



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF ENVIRONMENTAL QUALITY

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Jill Lipoti, Ph.D., Assistant Director
Radiation Protection Programs

May 28, 1991

Mr. John D. Kinneman, Chief
U.S. Nuclear Regulatory Commission
Region I, Nuclear Materials Safety Section B
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Kinneman,

I am writing to inquire about disposal plans for the monazite pile at Heritage Minerals, Inc. (HMI). In addition, I wish to reemphasize our concerns about NRC licensed radioactive material at the HMI site.

In a letter dated February 28, 1991, HMI presented a proposal to the NRC for the on-site disposal of 695 cubic yards of monazite material. This proposal entailed "returning the 695 cubic yards of monazite material to the 102,500 cubic yards of host material from which it was derived." Since such an action might impact future state cleanup programs, we would appreciate the opportunity to provide our comments and concerns regarding disposal options.

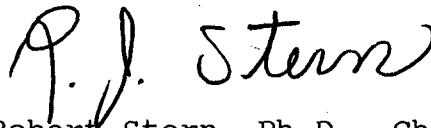
On a related matter there are, as you know, lingering health and safety uncertainties regarding acceptable radium and thorium levels in soil for areas to be released for unrestricted use. Therefore we recommend, as part of the HMI disposal option assessment process, that the NRC prepare an Environmental Assessment (EA) covering this disposal option. Our review of this document would provide a mechanism to address federal environmental requirements as well as satisfy our potential concerns. I would be happy to discuss the preparation of such a document to ensure that all issues are addressed.

We are also concerned about the timing of the implementation of an approved disposal plan at HMI. If other areas on site are in need of remediation, we would prefer that all disposal or cleanup actions occur at one time, rather than in a segmented fashion. To avoid segmentation of remediation activities, we recommend the preparation of a comprehensive EA prior to the approval of any disposal plan.

Finally, after a visit to the HMI site in March, we documented concerns regarding controls on the monazite pile as well as the presence of radioactive materials near the dry mill. Please update us on any changes implemented at the site as a result of our March 20, 1991 letter to you.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "R. J. Stern".

Robert Stern, Ph.D., Chief
Bureau of Environmental Radiation

c: Ronald R. Bellamy, NRC
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