

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:17 PM
To: Thornton, Marisa
Subject: Fw: how are registration #s looking for Denver hearing?

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:01 PM
To: Collections.SubW
Subject: FW: how are registration #s looking for Denver hearing?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Trulove-Cranor, Whitney
Sent: Tuesday, August 12, 2014 1:29 PM
To: Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique
Subject: how are registration #s looking for Denver hearing?

I know registration is open for another 10 days but wondering how many people have registered to date.

Thanks, Whitney

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:17 PM
To: Thornton, Marisa
Subject: Fw: how are registration #s looking for Denver hearing?

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:01 PM
To: Collections.SubW
Subject: FW: how are registration #s looking for Denver hearing?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Rosnick, Reid
Sent: Wednesday, August 13, 2014 6:50 AM
To: Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; lee-Ann_Tracy@sra.com
Subject: RE: how are registration #s looking for Denver hearing?

Hi Whitney,

I took a look at the registration site, and it appears that we have 89 people registered for September 3, and 48 registered for September 4. I have also copied our contractor so that she can either correct me or add the number of speakers to my tally.

Reid

From: Trulove-Cranor, Whitney
Sent: Tuesday, August 12, 2014 1:29 PM
To: Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique
Subject: how are registration #s looking for Denver hearing?

I know registration is open for another 10 days but wondering how many people have registered to date.

Thanks, Whitney

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:17 PM
To: Thornton, Marisa
Subject: Fw: how are registration #s looking for Denver hearing?

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:01 PM
To: Collections.SubW
Subject: FW: how are registration #s looking for Denver hearing?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Tracy, Lee-Ann [mailto:Lee-Ann_Tracy@sra.com]
Sent: Wednesday, August 13, 2014 9:41 AM
To: Rosnick, Reid; Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; Apostolico, Mary
Subject: RE: how are registration #s looking for Denver hearing?

Not sure how you are getting 89 people, as only a total of 50 tickets have been distributed.

Here's what I show:

13 people are attending 9/3/14 9AM-12PM (6 speakers)
11 people are attending 9/3/14 1-4 PM (1 speaker)
12 people are attending 9/4/14 9AM-12PM (3 speakers)
14 people are attending 9/4/14 1-4 PM (2 speakers)

There are a total of 50 attendees with 12 total speakers. Note that there are actually not 50 different people attending because most people are attending more than one session. There are actually only 19 unique people attending, of which 12 are speaking. Let me know if that doesn't make sense.

Thanks,
Lee-Ann Tracy
SRA International, Inc.
3434 Washington Boulevard
Arlington, VA 22201
703.284.5056

Please consider the environment before printing this email or any attachments.

This electronic message transmission contains information from SRA International, Inc. which may be confidential, privileged or proprietary. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is strictly prohibited. If you have received this electronic information in error, please notify us immediately by telephone at 866-584-2143.

From: Rosnick, Reid [<mailto:Rosnick.Reid@epa.gov>]
Sent: Wednesday, August 13, 2014 6:50 AM
To: Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; Tracy, Lee-Ann
Subject: RE: how are registration #s looking for Denver hearing?

Hi Whitney,

I took a look at the registration site, and it appears that we have 89 people registered for September 3, and 48 registered for September 4. I have also copied our contractor so that she can either correct me or add the number of speakers to my tally.

Reid

From: Trulove-Cranor, Whitney
Sent: Tuesday, August 12, 2014 1:29 PM
To: Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique
Subject: how are registration #s looking for Denver hearing?

I know registration is open for another 10 days but wondering how many people have registered to date.

Thanks, Whitney

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:18 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-328207361-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:01 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Friday, August 15, 2014 2:26 AM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Becky English
beckyrep@gmail.com
Order #328207361


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Becky, this is your registration confirmation for Subpart W Public Hearings



Organized by [U.S. Environmental Protection Agency](#)



Registration summary


Mobile Summary


Paper Summary

Open the email attachment
or [download here](#)

Message from [U.S. Environmental Protection Agency](#)

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 14, 2014

Order #: 328207361

Name	Type	Quantity
Becky English	Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons	1

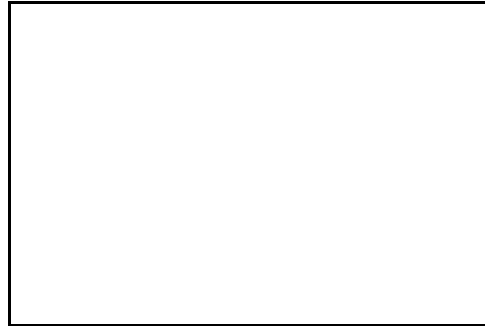
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)



About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address
819 S. Williams St

Who are you representing?
Sierra Club

Do you wish to speak at one of the sessions?
Yes

At which of the following sessions would you like to speak? You may select only one.
September 4 1:00 PM - 4:00 PM MDT

What time do you intend to arrive to speak?
3:30 pm



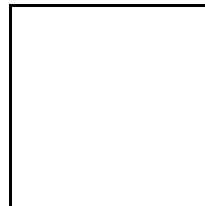
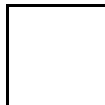
Your Account

[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)



Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--




This email was sent to beckyrep@gmail.com.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

328207361414955341001 	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #328207361. Ordered by Becky English on August 14, 2014 11:24 PM		
	Type Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



328207361414955341001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:18 PM
To: Thornton, Marisa
Subject: Fw: Subpart W Public Hearing

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:01 PM
To: Collections.SubW
Subject: FW: Subpart W Public Hearing

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Darrell Liles [mailto:dliles@senesusa.com]
Sent: Wednesday, August 13, 2014 12:05 PM
To: Nesky, Anthony; Rosnick, Reid
Subject: Subpart W Public Hearing

Hey Tony and Reid

I just left Tony a jumbled voice message on this . Will there be any equipment available if we want to give a presentation at the Subpart W Hearing in Denver on Sept 3rd and 4th. We would like to bring a USB drive with presentations (Doug Chambers , Steve Brown and myself).

Thanks

Darrell Liles, CHP, PE
Senior Health Physicist



ARCADIS-SENE
8310 South Valley Highway Suite 135
Englewood, Colorado, 80112
email: dliles@senesusa.com
phone: (720)961-0953
cell: (303)717-3257

Web Site: <http://www.senes.ca/>

This transmission is intended only for the addressee and may contain PRIVILEGED or CONFIDENTIAL information. Any unauthorized disclosure, use or retention is strictly prohibited. SENES does not accept liability for any errors, omissions, corruption or virus in contents or attachments. Information is provided for use "as is" by the addressee. Revised documents must not be represented as SENES work product, without express, written permission of a SENES Director.

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:18 PM
To: Thornton, Marisa
Subject: Fw: how are registration #s looking for Denver hearing?

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:00 PM
To: Collections.SubW
Subject: FW: how are registration #s looking for Denver hearing?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Trulove-Cranor, Whitney
Sent: Friday, August 15, 2014 1:04 PM
To: lee-Ann_Tracy@sra.com; Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique; Apostolico, Mary
Subject: RE: how are registration #s looking for Denver hearing?

Thanks for sharing this info. Whitney

From: Tracy, Lee-Ann [mailto:Lee-Ann_Tracy@sra.com]
Sent: Wednesday, August 13, 2014 7:41 AM
To: Rosnick, Reid; Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; Apostolico, Mary
Subject: RE: how are registration #s looking for Denver hearing?

Not sure how you are getting 89 people, as only a total of 50 tickets have been distributed.

Here's what I show:

13 people are attending 9/3/14 9AM-12PM (6 speakers)
11 people are attending 9/3/14 1-4 PM (1 speaker)
12 people are attending 9/4/14 9AM-12PM (3 speakers)
14 people are attending 9/4/14 1-4 PM (2 speakers)

There are a total of 50 attendees with 12 total speakers. Note that there are actually not 50 different people attending because most people are attending more than one session. There are actually only 19 unique people attending, of which 12 are speaking. Let me know if that doesn't make sense.

Thanks,
Lee-Ann Tracy
SRA International, Inc.

3434 Washington Boulevard
Arlington, VA 22201
703.284.5056

Please consider the environment before printing this email or any attachments.

This electronic message transmission contains information from SRA International, Inc. which may be confidential, privileged or proprietary. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is strictly prohibited. If you have received this electronic information in error, please notify us immediately by telephone at 866-584-2143.

From: Rosnick, Reid [<mailto:Rosnick.Reid@epa.gov>]
Sent: Wednesday, August 13, 2014 6:50 AM
To: Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; Tracy, Lee-Ann
Subject: RE: how are registration #s looking for Denver hearing?

Hi Whitney,

I took a look at the registration site, and it appears that we have 89 people registered for September 3, and 48 registered for September 4. I have also copied our contractor so that she can either correct me or add the number of speakers to my tally.

Reid

From: Trulove-Cranor, Whitney
Sent: Tuesday, August 12, 2014 1:29 PM
To: Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique
Subject: how are registration #s looking for Denver hearing?

I know registration is open for another 10 days but wondering how many people have registered to date.

Thanks, Whitney

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:18 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-328741619-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:00 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Saturday, August 16, 2014 11:38 AM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Joan Seeman
Joanseem@msn.com
Order #328741619




Cheers!
Eventbrite




P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Joan, this is your registration confirmation for **Subpart W Public Hearings**

Organized by U.S. Environmental Protection Agency

Registration summary

 **Mobile Summary**   **Paper Summary**

Open the email attachment or [download here](#)

Message from **U.S. Environmental Protection Agency**

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 16, 2014

Order #: 328741619

Name	Type	Quantity
Joan Seeman	Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons	1

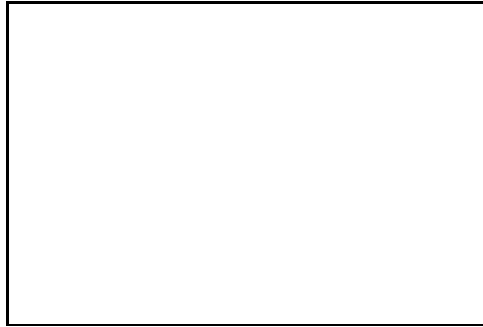
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)



About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address

6654 S. Buffalo Dr. Littleton, CO

Who are you representing?

Sierra Club

Do you wish to speak at one of the sessions?

Yes

At which of the following sessions would you like to speak? You may select only one.

September 4 1:00 PM - 4:00 PM MDT

What time do you intend to arrive to speak?

3:30 pm



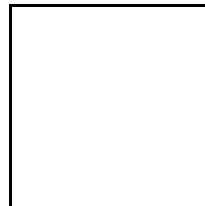
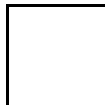
Your Account

[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)



Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--




This email was sent to joanseem@msn.com.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

 328741619415679167001	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #328741619. Ordered by Joan Seeman on August 16, 2014 8:31 AM		
	Type Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



328741619415679167001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:19 PM
To: Thornton, Marisa
Subject: Fw: how are registration #s looking for Denver hearing?

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:00 PM
To: Collections.SubW
Subject: FW: how are registration #s looking for Denver hearing?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Tracy, Lee-Ann [mailto:Lee-Ann_Tracy@sra.com]
Sent: Monday, August 18, 2014 9:08 AM
To: Trulove-Cranor, Whitney; Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique; Apostolico, Mary
Subject: RE: how are registration #s looking for Denver hearing?

Update since last report:

2 additional speaker registered for 9/4/14 1-4 PM (for a total of 4 speakers and 16 attendees)

Thanks,
Lee-Ann

From: Trulove-Cranor, Whitney [<mailto:Trulove-Cranor.Whitney@epa.gov>]
Sent: Friday, August 15, 2014 1:04 PM
To: Tracy, Lee-Ann; Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique; Apostolico, Mary
Subject: RE: how are registration #s looking for Denver hearing?

Thanks for sharing this info. Whitney

From: Tracy, Lee-Ann [mailto:Lee-Ann_Tracy@sra.com]
Sent: Wednesday, August 13, 2014 7:41 AM
To: Rosnick, Reid; Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; Apostolico, Mary
Subject: RE: how are registration #s looking for Denver hearing?

Not sure how you are getting 89 people, as only a total of 50 tickets have been distributed.

Here's what I show:

13 people are attending 9/3/14 9AM-12PM (6 speakers)
11 people are attending 9/3/14 1-4 PM (1 speaker)
12 people are attending 9/4/14 9AM-12PM (3 speakers)
14 people are attending 9/4/14 1-4 PM (2 speakers)

There are a total of 50 attendees with 12 total speakers. Note that there are actually not 50 different people attending because most people are attending more than one session. There are actually only 19 unique people attending, of which 12 are speaking. Let me know if that doesn't make sense.

Thanks,
Lee-Ann Tracy
SRA International, Inc.
3434 Washington Boulevard
Arlington, VA 22201
703.284.5056

Please consider the environment before printing this email or any attachments.

This electronic message transmission contains information from SRA International, Inc. which may be confidential, privileged or proprietary. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of the contents of this information is strictly prohibited. If you have received this electronic information in error, please notify us immediately by telephone at 866-584-2143.

From: Rosnick, Reid [<mailto:Rosnick.Reid@epa.gov>]
Sent: Wednesday, August 13, 2014 6:50 AM
To: Trulove-Cranor, Whitney; Nesky, Anthony
Cc: Diaz, Angelique; Tracy, Lee-Ann
Subject: RE: how are registration #s looking for Denver hearing?

Hi Whitney,

I took a look at the registration site, and it appears that we have 89 people registered for September 3, and 48 registered for September 4. I have also copied our contractor so that she can either correct me or add the number of speakers to my tally.

Reid

From: Trulove-Cranor, Whitney
Sent: Tuesday, August 12, 2014 1:29 PM
To: Rosnick, Reid; Nesky, Anthony
Cc: Diaz, Angelique
Subject: how are registration #s looking for Denver hearing?

I know registration is open for another 10 days but wondering how many people have registered to date.

