

January 11, 2013

PROCEDURE FOR HANDLING KR85 CONTAINING PRODUCTS

Background: KR85 is a radioactive material regulated by the NRC and the Georgia Department of Natural Resources, thus it requires special handling and special markings.

1. **Products:** The products that we currently stock that contains KR85 are:
 - A. All 2 pin CFL lamp
 - B. All Fluorescent starters
 - C. All ACCUARC lamps

The 2 pin CFL lamps will be transitioned to a RoHS compliant version by Q3 of 2013 and then will be removed from this list as they will no longer contain KR85. A complete list of these products will be maintained in the warehouse manager's office. This list will be updated once per quarter.

2. **Markings:** All KR85 containing products must have "Contains KR85" clearly marked on the outside carton as well as the individual lamp box or sleeve.
3. **Inspection:** All the products listed in point 1 above will be inspected when received to insure that they are marked properly with the KR85 marking.
 - A. If all are marked OK they can be put into stock and received in the system
 - B. If not marked OK a label will be created and put on the product with proper markings BEFORE products is put into stock and received in the system.
4. **Damaged product:** From time to time we have product in these categories that gets damaged, when that happens we must dispose of it properly. We currently use Waste Management Systems to dispose of these products if damaged or defective non working. When we find damaged or non working products we will do the following:
 - A. When product is discovered isolate it to the designated location in the warehouse. This is the same place we store damaged and defective Mercury containing products.
 - B. Contact Waste Management Systems for proper containers to dispose of the product.
 - C. Have WMS remove the product and recycle it where possible and dispose of what cannot be recycled.