

**From:** Elizabeth Ullrich  
**Sent:** Wednesday, June 03, 2009 6:54 AM  
**To:** Vincent Williams  
**Subject:** incinerator documentation

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Control No. 143753  
Merck Research Laboratories/Merck and Company

Vince,

I am reviewing the May 21 letter with the documentation, "Final Status Survey Report, Merck Waste Incinerator" for release of the incinerator. There following issues require more detail.

1. In Section 1.0, on page 4, it states that observations were of the readily visible, accessible areas only. In Section 5.0 on page 12, it also states that surveys were only of all accessible areas. Please describe the areas that were not accessible, and the relative fraction of accessible areas to inaccessible areas.

2. In Section 5.0 on page 15, under "Background Determination", there is a description of obtaining a background measurement in areas where refractory is present. I am confused by the description and do not understand how the background measurement was taken and how it was determined to be representative. Please provide more detail in how the measurement was made, what the background measurement(s) was (were) and the locations where the refractory background was applicable. I did see in Appendix F that the background in the Burn Chamber, the Bottom Ash Rake, the Horizontal Ventilation, and the Quench Tank were significantly higher than the other areas, but only expected that refractory would be present in the burn chamber. Also, provide the MDA for static and scan measurements in these areas of elevated background.

Please respond by regular mail to these questions. Contact me if you need to discuss them prior to submitting your response.

Thanks,

Betsy  
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