Thanks, Whitney

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:19 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-330721443-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 6:00 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Thursday, August 21, 2014 10:12 AM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Richard Blubaugh
rblubaugh@powertechuranium.com
Order #330721443


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Richard, this is your registration confirmation for Subpart W Public Hearings



Organized by [U.S. Environmental Protection Agency](#)



Registration summary


Mobile Summary


Paper Summary

Open the email attachment
or [download here](#)

Message from [U.S. Environmental Protection Agency](#)

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 21, 2014

Order #: 330721443

Name	Type	Quantity
Richard Blubaugh	Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons	1

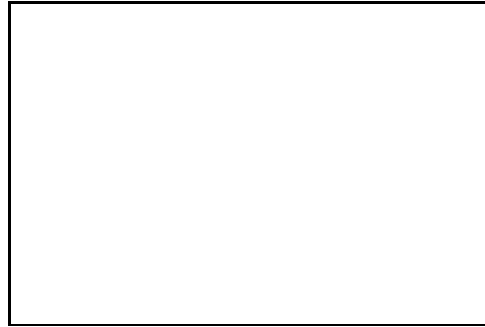
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)



About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address

5575 DTC Parkway, Ste. 140, Greenwood Village, CO 80111

Who are you representing?

Powertech (USA) Inc.

Do you wish to speak at one of the sessions?

Yes

At which of the following sessions would you like to speak? You may select only one.

September 4 9:00 AM - 12:00 PM MDT

What time do you intend to arrive to speak?

9:00 am



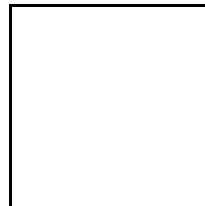
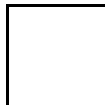
Your Account

[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)



Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--

This email was sent to rblubaugh@POWERTECHURANIUM.COM.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:19 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-333001855-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:59 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Wednesday, August 27, 2014 10:01 AM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Kay Hawkle
khawkle@aol.com
Order #333001855


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Kay, this is your registration confirmation for **Subpart W Public Hearings**



Organized by U.S. Environmental Protection Agency



Registration summary


Mobile Summary


Paper Summary

Open the email attachment or [download here](#)

Message from **U.S. Environmental Protection Agency**

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 27, 2014

Order #: 333001855

Name	Type	Quantity
Kay Hawlee	Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons	1

Kay Hawklee	Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons	1
Kay Hawklee	Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons	1
Kay Hawklee	Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons	1

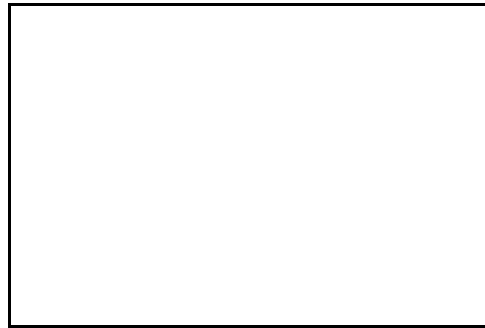
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)

□

About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address
1739 Fremont County Rd 21A

Who are you representing?
myself

Do you wish to speak at one of the sessions?
Yes

At which of the following sessions would you like to speak? You may select only one.
September 4 1:00 PM - 4:00 PM MDT

What time do you intend to arrive to speak?
1:00 pm

Your Account

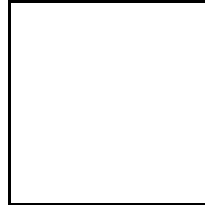
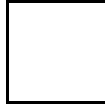


[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)

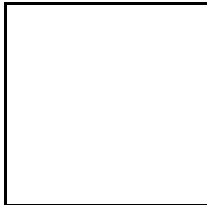
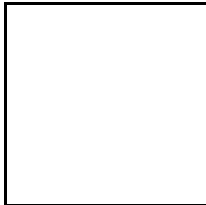


Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--



This email was sent to khawlee@aol.com.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

333001855421087163001	Event		
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Free Order
Order Info			
Order #333001855. Ordered by Kay Hawkleee on August 27, 2014 6:58 AM			
Type			
Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons			

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



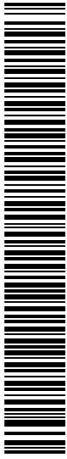


333001855421087163001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

 333001855421087167001	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #333001855. Ordered by Kay Hawklee on August 27, 2014 6:58 AM		
	Type Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



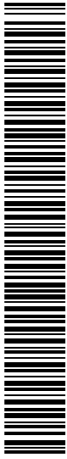


333001855421087167001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

 333001855421087169001	Event		
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Free Order
Order Info			
Order #333001855. Ordered by Kay Hawklee on August 27, 2014 6:58 AM			
Type			
Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons			

You are registered to attend the Subpart W Public Hearing. Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



333001855421087169001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:19 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-333001855-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:59 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Wednesday, August 27, 2014 10:01 AM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Kay Hawkle
khawkle@aol.com
Order #333001855


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Kay, this is your registration confirmation for **Subpart W Public Hearings**



Organized by U.S. Environmental Protection Agency



Registration summary

 **Mobile Summary**

 **Paper Summary**

Open the email attachment or [download here](#)

Message from **U.S. Environmental Protection Agency**

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 27, 2014

Order #: 333001855

Name	Type	Quantity
Kay Hawlee	Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons	1

Kay Hawklee	Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons	1
Kay Hawklee	Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons	1
Kay Hawklee	Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons	1

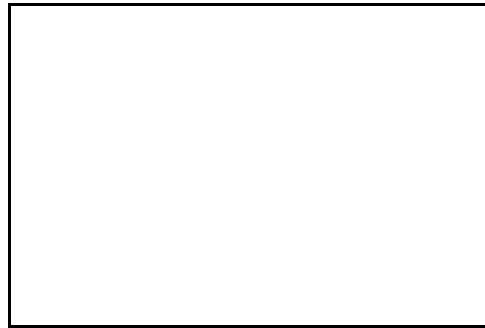
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)

□

About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address
1739 Fremont County Rd 21A

Who are you representing?
myself

Do you wish to speak at one of the sessions?
Yes

At which of the following sessions would you like to speak? You may select only one.
September 4 1:00 PM - 4:00 PM MDT

What time do you intend to arrive to speak?
1:00 pm

Your Account

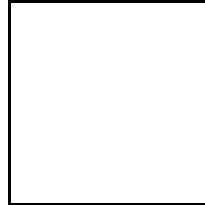


[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)

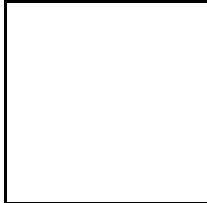
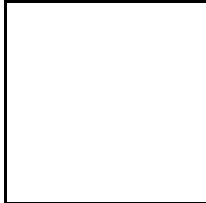


Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--



This email was sent to khawlee@aol.com.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

333001855421087163001	Event		
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Free Order
Order Info			
Order #333001855. Ordered by Kay Hawkleee on August 27, 2014 6:58 AM			
Type			
Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons			

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



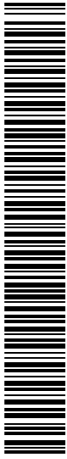

333001855421087163001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

333001855421087165001 	Event	<h1>Subpart W Public Hearings</h1> 	
	Date+Time	Location	Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Free Order
	Order Info	Order #333001855. Ordered by Kay Hawklee on August 27, 2014 6:58 AM	
Type	Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



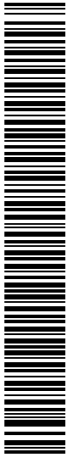


333001855421087165001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

 333001855421087167001	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #333001855. Ordered by Kay Hawklee on August 27, 2014 6:58 AM		
	Type Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



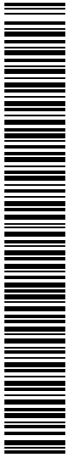


333001855421087167001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

 333001855421087169001	Event		 Payment Status Free Order
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	
	EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129		
Order Info			
Order #333001855. Ordered by Kay Hawklee on August 27, 2014 6:58 AM			
Type			
Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons			

You are registered to attend the Subpart W Public Hearing. Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--
Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



333001855421087169001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:20 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-333034607-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:59 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Wednesday, August 27, 2014 11:02 AM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Travis Stills
stills@frontier.net
Order #333034607


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Travis, this is your registration confirmation for Subpart W Public Hearings



Organized by [U.S. Environmental Protection Agency](#)



Registration summary


Mobile Summary


Paper Summary

Open the email attachment
or [download here](#)

Message from [U.S. Environmental Protection Agency](#)

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 27, 2014

Order #: 333034607

Name	Type	Quantity
Travis Stills	Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons	1

Travis Stills	Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons	1
Travis Stills	Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons	1
Travis Stills	Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons	1

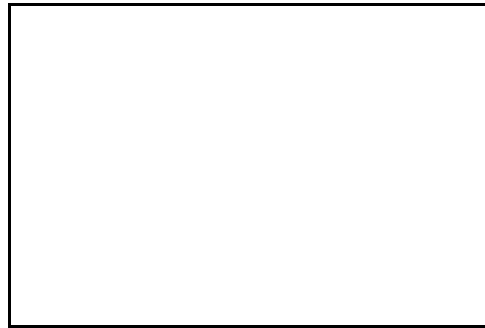
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)

□

About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address
stills@frontier.net

Who are you representing?
Clients, including Colorado Citizens Against ToxicWaste

Do you wish to speak at one of the sessions?
Yes

At which of the following sessions would you like to speak? You may select only one.
September 4 9:00 AM - 12:00 PM MDT

What time do you intend to arrive to speak?
Date and Time to Be Determined by Travel Schedule

Your Account

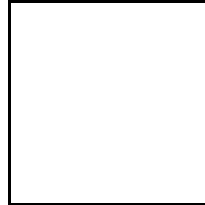
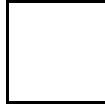


[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)

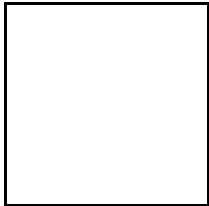
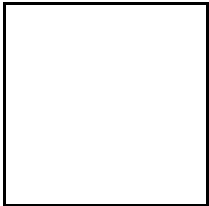


Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--

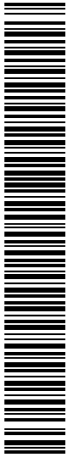


This email was sent to stills@frontier.net.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

333034607421130551001 	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #333034607. Ordered by Travis Stills on August 27, 2014 7:59 AM		
	Type Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.





333034607421130551001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

333034607421130553001	Event		
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Free Order
Order Info			
Order #333034607. Ordered by Travis Stills on August 27, 2014 7:59 AM			
Type			
Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons			

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



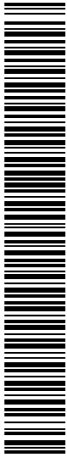


333034607421130553001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

333034607421130555001 	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #333034607. Ordered by Travis Stills on August 27, 2014 7:59 AM		
	Type Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



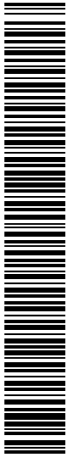


333034607421130555001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

333034607421130557001 	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #333034607. Ordered by Travis Stills on August 27, 2014 7:59 AM		
	Type Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



333034607421130557001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:20 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-334214361-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:59 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Friday, August 29, 2014 3:04 PM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Jim Cain
jim.cain@cotterusa.com
Order #334214361


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Jim , this is your registration confirmation for **Subpart W Public Hearings**



Organized by U.S. Environmental Protection Agency



Registration summary


Mobile Summary


Paper Summary

Open the email attachment
or [download here](#)

Message from **U.S. Environmental Protection Agency**

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 29, 2014

Order #: 334214361

Name	Type	Quantity
Jim Cain	Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons	1

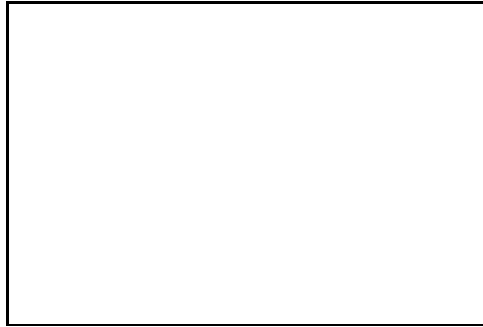
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)



About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address

PO Box 1750 Canon City, CO 81215

Who are you representing?

Cotter Corporation

Do you wish to speak at one of the sessions?

No



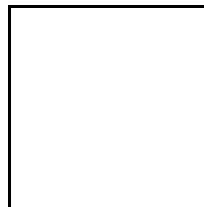
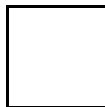
Your Account

[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)



Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--




This email was sent to jim.cain@cotterusa.com.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

334214361422622407001 	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #334214361. Ordered by Jim Cain on August 29, 2014 11:59 AM		
	Type Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



334214361422622407001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:20 PM
To: Thornton, Marisa
Subject: Fw: Registration Notification for Subpart W Public Hearings
Attachments: 1408042493-334264823-registration.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:58 PM
To: Collections.SubW
Subject: FW: Registration Notification for Subpart W Public Hearings

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Eventbrite [<mailto:orders@eventbrite.com>]
Sent: Friday, August 29, 2014 4:39 PM
To: Nesky, Anthony
Subject: Registration Notification for Subpart W Public Hearings



Find events My Tickets

Good news! A registration for [Subpart W Public Hearings](#) just came through. Below, you'll find a copy of the registration confirmation email for:

Sharyn Cunningham
sharyn@bresnan.net
Order #334264823


Cheers!
Eventbrite


P.S. You can turn off this notification anytime on your [email preferences page](#).

Hi Sharyn, this is your registration confirmation for Subpart W Public Hearings



Organized by [U.S. Environmental Protection Agency](#)



Registration summary


Mobile Summary


Paper Summary

Open the email attachment
or [download here](#)

Message from [U.S. Environmental Protection Agency](#)

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here:
<http://www.denvergov.org/tabid/437781/Default.aspx>><http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at:

<http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.

