of Texas Radiation Control

Home Page

Washington http://www.doh.wa.gov/ehp/rp

## **Excerpts from the Federal Register**

63 FR 6915-6917, February 11, 1998

Multi-Agency Radiation Survey and Site Investigation Manual

Agency: U.S. Department of Defense (DOD), Department of Energy (DOE), U.S. Environmental Protection Agency, and the U.S. Nuclear Regulatory Commission.

Summary: The Department of Defense (DOD), Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), and the U.S. Nuclear Regulatory Commission (NRC) are announcing the availability for use of the "Multi-Agency Radiation Survey and Site Investigation Manual" (MARSSIM). The MARSSIM provides information on planning, conducting, evaluating, and documenting environmental radiological surveys of surface soils and building surfaces for demonstrating compliance with regulations. The MARSSIM, now finalized, is a multiagency consensus document. The agencies previously have sought public comment in order to receive feedback from the widest range of interested parties and to ensure that all information relevant to developing the

document was received. The agencies reviewed public comments received on the draft MARRSIM as well as comments from a concurrent, independent, technical peer review. Suggested changes were incorporated, where appropriate, in response to those comments.

http://www.tdh.state.tx.us

62 FR 19940-19941, April 24, 1997

Occupational Radiation Protection; Availability of Draft Guides and Technical Standards.

Agency: Department of Energy (DOE).

Summary: The DOE announces that drafts of guidance documents that may be used to implement Occupational Radiation Protection regulations are available for public comment. These draft guidance documents consist of 13 implementation guides, a radiological control technical standard, and two Department of Energy Laboratory Accreditation Program (DOELAP) technical standards. These guidance documents are intended to provide useful information and methodologies on how the requirements in the proposed Occupational Radiation Protection regulations might be implemented.

## Manufactures of Fixed and Portable Radiation Monitors

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Some Manufacturers of Fixed and Portable Radiation Monitoring Instruments	Phone / Fax.	800/472-5656 216/349-6581	203/238-2351 -1347	505/471-3232 473/9221	905/712-3100 -3105	304/645-6568 -2182	800/622-0828 915/235-4672	408/745-6650 -6755	. 215/343-5900 -4670	410/740-1440	800/962-1632 619/646-9009	818/883-7043 -6107	303/651-6149 -6823	800/850-4608 440/248-9301	408/745-6654
S	Firm / Contact Person	Bicron Joe Bellian	Canberra John Smalling	Eberline Jim Hesch	Exploranium Michelle Meuser	Wm. B. Johnson Dick Landfried	Ludium Duane Stevens	National Nuclear Mario Hug	Nuclear Research Corp. 215/343-5900 Jack Malz	Rados Technology Jim Menge	SAIC Dana Emmons	Technical Associates Allen Goldstein	TSA Systems Charlie Schnurr	Victoreen Len Bader	Xetex Ken Ryan

A Personnel dosimeter, here, means self-reading, easily reset devices, not e.g. film badges.

This information Is not to be construed as an endorsement by CRCPD, Inc., of the products and services identitied in this list. Please provide corrections to Terry Devine, Ph. 502/227-4543

B All manufacturers of fixed monitoring systems provide installation, training, repair and calibration.

Some Mig.s of check sources are isotope Products 818/843-7000, North American Scientific 818/503-9201, and Oxford Instr. 800/769-3673

μ-rem, here, means meters having Internal electronic compensation of RBE for radiation energy.

## **Regulatory References**

Title 42 U.S.C 4321, et seq	Toxic Substances Control Act (TSCA)	SOUTH CAROLINA	Part IX, Licensing of NORM
Title 42 U.S.C 2011, et seq.	Atomic Energy Act of 1954, as amended		Administrative Rules, Chapter 333, Division 117 Health Division
Title 42 U.S.C. 300, et seq	Safe Drinking Water Act, as amended	OREGON	Regulations and Licensing of NORM Oregon
Title 40 CFR Part 440 O	re Mining and Dressing bint Source Category	NEW MEXICO	Subject 14: NORM in the Oil and Gas Industry
U	ealth and Environmental otection Standards for ranium and Thorium ill Tailings	MISSISSIPPI	Part 801 Section N Licensing of NORM Oil and Gas Board, Rule 69, Control of Oil field NORM
Pı	nvironmental Radiation otection Standards for otection Power perations	LOUISIANA	Title 33: Environmental Quality Part XV: Radiation Protection. Chapter 14: Regulation and Licensing of NORM
Pı	Act as amended ational Primary rinking Control rogram; Criteria de Standards	GEORGIA	Rules and Regulations for Radioactive Materials, Chapter 391-3-17, Section 08-Regulation and Licensing of NORM
Title 33 U.S.C. 466, et seq	Federal Water Pollution Control		Control of Sources of Ionizing Radiation. Section 7 NORM
Title 29 CFR Part 1910.96		ARKANSAS	Rules and Regulations for
Title 10 CFR Part 61 Nat		Er	UREG 1.86 U.S. Atomic nergy Commission, ashington, D.C. June 1974
Ag	ndards for Protection ainst Radiation	Li	rmination of Operating censes for Nuclear Reactors,

