

Radioactive Materials Unit Minnesota Department of Health 625 Robert Street North PO Box 64975 St. Paul, Minnesota 55164-0975

Date: March 23, 2007

To: General Licensees Possessing Tritium Exit Signs

From: Radioactive Materials Unit

Subject: Transfer and Disposal of Generally Licensed Tritium Exit Signs

Information Notice 2007-02

The Minnesota Department of Health (MDH) is issuing this Information Notice to reiterate the Minnesota requirements in 4731.3330 for general licensees regarding transfer and disposal of the tritium exit signs. It is the intent of the MDH to minimize the chances that tritium exit signs will be disposed of incorrectly and be disposed of in the nation's landfills or be sold on eBay or in other venues such as flea markets.

For the purposes of this Informational Notice, a "General Licensee" is used to describe an individual or entity that possesses a generally licensed device, such as a tritium exit sign. Although the general licensee does not need specific approval form Minnesota, the general licensee is responsible for understanding and following the applicable Minnesota regulations (i.e., 4731.3200 though 4731.3245). General licensees are also subject to a Minnesota inspection and enforcement activities, including issuance of civil penalties.

The relevant portions of the general license contained in 4731.3215 include requirements that general licensees must follow regarding the transfer or disposal of generally licensed devices, including tritium exit signs, which contain radioactive material.

In order for a general licensee to dispose of a device properly (i.e., when the device is no longer useful), the general licensee must transfer the generally licensed device to a specific licensee. Examples of specific licensee that would typically receive tritium exit signs when they are no longer useful include the manufacturer, distributor, licensed radioactive waste brokers, and licensed low level waste disposal facilities. These licensee often charge fees to receive such material, so possessors of tritium exit signs are advised to contact specific licensees and explore disposal options. Transfer to a specific licensee is the only authorized disposal method for generally licensed tritium exit signs. The requirements for transferring a generally licensed device to a specific licensee are found in 4731.3215.

The licensee shall within 30 days after the transfer of a device, furnish a report to:

Minnesota Department of Health Radioactive Materials Unit 625 North Robert Street P.O. Box 64975 St. Paul, Minnesota 55101

The report must contain:

- The identification of the device by:
 - o manufacturer's (or initial transferor's) name,
 - o model number, and
 - o serial number;
- The name, address, and license number of the person receiving the device; and
- The date of the transfer.

In addition, general licensees are also required by 4731.3215, to appoint an individual responsible for having knowledge of the appropriate regulations and requirements and the authority for taking required actions to comply with appropriate regulations and requirements. General licensees intending to transfer and dispose of tritium exit signs must comply with these requirements.