Have a question? Contact the organizer at nesky.tony@epa.gov



Order Summary

August 29, 2014

Order #: 334264823

Name	Type	Quantity
Sharyn Cunningham	Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons	1

Sharyn Cunningham	Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons	1
Sharyn Cunningham	Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons	1
Sharyn Cunningham	Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons	1

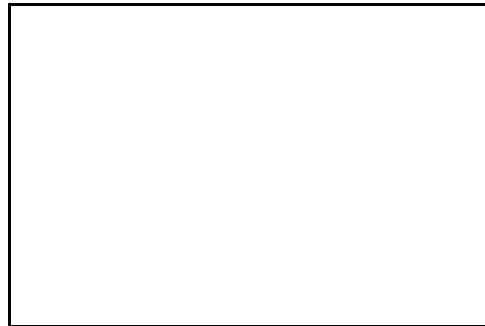
This order is subject to Eventbrite [Terms of Service](#), [Privacy Policy](#), and [Cookie Policy](#)

□

About this event



EPA Region 8 Office
1595 Wynkoop Street
Denver, CO 80202-1129



Registration Information

Contact Address

PO Bx 964, Canon City, CO 81215

Who are you representing?

Colorado Citizens Against ToxicWaste, Inc.

Do you wish to speak at one of the sessions?

Yes

At which of the following sessions would you like to speak? You may select only one.

September 4 1:00 PM - 4:00 PM MDT

What time do you intend to arrive to speak?

9am

Your Account

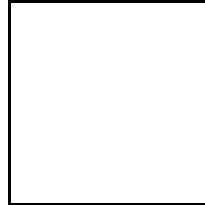


[Log in](#) to manage your orders.

Create your own event

Anyone can sell tickets or manage registration with Eventbrite.

[Learn More](#)

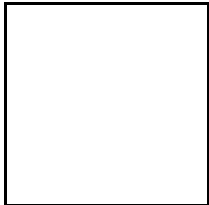
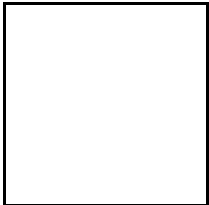


Discover great events

Find local events that match your passions.

[See events](#)



ABOUT	HELP	MY ACCOUNT	CONTACT US	PRIVACY	TERMS	BLOG		
-------	------	------------	------------	---------	-------	------	--	--




This email was sent to sharyn@bresnan.net.

Eventbrite | 155 5th St | San Francisco, CA 94103

Copyright © 2014 Eventbrite. All rights reserved.



Please print and bring with you to the event

 334264823422684597001	Event		
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Free Order
Order Info			
Order #334264823. Ordered by Sharyn Cunningham on August 29, 2014 1:36 PM			
Type			
Subpart W Public Hearings - September 4, 2014, 1:00 PM - 5:00 PM MDT Capacity: 60 persons			

You are registered to attend the Subpart W Public Hearing. Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport-- Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.






334264823422684597001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

334264823422684599001 	Event <h1>Subpart W Public Hearings</h1>		
	Date+Time	Location EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	Payment Status Free Order
	Order Info Order #334264823. Ordered by Sharyn Cunningham on August 29, 2014 1:36 PM		
	Type Subpart W Public Hearings - September 3, 2014, 9:00 AM - 12:00 PM MDT Capacity: 100 persons		

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.





334264823422684599001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

334264823422684601001	Event			
	<h1>Subpart W Public Hearings</h1>			
	Date+Time	Location		Payment Status
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129		Free Order
Order Info				
Order #334264823. Ordered by Sharyn Cunningham on August 29, 2014 1:36 PM				
Type				
Subpart W Public Hearings - September 3, 2014, 1:00 PM - 5:00 PM MDT Capacity: 100 persons				

You are registered to attend the Subpart W Public Hearing.
Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.






334264823422684601001

Eventbrite

Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Please print and bring with you to the event

 334264823422684603001	Event		
	<h1>Subpart W Public Hearings</h1>		
	Date+Time	Location	
		EPA Region 8 Office 1595 Wynkoop Street Denver, CO 80202-1129	
Order Info			
Order #334264823. Ordered by Sharyn Cunningham on August 29, 2014 1:36 PM			
Type			
Subpart W Public Hearings - September 4, 2014, 9:00 AM - 12:00 PM MDT Capacity: 60 persons			

You are registered to attend the Subpart W Public Hearing. Please read the following before attending:

BUILDING LOCATION

The EPA Region 8 office is at 1595 Wynkoop Street, Denver, CO80202-1129. The building is located along the 16th Street Mall in downtown Denver, adjacent to Union Station and across from the Tattered Cover bookstore. The building opens at 8 AM Monday-Friday.

PARKING

The City of Denver provides information on parking here: <http://www.denvergov.org/tabid/437781/Default.aspx>
<http://www.denvergov.org/tabid/437781/Default.aspx>

DRIVING DIRECTIONS

If coming from Denver International Airport--
Follow the "Airport Exit" signs to proceed south and west on Pena Boulevard for about 9 miles. Keep following the natural turn to the right as Pena Blvd. turns into Interstate 70 West, heading toward downtown. Follow I-70 West for 10 miles before exiting onto I-25 South. Two miles after turning south on I-25, take the Speer Avenue South exit and make a left towards downtown and the Pepsi Center. Upon crossing the Interstate, you will see the Pepsi Center on your right. Stay left and make a left at the stop light on Wewatta Street (there is a lefthand turn lane provided). Head across a small bridge and go straight until you reach 15th Street. Make a right on 15th Street, and your first left on Wynkoop Street. The EPA building is on the left, with the building entrance off of 16th Street.

If coming from the north, south or west--

Take Interstate 25 to the Speer Boulevard South exit and follow the directions two paragraphs above.

SECURITY REQUIREMENTS

Visitors to EPA's regional office must show identification and pass through security screening at the building entrance. The EPA Region 8 office building is a Level-4-security building, similar to what you experience at the airport. All visitors need to bring a government-issued photo ID (i.e., a driver's license). You will be asked to show this ID as you enter the lobby.

Please arrive at the building 30 minutes before any talks or events you have scheduled. Our security screening process is similar to screening at the airport: you will be asked to walk through a magnetometer (removing metal objects from your pockets), and your coats, bags etc. will be x-rayed. We regret that we do not have facilities to check coats or bags. You will be provided with a visitor badge after you pass through security. Please wear this at all times while you are in the building.

Video, as well as photos of any kind, are not allowed. Also, NO weapons of any kind are allowed in the building. This includes mace, knives, guns, etc. You will not be permitted in the building if you have any of these items. For a complete list of restricted items and additional information, please visit the EPA Region 8 website at: <http://www2.epa.gov/region8/directions-and-visitor-information-us-epa-region-8>

TO GET TO THE HEARING ROOM

After going through security, please proceed to the 2nd Floor Conference Center via the elevator. Conference Center attendees are not allowed above the 2nd floor without having an EPA escort. Outside of the meeting room, there will be a registration table where you will check-in and receive a temporary badge that must be worn at all times while in the building. Any visitor exiting the building during breaks or lunch will be required to pass through security screening upon return each time. At the conclusion of the conference, please return to the registration table to be checked out and turn in your temporary visitor badge.

SPEAKERS

Speakers will be allotted 5 minutes to make his or her presentation. Speakers will be assigned a speaker number upon arriving, and will be called in sequential order to give his or her presentation. Submission of written remarks is not required, but will be gladly accepted. All remarks and submissions become part of the official public record.

Please print and bring your ticket with you.



334264823422684603001



Do you organize events?

Start selling in minutes with Eventbrite!
www.eventbrite.com

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:20 PM
To: Thornton, Marisa
Subject: Fw: Web Update: Additional Reference to that page

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:13 PM
To: Collections.SubW
Subject: FW: Web Update: Additional Reference to that page

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 7:32 AM
To: Nesky, Anthony
Cc: Romero, Carmen
Subject: RE: Web Update: Additional Reference to that page

This was completed on Friday, August 1st. Check the staging server for your updates.

From: Nesky, Anthony
Sent: Tuesday, August 05, 2014 3:31 PM
To: Thornton, Marisa
Cc: Romero, Carmen
Subject: RE: Web Update: Additional Reference to that page

Sorry if I missed it, but what is the status of this update below? Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Friday, August 01, 2014 4:53 PM
To: Thornton, Marisa
Cc: Romero, Carmen
Subject: Web Update: Additional Reference to that page

Dear Marisa:

We have some updates to:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

FR (Federal Register) 1985a. [EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities](#), Volume 50, p. 7280, February 8, 1985. (8 pp, 4.02 MB) [About PDF](#).

Please replace the above reference with:

FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985.

Please link the title in the ERRATUM to the attached file, FR5190.pdf

Metadata:

- **Title:** Standards for Radionuclides
- **Author:** EPA/OAR/Office of Radiation and Indoor Air
- **Subject:** Standards for Elemental Phosphorous Plants, NRC, and DOE facilities
- **Keywords:** "FR505190" "EPA" "radionuclide standards" "Phosphorous Plants" "NRC facilities" "DOE Facilities"

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:21 PM
To: Thornton, Marisa
Subject: Fw: EIA Reference Page Ready for a last review

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:12 PM
To: Collections.SubW
Subject: FW: EIA Reference Page Ready for a last review

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Rosnick, Reid
Sent: Thursday, August 07, 2014 11:36 AM
To: Nesky, Anthony
Subject: RE: EIA Reference Page Ready for a last review

Tony,

Go with it!

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 10:01 AM
To: Rosnick, Reid
Subject: EIA Reference Page Ready for a last review

Dear Reid:

I think we finally have the EIA reference page in order. Please check it out and let me know what you think. We can then publish it to the website.

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:24 PM
To: Thornton, Marisa
Subject: Fw: Update to Subpart W Page on Tuesday

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:57 PM
To: Collections.SubW
Subject: FW: Update to Subpart W Page on Tuesday

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Friday, August 29, 2014 12:26 PM
To: Romero, Carmen; Thornton, Marisa
Cc: Rosnick, Reid; Herrenbruck, Glenna
Subject: Update to Subpart W Page on Tuesday

Dear Marisa and Carmen:

Registration is closing today for the hearings, so we need to update the Subpart W webpage on Tuesday, Sep 2. Please don't change the page before then.

On Tuesday, please delete the strikeout text below on

<http://www.epa.gov/radiation/neshaps/subpartw/rulemaking-activity.html>

PUBLIC HEARING, SEPTEMBER 3 and 4, 2014, DENVER, COLORADO

EPA will hold a public hearing to allow the public to make oral presentations of data, views or arguments about the proposed revisions to Subpart W. The public hearing will be held September 3 and 4, 2014, at the EPA Region 8 Office, 1595 Wynkoop Street, Denver, CO 80202-1129. Sessions will be held both days from 9:00 am to 12:00 pm and from 1:00 pm to 5:00 pm. ~~Capacity is limited; advance registration is required to help accommodate those who wish to attend or speak. Registration has been extended to August 29, 2014.~~ [CLICK TO REGISTER FOR THE PUBLIC HEARING.](#)

Note: Participation or attendance at the public hearing is not necessary to comment on this proposed rulemaking. EPA also welcomes [written comments](#).

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:24 PM
To: Thornton, Marisa
Subject: Fw: Subpart W Hearings - Draft Opening Statement

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:57 PM
To: Collections.SubW
Subject: FW: Subpart W Hearings - Draft Opening Statement

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Diaz, Angelique
Sent: Tuesday, August 26, 2014 1:11 PM
To: Sutin, Elyana; Nesky, Anthony; Peake, Tom; Rosnick, Reid; Schultheisz, Daniel
Subject: RE: Subpart W Hearings - Draft Opening Statement

Hi, Tony.

Next week will you be bringing a fact sheet that will include instructions for submitting comments?

Thanks,
Angelique

Angelique D. Diaz, Ph.D.
Environmental Engineer
Air Program, USEPA/Region 8
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Office: 303.312.6344
Fax: 303.312.6064
diaz.angelique@epa.gov

From: Sutin, Elyana
Sent: Thursday, August 21, 2014 3:54 PM
To: Nesky, Anthony; Peake, Tom; Rosnick, Reid; Schultheisz, Daniel
Cc: Diaz, Angelique
Subject: Subpart W Hearings - Draft Opening Statement

Hi Everyone-

As discussed, attached is a draft of my opening remarks. I used a previous statement as a template and you will see for the technical program remarks I left open space for you to fill in what you would like to say. It is a bit crude and only a suggestion so feel free to edit/change as much as you want.

Please let me know if you have any questions.

Thanks,

Elyana Sutin
U.S. EPA, Region 8
Regional Judicial Officer
Associate Regional Counsel
sutin.elyana@epa.gov
303.312.6899

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:24 PM
To: Thornton, Marisa
Subject: Fw: Subpart W Public Hearing

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:58 PM
To: Collections.SubW
Subject: FW: Subpart W Public Hearing

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Darrell Liles [<mailto:dliles@senesusa.com>]
Sent: Tuesday, August 26, 2014 11:55 AM
To: Rosnick, Reid
Cc: Nesky, Anthony
Subject: RE: Subpart W Public Hearing

Hey Reid

Any response from the contractor on equipment that will be available?

Thanks!
Darrell

From: Rosnick, Reid [<mailto:Rosnick.Reid@epa.gov>]
Sent: Thursday, August 14, 2014 5:09 AM
To: dliles@senesusa.com
Subject: RE: Subpart W Public Hearing

Darrell,

Tony is currently on vacation, but I sent a note to our contractor to see if we'll have equipment available. I do know that we are imposing 5 minutes on speakers so that everyone has a chance to speak.

Reid

From: Darrell Liles [<mailto:dliles@senesusa.com>]
Sent: Wednesday, August 13, 2014 12:05 PM
To: Nesky, Anthony; Rosnick, Reid
Subject: Subpart W Public Hearing

Hey Tony and Reid

I just left Tony a jumbled voice message on this . Will there be any equipment available if we want to give a presentation at the Subpart W Hearing in Denver on Sept 3rd and 4th. We would like to bring a USB drive with presentations (Doug Chambers , Steve Brown and myself).

Thanks

Darrell Liles, CHP, PE
Senior Health Physicist



ARCADIS-SENE
8310 South Valley Highway Suite 135
Englewood, Colorado, 80112
email: dliles@senesusa.com
phone: (720)961-0953
cell: (303)717-3257

Web Site: <http://www.senes.ca/>

This transmission is intended only for the addressee and may contain PRIVILEGED or CONFIDENTIAL information. Any unauthorized disclosure, use or retention is strictly prohibited. SENES does not accept liability for any errors, omissions, corruption or virus in contents or attachments. Information is provided for use "as is" by the addressee. Revised documents must not be represented as SENES work product, without express, written permission of a SENES Director.

