

## **SNS Experience with Mercury**

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OAK RIDGE NATIONAL LABORATORY U. S. DEPARTMENT OF ENERGY

#### Introduction

SNS Experience with Mercury

Safety Analyses/Documentation

- Clean Air Act
- Waste Management





#### Source Term Development

- Grouped Elements (based on volatility)
- Source Term for Hot Cell Fire Accident Scenario
- A conservative approach envisioned a fire surrounded by a puddle of exposed mercury
- 430 kg of Hg (2.4% of total) amount vaporized





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Atmospheric Transport

- US EPA Codes

- SCREEN
- ISCST3





#### Consequence Evaluation

- Dose Conversion Factors (DCFs)
  - Deposition/Biokinetics Respiratory Tract

- Systemic Biokinetic Model
- Activity to Dose Conversion Model





#### Bottom Line

- Unmitigated Scenario: 1.4 Rem MOI
- Mitigated Scenario: 66 mrem MOI
- Mitigation (Passive Structures)
  - Target Building (seismic-qualified)
  - Service Bay Walls (4 ft thick)
  - Hg Loop System (encased)
  - Service Bay Floors sloped to drain





#### **Clean Air Act**

- National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 61
- Subpart H
- National Emission Standards for Emissions of Radionuclides Other Than Radon from Department of Energy Facilities







- Emissions of radionuclides from DOE facilities are limited to 10 mrem/year
- EPA approved method CAP88
- Unabated/Abated Releases
- Does dose exceed 1% of standard?
- Measure all radionuclides that contribute greater than 10% of dose.





#### CAA

#### ANSI/HPS N13.1-1999

- Select Monitoring or Sampling Site
- Guidance for in-line detectors
- Radionuclides shall be collected/measured





#### CAA

- Permit to Construct
- Operating Permit
- Who is the regulator?

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#### **Waste Management**

 Solid wastes generated at SNS fall into three major categories:

- Low Level Waste
- Mixed Low Level Waste
- Hazardous (no rad added)





### **Characterization (Radioactivity)**

- Calculations completed by SNS Nuclear Physics group
- CALOR96 Code System
  - 3D multimedia high energy transport code
  - Used to model nucleon-meson cascade
  - High energy physics model
- MCNP code coupled to HETC96
  - Low energy neutron transport
- ORIHET95 to study buildup and decay of activity
- These codes are state-of-the-art
- Present calculations for 5000 hr/year operation at 2 MW power level and are maximum activities
- Actual characterization calculations will use actual irradiation history of components





#### **Characterization (Haz. Materials)**

- Principal hazardous material is elemental mercury
- Some materials from the service bay will have been in contact with liquid mercury
- Generally, if these materials do not have visible mercury on them, they are considered to be RCRAfree
- If there are other materials (Cd, Pb), then they are known at the beginning of irradiation





#### **Waste Classification Considerations**

- NRC Regulations
  - Classification of Waste (Class A, B, C, GTCC, 10 CFR 61.55)

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DOT Regulations

 Classification of Shipment





- Assembly of type 316 stainless steel vessels suspended from a flange
- Inner vessel for containing the target mercury
- Outer vessel used for containing any mercury that may leak from the inner vessel

- Estimated lifetime 52 days; 4 operating periods per year
- Total weight (without mercury) is 1527 lb











- Module is removed from service according to the following procedure:
  - Drain mercury from the process loop
  - Retract the target carriage to the maintenance position in the hot cell
  - Install the shield boot over the end of the module
  - Tilt module to drain more fluids (including mercury) from the module
  - Lift the module off its carriage (nose-down vertical position)

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Move to shielded, ventilated container in the hot cell





- Characterization
  - Draining and sectioning
  - <3% by weight of mercury remains</p>
  - Container-like equipment < 110 gal volume</li>
  - RCRA empty; manage as solid waste
- Modules will be studied for a period of time (PIE)

