

# STEPAN CHEMICAL COMPANY



100 WEST HUNTER AVE., MAYWOOD, N. J. 07607

DONALD H. FRANCIS  
VICE, PRESIDENT & GENERAL MANAGER

Telephone  
(212) 524-0731  
(201) 342-2020

Cable Address  
SCHAEFER MAYWOOD, N. J.

November 29, 1967

United States Atomic Energy Commission  
Division of Compliance  
Region 1  
376 Hudson Street  
New York, New York 10004

Attention: Mr. Robert W. Kirkman, Director  
Region 1 Division of Compliance

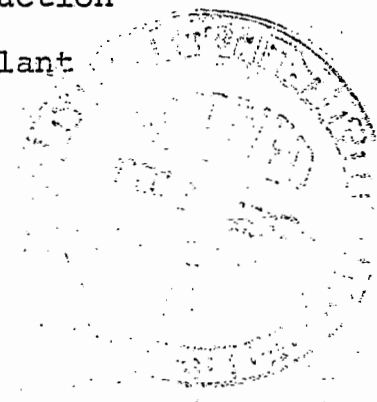
Gentlemen:

Your letter of November 21, 1967 stating that activities were carried out by us under our AEC license, STC-130, which appear to be in noncompliance with AEC regulations or license requirements, has been received.

As was related by our E. A. Swanson (Director of Production and Engineering) to Mr. N. M. Shopenn, AEC Compliance Inspector, during the occasion of his visits to our plant in Maywood on October 18th and November 2, 1967,

- (a) In the early part of 1966 Thorium processing buildings were decontaminated and dismantled and
- (b) In November and December, 1966, and July and August, 1967, the Thorium waste sludge stored above ground for many years at the west end of our property was relocated, underground, at two other adjacent sites, still on our property.

Regarding your notification of items of noncompliance, the decontamination and disposal (including some incineration) of the Thorium process buildings was done in conjunction with and with complete approval of Mr. John Russo of the Radiological Health Program of the New Jersey State Department of Health. Complete and adequate records of surveys, radiation monitoring and disposal were made before, during and after demolition and disposal. Prior to starting the demolition a radiation survey of the interior building, floors, walls, etc.



United States Atomic Energy Commission  
November 29, 1967  
Page 2

was made by Tracerlab, Inc., Waltham, Massachusetts. The entire area of the Thorium processing buildings was restricted to a limited number of employees. All wore Film Badges which were monitored by Tracerlab, Inc. All of these records are available. The incineration of some Thorium contaminated timbers was carried out at the suggestion of Mr. John Russo of the Radiological Health Program of the New Jersey State Department of Health.

Our AEC license, No. STC-130, permits the storage of radioactive material on our property. In November and December, 1966, and July and August, 1967, the Thorium waste sludge stored above ground at the west end of our property was relocated underground. The AEC was not notified regarding this relocation as this was not considered by us to be disposal but merely relocation of the storage of this material. The present underground storage of the waste sludge material is now considered by us to be completely safe, considerably more so than the previous above ground storage which had concerned AEC in past inspections, thereby completely eliminating any hazard that had existed. As much as 4 ft. of cover (uncontaminated, background soil) has been used in the final grade of the two storage sites. Both areas have been exactly located in our records including the amount of material stored. These records are available.

During the transfer of the waste material from the above ground storage area to the two underground storage areas, numerous radiation checks were made to be certain that no material remained at the old above ground area with a radiation of more than 0.2 MR's per hour. Actually many cubic yards of marginal material, less than 0.2 MR's per hour, were also moved just to be "extra certain". Radiation surveys have been made of both the former above ground and the new underground storage areas to ensure that they are completely safe. The old storage area has been completely filled in and graded and is now suitable for occupancy.

We wish to point out that we no longer are in nor do we intend to get back into any business involving Thorium or any radioactive chemicals but feel that the AEC should continue our AEC license STC-130 to cover this safer storage of our Thorium waste.

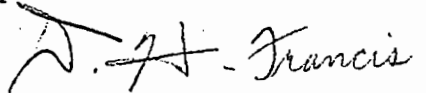
I might add that we are both surprised and embarrassed that the AEC feels that we have violated our license - when the sole purpose for our considerable expenditure was to provide a safe and permanent solution for our radioactive waste storage problem.

United States Atomic Energy Commission  
November 29, 1967  
Page 3

If you have need for further information that will help in the final evaluation of these matters, we would be pleased to meet with you either here or at your office.

Very truly yours,

STEPAN CHEMICAL COMPANY  
Maywood Division

A handwritten signature in cursive script that reads "D. H. Francis".

Donald H. Francis  
Vice President & General Manager

DHF/taf