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:24 PM
To: Thornton, Marisa
Subject: Fw: Nine docs to be uploaded to Docket

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:58 PM
To: Collections.SubW
Subject: FW: Nine docs to be uploaded to Docket

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Lee, Raymond
Sent: Monday, August 25, 2014 4:16 PM
To: Nesky, Anthony
Subject: RE: Nine docs to be uploaded to Docket

Perfect, thanks Tony! I'll have these up in the next day or two.

Ray Lee | Center for Radiation Information and Outreach (CRIO) | US EPA | Phone 202.343.9463 | Fax 202.343.2305 | lee.raymond@epa.gov

From: Nesky, Anthony
Sent: Monday, August 25, 2014 4:15 PM
To: Lee, Raymond
Subject: Nine docs to be uploaded to Docket

Dear Ray:

Thanks for your offer to upload some of the EIA references to the Docket. Here's your half. The files are located at:

G:\CRIO\Web\RPD_Internet\RPD New Web\docs\neshaps\subpart-w

FR (Federal Register) 1989b. National Emission Standards for Hazardous Air Pollutants; Radionuclides, Volume 54, p. 51654, December 15, 1989.

[File Name: FR51654.pdf](#)

FR (Federal Register) 1986. 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants, Standards for Radon-222 Emissions from Licensed Uranium Mill Tailings; Final Rule, Volume 51, p. 34056, September 24, 1986

[File Name: FR34056.pdf](#)

FR (Federal Register) 1994. National Emission Standards for Hazardous Air Pollutants; Final Rule, Volume 59, p. 36280, July 15, 1994.(23 pp, 13.36 MB) About PDF

[File Name: FR36280.pdf](#)

Golder Associates Inc. 2008, "[Evaporation Pond Design Report, Piñon Ridge Project, Montrose County, Colorado.](#)" submitted to Energy Fuels Resources Corporation, October 2008.

<http://www.epa.gov/rpdweb00/docs/neshaps/subpart-w/evaporationponddesignreport100708.pdf>

SC&A (S. Cohen & Associates) 2008. "Report on the Review of Method 115 to Monitor Radon Emissions from Uranium Tailings," Contract Number EP-D-05-002, Work Assignment No. 4-11, Task 6, SC&A, Inc., Vienna, Virginia, September 25, 2008

[File Name: method-115-compliance.pdf](#)

SC&A (S. Cohen and Associates) 2010. "Risk Assessment Revision for 40 CFR Part 61 Subpart W – Radon Emissions from Operating Mill Tailings, Task 5 – Radon Emission from Evaporation Ponds," Contract Number EP-D-10-042, Work Assignment No. 1-04, Task 5, SC&A, Inc., Vienna, Virginia, November 2010.

[File Name: riskassessmentrevision.pdf](#)

SC&A (S. Cohen and Associates) 2011. "[Risk Assessment Revision for 40 CFR Part 61 Subpart W – Radon Emissions from Operating Mill Tailings](#), Task 4 – Detailed Risk Estimates," Contract Number EP-D-10-042, Work Assignment No. 1-04, Task 4, SC&A, Inc., Vienna, Virginia, March 25, 2011.

[File Name: SubpartWHist&Basis-final.pdf](#)

Titan Uranium 2011 "[Sheep Mountain Uranium Project Crooks Gap, Wyoming.](#)" presentation to U.S. Nuclear Regulatory Commission, ML111740073, May 24, 2011

[File Name: sheepmountainproject.pdf](#)

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:24 PM
To: Thornton, Marisa
Subject: Fw: Are you in the office Monday?

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:59 PM
To: Collections.SubW
Subject: FW: Are you in the office Monday?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Lee, Raymond
Sent: Thursday, August 21, 2014 4:41 PM
To: Nesky, Anthony
Subject: RE: Are you in the office Monday?

Hi Tony,

Yep – I'm in the office on Monday! I have some meetings in the morning but should be in after lunch. I logged into FDMS and I believe I'm not assigned to the Subpart W docket currently (it must be Reid & Beth at the moment), so I'm going to see if I/we need to get added as well.

Thanks,

Ray

Ray Lee | Center for Radiation Information and Outreach (CRIO) | US EPA | Phone 202.343.9463 | Fax 202.343.2305 | lee.raymond@epa.gov

From: Nesky, Anthony
Sent: Thursday, August 21, 2014 4:02 PM
To: Lee, Raymond
Subject: Are you in the office Monday?

Dear Ray:

My application for FDMS was accepted, but my browser isn't Java enabled and it isn't working. Will you be in the office on Monday? I think it will be much quicker to upload the references from the office on Monday—they are all on the G Drive. I can get computer support to fix my machine, and then we can just divvy up the work.

Tony Nesky

Center for Radiation Information and Outreach

Tel: 202-343-9597

nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:23 PM
To: Thornton, Marisa
Subject: Fw: References from Subpart W page need to be put in rulemaking Docket as well.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:00 PM
To: Collections.SubW
Subject: FW: References from Subpart W page need to be put in rulemaking Docket as well.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Thursday, August 21, 2014 3:09 PM
To: Lee, Raymond
Subject: RE: References from Subpart W page need to be put in rulemaking Docket as well.

Dear Ray:

I registered for the site, but it is pending approval .

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Lee, Raymond
Sent: Thursday, August 21, 2014 2:14 PM
To: Thornton, Marisa; Nesky, Anthony; Miller, Beth
Subject: RE: References from Subpart W page need to be put in rulemaking Docket as well.

Hi guys,

I was just about to suggest this, as I remembered Beth is a registered FDMS user and can probably help with this since she's uploaded plenty in the past.

Tony - I won't be able to respond much until after 4 now because of my training but I'll be in touch once I get back and if you need help with anything.

Ray

Sent by EPA Wireless E-mail Services

From: Thornton, Marisa
Sent: Thursday, August 21, 2014 2:10 PM
To: Nesky, Anthony; Miller, Beth
Cc: Lee, Raymond
Subject: RE: References from Subpart W page need to be put in rulemaking Docket as well.

Beth is still in charge of the docket.

From: Nesky, Anthony
Sent: Thursday, August 21, 2014 1:39 PM
To: Thornton, Marisa
Cc: Lee, Raymond
Subject: References from Subpart W page need to be put in rulemaking Docket as well.

Dear Marisa:

All the references on the Subpart W EIA page need to be put into the rulemaking Docket. Is this something that you and Carmen can do? There are a lot of them, so I can get an account and help you if needed. The PDF references are at:

<http://www.epa.gov/radiation/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:23 PM
To: Thornton, Marisa
Subject: Fw: References from Subpart W page need to be put in rulemaking Docket as well.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:00 PM
To: Collections.SubW
Subject: FW: References from Subpart W page need to be put in rulemaking Docket as well.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Lee, Raymond
Sent: Thursday, August 21, 2014 2:14 PM
To: Thornton, Marisa; Nesky, Anthony; Miller, Beth
Subject: RE: References from Subpart W page need to be put in rulemaking Docket as well.

Hi guys,

I was just about to suggest this, as I remembered Beth is a registered FDMS user and can probably help with this since she's uploaded plenty in the past.

Tony - I won't be able to respond much until after 4 now because of my training but I'll be in touch once I get back and if you need help with anything.

Ray

Sent by EPA Wireless E-mail Services

From: Thornton, Marisa
Sent: Thursday, August 21, 2014 2:10 PM
To: Nesky, Anthony; Miller, Beth
Cc: Lee, Raymond
Subject: RE: References from Subpart W page need to be put in rulemaking Docket as well.

[Beth is still in charge of the docket.](#)

From: Nesky, Anthony

Sent: Thursday, August 21, 2014 1:39 PM

To: Thornton, Marisa

Cc: Lee, Raymond

Subject: References from Subpart W page need to be put in rulemaking Docket as well.

Dear Marisa:

All the references on the Subpart W EIA page need to be put into the rulemaking Docket. Is this something that you and Carmen can do? There are a lot of them, so I can get an account and help you if needed. The PDF references are at:

<http://www.epa.gov/radiation/neshaps/subpartw/eiareferences.html>

Tony Nesky

Center for Radiation Information and Outreach

Tel: 202-343-9597

nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:23 PM
To: Thornton, Marisa
Subject: Fw: References from Subpart W page need to be put in rulemaking Docket as well.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:00 PM
To: Collections.SubW
Subject: FW: References from Subpart W page need to be put in rulemaking Docket as well.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Lee, Raymond
Sent: Thursday, August 21, 2014 1:53 PM
To: Nesky, Anthony; Thornton, Marisa
Subject: RE: References from Subpart W page need to be put in rulemaking Docket as well.

Hi Marisa,

Just spoke to Tony - this is something we'll have to do on our own via the FDMS system, so I don't think there's anything you or Carmen can do unless you are a registered user there.

Thanks,

Ray

Sent by EPA Wireless E-mail Services

From: Nesky, Anthony
Sent: Thursday, August 21, 2014 1:39 PM
To: Thornton, Marisa
Cc: Lee, Raymond
Subject: References from Subpart W page need to be put in rulemaking Docket as well.

Dear Marisa:

All the references on the Subpart W EIA page need to be put into the rulemaking Docket. Is this something that you and Carmen can do? There are a lot of them, so I can get an account and help you if needed. The PDF references are at:

<http://www.epa.gov/radiation/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:23 PM
To: Thornton, Marisa
Subject: Fw: References from Subpart W page need to be put in rulemaking Docket as well.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:01 PM
To: Collections.SubW
Subject: FW: References from Subpart W page need to be put in rulemaking Docket as well.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Thursday, August 21, 2014 1:39 PM
To: Thornton, Marisa
Cc: Lee, Raymond
Subject: References from Subpart W page need to be put in rulemaking Docket as well.

Dear Marisa:

All the references on the Subpart W EIA page need to be put into the rulemaking Docket. Is this something that you and Carmen can do? There are a lot of them, so I can get an account and help you if needed. The PDF references are at:

<http://www.epa.gov/radiation/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:23 PM
To: Thornton, Marisa
Subject: Fw: Subpart W docket

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:02 PM
To: Collections.SubW
Subject: FW: Subpart W docket

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Miller, Beth
Sent: Thursday, August 21, 2014 6:44 AM
To: Nesky, Anthony
Cc: Rosnick, Reid
Subject: FW: Subpart W docket

Hi Tony,

I am forwarding this to you in case you missed it yesterday. The pdfs that are needed are the ones located on <http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Miller, Beth
Sent: Wednesday, August 20, 2014 8:06 AM
To: Nesky, Anthony
Subject: Subpart W docket

Hi Tony,

I spoke to Reid and he mentioned that you could make pdfs to be put in the docket. This would be very helpful, considering my plate is very full. Please give me a call if you have any questions as to what I am talking about. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:22 PM
To: Thornton, Marisa
Subject: Fw: Subpart W docket

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:02 PM
To: Collections.SubW
Subject: FW: Subpart W docket

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Miller, Beth
Sent: Wednesday, August 20, 2014 8:06 AM
To: Nesky, Anthony
Subject: Subpart W docket

Hi Tony,

I spoke to Reid and he mentioned that you could make pdfs to be put in the docket. This would be very helpful, considering my plate is very full. Please give me a call if you have any questions as to what I am talking about. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:22 PM
To: Thornton, Marisa
Subject: Fw: Docket question

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:03 PM
To: Collections.SubW
Subject: FW: Docket question

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Lee, Raymond
Sent: Tuesday, August 19, 2014 2:49 PM
To: Akram, Assem
Cc: Castillo, Amparo; Nesky, Anthony
Subject: Docket question

Hi Assem,

I have a question in regards to docket EPA-HQ-OAR-2008-0218. Apparently we received a request to have a number of references included in this docket, although we have made all of them available on our website, located here:

<http://www.epa.gov/radiation/neshaps/subpartw/eiareferences.html>

Each of the documents listed are in PDF format and have appropriate metadata required for web posting. Is there a way for you guys/the docket staff to just pull the documents and related information from here and include them? Or would we have to submit individual requests to you for each PDF listed? We're just trying to see a way to include them while making the process less tedious.

Thanks,

Ray

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:22 PM
To: Thornton, Marisa
Subject: Fw: Subpart W Public Hearing

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:11 PM
To: Collections.SubW
Subject: FW: Subpart W Public Hearing

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Darrell Liles [mailto:dliles@senesusa.com]
Sent: Wednesday, August 13, 2014 12:05 PM
To: Nesky, Anthony; Rosnick, Reid
Subject: Subpart W Public Hearing

Hey Tony and Reid

I just left Tony a jumbled voice message on this . Will there be any equipment available if we want to give a presentation at the Subpart W Hearing in Denver on Sept 3rd and 4th. We would like to bring a USB drive with presentations (Doug Chambers , Steve Brown and myself).

Thanks

Darrell Liles, CHP, PE
Senior Health Physicist



ARCADIS-SENE
8310 South Valley Highway Suite 135
Englewood, Colorado, 80112
email: dliles@senesusa.com
phone: (720)961-0953
cell: (303)717-3257

Web Site: <http://www.senes.ca/>

This transmission is intended only for the addressee and may contain PRIVILEGED or CONFIDENTIAL information. Any unauthorized disclosure, use or retention is strictly prohibited. SENES does not accept liability for any errors, omissions, corruption or virus in contents or attachments. Information is provided for use "as is" by the addressee. Revised documents must not be represented as SENES work product, without express, written permission of a SENES Director.

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:21 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W Letter to Tribes re Consultation and Comment

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:11 PM
To: Collections.SubW
Subject: FW: EPA Subpart W Letter to Tribes re Consultation and Comment

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: sarah@uraniumwatch.org [mailto:sarah@uraniumwatch.org]
Sent: Thursday, August 07, 2014 2:33 PM
To: Nesky, Anthony
Subject: EPA Subpart W Letter to Tribes re Consultation and Comment

Dear Mr. Nesky,

Earlier this year the EPA sent out a letter to various tribes regarding the EPA 40 C.F.R. Part 40 Subpart W Rulemaking. The letter was signed by Jonathan D. Edwards, Director, EPA Radiation Protection Division. You were listed as the contact person.

