



SECRET NUMBER
PROPOSED RULE **PR 20**
(59 FR 9146)

Metropolitan Waste Control Commission

Mears Park Centre, 230 East Fifth Street, St. Paul, Minnesota 55101-1633

June 16, 1994

612 222-8423

The Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Docketing and Service Branch

94 JUN 20 10 23

70

Re: February 25, 1994 Federal Register Advance Notice of Proposed Rulemaking. "Disposal Of Radioactive Material By Release Into Sanitary Sewer Systems"

Dear Secretary of the Commission:

This letter is in response to the advance notice of proposed rulemaking. I have spoken with Dr. George Powers (NRC) recently, he stated that comments may still be submitted.

Dr. Powers also stated that he had received comments from the Association of Metropolitan Sewerage Agencies (AMSA). Although these comments were discussed only briefly, the Metropolitan Waste Control Commission (MWCC) believes that AMSA has raised some valid concerns.

Enclosed are two fact sheets regarding the MWCC and the Industrial Waste Division of the MWCC. These fact sheets should help you understand the scope of our organization.

MWCC comments are as follows:

1. The NRC should consider exposure to collection system workers, in addition to wastewater treatment plant (WWTP) personnel and overall environmental issues.
2. Due to the variability, the NRC should consider the size and methods of treatment utilized by a WWTP, when considering the allowable quantity of radioactive wastes discharged.
3. The NRC should consider whether there are multiple NRC license holders discharging to individual WWTP's. It may suffice to keep track of license holders by community.
4. The NRC should consider all "releases" from WWTP's (not just the normal sludges) such as: screenings, grit, ash, and any other residual material generated at a WWTP.
5. In terms of the type or method of deriving a limit, the most appropriate approach would be to evaluate all scenarios of exposure, and choose the most conservative limit in terms of protecting human health and the environment. As far as determining the actual numerical limits, the MWCC has relied on the NRC to establish minimal federal limits. The MWCC would however, like to have the authority to establish more stringent local limits, if warranted.

9406220273 940616
PDR PR
20 59FR9146 PDR

Equal Opportunity/Affirmative Action Employer



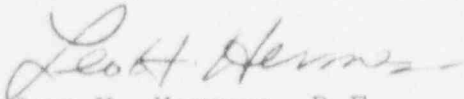
DS10

Page 2,
U.S. Nuclear Regulatory Commission
June 16, 1994

6. Regarding radioactive materials within human waste, the February 25, 1994 Federal Register indicated that the Pacific Northwest Lab study did not address these wastes. The federal register did not indicate whether these types of wastes had been evaluated before. If the NRC is aware of all types, and amounts, of radioactive materials being used in this manner, then the MWCC (at this time) will rely on the judgement of the NRC to evaluate the fate of these wastes. The fact that radioactive materials are being used for diagnostic or therapeutic purposes is not reason enough to go without a thorough evaluation.
7. Another issue, not necessarily raised in the federal register, deals with reporting and sampling by NRC license holders. As a condition of holding a NRC license, licensees should take and analyze samples, then report these findings to the NRC. A report should also indicate how much radioactive waste was discharged, based on calculations or logs. This information could then be checked against the monitoring results. This information should be readily available to the respective WWTP operator.
8. There is another issue that may be of interest, and warrants consideration; and that is the possibility that a community's wastewater collection system is not 100% watertight. In other words, there may be the possibility that a small percentage of the wastewater, flowing through the sewer lines, is going into the ground, before arriving at the WWTP.

The MWCC appreciates having the opportunity to comment on these issues. If the MWCC can be of assistance in the future, or if you have any questions related to these comments, please phone Peter Berglund at (612) 772-7008.