- This involves sectioning of the steel
- Ensures complete mercury drainage







#### Target Module Waste Analysis for Class A Waste

	Half Life	Class A Limit					-					
Isotope	(s)	Ci/m3	0	ly	3y	5y	бу	7y	8y	9y	10y	lly
H3	3.89E+08	40	1.32E+01	1.25E+01	1.11E+01	9.96E+00	9.41E+00	8.90E+00	8.41E+00	7.95E+00	7.52E+00	7.11E+00
Co60 Ni63	1.66E+08	700	8.72E+00	7.65E+00	5.88E+00	4.52E+00	3.96E+00	3.47E+00	3.05E+00	2.67E+00	2.34E+00	2.05E+00
(act metal) Ni59	3.16E+09	35	5.10E+00	5.07E+00	5.00E+00	4.93E+00	4.90E+00	4.86E+00	4.83E+00	4.80E+00	4.76E+00	4.73E+00
(act metal)	2.37E+12	2.20E+01	4.49E-02	4.49E-02	4.49E-02	4.49E-02	4.49E-02	4.49E-02	4.49E-02	4.49E-02	4.49E-02	4.49E-02
Tc99	6.66E+12	3.00E-01	1.30E-03	1.41E-03	1.41E-03	1.41E-03	1.41E-03	1.41E-03	1.41E-03	1.41E-03	1.41E-03	1.41E-03
Sr90 Nb94	8.88E+08	4.00E-02	1.10E-03	1.08E-03	1.02E-03	9.75E-04	9.52E-04	9.28E-04	9.06E-04	8.84E-04	8.62E-04	8.41E-04
(act metal) C14	6.41E+11	2.00E-02	5.65E-04	5.65E-04	5.65E-04	5.65E-04	5.65E-04	5.65E-04	5.65E-04	5.65E-04	5.65E-04	5.65E-04
(act metal) All	1.81E+11	8.00E+00	1.73E-05	1.73E-05	1.73E-05	1.73E-05	1.73E-05	1.73E-05	1.73E-05	1.73E-05	1.73E-05	1.73E-05
Activity		7.00E+02	8.72E+04	2.25E+03	8.13E+02	<mark>4.05E+02</mark>	3.03E+02	2.32E+02	1.80E+02	1.41E+02	1.12E+02	8.92E+01
Sum of the i	fractions		5.50E-01	5.29E-01	4.90E-01	4.56E-01	4.40E-01	4.25E-01	4.10E-01	3.97E-01	3.84E-01	3.72E-01

Decay Period

In accordance with 10CFR61.55 the Target module is classified as a class A waste if classified by long lived radionuclide, but is a class B waste initially if classified by short lived radionuclides. Analysis shows that the target module is a class A waste after 5 years decay



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#### **Target Module Packaging**

JT-BATTELLE









#### **Target Disposition Operations**



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#### **Target Disposition**











### **Spent Adsorbers**

- Carbon Adsorbers
- Gold Adsorbers



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#### **Gold Adsorber**

- Al<sub>2</sub>O<sub>3</sub> pellets containing a gold impregnant
- Sized for mercury that would exit into the off-gas during operational period
  - preliminary estimate is two target cycles per year
- Two gold adsorbers
  - one located in the target service bay
  - one in the MOTS
- Contains ~110 g of mercury when it is spent
  - calculated using the mercury weight and the specific activity of the mercury based upon the known irradiation history







**Gold Adsorber in Target Service Bay** 





#### **Gold Adsorber**

#### Spent Gold Adsorber Activity Inventory\*

Isotope		Half life (s)	shutdown-	+30 min	Ci/Adsorber	r (30 m)	Ci/Adsorber (90 d)	
			(Ci/1 cu m)	(Ci/g Hg)	(Ci)	Ci/m3	90 d decay	Ci/m3
Hg	187	1.44E+02	0.285	2.11E-08	2.31E-06	1.29E-04	0.00E+00	0.00E+00
Hg	188	1.95E+02	5.46	4.04E-07	4.43E-05	2.46E-03	0.00E+00	0.00E+00
Hg	189	4.56E+02	277	2.05E-05	2.25E-03	1.25E-01	0.00E+00	0.00E+00
Hg	190	1.20E+03	2650	1.96E-04	2.15E-02	1.20E+00	0.00E+00	0.00E+00
Hg	191	2.90E+03	6000	4.44E-04	4.87E-02	2.71E+00	0.00E+00	0.00E+00
Hg	192	1.75E+04	8900	6.59E-04	7.22E-02	4.01E+00	1.25E-135	6.97E-134
Hg	193	1.37E+04	15200	1.13E-03	1.23E-01	6.86E+00	1.70E-172	9.42E-171
Hg	193*	4.25E+04	120	8.89E-06	9.74E-04	5.41E-02	8.14E-59	4.52E-57
Hg	194	1.64E+10	709	5.25E-05	5.75E-03	3.20E-01	5.75E-03	3.20E-01
Hg	195	3.56E+04	33300	2.47E-03	2.70E-01	1.50E+01	4.77E-67	2.65E-65
Hg	195*	1.50E+05	1210	8.96E-05	9.82E-03	5.46E-01	2.44E-18	1.35E-16
Hg	197	2.31E+05	115000	8.52E-03	9.33E-01	5.19E+01	6.87E-11	3.82E-09
Hg	197*	8.57E+04	18100	1.34E-03	1.47E-01	8.16E+00	7.13E-29	3.96E-27
Hg	199*	2.56E+03	70400	5.21E-03	5.71E-01	3.18E+01	0.00E+00	0.00E+00
Hg	203	4.03E+06	179000	1.33E-02	1.45E+00	8.07E+01	3.81E-01	2.12E+01
Hg	205	3.12E+02	60.1	4.45E-06	4.88E-04	2.71E-02	0.00E+00	0.00E+00
					Total	2.03E+02	3.87E-01	2.15E+01

