

Law Office of Steven J. Rando, L.L.C.

TRIAL ATTORNEY

3530 CANAL STREET
NEW ORLEANS, LOUISIANA 70119

TELEPHONE
504-486-7122

CASE NO: NRC-2019-000345
DATE REC'D: 06/20/2019

FAX
504-486-7102

June 20, 2019

US Nuclear Regulatory Commission
Washington, DC 20555-0001

REQUEST BY EMAIL: FOIA.resource@nrc.gov
Phone 301-415-7169

**FREEDOM OF INFORMATION ACT REQUEST
UNDER THE PRIVACY ACT (PA) OF 1974, TITLE 5,
SECTION 552 (a)**

To whom it may concern:

I am an attorney working with a group of lawyers who have filed a Petition for Damages and a request for class action certification concerning "Radiation Contaminated Soil found in the 3400 Block of Lowerline Street near the intersection of Lowerline and Coolidge Streets in New Orleans, Louisiana."

My name is Steven J. Rando, Law Offices of Steven J. Rando, LLC. 3530 Canal Street, New Orleans, Louisiana 70119. My

date of birth is (b)(6) My firm tax id number is (b)(6)
(b)(6). My request is to obtain information concerning the public health safety and well being of citizens of New Orleans with the epicenter of the hazardous condition in Gert Town as more specifically described herein.

Radium 226, a hazardous radiation, has been not only detected but has been actually disturbed by the City of New Orleans and ARS Aleut Remediation, LLC. The Petition for Damages bears Civil District Court number 2019-6195 Div. "A".

Concerned citizens including but not limited to the named plaintiffs, Eric Lassair, Patricia Lassair and Telejacks and Things, Inc. are represented by this office and request information under the Freedom of Information Act.

A prior public records request has been made in Louisiana for the following:

Public Records Request: 43422

Any and all documents in the possession of LDEQ regarding the presence of Radium-226 and other radioactive materials in the subsurface soil located at or near Lowerline, Coolidge and Edinburg Streets in New Orleans, Louisiana, including but not limited to the following: communications with the City of New Orleans; communications with the U.S. Environmental Protection Agency; requests for proposal and bids from any remediation contractors including ARS Aleut Remediation, LLC; any actions the City or government entities took to warn

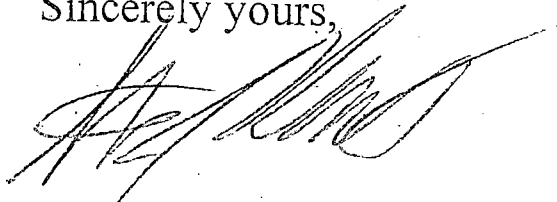
and/or to protect Plaintiffs, other residents or other business owners of the presence of soil contamination and the risk of exposure to Radium-226 and radiation; any and all documents related to the remediation of the soil in the 3400 block of Lowerline Street and the area near the former Thompson-Haywood Chemical Company; any communications with any principal responsible parties who may have placed the contaminants in the soil; any documents that identify the geographic area where the City distributed the "Construction Notice" and "Frequently Asked Questions" documents on or about May 18, 2019; any documents that set forth when and how the City and LDEQ first learned about the presence of Radium-226 and other radioactive materials in the subsurface soil located at or near Lowerline, Coolidge and Edinburg Streets in New Orleans, Louisiana; any and all documents that identify the contaminants identified in the soil in the 3400 block of Lowerline Street and the area near the former Thompson-Haywood Chemical Company; any documents that identify any companies who obtained business permits from the City and LDEQ to remediate radioactive materials in the 3400 block of Lowerline Street and the area near the former Thompson-Haywood Chemical Company; any and all documents that set forth land use restrictions for the former Thompson-Haywood Superfund site in New Orleans, Louisiana.

Please allow this document to serve as a formal public records request for not only any documents held by the U.S. Nuclear Regulation Commission related to the above request for information but also for:

“ANY DOCUMENTS RELATED TO RADIATION, OR CONTAMINATED SOIL, HEALTH RISK ASSESSMENT, NUCLEAR TESTING RESULTS, AND OR ANY RELATED DOCUMENT RELATIVE TO THE RADIATION LOCATED IN NEW ORLEANS IN GERT TOWN, 3400 BLOCK of LOWERLINE OR THE FORMER THOMPSON-HAYWOOD SUPERFUND SITE, DEATHS, CANCER, AND THE SOURCE OF THE RADIATION, OF PARTICULAR INTEREST IS THE STATEMENT BY THE CITY THAT THE RADIATION IS OF UNKNOWN ORIGIN.”

Please contact this office to discuss any deficiencies with this request or any processing fees associated with this request.

Sincerely yours,



Steven J. Rando
Attorney at Law
on behalf of
Gert Town Radiation

See attached ROAD WORK / Construction Notice documenting the Radiation and the City of New Orleans statement that same is of unknown origin.