The letter sent out in May is outdated. Since that time the EPA has agreed to a 90-day extension of the comment period and will have a hearing in Denver on September 2-4.

Has the EPA sent out a letter to the tribes updating the information that was contained in the original letter to the tribes?

Also, did the EPA consider sending letters to the tribal Environmental Protection Agencies or equivalent tribal agencies? Sometimes the appropriate tribal agency is not informed by the office of the Chair of the tribe of an opportunity to comment or request consultation. The EPA should be aware of that and make a special effort to communicate with the appropriate tribal agencies, particularly for tribes that the EPA knows have an interest in the Subpart W Rulemaking, such as the Navajo Nation EPA.

Thank you for your response to this inquiry,

Sarah Fields
Program Director
Uranium Watch

PO Box 344
Moab, Utah 84532
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:21 PM
To: Thornton, Marisa
Subject: Fw: EIA Reference Page Ready for a last review

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:12 PM
To: Collections.SubW
Subject: FW: EIA Reference Page Ready for a last review

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Thursday, August 07, 2014 12:39 PM
To: Nesky, Anthony
Subject: RE: EIA Reference Page Ready for a last review

[Just remembered your working at home....call me 202-343-9237](tel:202-343-9237)

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 11:45 AM
To: Thornton, Marisa
Cc: Rosnick, Reid; Herrenbruck, Glenna
Subject: FW: EIA Reference Page Ready for a last review

Dear Marisa:

Please publish the reference page to the server. Please create a link for it that says: References and place it under this document on the Subpart W page:

[Background Information Document Economic Impact Analysis in Support of the Subpart W Proposed Rulemaking](#) (128 pp, 2.24 MB) April 2014

Thanks for your help with this!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Rosnick, Reid
Sent: Thursday, August 07, 2014 11:36 AM

To: Nesky, Anthony

Subject: RE: EIA Reference Page Ready for a last review

Tony,

Go with it!

From: Nesky, Anthony

Sent: Thursday, August 07, 2014 10:01 AM

To: Rosnick, Reid

Subject: EIA Reference Page Ready for a last review

Dear Reid:

I think we finally have the EIA reference page in order. Please check it out and let me know what you think. We can then publish it to the website.

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Tony Nesky

Center for Radiation Information and Outreach

Tel: 202-343-9597

nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:21 PM
To: Thornton, Marisa
Subject: Fw: EIA Reference Page Ready for a last review

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:12 PM
To: Collections.SubW
Subject: FW: EIA Reference Page Ready for a last review

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Thursday, August 07, 2014 12:33 PM
To: Nesky, Anthony
Subject: RE: EIA Reference Page Ready for a last review

Can you come over for a few minutes?

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 11:45 AM
To: Thornton, Marisa
Cc: Rosnick, Reid; Herrenbruck, Glenna
Subject: FW: EIA Reference Page Ready for a last review

Dear Marisa:

Please publish the reference page to the server. Please create a link for it that says: References and place it under this document on the Subpart W page:

[Background Information Document Economic Impact Analysis in Support of the Subpart W Proposed Rulemaking](#) (128 pp, 2.24 MB) April 2014

Thanks for your help with this!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Rosnick, Reid
Sent: Thursday, August 07, 2014 11:36 AM

To: Nesky, Anthony
Subject: RE: EIA Reference Page Ready for a last review

Tony,

Go with it!

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 10:01 AM
To: Rosnick, Reid
Subject: EIA Reference Page Ready for a last review

Dear Reid:

I think we finally have the EIA reference page in order. Please check it out and let me know what you think. We can then publish it to the website.

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

ENVIRONMENTAL PROTECTION AGENCY**40 CFR Part 61****[AD-FRL-2764-7]****National Emission Standards for Hazardous Air Pollutants; Standards for Radionuclides****AGENCY:** Environmental Protection Agency (EPA).**ACTION:** Final rules.

SUMMARY: On April 6, 1983, the Environmental Protection Agency, pursuant to Section 112 of the Clean Air Act, published in the Federal Register proposed standards for sources of emissions of radionuclides to air. These included the following source categories: (1) Department of Energy (DOE) facilities; (2) Nuclear Regulatory Commission (NRC)-licensed facilities and non-DOE Federal facilities; (3) elemental phosphorus plants; and (4) underground uranium mines. Subsequently, on October 23, 1984, the Agency withdrew its proposed standards for the first three source categories on the grounds that current emission control and operational practices provide an ample margin of safety in protecting the public health from the hazards associated with exposure to airborne radionuclides from these sources. EPA continues to believe existing emissions from these sources are so low that the public health is already protected with an ample margin of safety, even without regulations. EPA also concluded it was impossible at the time to issue a legally valid final standard for uranium mines.

However, the U.S. District Court for the Northern District of California has ordered the Agency to either promulgate standards for the first three source categories by January 10, 1985, or to find that radionuclides are clearly not a hazardous pollutant, in essence "delisting" the pollutant from regulatory consideration under Section 112 of the Act. EPA believes that this order exceeds the District Court's jurisdiction and is appealing it to the Court of Appeals for the Ninth Circuit. As set forth in its withdrawal decision, EPA believes that, although emission levels from these three source categories are not hazardous, radionuclides cannot properly be delisted under Section 112 because radionuclide emissions from uranium mines appear to reach hazardous levels that warrant regulation. Under the provisions of the Court's order, however, the Agency is nonetheless required to issue standards

governing these three source categories. Accordingly, the Agency is promulgating final rules for DOE facilities, NRC-licensed and non-DOE Federal facilities, and elemental phosphorus plants. EPA continues to believe that its original position was correct and intends to pursue its appeal of the District Court's order. The Court also ordered EPA to promulgate final standards for underground uranium mines. EPA expects to promulgate these standards by April 10, 1985, the date specified in the Court order.

EFFECTIVE DATE: Final rules are effective on February 6, 1985. For existing sources, the standards shall not apply until 90 days after the effective date.

The information collection requirements contained in 40 CFR 61.94, 61.95, 61.96, 61.97, 61.104, 61.105, 61.107, 61.108, 61.123, 61.124, 61.125, 61.126, and, as they apply to radionuclide sources, 61.07, 61.09, 61.10, and 61.13 have not been approved by the Office of Management and Budget (OMB) and are not effective until OMB has approved them.

ADDRESSES: The rulemaking record is contained in Docket No. A-79-11. This docket is available for public inspection between 3:00 a.m. and 4:00 p.m., Monday through Friday, at EPA's Central Docket Section, West Tower Lobby, Gallery One, Waterside Mall, 401 M Street, S.W., Washington, D.C. 20460. A reasonable fee may be charged for copying.

FOR FURTHER INFORMATION CONTACT: James M. Hardin, Environmental Standards Branch (ANR-460), Criteria and Standards Division, Office of Radiation Programs, U.S. Environmental Protection Agency, Washington, D.C. 20460, (703) 557-8977.

SUPPLEMENTARY INFORMATION:**I. Supporting Documents**

A final Background Information Document has been prepared and single copies may be obtained by writing the Program Management Office, Office of Radiation Programs (ANR-458), U.S. Environmental Protection Agency, Washington, D.C. 20460, or by calling (703) 557-9351. Please refer to "NESHAPS—Radionuclides: Background Information Document for Final Rules, Volumes 1 and 2, [EPA 520/1-84-022-1, EPA 520/1-84-022-2], October 1984. Volume 1 of the Background Information Document contains a complete description of the Agency's methodology used in its risk assessment of the hazards associated with airborne emissions of radionuclides. Volume 2 contains a description of how the Agency applied

this methodology to each source category subject to this rulemaking.

The Agency has also prepared a final economic analysis of the impact of its standards on the elemental phosphorus industry, entitled "Regulatory Impact Analysis of Environmental Standards for Elemental Phosphorus Plants" [EPA 520/1-84-025], October 1984. In addition, a final report on control technology for radionuclide emissions to air at DOE facilities has been completed and is entitled "Control Technology for Radioactive Emissions to the Atmosphere at U.S. Department of Energy Facilities" [PNL-4621], October 1984. Single copies of both reports may be obtained from the Program Management Office, Office of Radiation Programs.

The Agency's decision to withdraw its proposed standards for radionuclide emissions from elemental phosphorus plants, DOE facilities, and NRC-licensed and non-DOE Federal facilities was published in the Federal Register on October 31, 1984 (43906). The notice contains a complete history of the rulemaking up to the withdrawal action, a summary of the major issues raised in public comments and the Agency's responses, alternatives considered, and the Agency's rationale for its decision to withdraw the proposed standards. Single copies of this document may be obtained by contacting the Program Management Office, Office of Radiation Programs.

II. History of Standards Development

On April 6, 1983, EPA announced in the Federal Register its proposed standards for sources of emissions of radionuclides from four categories: (1) DOE facilities; (2) NRC-licensed facilities and non-DOE Federal facilities; (3) elemental phosphorus plants; and (4) underground uranium mines. The notice also identified several additional source categories which emit radionuclides. However, the Agency concluded that good reasons existed to propose not to regulate these categories, which included: (1) coal-fired boilers; (2) the phosphate industry; (3) other extraction industries; (4) uranium fuel cycle facilities, uranium mill tailings, and management of high-level radioactive waste; and (5) low energy accelerators (48 FR 15076, April 6, 1983). At the time of proposal, these nine source categories were considered to be all that might potentially release radionuclides to air at levels that could warrant regulatory attention.

On February 17, 1984, the Sierra Club filed suit to compel final action in the U.S. District Court for the Northern

District of California, pursuant to the citizens' suit provision of the Act (*Sierra Club v. Ruckelshaus*, No. 84-0656 WHO). On July 25, 1984, the Court granted Sierra Club's summary judgment motion and ordered EPA to promulgate standards or make a finding that radionuclides are not a hazardous air pollutant within 90 days of the date of the order.

On October 23, 1984, EPA withdrew its proposed standards for radionuclide emissions from the following categories: (1) elemental phosphorus plants; (2) DOE facilities; (3) NRC-licensed facilities and non-DOE Federal facilities; and (4) underground uranium mines. The Agency also affirmed its original decision not to regulate emissions from the five other source categories considered (49 FR 43906, October 31, 1984). The proposed standards for the first three categories were withdrawn because the Administrator determined that current practice provides an ample margin of safety in protecting the public health from the hazards associated with exposure to radionuclides from these sources.

In the case of underground uranium mines, the Administrator withdrew the proposed standard because it did not meet the legal requirements of section 112 of the Clean Air Act. Simultaneous with this action, the Agency published an Advance Notice of Proposed Rulemaking for radon-222 emissions from underground uranium mines to solicit additional information on control methods such as bulkheading and other forms of operational controls for radon-222 which would meet the legal requirements of section 112 (49 FR 43915, October 31, 1984).

On October 31, 1984, the U.S. District Court, Northern District of California issued an order requiring the Administrator and the Agency to show cause why they should not be held in contempt of the Court's July 25 order. A Court hearing was held on November 21, 1984, to consider the issue. In a ruling on December 11, 1984, the Court found the Administrator and the Agency in contempt and ordered the following remedial action:

1. (a) Issue within 30 days of the date of the order final radionuclide emission standards for DOE facilities, NRC-licensed and non-DOE Federal facilities, and elemental phosphorus plants, and
- (b) Issue within 120 days of the date of the order final radionuclide emission standards for uranium mines; or
2. Make a finding based on the information presented at hearings during the rulemaking, that radionuclides are clearly not a hazardous pollutant.

On December 21, 1984, EPA requested a stay of the District Court's order; this request was denied on January 3, 1985. The Agency subsequently requested a stay from the 9th Circuit Court of Appeals on January 8, 1985. This request was also denied. However, the Court did allow the Agency an additional seven days to provide time for further appeal to the U.S. Supreme Court. These efforts also failed. Therefore, to comply with the District Court's EPA is promulgating standards for radionuclide emissions to air from DOE facilities, NRC-licensed and non-DOE Federal facilities, and elemental phosphorus plants. Litigation regarding these three standards is continuing.

III. Summary of Decision

As stated above, EPA withdrew proposed standards for the three categories that are the subject of this notice based on the judgment that emissions from these source categories are presently controlled at levels that provide an ample margin of safety in protecting public health from the hazards associated with exposure to airborne radionuclides. In reaching this judgment, EPA considered the available evidence, including public comments on its proposed standards and information developed since that proposal.

In the case of DOE facilities and NRC-licensed and non-DOE Federal facilities, the risk was judged too small to warrant regulation. Since the beginning of regulation under section 112, EPA has interpreted this section as not requiring regulation in cases where the risks from a category of sources do not exceed a certain minimum threshold. Indeed, contrary interpretations lead to results that are hard to defend from any logical or policy perspective. The risks presented by radionuclide emissions from these source categories are not as great as risks that EPA has found insufficient to trigger regulation in prior rulemakings under section 112. The health gains from regulation, as represented by the difference between the risk before and after regulation, are smaller still.

In the case of elemental phosphorus plants, the risks are also very small. In addition, the cost of controls compared to the amount that the risk is reduced is far higher than EPA has imposed in prior regulatory decisions under section 112.

At the same time, EPA believed that radionuclides could not properly be delisted because a fourth category of sources, uranium mines, did emit radionuclides in amounts that appeared to warrant regulation.

None of these circumstances has changed since October 23. EPA

continues to believe that its original position was correct and hopes that future litigation will permit the Agency to return to that position. However, the District Court's December 11 order and the subsequent denials of stays, compel issuance of standards for these three categories absent a decision by EPA to delist radionuclides. For the reasons discussed in detail in the Advance Notice of Proposed Rulemaking for underground uranium mines and the **Federal Register** notice published on October 31, EPA cannot conclude that radionuclides are clearly not hazardous, and thereby delist.