Spent gold adsorber is a class A waste immediately upon generation. Since the mercury in the adsorber may only be deposited by evaporation, no spallation product isotopes present; and only mercury isotopes included.





#### Packaging

- Removed from the installed position and capped.
- Inserted into a 85-gal drum with other in-cell materials
- Drum is inserted in the TN-RAM liner and removed from the hot cell through the bottom loading port





#### **Carbon Adsorbers**

- Sulfur impregnated charcoal
   Nucon Mersorb 1.5 mm
- 1750 lb weight (total)
- Mercury content is about 2 kg
- measured by mercury content of air stream and flowrate
- Also measured by monitoring surface dose
  - Surface dose is <200 mrem/h</li>
  - Known specific activity yields mercury content

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#### **Dose Rate Buildup on Carbon Adsorbers**



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#### **Misc Service Bay Wastes**

- How much mercury is possible to have in an 85-gal drum before a class A limit is exceeded?
- ~79 g Hg (40 year irradiation basis)
- in an 85 gal drum
- No visible mercury policy should eliminate exceeding this quantity





		ClassA						
	Value	Limit	Fraction					
C-14	9.35E-03	8.00E-01	1.17E-02					
Ni-59	5.71E-03	2.20E+01	2.60E-04					
Nb-94	5.79E-02	2.00E-02	2.89E+00	Class C, <2	2E-1			
Tc-99	1.13E-02	3.00E-01	3.77E-02					
1-129	1.62E-05	8.00E-03	2.02E-03					
Alpha emit	ters with ha	lf life >5 yea	ars					
	1.37E-03	Ci/m3						
	1.01E-01	1.00E+02	nCi/g					
Pu-241	1.18E+00	3.50E+03	nCi/g					
Cm-242	6.74E-02	2.00E+04	nCi/g					
H-3	5.54E+04	4.00E+01	1.38E+03					
Co-60	4.56E+01	7.00E+02	6.51E-02					
Ni-63	1.77E+01	3.50E+00	5.05E+00					
Sr-90	2.20E+01	4.00E-02	5.49E+02					
Cs-137	5.83E-01	1.00E+00	5.83E-01					
Nuclides w	ith half life <	< 5 years						
	2.66E+04	Ci/m3	7.00E+03					
In an	85	gal contain	er =	0.32	m3			
In an	85 When is th	gal contain e waste clas	er = ss A?	0.32	m3			
In an	85 When is th E.g, what a	gal contain e waste clas activity is pe	er = ss A? rmitted befo	0.32 ore Class A	m3 is exceeded			
In an	85 When is th E.g. what a Ci/m3	gal contain e waste clas ctivity is pe Ci/package	er = ss A? rmitted befo ? <sup>*</sup>	0.32 ore Class A m3 Hg	m3 is exceeded kg Hg			
In an C-14	85 When is th E.g. what a Ci/m3 8.00E-01	gal contain e waste clas ctivity is pe Ci/package 2.57E-03	er = ss A? rmitted befo e <sup>x</sup>	0.32 ore Class A m3 Hg 2.75E-01	m3 is exceeded kg Hg 3.72E+03			
In an C-14 Ni-59	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01	gal contain e waste clas ctivity is pe Ci/package 2.57E-03 7.08E-02	er = ss A? rmitted befo	0.32 me Class A m3 Hg 2.75E-01 1.24E+01	m3 is exceeded kg Hg 3.72E+03 1.67E+05			
In an C-14 Ni-59 Nb-94	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05	er = ss A? rmitted befo	0.32 ore Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01			
In an C-14 Ni-59 Nb-94 Tc-99	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04	er = ss A? rmitted befo	0.32 me Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03			
In an C-14 Ni-59 Nb-94 Tc-99 I-129	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04			
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 If life >5 yea	er = ss A? rmitted befo e <sup>x</sup>	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04			
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 tters with ha 1.00E+02	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 If life >5 yea nCi/g	er = ss A? rmitted befo e*	0.32 re Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04			
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 tters with ha 1.00E+02 4.00E+01	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 If life >5 yea nCi/g 1.29E-01	er = ss A? rmitted befo e <sup>*</sup>	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02	> Class A		
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02	gal contain e waste clas octivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 if life >5 yea nCi/g 1.29E-01 2.25E+00	er = ss A? rmitted befo e <sup>s</sup>	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02	> Class A		
