



DEPARTMENT OF PUBLIC SERVICE
PUBLIC UTILITIES BUREAU

DONALD L. PLUSQUELLIC
Mayor

20-22
(58-FR-54071)

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CUSTOMER INQUIRIES:
375-2554

November 18, 1993

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Subject: Northeast Ohio Regional Sewer District
Petition for Rulemaking
Docket No. PRM-20-22

Gentlemen:

Based on the information provided in the October 20, 1993 Federal Register the City of Akron, Public Utilities Bureau fully supports the petitioner request (PRM-20-22) that the NRC amend its regulations as follows:

- 1.) All licensees provide at least 24 hours advance notice to the appropriate sewage treatment plant before releasing radioactive materials to the sanitary sewer
- 2.) NRC exempt materials that enter the sanitary waste stream from the requirements regarding commission approval for incineration under the NRC's current regulations
- 3.) NRC review the occurrence of unwanted radioactive material in sewage treatment plants

Detailed information on the City of Akron's concerns are provided on the attached Fact Sheet and Wastewater Discharge Disclosure Declaration.

Please provide the writer with the status of the petition. Thank you for the opportunity to comment.

Yours truly,

Patrick D. Gsellman
Patrick D. Gsellman
Industrial Pretreatment Engineer
Utilities Services Division

PDG/lag

Approval:

David L. Crandell
David L. Crandell, Manager
Public Utilities Bureau

Enclosure

cc: Erwin J. Odeal, NEORSD
L.A. Sowa, D.L. Crandell, W.C. Copeland
R.A. Monteith, F.M. DeBellis

AFTER 5 DAYS, RETURN TO
CITY OF AKRON
PUBLIC UTILITIES BUREAU
146 S. HIGH STREET
P.O. BOX 3665
AKRON, OHIO 44309-3665
Pretreatment

City of Akron
Public Utilities Bureau, Utilities Services Division
INDUSTRIAL PRETREATMENT PROGRAM

FACT SHEET
RADIOACTIVE MATERIALS

Approximately 24,000 facilities nationwide are licensed by the U.S. Nuclear Regulatory Commission (NRC) or State Governments to handle radioactive materials. These facilities are permitted by NRC to discharge up to one curie a year of soluble or readily dispersible material into a sanitary sewer. A concern has arisen with the advancement of municipal wastewater treatment (i.e. higher removal rates) of possible reconcentration or accumulation of radioactive materials in the treated sludge. This has the potential to effect the ultimate method of sludge disposal utilized by Publicly Owned Treatment Works (POTW).

Radioactive discharges to POTW's have caused sludge disposal problems in Ann Arbor, Michigan, from a University Research Reactor; in New York State from a smoke detector manufacturer; in Pennsylvania from a nuclear power plant laundry and in Washington D.C. area from a federal research facility. Also, as a result of the improper discharge of radioactive material to the sewer system in Cleveland, Ohio, low levels of radioactivity have been detected in the incinerator ash at the Northeast Ohio Regional Sewer District (NEORS), Southerly Facility.

Although the rate of exposure to radioactivity in the Southerly Facility incinerator ash is extremely low, with no threat to the health and safety of the surrounding community or employees (according to NRC), NEORS has initiated a very proactive action plan of investigation and monitoring.

The U.S. NRC has the responsibility to regulate and monitor the discharge of radioactive materials. POTW's must rely on the NRC to issue licenses and to prevent dumping of radioactive material.

The City of Akron is currently unaware of any problems in regard to radioactive materials adversely affecting the POTW or solids used in the manufacture of its compost. In order to remain proactive and maintain the integrity and high quality of its compost product and to insure safe incinerator ash disposal, the City has taken the following steps:

- 1) Obtained a list of all licenses from NRC in the sewer service area;
- 2) Initiated a preliminary screening of licensees in regard to licensed materials, uses and disposal practices;
- 3) Currently investigating the availability, cost and need of various testing devices and instrumentation to monitor radioactivity.

The City's investigation is being conducted by its Industrial Pretreatment Program. The Program's authority is derived from Chapter 50 of the Code of Ordinances of the City of Akron, Ohio 1985, as amended in 1991. Section 50.44 (A and C) specifically states that the objectives of the Sewer Use, Industrial Pretreatment Code are as follows:

"To prevent the introduction of pollutants into the city's wastewater system which will interfere with normal operation of the system, safety of the employees or contaminate the resulting municipal sludge;"

"To improve the opportunity to recycle and reclaim wastewater and sludge from the system;"

Also, applicable general discharge prohibitions include section 50.46 parts A, P, S and T.

Any questions or concerns on this "Fact Sheet" should be forwarded to the City of Akron, Industrial Pretreatment Program, 146 S. High Street, P.O. Box 3665, Akron, Ohio 44309 or call at (216) 375-2232. This fact sheet has been prepared at the request of the Water Pollution Control Division by the Industrial Pretreatment Staff of the Utilities Services Division, Public Utilities Bureau of the City of Akron.

Information Sources:

- (1) Sludge Newsletter, September 25, 1991 (pg. 157-158)
- (2) NEORS Pipeline, Vol. 8, No. 3 Special Edition
- (3) U.S. Nuclear Regulatory Commission, NRC Licensees, Division of Industrial and Medical Nuclear Safety, February 11, 1993.

INDUSTRIAL PRETREATMENT PROGRAM
WASTEWATER DISCHARGE DISCLOSURE DECLARATION (WDDD)
(Radioactive Materials, Short Form)

Please return completed form to:

City of Akron
Public Utilities Bureau
P.O. Box 3665
146 S. High Street
Akron, OH 44309-3665
Attn: Industrial Pretreatment Engineer
(216) 375-2232

1. Company Name: _____
Mailing Address: _____
Address of Premises: _____
Person to Contact: _____
Title: _____
Telephone Number: _____
2. Standard Industrial Classification Code(s): _____

3. Description of manufacturing, business or service activity on premises:

4. Does this facility have an active U.S. Nuclear Regulatory Commission (NRC) License for the use of radioactive material? ☐ YES ☐ NO

If yes, describe the licensed materials, their uses and disposal practices:

5. Does this facility have a license with the State of Ohio, Department of Health in regard to radioactive material (including NARM materials)? ☐ YES ☐ NO

If yes, describe the licensed materials, their uses and disposal practices:

6. Does this facility have any discharge of radioactive material or waste to the sanitary sewer system? ☐ YES ☐ NO

If yes, describe the material and/or waste being discharged including characteristics and quantity:

7. Is a Spill Prevention Control and Countermeasure Plan and/or a Slug Control Plan in effect for radioactive material for this facility? ☐ YES ☐ NO

8. Industry Comments:

The information contained in this application is familiar to me and to the best of my knowledge and belief, such information is true, complete, and accurate.

Name of Signing Official

Signature

Title

Date