

From: Mary Ziegler <mzi@mindspring.com>
To: Charles Cox <cxc5@nrc.gov>
Date: 02/27/2004 2:26:31 PM
Subject: Comments - Public Meeting Radiac

Hi Mr Cox,

As agreed at the end of the 2/20/04 public meeting about Radiac, I'm sending my comments to the committee because I didn't get to speak. Thank you and Ms. Federlein for holding the meeting, and reviewing our case and these comments. We feel this is an extremely relevant and important issue for New York City.

Mary Ziegler

Mary Ziegler
Neighbors Against Garbage
101 Kent Ave, Brooklyn, NY 11211

Comments: Public Meeting on Radiac, 2/20/04
To: Nuclear Regulatory Commission
Margaret Federlein, Chair

2/26/04

As a 17 year resident of Williamsburg, Brooklyn, in close proximity of Radiac, I speak for many neighbors as well as myself. We have always been concerned about accidental fire or explosion at the facility, but in the wake of 911 the fear has risen to new heights. People see Radiac as an easy terrorist target for 2 reasons:

1. The concentration of highly flammable toxic chemicals stored adjacent to radioactive waste, offers an easy means of dispersal for the radioactive material.
2. The other is the lack of security. The impossibility of protecting the facility at this location adds to the risk and increased likelihood of success in a terrorist attack.

In considering the safety of this facility we believe it's risk must be judged on Radiac's permitted potential. not on a snapshot of today's inventory. Below are reasons and examples that support the argument that Radiac is a threat to defense and security in this location.

- On Wednesday May 7, 2003, in the middle of the workday I climbed onto an adjacent rooftop and walked around Radiac's radioactive and chemical storage roofs for about an hour. The purpose was to take pictures of the surrounding area for the Arnold and Porter presentation. I was surprised to find that no one from the facility came to challenge me, stop me, or even inquire. I got up there via an adjacent backyard, but one could easily get onto a roof from a ladder from South 1st St. at night. Many roofs on these street are connected.

Once you're on one, you have access to them all. There is no security there.

- There is no buffer zone at street level for this facility. The only gated and buffered area is Radiac's office and parking lot. The rollup garage doors for both the radioactive and chemical storage are directly on the street. The radioactive storage door is on Kent Ave., a major truck thoroughfare. There is no practical way to give this a buffer, as that would involve blocking Kent Ave.
- There is no truck bar on either rollup garage door. This is the simplest security device used by many commercial businesses to prevent trucks from backing into a rollup gate, pushing it off it's tracks, and providing a hole in which to get into the garage. It's a large steel bar that's slid in front of the closed rollup door at bumper height. (For example, a food distributor across Kent Ave. from Radiac has these bars.) It is alarming that Radiac doesn't even have this basic security measure.
- While a neighbor was taking the picture of the open roll up door on South 1st St. (dated: fall '03, part of the Arnold and Porter presentation) he saw no one from Radiac present guarding the open door. No one from the facility came out to inquire.
- The small maneuvering room for trucks in that picture makes it easy to envision a collision with containers. The alternative is for trucks to unload on the sidewalk, leaving the facility wide open and even more vulnerable from passers by.
- The comparison of Radiac's risk as no better or worse than a hospital or research facility is false. Radiac's business as a collector and transfer station for both hazardous chemical and radioactive waste concentrates the materials of many facilities into one unprotectable site. This is where it differs, and this is where the increased risk lies.
- The release of radioactive material in any amount would cause widespread panic and economic harm within New York City.
- As far as I am aware, there is no emergency evacuation plan for this people in this area. Residents have not been given instructions as to what to do in case of emergency.

Thank you for your consideration in this vital matter,

Sincerely,
Mary Ziegler