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60 Ni-63	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 3.50E+00	gal contain e waste clas octivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 6 life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00	> Class A		
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60 Ni-63 Sr-90	85 When is th E.g, what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 3.50E+00 4.00E-02	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 if life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.86E-06	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02	> Class A 79.1	g hg per pa	
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60 Ni-63 Sr-90 Cs-137	85 When is th E.g, what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 3.50E+00 4.00E-02 1.00E+00	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 If life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04 3.22E-03	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.86E-06 5.51E-03	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02 7.45E+01	> Class A 79.1	g hg per pa	
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60 Ni-63 Sr-90 Cs-137 Nuclides w	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 3.50E+00 4.00E-02 1.00E+00 ith half life	gal contain e waste clas octivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 if life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04 3.22E-03 < 5 years	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.86E-06 5.51E-03	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02 7.45E+01	> Class A 79.1	g hg per pa	ackage
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-80 Ni-83 Sr-90 Cs-137 Nuclides w	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 3.50E+00 4.00E-02 1.00E+00 vith half life 7.00E+03	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 if life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04 3.22E-03 < 5 years 2.25E+01	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.86E-06 5.51E-03 8.46E-04	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02 7.45E+01 1.14E+01	> Class A 79.1	g hg per pa	ackage
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-80 Ni-83 Sr-90 Cs-137 Nuclides w	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 1.00E+00 ith half life 4 7.00E+03	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 If life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04 3.22E-03 < 5 years 2.25E+01	er = ss A? rmitted befo	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.80E-06 5.51E-03 8.46E-04	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02 7.45E+01 1.14E+01	> Class A 79.1	g hg per pa	
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60 Ni-63 Sr-90 Cs-137 Nuclides w	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 ters with ha 1.00E+02 4.00E+01 7.00E+02 1.00E+00 4.00E+00 0.00E+03	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 if life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04 3.22E-03 < 5 years 2.25E+01 * to approa	er = ss A? rmitted befo e*	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.80E-06 5.51E-03 8.46E-04 e limit	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02 7.45E+01 1.14E+01	> Class A 79.1	g hg per pa	
In an C-14 Ni-59 Nb-94 Tc-99 I-129 Alpha emit H-3 Co-60 Ni-63 Sr-90 Cs-137 Nuclides w	85 When is th E.g. what a Ci/m3 8.00E-01 2.20E+01 2.00E-02 3.00E-01 8.00E-03 tters with ha 1.00E+02 4.00E+01 7.00E+02 3.50E+00 4.00E+02 1.00E+03 vith half life < 7.00E+03	gal contain e waste clas ctivity is pe 2.57E-03 7.08E-02 6.43E-05 9.65E-04 2.57E-05 if life >5 yea nCi/g 1.29E-01 2.25E+00 1.13E-02 1.29E-04 3.22E-03 < 5 years 2.25E+01 * to approa	er = ss A? rmitted befo e* ars ars ch 1% of th 1.61E-02	0.32 pre Class A m3 Hg 2.75E-01 1.24E+01 1.11E-03 8.54E-02 1.59E+00 2.32E-06 4.94E-02 6.37E-04 5.86E-06 5.51E-03 8.46E-04 e limit	m3 is exceeded kg Hg 3.72E+03 1.67E+05 1.50E+01 1.15E+03 2.14E+04 3.14E-02 6.67E+02 8.60E+00 7.91E-02 7.45E+01 1.14E+01	> Class A 79.1	g hg per pa	

# All Hg together is a Class C waste

Class A limit for Sr-90 is exceeded at 79.1 g Hg

#### Conclusion

Science should drive selection of target!

 In the U.S., should mercury be selected as the target of choice, there is a path forward through the myriad regulations.



