

## Recent Comments From EPA on the K-65 Residues

Below are comments received from EPA Region II by DOE in a letter from William J. Muszynski (EPA Region II) to Paul D. Grimm (DOE-Headquarters) dated June 1993.

*While we are not opposed to the long-term on-site management of the NFSS wastes, we believe that long-term on-site management of the residues would be inappropriate.*

*The K-65 residues are similar in activity and half-life to transuranic waste, which is regulated under 40 CFR Part 191.*

*Specifically, radium-226 exhibits levels of activity at 100 to 1,000 times that of uranium mill tailings and is capable of generating dose rates in excess of 1,000 rem per year.*

*We request that the DOE provide a written commitment that the residues will be moved to a permitted high-level radioactive waste repository when such a facility becomes available.*

## Recent Comments From NYSDEC

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**Below are comments from the State of New York Department of Environmental Conservation received by DOE in a letter from Thomas C. Jorling (NYSDEC) to Hazel O'Leary (Secretary of Energy) dated September 28, 1993.**

*... the most applicable standards would be those of 40 CFR Part 191 requiring deep mine repository disposal and assurance of over 10,000 years of isolation from mankind.*

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## **Recent Comments From NY Health Department**

**Below are comments from the State of New York Health Department received by DOE in a letter from Mark R. Chassin (NY Health Department) to Hazel O'Leary (Secretary of Energy) dated August 3, 1993.**

*The activity of Ra-226 in the K-65 residues is 100 to 100,000 times higher than that found in uranium mill tailings subject to 40 CFR 192.*

*Disposal of these wastes in a deep geological repository is the only way to protect the public health and safety for a long period. The fact that DOE does not currently have an operational high level waste storage facility does not justify leaving these high activity residues at a site that does not meet the minimum requirements for protection of the public.*

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