

**CLARIFICATION NUMBER CAO-00-068, REV. 1  
INDICATORS OF PROHIBITED ITEMS IN WASTE**

**ISSUE**

Is there a list of indicators that a radiography operator can use to determine if a container has such prohibited items as polychlorinated biphenyls (PCBs), pyrophorics, or explosives? B-4a(1) and B1-3b

**CONCLUSION**

There is not a comprehensive list of such indicators. However, a site should develop a list based on what they know to be in their waste. This list should be included in the training program for radiography operators.

**DISCUSSION**

Section B1-3b requires that radiography operators be trained to be familiar with the waste that the operator will be viewing. Training must include instruction "...in the specific waste generating practices, typical packaging configurations, and associated waste material parameters expected to be found in each Waste Matrix Code at the site". This includes potential prohibited items and indicators that such items are present. For example, electrical parts (ballasts, transformers, capacitors, etc.) known to contain PCBs that may be in the waste should be identified and included in the training program. If munitions could be in the waste, they should be identified as part of training. Such items can also be placed in a training drum.