The standards established today limit radionuclide emissions from DOE facilities to an amount that causes a dose equivalent rate of 25 mrem/y to the whole body or a dose equivalent rate of 75 mrem/y to the critical organ of any member of the public. This standard excludes doses due to radon-220, radon-222, and their respective decay products. For NRC-licensed and non-DOE Federal facilities, EPA is promulgating a standard which limits radionuclide emissions from these facilities to an amount that causes a dose equivalent rate of 25 mrem/y to the whole body or a dose equivalent rate of 75 mrem/y to the critical organ of any member of the public. This standard also excludes doses due to radon-220, radon-222, and their respective decay products. EPA will grant a waiver of the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public and issue alternative standards, if a facility operator demonstrates that no member of the public will receive a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. In the case of elemental phosphorus plants, EPA is promulgating a standard which limits the total emissions of polonium-210 from calciners and nodulizing kilns at these plants to 21 Ci/y. These limits will assure that emissions do not increase over present levels.

IV. Rationale for Standards

A. Department of Energy Facilities

The DOE administers many government-owned, contractor-operated facilities that emit radionuclides to the air. Operations at these facilities include research and development, production of nuclear weapons, enrichment of uranium and production of plutonium for nuclear weapons and reactors, and

processing, storing, and disposing of radioactive wastes. These facilities are on large sites, some of which cover hundreds of square miles in remote areas, and are located in about 20 different states. Some smaller facilities resemble typical industrial sites and are located in suburban areas.

The Agency estimates that the total population risk from radionuclide emissions to air from all DOE facilities is about 0.07 fatal cancer cases per year, or one case every 14 years. The risk to nearby individuals exposed to the most concentrated of the plants' emission is about one in ten thousand to seven in ten thousand.

DOE facilities currently operate under a policy of keeping radionuclide emissions "as low as reasonably achievable" (ALARA). This policy has generally led to low emissions from most facilities and EPA expects that this current policy will continue.

The Agency is promulgating a final standard that will limit radionuclide emissions to air from DOE facilities to that amount which will cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These limits generally reflect current emission levels achieved by existing control technology and operating practices at DOE facilities.

This final rule does not apply to radon-220, radon-222 and their respective decay products. These radionuclides are exempted because the Agency currently has very little information regarding the emissions of these radionuclides from DOE facilities. However, available information suggests that the DOE facilities that are covered by this standard are likely only to have relatively small total quantities of materials containing radium-224 and radium-226, the sources of radon-220 and radon-222, respectively. The quantities of these materials will be much smaller than uranium mill tailings piles, for example. In practice, EPA expects DOE will seal up all significant sources of radon emissions to air or take other appropriate control action as part of their ALARA program. In addition, it would not be appropriate to establish a dose equivalent standard for radon-220 and radon-222 because radon decay products cause exposure primarily to only a small part of the lung—the bronchial epithelia cells. Such an exposure cannot be accurately expressed as a dose equivalent to the lung.

For DOE facilities that exceed the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public, EPA will issue

alternative standards, if DOE demonstrates that no member of the public will receive a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. This provision applies to those specific DOE facilities where emissions may exceed the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These provisions embody the recommendations of the National Council on Radiation Protection and Measurements for exposure to external radiation ("Control of Air Emissions of Radionuclides," National Council on Radiation Protection and Measurements, September 18, 1984).

B. Nuclear Regulatory Commission-Licensed Facilities and Non-DOE Federal Facilities

NRC-licensed and non-DOE Federal facilities include research and test reactors, shipyards, the radiopharmaceutical industry, and other research and industrial facilities. This category includes both facilities licensed by NRC and facilities licensed by a State under an agreement with NRC. These facilities number in the thousands and are located in all fifty States. Uranium fuel cycle facilities are not included because radionuclide emissions from these facilities are limited by standards promulgated previously by EPA (40 CFR Part 190).

The Agency estimates that the total population risk from radionuclide emissions to air from all NRC-licensed facilities and non-DOE Federal facilities is no more than 0.001 fatal cancer case per year, or one case every one thousand years. The risk to nearby individuals exposed to the most concentrated of the plants' emissions is about two in one hundred thousand.

The NRC and all non-DOE Federal facilities currently operate under a policy of keeping radionuclide emissions "as low as reasonably achievable" (ALARA). This policy has generally led to low emissions from most facilities and the Agency expects that this policy will continue.

The Agency is promulgating a final standard that will limit radionuclide emissions to air from these facilities to that amount which will cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These limits reflect current emission levels achieved by existing control technology

and operating practices at NRC-licensed facilities and non-DOE Federal facilities.

This standard, similarly, does not apply to radon-220, radon-222, and their respective decay products. Facilities covered by this standard are likely only to have relatively small quantities of the sources of these radionuclides and are expected to take appropriate control action to limit emissions as part of the NRC's ALARA program.

For facilities that exceed the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public, EPA will issue alternative standards, if a facility operator demonstrates that no member of the public will receive a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. This provision applies to those specific NRC-licensed and non-DOE Federal facilities where emissions may exceed 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These provisions embody the recommendations of the National Council on Radiation Protection and Measurements for exposure to external radiation ("Control of Air Emissions of Radionuclides," National Council on Radiation Protection and Measurements, September 18, 1984).

After reviewing comments, EPA has concluded that the great majority of NRC-licensed facilities are licensed to possess such small quantities of radionuclides, that even given the most conservative assumptions, they are unlikely to emit radionuclides at a level that would violate the standard during normal operation. Therefore, these facility owners will not be required to submit an initial report (40 CFR 61.10). EPA has established a simple procedure (40 CFR 61.106) to exempt most of these licensees from the initial reporting requirements of the Clean Air Act. EPA expects that all but a few (less than 100) facilities licensed by the NRC could make use of this exemption; the remainder are major facilities using large amounts of radionuclides. Radiation safety personnel at these facilities are expected to have the skill necessary to demonstrate compliance.

Many facilities are licensed by NRC to obtain and use sealed sources of radionuclides. Such sources have no potential to routinely release radionuclides to air and have, therefore, been exempted from this final rule. In addition, low energy accelerators have

been exempted because EPA concluded that emissions from these sources are negligible (49 FR 43906, October 31, 1984).

C. Elemental Phosphorus Plants

There are six elemental phosphorus plants in the United States which process phosphate rock into elemental phosphorus that is used in the production of phosphoric acid, phosphate-based detergents, and organic chemicals. Some of the uranium decay products, polonium-210 and lead-210, contained in the phosphate rock are volatilized by the high temperatures in the plant calciners.

The Agency estimates that the total population risk from radionuclide emissions to air from all elemental phosphorus plants in about 0.06 fatal cancer cases per year, or one case every seventeen years. The risk to nearby individuals exposed to the most concentrated of the plants' emissions is about one in one thousand.

The Agency is promulgating a standard which limits the total emissions of polonium-210 from calciners and nodulizing kilns at these plants to 21 Ci/y. This standard reflects current emission levels achieved by existing control technology and operating practices at elemental phosphorus plants.

The areas surrounding two plants, the FMC plant in Pocatello, Idaho, and the Monsanto plant in Soda Springs, Idaho, are characterized by high total levels of radiation from a variety of sources. The storage and widespread use of slag and possibly other waste products from these plants have significantly increased the natural background radiation levels in parts of the communities. In particular, phosphate slag from these plants has been widely used as aggregate in road and house construction in these areas. EPA and the State of Idaho will initiate a total assessment of the various sources and will investigate ways to reduce or prevent risks from growing.

V. Miscellaneous

A. Docket

The docket is an organized and complete file of all information considered by EPA in the development of the standards. The docket allows interested persons to identify and locate documents so they can effectively participate in the rulemaking process. It also serves as the record for judicial review.

Transcripts of the hearings, all written statements, the Agency's response to comments, and other relevant

documents have been placed in the docket and are available for inspection and copying during normal working hours.

B. General Provisions

The general provisions of 40 CFR Part 61, Subpart A apply to all sources regulated by this rule.

C. State Implementation of Enforcement and Emission Standards

Under section 112(d)(1) of the Act, any State may develop and submit to the Administrator a procedure for implementing and enforcing emission standards for hazardous air pollutants for stationary sources located in such State. If the Administrator finds a State's procedure for implementing the standard adequate, the Federal authority then is delegated to the State. To streamline this procedure, some of EPA's Regional offices have entered into agreements with certain States for "automatic" delegation of new section 112 standards. Under this arrangement, States are delegated authority to implement and enforce all new section 112 standards when they are issued.

The Agency has decided that "automatic" delegation shall not be made for the radionuclide final rules. When EPA entered into these agreements, the State's capabilities and expertise with respect to radionuclides were not considered. Therefore, States must reapply for delegation in the case of radionuclide final rules.

D. Measurement Techniques and Waivers of Compliance

The Agency recognizes that today's notice does not contain descriptions of EPA's approved measurement techniques for measuring emissions and estimating dose. The Agency will publish a list shortly of methods it believes suitable for the purpose of implementing its final rules for DOE facilities and NRC-licensed and non-DOE Federal facilities. Owners of such facilities are invited to submit procedures for inclusion on this list of Agency approved procedures. Submissions should be sent to the Director, Criteria and Standards Division (ANR-460), Office of Radiation Programs, U.S. Environmental Protection Agency, 401 M Street, SW., Washington, D.C. 20460.

This rule is effective immediately for new sources and after 90 days for existing facilities. Those facilities that are not in compliance with the final rule based on information currently available to them and who may wish to request a waiver from the Administrator under the provisions of section 112(c)(1)

shall follow the procedures established under § 61.10 for waiver of compliance, as modified in this rule.

E. Communications

Communications with the Administrator regarding the reporting and recordkeeping requirements of this rule, as well as requests for waivers, shall follow the provisions of § 61.10, except as otherwise noted in this rule.

F. Executive Order 12291

Under Executive Order 12291, issued February 17, 1981, EPA must judge whether a rule is a "major rule" and, therefore, requires that a Regulatory Impact Analysis be prepared. EPA has determined that this rule is not a major rule as defined in section 1(b) of the Executive Order because the annual effect of the rule on the economy will be less than \$100 million. Also, it will not cause a major increase in costs or prices for any sector of the economy or for any geographic region. Further, it will not result in any significant adverse effects on competition, employment, investment, productivity, innovation, or the ability of United States enterprises to compete with foreign enterprises in domestic or foreign markets. Under Executive Order 12291, this regulation was submitted to the Office of Management and Budget (OMB) for review. Any comments from OMB to EPA and any response to those comments are included in the docket.

G. Paperwork Reduction Act

Under the Paperwork Reduction Act of 1980 U.S.C. 3501, *et seq.*, the information collection provisions in this rule will be submitted for approval to the Office of Management and Budget (OMB). They are not effective until OMB approves them. A notice of that approval will be published in the **Federal Register**. Further, EPA will not require reporting until it publishes the list of acceptable measurement techniques described in §§ 61.93 and 61.103.

H. Regulatory Flexibility Analysis

Section 603 of the Regulatory Flexibility Act, 5 U.S.C. 603, requires EPA to prepare and make available for comment an "initial regulatory flexibility analysis" in connection with any rulemaking for which there is a statutory requirement that a general notice of proposed rulemaking be published. The "initial regulatory flexibility analysis" describes the effect of the proposed rule on small business entities.

However, section 604(b) of the Regulatory Flexibility Act provides that section 603 "shall not apply to any proposed . . . rule if the head of the Agency certifies that the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."

EPA believes that virtually all small businesses covered by this final rule already comply. Therefore, this rule will have little or no impact on small businesses. A small business is one that has 750 employees or fewer.

For the preceding reasons, I certify that this rule will not have significant economic impact on a substantial number of small entities.

I. Judicial Review

Judicial review of these standards is available only by filing a petition for review in the United States Court of Appeals for the District of Columbia Circuit within 60 days of today's publication date. The requirements established in this notice may not be challenged later in civil or criminal proceedings brought by EPA to enforce them.

List of Subjects in 40 CFR Part 61

Air pollution control, Hazardous materials, Asbestos, Beryllium, Mercury, Vinyl chloride, Benzene, Arsenic, Radionuclides.

Dated: January 17, 1985.

Lee M. Thomas,
Acting Administrator.

PART 61—[AMENDED]

Part 61 of Chapter I of Title 40 of the Code of Federal Regulations is amended as follows:

1. By adding Subparts H, I, and K to read as follows:

Subpart H—National Emission Standard for Radionuclide Emissions From Department of Energy (DOE) Facilities

- Sec.
- 61.90 Designation of facilities.
 - 61.91 Definitions.
 - 61.92 Emission standard.
 - 61.93 Emission monitoring and compliance procedures.
 - 61.94 Reporting.
 - 61.95 Recordkeeping. [Reserved]
 - 61.96 Waiver of compliance.
 - 61.97 Alternative emission standards.
 - 61.98 Exemption from reporting and testing requirements of 40 CFR 61.10.

Subpart I—National Emission Standard for Radionuclide Emissions From Facilities Licensed by the Nuclear Regulatory Commission (NRC) and Federal Facilities Not Covered by Subpart H

- Sec.
- 61.109 Designation of facilities.
 - 61.101 Definitions.
 - 61.102 Emission standard.
 - 61.103 Emission monitoring and compliance procedures.
 - 61.104 Reporting. [Reserved]
 - 61.105 Recordkeeping. [Reserved]
 - 61.106 Exemption from reporting and testing requirements of 40 CFR 61.10.
 - 61.107 Waiver of compliance.
 - 61.108 Alternative emission standards.

Subpart K—National Emission Standard for Radionuclide Emissions From Elemental Phosphorus Plants

- 61.120 Applicability.
- 61.121 Definitions.
- 61.122 Emission standard.
- 61.123 Emission testing.
- 61.124 Test methods and procedures.
- 61.125 Monitoring of operations.
- 61.126 Waiver of compliance.

Authority: Secs. 112 and 301(a), Clean Air Act, as amended (42 U.S.C. 7412, 7601(a)).

Subpart H—National Emission Standard for Radionuclide Emissions From Department of Energy (DOE) Facilities

§ 61.90 Designation of facilities.

The provisions of this subpart apply to all facilities that are owned or operated by the Department of Energy, except any facility regulated under 40 CFR Parts 190, 191, or 192.

§ 61.91 Definitions.

(a) "Dose equivalent" means the product of absorbed dose and appropriate factors to account for differences in biological effectiveness due to the quality of radiation and its distribution in the body. The unit of the dose equivalent is the rem.

