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A 360 Degree Look at Commercial TENORM Management in the USA

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In the past couple of decades, management of TENORM in the USA for environmental and health and safety reasons has come to the forefront. New commercial disposal facilities have been licensed. Individual states within the country have begun to develop rules for importation, interstate movement, treatment and disposal of TENORM. There has been special emphasis on TENORM arising from the exploration, production and transport of oil and gas in oil-rich regions of the country. The Permian Basin in the State of Texas is the most prolific producer among those.

Until recently, TENORM disposal was limited to a few states that provided disposal of TENORM waste residues via injection wells. Very few companies operated and very few states allowed the operation of surface landfills for large components contaminated with TENORM. More recently, a number of surface landfills have been proposed for TENORM disposal and a couple have been permitted. The proliferation of landfills and injection wells has changed the landscape with respect to competitiveness and disposal costs and has given rise to the consideration of equity in the interstate transport of TENORM from oil and gas producing regions to non-producing regions. Needless to say, the interstate movement of TENORM waste products is fraught with political difficulties arising from the public's general aversion to anything that is radioactive.

In response to the public's concerns and the general awareness of TENORM in oil and gas production, regulatory authorities have begun to develop rules to regulate the transportation, management and disposal of TENORM. For historical and political reasons, TENORM arising from oil and gas exploration or production is not regulated at the federal level. No federal regulation prohibits the import or export of TENORM. Regulation of TENORM is left to the discretion of each of the fifty states in the union.

This paper will provide a historical basis for TENORM regulation in the USA and will consider the technical, commercial and sociopolitical aspects of the current regulatory regime. The authors recommendations for a coherent policy and rationale regulatory program are presented.

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