Sincerely,



Leo H. Hermes, P.E.
Industrial Waste Manager
MWCC Industrial Waste Division

LHH/PAB

enclosures

cc: Peter Berglund, MWCC

FACT SHEET



CONTACT: Jeff Syme
(612) 229-2109

METROPOLITAN WASTE CONTROL COMMISSION

1. The Metropolitan Waste Control Commission was established by the Minnesota Legislature in 1969 to manage wastewater in the Twin Cities metropolitan area, to protect the public health and environment.
2. The MWCC owns and operates the wastewater treatment system in the metropolitan area and treats approximately 300 million gallons of wastewater every day from 105 area communities. The system includes 10 treatment plants and more than 500 miles of interceptor sewers (sewers shared by two or more communities that convey sewage from the communities to MWCC's plants for treatment). MWCC's largest facility, the Metro Plant, treats approximately half of the wastewater generated in Minnesota. The MWCC is also responsible for construction and maintenance within the regional system.
3. The MWCC has about 1,200 employees and an annual operating budget of \$152.5 million in 1993. The average household in the metro area generates about 80,000 gallons of wastewater each year and is charged less than \$100 annually by the MWCC for treatment.
4. The MWCC has a 20-year Implementation Plan that is updated every two years. The Implementation Plan, describing the agency's goals, projections and strategies to meet future needs, is approved by the Metropolitan Council, the long-range planning and coordinating agency for the metropolitan area.
5. A nine-member Board of Commissioners is responsible for policymaking at the MWCC. The chair is appointed by the governor and eight commissioners are appointed to four-year terms by the Metropolitan Council. Commission meetings, which occur several times each month, are open to the public. Day-to-day operations are administered by the MWCC staff, headed by the chief administrator.
6. To track the effectiveness of its treatment programs, the MWCC conducts 200,000 environmental laboratory tests every year, sampling air quality, raw sewage, groundwater and receiving waters. In 1992, MWCC achieved 99.8 percent compliance with all federal and state water quality regulations.
7. The U.S. Department of Energy presented MWCC with a Special Recognition Award for Energy Innovation for a solids processing/energy recovery system that is saving area residents \$4 million annually.
8. Every year, the MWCC receives awards for outstanding plant performance from the Minnesota Pollution Control Agency and the national Association of Metropolitan Sewerage Agencies. In 1991, the U.S. Environmental Protection Agency presented MWCC its Award of Excellence for Beneficial Use of Sludge for MWCC's NutraLime ash-recycling program. In 1992, MWCC was presented an Award of Excellence from the National Environmental Awards Council, representing 28 leading environmental organizations, also for the NutraLime ash-recycling program.

JDS/sgk
08/01/93



FACT SHEET



Contact: Jeff Syme
(612) 229-2109

INDUSTRIAL WASTE DIVISION

1. The Industrial Waste Division is a division of the Quality Control Department of the Metropolitan Waste Control Commission (MWCC). This division controls and regulates industrial discharges to the sewer system to ensure compliance with local and federal regulations. The division also responds to sewer related spills and community sewer problems.
2. Division staff issue Industrial Discharge Permits to industrial users of the Metropolitan Disposal System (public sanitary sewers). Currently, more than 800 permits are in effect.
3. Each permittee is required to engage in self-monitoring and report to the Industrial Waste Division on a routine basis. These reports are one means of determining permit compliance with the MWCC Waste Discharge Rules.
4. Another means of determining compliance involves monitoring by the Industrial Waste Division, which uses specialized equipment (automatic samplers, flow meters, pH recorders). The U.S. Environmental Protection Agency (EPA) now requires the MWCC to inspect and monitor significant industrial users at least once per year. The samples obtained are analyzed by the Laboratory Services Division of the Quality Control Department. MWCC's laboratory performs approximately 16,000 analyses per year for the Industrial Waste Division.
5. The Industrial Waste Division also regulates liquid waste haulers (septage pumpers). About 40 liquid waste haulers are permitted to dispose of household septage, commercial and certain industrial wastes in the sewer system. Another special program regulates discharges of leachate and contaminated groundwater. More than 140 special permits are in effect for these sources, which often result from remedial actions related to underground tank or pipeline leaks or disposal site cleanups.
6. Another important task of the Industrial Waste Division is responding to spills, accidental discharges and other problems which may adversely affect MWCC facilities or the sewer system. Examples include chemical spills, transportation accidents (tank truck or railcar releases), industrial fires (toxic fire-fighting water can result), underground tank/pipeline leaks, and various sewer blockage or damage problems. The Industrial Waste Division conducts about 60 such response actions of various types each year.
7. The Industrial Waste Division is actively involved in promoting "pollution prevention" among industrial users. Pollution prevention involves preventing the generation of waste which then requires disposal. MWCC received an EPA grant for this purpose, and activities include workshops, on-site technical assistance, referrals and interagency coordination.

- over -