(b) "Critical organ" means the most exposed human organ or tissue exclusive of the integumentary system (skin) and the cornea.

(c) "Radionuclide" means any nuclide that emits radiation. (A nuclide is a species of atom characterized by the constitution of its nucleus and hence by the number of protons, the number of neutrons, and the energy content.)

(d) "Whole body" means all human organs or tissue exclusive of the integumentary system (skin) and the cornea.

(e) "Effective dose equivalent" means the sum of the products of the dose

equivalents to individual organs and tissues and appropriate weighing factors representing the risk relative to that for an equal dose to the whole body.

§ 61.92 Emission standard.

Emissions of radionuclides to air from DOE facilities shall not exceed those amounts that cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. Doses due to radon-220, radon-222, and their respective decay products are excluded from these limits.

§ 61.93 Emission monitoring and compliance procedures.

To determine compliance with the standard, radionuclide emissions shall be determined and dose equivalents to members of the public shall be calculated using EPA approved sampling procedures, EPA models AIRDOS-EPA and RADRISK, or other procedures, including those based on environmental measurements, that EPA has determined to be suitable. Compliance with this standard will be determined by calculating the dose to members of the public at the point of maximum annual air concentration in an unrestricted area where any member of the public resides or abides.

List of approved methods: [Reserved]

§ 61.94 Reporting.

(a) The following provisions of § 61.10 are applicable to DOE-owned facilities: paragraphs (b)-(d).

(b) The following provisions are also applicable:

(1) The owner or operator of any existing source, or any new source to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(i) Name and address of the owner or operator.

(ii) The location of the source.

(iii) The types of radionuclides emitted by the stationary source and the annual quantity (in Ci/y for the most recent calendar year) of each radionuclide emitted.

(iv) A brief description of the nature, size, design, and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(v) Estimate of dose equivalent rate to the member of the public at the point of maximum annual air concentration in an unrestricted area where an individual resides or abides.

(vi) A description of the existing control equipment for each emission point.

(A) Primary control device(s) for radionuclide emissions.

(B) Secondary control device(s) for radionuclide emissions.

(C) Estimated control efficiency (percent) for each control device.

(vii) A statement by the owner or operator of the source as to whether he can comply with the standards prescribed in this part within 90 days of the effective date.

All information collection provisions in this subpart are not effective until the Office of Management and Budget approves them.

(c) In addition to the reporting requirements described in paragraphs (a) and (b) of this section, DOE shall submit to EPA an annual report, by June 1, 1986, and annually thereafter, that includes the results of monitoring emissions from points subject to this final rule and associated dose calculations. This information shall be based on data collected during the calendar year immediately preceding the required date of submission of the annual report. This report shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, Washington, D.C. 20460.

§ 61.95 Recordkeeping. [Reserved]

§ 61.96 Waiver of compliance.

To request a waiver, applicants shall provide the information required in § 61.11 and § 61.94 (a) and (b). Waiver requests shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, Washington, D.C. 20460.

§ 61.97 Alternative emission standards.

If a facility may exceed the values established in § 61.92, DOE may apply to EPA for an alternative emission standard. The Administrator will review such applications and will establish an appropriate alternative emission standard that will ensure that no member of the public being exposed to emissions from the facility will receive a continuous exposure of than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent

from all sources, excluding natural background and medical procedures.

The application shall include the following:

(a) An assessment of the additional effective dose equivalents to the individual receiving maximum exposure from the facility due to all other sources.

(b) The information required in § 61.94.

(c) The effective dose equivalent shall be calculated using the following weighting factors:

Organ	Weighting factor
[Reserved]	[Reserved]

Requests for alternative emission standards shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, 401 M Street, Washington, D.C. 20460.

§ 61.98 Exemption from reporting and testing requirements of 40 CFR 61.10.

Facilities having emissions of radionuclides to air that do not exceed those amounts that cause a dose equivalent of 5 mrem/y to the whole body or 15 mrem/y to the critical organ of any member of the public residing or abiding at the point of maximum annual air concentration in an unrestricted area, are exempt from the reporting requirements of 40 CFR 61.10.

Subpart I—National Emission Standard for Radionuclide Emissions From Facilities Licensed by the Nuclear Regulatory Commission (NRC) and Federal Facilities Not Covered by Subpart H

§ 61.100 Designation of facilities.

The provisions of this subpart apply to NRC-licensed facilities and to facilities owned or operated by any Federal agency other than the Department of Energy that emit radionuclides to air. This subpart does not apply to facilities regulated under 40 CFR Parts 190, 191, or 192, to any low energy accelerator, or to any user of the sealed radiation sources.

§ 61.101 Definitions.

(a) "Agreement State" means any State with which the Atomic Energy Commission or the Nuclear Regulatory Commission has entered into an effective agreement under subsection 274(b) of the Atomic Energy Act of 1954, as amended.

(b) "Dose equivalent" means the product of absorbed dose and appropriate factors to account for differences in biological effectiveness

due to the quality of radiation and its distribution in the body. The unit of dose equivalent is the rem.

(c) "NRC-licensed facility" means any facility licensed by the Nuclear Regulatory Commission or any Agreement State to receive title to, receive, possess, use, transfer, or deliver any source, byproduct, or special nuclear material, except facilities regulated by 40 CFR Parts 190, 191, or 192.

(d) "Critical organ" means the most exposed human organ or tissue exclusive of the integumentary system (skin) and the cornea.

(e) "Radionuclide" means any nuclide that emits radiation. (A nuclide is a species of atom characterized by the constitution of its nucleus and hence by the number of protons, the number of neutrons, and the energy content.)

(f) "Whole body" means all organs or tissues exclusive of the integumentary system (skin) and the cornea.

(g) "Effective dose equivalent" means the sum of the products of the dose equivalents to individual organs and tissues and appropriate weighting factors representing the risk relative to that for an equal dose to the whole body.

§ 61.102 Emission standard.

Emissions of radionuclides to air from facilities subject to this subpart shall not exceed those amounts that cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. Doses due to radon-220, radon-222, and their respective decay products are excluded from these limits.

§ 61.103 Emission monitoring and compliance procedures.

To determine compliance with the standard, radionuclide emissions shall be determined and dose equivalent to members of the public shall be calculated using EPA-approved sampling procedures, EPA codes AIRDOS-EPA and RADRISK, or other procedures, including those based on environmental measurements, that EPA has determined to be suitable. In most cases, compliance with this standard will be determined by calculating the dose to members of the public at the point of maximum annual air concentration in an unrestricted area where any member of the public resides or abides.

List of approved procedures: [Reserved]

§ 61.104 Reporting. [Reserved]

§ 61.105 Recordkeeping. [Reserved]

§ 61.106 Exemption from reporting and testing requirements of 40 CFR 61.10.

Facilities in possession of a radionuclide in annual quantities less than the activity shown in Table 1 are exempt from the reporting requirements of 40 CFR 61.10. If a facility possesses more than one radionuclide, and the sum of the annual amount possessed divided by the equivalent activity in Table 1 is summed for all radionuclides in possession, and the sum is less than unity, then the facility is exempt from the reporting requirements of 40 CFR 61.10. For radionuclides not on this list, a facility may apply to the Administrator for an exemption from the reporting requirements.

Table 1 [Reserved]

§ 61.107 Waiver of compliance.

(a) To request a waiver, applicants shall follow the requirements of § 61.10 (b)-(d).

(b) The following provisions also apply:

(1) the owner or operator of any existing source, or any new source to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(i) Name and address of the owner or operator.

(ii) The location of the source.

(iii) The types of radionuclides emitted by the stationary source and the annual quantity (in Ci/y for the most recent calendar year) of each radionuclide emitted.

(iv) A brief description of the nature, size, design, and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(v) Estimate of dose equivalent rate to the member of the public at the point of maximum annual air concentration in an unrestricted area where any member of the public resides or abides.

(vi) A description of the existing control equipment for each emission point.

(A) Primary control device (s) for radionuclide emissions.

(B) Secondary control device(s) for radionuclide emissions.

(C) Estimated control efficiency (percent) for each control device.

(vii) A statement by the owner or operator of the source as to whether he

can comply with the standards prescribed in this part within 90 days of the effective date.

§ 61.108 Alternative emission standard.

If a facility may exceed the emission standard established in § 61.102, the operator may apply to EPA for an alternative emission standard. The Administrator will review such applications and will establish an appropriate alternative emission standard that will ensure that no member of the public being exposed to emissions from the facility receives a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. The application shall include the following:

(a) An assessment of the additional effective dose equivalents to the member of the public receiving maximum exposure from the facility due to all other sources. The natural radiation background shall be part of this assessment.

(b) The information required in § 61.107.

(c) The effective dose equivalent shall be calculated using the following weighting factors:

Organ	Weighting factor
[Reserved]	[Reserved]

Requests for alternative emission standards shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, 401 M Street SW., Washington, D.C. 20460. This action shall be taken, for existing facilities by April 17, 1985.

Subpart K—National Emission Standard for Radionuclide Emissions From Elemental Phosphorus Plants

§ 61.120 Applicability.

The provisions of this subpart are applicable to owners and operators of calciners and nodulizing kilns at elemental phosphorus plants.

§ 61.121 Definitions.

(a) "Elemental phosphorus plant" means any facility that processes phosphate rock to produce elemental phosphorus using pyrometallurgical techniques.

(b) "Calciner" or "Nodulizing kiln" means a unit in which phosphate rock is heated to high temperatures to remove organic material and/or to convert it to a nodular form. For the purpose of this

subpart, calciners and nodulizing kilns are considered to be similar units.

(c) "Curie" is a unit of radioactivity equal to 37 billion nuclear transformations (decays) per second.

§ 61.122 Emission standard.

Emissions of polonium-210 to air from calciners and nodulizing kilns at an elemental phosphorus plant shall not exceed a total of 21 curies in a calendar year.

§ 61.123 Emission testing.

(a) Unless a waiver of emission testing is obtained under § 61.13, each owner or operator of an elemental phosphorus plant shall test emissions from his plant according to the following requirements:

(1) Within 90 days of the effective date of this standard for a source that has an initial start-up date preceding the effective date of this standard; or

(2) Within 90 days of start-up for a source, that has an initial startup after the effective date of the standard.

(b) The Administrator shall be notified at least 30 days prior to an emission test so that EPA may, at its option, observe the test.

(c) An emission test shall be conducted at each operational calciner or nodulizing kiln. If emissions from a calciner or nodulizing kiln are discharged through more than one stack, then an emission test shall be conducted at each stack and the total emission rate from the calciner or kiln shall be the sum of the emission rates from each of the stacks.

(d) Each emission test shall consist of three valid sampling runs. The phosphate rock processing rate during each run shall be recorded. An emission rate in curies per metric ton of phosphate rock processed shall be calculated for each run. The average of all three runs shall apply in computing the emission rate for the test. The annual polonium-210 emission rate from a calciner or nodulizing kiln shall be determined by multiplying the measured polonium-210 emission rate in curies per metric ton of phosphate rock processed by the annual phosphate rock processing rate in metric tons. In determining the annual phosphate rock processing rate, the values used for operating hours and operating capacity shall be values that will maximize the expected processing rate. For determining compliance with the emission standard of Section 61.122 the total annual emission rate is the sum of the annual emission rates for all operating calciners or nodulizing kilns.

(e) If the owner or operator changes his operation in such a way as to increase his emissions of polonium-210, such as changing the type of rock processed, the temperature of the calciners or kilns, or increasing the annual phosphate rock processing rate, then a new emission test shall be conducted under these conditions.

(f) Each owner or operator of an elemental phosphorus plant shall furnish the Administrator a written report of the results of the emission test within 60 days of conducting the test.

(g) Records of emission test results and other data needed to determine total emissions shall be retained at the source and made available for inspection by the Administrator for a minimum of 2 years.

All information collection provisions in this subpart are not effective until the Office of Management and Budget approves them.

§ 61.124 Test methods and procedures.

(a) Each owner or operator of a source required to test emissions under § 61.213, unless an equivalent or alternate method has been approved by the Administrator, shall use the following test methods:

(1) Test Method 1 of Appendix A to Part 60 shall be used to determine sample and velocity traverses;

(2) Test Method 2 of Appendix A to Part 60 shall be used to determine velocity and volumetric flow rate;

(3) Test Method 3 of Appendix A to Part 60 shall be used for gas analysis.

(4) Test Method 5 of Appendix A to Part 60 shall be used to collect particulate matter containing the polonium-210; and

(5) Test Method 111 of Appendix B to this part shall be used to determine the polonium-210 emissions.

§ 61.125 Monitoring of operations.

(a) The owner or operator of any source subject to this subpart using a wet-scrubbing emission control device shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate with ± 250 pascals (± 1 inch of water). Records of these measurements shall be maintained at the source and made available for inspection by the Administrator for a minimum of 2 years.

(b) The owner or operator of any source subject to this subpart using an electrostatic precipitator control device shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the primary

and secondary current and the voltage in each electric field. Baseline operating values for these parameters shall be maintained with ± 30 percent of their baseline operating values.

(c) For the purpose of conducting an emission test under Section 61.123, the owner or operator of any source subject to the provisions of this subpart shall install, calibrate, maintain, and operate a device for measuring the phosphate rock feed to any affected calciner or nodulizing kiln. The measuring device used must be accurate to within ± 5 percent of the mass rate over its operating range.

§ 61.126 Waiver of compliance.

(a) To request a waiver, applicants shall follow the requirements of § 61.10(b)-(d).

(b) The following provisions also apply:

(1) The owner or operator of any existing source, or any new source to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(i) Name and address of the owner or operator.

(ii) The location of the source.

(iii) The annual quantity of polonium-210 emitted (in Ci/y for the most recent calendar year).

(iv) A brief description of the nature, size, design, and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(v) The average amount of polonium-210 being processed by the source over the last 12 months preceding the date of the report.

(vi) A description of the existing control equipment for each emission point.

(A) Primary control device(s) for radionuclide emissions.

(B) Secondary control device(s) for radionuclide emissions.

(C) Estimated control efficiency (percent) for each control device.

