

Bechtel

Interoffice Memorandum

To M. E. Kaye File No. 145/7000
Subject Review of New York Regulations for BWW Date January 10, 1991
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of FUSRAP
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The following information is a summary of a review of New York regulations which apply to the operations at the Baker and Williams Warehouses Site.

Waste Classification

The BWW wastes are considered to be solid, low-level radioactive wastes, but not hazardous wastes, by NY state. U.S. Department of Transportation regulations consider the BWW wastes to be hazardous substances.

Ionizing radiation and airborne contaminants

Applicable standards for permissible occupational doses and concentrations for airborne radioactive materials can be found in NY regulations issued by the Department of Labor.

Transportation

Under NY regulations a LLRW manifest and transport permit must accompany all LLRW shipments while in transit into, through, or within NY unless an exemption is granted. An exemption may be granted if the NY State Department of Environmental Conservation and the NY State Department of Health determine the LLRW transport cannot impose a potential significant adverse impact human health and the environment.

A LLRW transport permit cannot be issued unless the receiving facility is authorized or licensed, under the laws and regulations of either the federal government or the state in which the facility is located, to accept LLRW for treatment, storage, or disposal.

NY regulations prohibit transporters of LLRW to use several bridges and tunnels (See attached map, restricted facilities are highlighted). The transporter may use all of the marked facilities, except the George Washington Bridge Lower Level, if three criteria are met.



- 2
- (1) The facility is a component of a route selected by the carrier to minimize radiological risk in accordance with the U.S.D.O.T. regulations.
 - (2) The shipment complies with all packaging, labeling, placarding, quantity limitations, and other applicable U.S.D.O.T. requirements.
 - (3) The carrier has proof of financial responsibility in the amounts required by federal regulations.

No regulations have been found restricting use of the George Washington Bridge Upper Level.

U.S.D.O.T. regulations require the BWV wastes to be placarded for transport.

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