## Comparison of NORM Rules by State

Radium E	Exemption Concentration	Radium Cleanup Standard			
AR	5 pCi/g	AR	5/15 pCi/g <sup>(3)</sup>		
CO (proposed)	5 pCi/g	CO (proposed)	5 pCi/g		
GA	5 pCi/g with high radon factor <sup>(1)</sup> 30 pCi/g with low radon factor <sup>(2)</sup>	GA	5/15 pCi/g with high radon factor 30/15 pCi/g <sup>(4)</sup> with low radon factor		
LA	5 pCi/g above background	LA	5/15 pCi/g, or 30 pCi/g if the effective dose equivalent to		
MI (proposed)  MS	5 pCi/g with high radon factor		members of the public does not exceed 100 millirem per year		
J	30 pCi/g with low radon factor	MI (proposed)	5/15 pCi/g		
NM	30 pCi/g 5 pCi/g.	MS	5/15 pCi/g with high radon factor 30 pCi/g with low radon factor		
ND	-	<b>NIN 6</b>	30/15 pCi/g		
NJ	Variable- depending on concentrations and volumes- annual dose less than 15 mrem/yr.	NM ND	5 pCi/g		
OK (proposed)	30 pCi/g	NJ	Variable- depending on concentrations and volumes-		
OR	5/15 pCi/g		annual dose less than 15 mrem/yr.		
SC	5 pCi/g with high radon factor	OK (proposed)	30/15 pCi/g		
	30 pCi/g with low radon factor	OR	5 pCi/g		
TX	5 pCi/g with high radon factor 30 pCi/g with low radon factor	SC	5/15 pCi/g with high radon factor 30/15 pCi/g with low radon factor		
CRCPD (proposed) 5 pCi/g		TX	5/15 pCi/g with high radon factor		
	<u>NOTES</u>		30/15 pCi/g with low radon factor		
(1) High radon	factory is a radon emanation rate 20 pCi per square meter per second	CRCPD (propos	ed) 5/15 pCi/g		

- greater than 20 pCi per square meter per second
- (2) Low radon factory is a radon emanation rate less than 20 pCi per square meter per second.
- (3) 5/15 pCi/g of radium of radium in soil, averaged over any 100 square meters and averaged over the first 15 centimeters of soil below the surface.

CRCPD (proposed)

(4) 30/15 pCi/g is 30 pCi/g of radium in soil, averaged over any 100 square meters and averaged over the first 15 centimeters of soil below the surface.

(Continued on page 28)

## NORM Training Course Offered by OGCI & Peter Gray

OGCI (Oil & Gas Consultants International, Inc.), a world leader in petroleum training, has scheduled 2-day training courses in NORM for 1998. The course NORM Contamination in the Petroleum Industry covers all aspects of NORM contamination and its control, including:

- Fundamentals of Radiation
- Fundamentals of NORM
- Radium Contamination
- Radon Contamination
- State & Federal Regulations
- NORM Surveys including Hands-on Training
- Maintenance Procedures
- Disposal of NORM Wastes
- Decontaminations
- Release of Facilities
- Recommended Programs
- Liability and Litigation

This course builds a rigorous and complete foundation for the control of NORM contamination.

This in-depth course is taught by Peter Gray who has a background in nuclear and radiochemistry and 25 years experience in the petroleum industry. Dr. Gray has a Ph.D. in Nuclear Chemistry from the University of California at Berkeley. He took early retirement from Phillips Petroleum Company in 1985 after 25 years with the company. Since 1985, Dr. Gray has been a consultant in NORM. During his tenure with Phillips, Dr. Gray was in charge of the company's NORM control program from the discovery of NORM contamination in natural gas and natural gas liquids in 1971 until his early retirement in 1985. This background uniquely qualifies Dr. Gray as the instructor for the course .-- an instructor who understands the origin of NORM and why it contaminates nearly all petroleum facilities, where the contamination is, how to set up programs that protect employees, company facilities, the environment and the public, how to survey for NORM contamination, the available options for the disposal of NORM wastes, and the Federal and state regulations for the control of NORM.

Peter Gray is the editor/publisher of **The NORM Report**, a newsletter reporting on developments in NORM, including summaries of regulatory activities on the state and Federal level as well as in Canada.

The 1998 schedule for the course NORM Contamination in the Petroleum Industry is:

April 28/29, 1998 Tulsa, OK Nov. 3/4, 1998 Tulsa, OK For further information about the course, contact Joseph Goetz, OGCI. 1-800-821-5933, or contact Peter Gray, 918-492-5250, for information about the course content.

## Comparison of NORM Rules by State (Continued)

### **Exemption for Contaminated Equipment**

AR	Concentration limit only	ОК	50 μR/hr including background		
, , , , , , , , , , , , , , , , , , ,	(5 pCi/g)	OR	5 pCi/g		
CO (Proposed)	Concentration limit only (5pCi/g)	SC	50 μR.hr including background		
GA .	50 μR/hr including background	TX	50 μR/hr including background		
LA	50 μR/hr including background	CRCPD (Proposed)	Concentration in dpm		
MS	25 μR/hr above background 100 cpm above background	NOTES  Before release for unrestricted use, facilities or equipment contaminated with NORM should not			
NM	50 μR/hr including background	exceed specified contentimeters.	tamination limits in dpm/100 sq.		