(vii) A statement by the owner or operator of the source as to whether he can comply with the standards prescribed in this part within 90 days of the effective date.

2. Appendix B to Part 61 is amended by adding Test Method 111 as follows:

Appendix B—[Amended]

Method 111—Determination of Polonium-210 Emissions From Stationary Sources

Performance of this method should not be attempted by persons unfamiliar with the use of equipment for measuring radioactive disintegration rates.

1.0 Applicability and Principle.

1.1 Applicability

This method is applicable to the determination of polonium-210 emissions in particulate samples collected in stack gases. Samples should be analyzed within 30 days of collection to minimize error due to growth of polonium-210 from any lead-210 present in the sample.

1.2 Principle

A particulate sample is collected from stack gases as described in Method 5 of Appendix A to 40 CFR Part 60. The polonium-210 in the sample is put in solution, deposited on a metal disc, and the radioactive disintegration rate measured. Polonium in acid solution spontaneously deposits on surfaces of metals that are more electropositive than polonium. This principle is routinely used in the radiochemical analysis of polonium-210.

2.0 Apparatus.

2.1 Alpha spectrometry system consisting of a multichannel analyzer, biasing electronics, silicon surface barrier detector, vacuum pump and chamber.

2.2 Constant temperature bath at 85 °C.

2.3 Polished silver discs, 3.8 cm diameter, 0.4 mm thick with a small hole near the edge.

2.4 Glass beakers, 400 ml, 150 ml.

2.5 Hot plate, electric.

2.6 Fume hood.

2.7 Teflon¹ beakers, 150 ml.

2.8 Magnetic stirrer.

2.9 Stirring bar.

2.10 Plastic or glass hooks to suspend plating discs.

2.11 Internal proportional counter for measuring alpha particles.

2.12 Nuclepore¹ filter membranes, 25 mm diameter, 0.2 micrometer pore size or equivalent.

2.13 Planchets, stainless steel, 32 mm diameter with 1.5 mm lip.

2.14 Transparent plastic tape, 2.5 cm wide with adhesive on both sides.

2.15 Epoxy spray enamel.

2.16 Suction filter apparatus for 25 mm diameter filter.

2.17 Wash bottles, 250 ml capacity.

2.18 Plastic graduated cylinder, 25 ml capacity.

3.0 Regents.

3.1 Ascorbic acid, Reagent grade.

3.2 Ammonium hydroxide (NH₄OH) 15 M, Reagent grade.

3.3 Distilled water meeting ASTM specifications for Type 3 Reagent Water. ASTM Test Method D 1193-77 (incorporated by reference-Section 61.18).

3.4 Ethanol (C₂H₅OH), 95 percent, Reagent grade.

3.5 Hydrochloric acid (HCl), 12 M, Reagent grade.

- 3.6 Hydrochloric acid, 1 M, dilute 83 ml of the 12 M Reagent grade HCl to 1 liter with distilled water.
- 3.7 Hydrofluoric acid (HF), 29 M, Reagent grade.
- 3.8 Hydrofluoric acid, 3 M, dilute 52 ml of the 29 M Reagent grade HF to 500 ml with distilled water. Use a plastic graduated cylinder and storage bottle.
- 3.9 Lanthanum carrier, 0.1 mg La⁺³/ml. Dissolve 0.078 gram Reagent grade lanthanum nitrate, La(NO₃)₃·6H₂O in 250 ml of 1 M HCl.
- 3.10 Nitric acid (HNO₃), 16 M, Reagent grade.
- 3.11 Perchloric acid (HNO₄), 12 M, Reagent grade.
- 3.12 Polonium-209 solution.
- 3.13 Commercial silver cleaner.
- 3.14 Degreaser.
- 3.15 Standard solution of plutonium or americium.
- 3.16 Volumetric flask, 100 ml, 250 ml.
- 4.0 Procedure.
- 4.1 Sample Preparation
- 4.1.1 Place filter collected by EPA Method 5 of Appendix A to 40 CFR Part 60 in Teflon beaker, add 30 ml of 29 M hydrofluoric acid, and evaporate to near dryness on hot plate in a properly operating fume hood. *Caution:* Do not allow residue to go to dryness and overheat. This will result in a loss of polonium.
- 4.1.2 Repeat the procedure described in Section 4.1.1 until the glass fiber filter is dissolved.
- 4.1.3 Add 100 ml of 16 M nitric acid to residue in Teflon beaker and evaporate to near dryness. *Caution:* Do not allow residue to go to dryness and overheat.
- 4.1.4 Add 50 ml of 16 M nitric acid to residue from Section 4.1.3 and heat to 85 °C.
- 4.1.5 Transfer acid solution into a 150 ml glass beaker and add 10 ml of 12 M perchloric acid.
- 4.1.6 Heat acid mixture until dense perchloric acid fumes are evolved.
- 4.1.7 Dilute sample with 1 M HCl to a volume of 250 ml in a volumetric flask.
- 4.2 Sample Screening
- The samples are checked for radioactivity levels to avoid contamination of the alpha spectrometry system. Use the following screening method:
- 4.2.1 Twenty ml of 1 M HCl are added to a 150 ml beaker.
- 4.2.2 One ml of the lanthanum carrier solution, 0.1 mg lanthanum per ml, is added to beaker.
- 4.2.3 A 1 ml aliquot of solution from Section 4.1.7 is added to the beaker.
- 4.2.4 Three ml of 15 M ammonium hydroxide are added to the beaker.
- 4.2.5 The solution from Section 4.2.4 is allowed to stand for a minimum of 30 minutes.
- 4.2.6 The solution is filtered through a filter membrane using suction.
- 4.2.7 The membrane is washed with 10 ml of distilled water and 5 ml of ethanol.

4.2.8 The membrane is allowed to air dry and then mounted, filtration side up, on a planchet lined with double-side plastic tape.

4.2.9 The membrane is radioassayed using an internal proportional alpha counter.

4.2.10 The activity of the original solution from Section 4.1.7 is calculated using Eq. 111-1.

(Eq. 111-1)

$$P = \frac{250 C_S - C_B}{2.22 E_V A_L T}$$

where:

P = total activity of original solution from Section 4.1.7, in pCi.

C_S = total counts of screening sample.

C_B = total counts of procedure background. (See 4.6).

(Eq. 111-2)

250 (desired picocuries in aliquot)

A_L

E_V = counting efficiency as determined in Section 8.0, counts per minute per disintegration per minute.

2.22 = disintegrations per minute per picocurie.

A_L = aliquot used in Section 4.2.3 in ml if different from 1 ml.

T = counting time in minutes for sample and background (which must be equal).

250 = volume of solution from Section 4.1.7 in ml.

4.2.11 Determine the aliquot volume of solution from Section 4.1.7 to be analyzed for polonium-210 using results of the calculation described in Section 4.2.10. The aliquot used should contain an activity between 1 and 4 picocuries.

A_g = aliquot to be analyzed in ml.

P = total activity, as calculated with Eq. 111-1.

4.3 Preparation of silver disc for spontaneous electrodeposition.

4.3.1 Clean both sides of disc with a mild abrasive commercial silver cleaner.

4.3.2 Clean both sides of disc with degreaser.

4.3.3 Place disc on absorbent paper and spray one side with epoxy spray enamel. This should be carried out in a well-ventilated area, with the disc lying flat to keep paint on one side only.

4.3.4 Allow paint to dry for 24 hours before using disc for deposition.

4.4 Sample Analysis

4.4.1 Add the aliquot of solution from Section 4.1.7 to be analyzed as determined in Section 4.2.11 to a suitable 200 ml container to be placed in a constant temperature bath. Note, aliquot volume may require a larger container.

4.4.2 Add an aliquot of polonium-209 tracer solution (see Section 7.0) that contains approximately the same amount of activity as that in the aliquot of the sample to be analyzed as determined in Section 4.2.11.

4.4.3 If necessary, bring the volume to 100 ml with 1 M HCl. If the aliquot volume exceeds 100 ml, use total aliquot.

4.4.4 Add 200 mg of ascorbic acid and heat solution to 85 °C in a constant temperature bath.

4.4.5 Stirring of the solution must be maintained while the solution is in the constant temperature bath for plating.

4.4.6 Suspend a silver disc in the heated solution using a glass or plastic rod with a hook inserted through the hole in the disc. The disc should be totally immersed in the solution at all time.

4.4.7 Maintain the disc in solution for 3 hours while stirring.

4.4.8 Remove the silver disc, rinse with distilled water and allow to air dry at room temperature.

4.5 Measurement of Polonium-210

4.5.1 Place the silver disc, with deposition side (unpainted side) up, on a planchet and secure with double-side plastic tape.

4.5.2 Place the planchet with disc in alpha spectrometry system and count for 1000 minutes.

4.6 Determination of Procedure Background

Background counts used in all equations are determined by performing the specific analysis required using the analytical reagents only. This should be repeated every 10 analyses.

4.7 Determination of Instrument Background

Instrument backgrounds of the internal proportional counter and alpha spectrometry system should be determined on a weekly basis. Instrument background should not exceed procedure background. If this occurs, it may be due to a malfunction or contamination.

5.0 Calculation of Polonium-210 Activity.

5.1 Calculate the activity of polonium-210 on a sample filter using Eq. 111-3

Eq. 111-3

$$A = \frac{C_T - C_B L}{2.22 E_V E_C T D}$$

where:

A = picocuries of polonium-210 per filter.

C_T = total counts in polonium-210 spectral region.

C_B = procedure background counts in polonium-210 spectral region.

L = dilution factor. This is the volume in ml of solution in Section 4.1.7 (250 ml) divided by volume in ml used in Section 4.4.1.

2.22 = disintegrations per minute per picocurie.

E_V = fraction of polonium recovered on the planchet. Given by:

¹ Mention of registered trade names or specific products does not constitute endorsement by the Environmental Protection Agency.

$$E_V = \frac{B_T - B_B}{2.22 F E_C T}$$

where:

- B_T = polonium-209 tracer counts in sample.
- B_B = procedure background counts measured in polonium-209 spectral region.
- F = activity in picocuries of polonium-209 added to sample—from Eq. 111-7.
- 2.22 = disintegrations per minute per picocurie.
- E_C = See below.
- T = See below.
- E_C = counting efficiency of detector used, given by Eq. 111-6, as counts per minute per disintegration per minute.
- T = counting time, specified in Section 4.5.2 and 7.11 as 1000 minutes for all alpha spectrometry sample and background counts.
- D = decay correction for time "t" (in days) from sample collection to sample counting, given by: $D = e^{-\lambda t}$

5.2 Procedure for Calculating Emission Rate in Curies per Metric Ton of Phosphate Rock Processed

Calculate the polonium-210 emission per metric ton of rock processed from each run at each stack using equation 111-4. The emission rate from each stack is determined by averaging the emission rates calculated for each of the three runs at each stack.

(Eq. 111-4)

$$R_S = \frac{1 \times 10^{-12} A Q_{SD}}{V_{SD} M_H}$$

Where:

- R_S = emission rate from stack, in curies of polonium-210 per metric ton of rock processed.
- A = picocuries of polonium-210 in filter sample as determined by A in Eq. 111-3.
- Q_{SD} = volumetric flow rate of effluent stream in dry standard m³/hr as determined by Method 2 of Appendix A to 40 CFR Part 60.
- V_{SD} = total volume of air sample in dry standard m³ as determined by Method 5 of Appendix A to 40 CFR Part 60.
- M_H = rock processing rate during sampling in metric tons/hr.
- 1 × 10⁻¹² = curies per picocurie.

5.3 Average Stack Emission Rate Calculation

Determine the average stack emission rate from the average of the three emission rates calculated in Section 5.2. Perform these calculations for each stack of each calciner.

5.4 Calciner Emission Rate Calculation

Determine each calciner's emission rate (X_i) by taking the sum of the emission rates from all stacks of each calciner.

5.5 Annual Polonium-210 Emission Calculation

Determine the annual elemental phosphorus plant emissions of polonium-210 by taking the sum of emission rates at each calciner (X_i in 5.4) and

multiplying this sum by the annual metric tons of phosphate rock processed by that calciner, according to Eq. 111-5.

(Eq. 111-5)

$$S = X_1 M_1 + X_2 M_2 + \dots + X_N M_N$$

Where:

- S = annual polonium-210 emissions in curies from the elemental phosphorus plant.
- X_i = emission rate from a calciner (i) in curies per metric ton, as determined in Section 5.4.
- N = number of calciners at the elemental phosphorus plant.
- M_i = phosphate rock processed per year, in metric tons for each calciner.

6.0 Standardization of Alpha Spectrometry System.

- 6.1 Obtain a standardized solution of an alpha-emitting actinide element such as plutonium-239 or americium-241. Add a quantity of the standardized solution to a 100 ml volumetric flask so that the final concentration when diluted to a volume of 100 ml will be approximately 1 pCi/ml. Add 10 ml of 16 M HNO₃ and dilute to 100 ml with distilled water.
- 6.2 Add 20 ml of 1 M HCl to each of six 150 ml beakers.
- 6.3 Add 1.0 ml of lanthanum carrier, 0.1 mg lanthanum per ml, to the acid solution in each beaker.
- 6.4 Add 1.0 ml of actinide solution from Section 6.1 to each beaker.
- 6.5 Add 5.0 ml of 3 M HF to each beaker.
- 6.6 Cover beakers and allow solutions to stand for a minimum of 30 minutes.
- 6.7 Filter each solution through a filter membrane using this suction filter apparatus.
- 6.8 After each filtration, wash the filter membrane with 10 ml of distilled water and 5 ml of ethanol.
- 6.9 Allow the filter membrane to air dry on the filter apparatus.
- 6.10 Carefully remove the filter membrane and mount with double-side tape on the inner surface of a planchet. Mount filter with filtration side up.
- 6.11 Place planchet in an alpha spectrometry system and count each planchet for 1000 minutes.
- 6.12 The counting efficiency of each detector can be calculated using Eq. 111-6.

(Eq. 111-6)

$$E_C = \frac{C_S - C_B}{2.22 A_A T}$$

where:

- C_S = gross counts in actinide peak.
- C_B = background counts in same peak area as C_S.
- 2.22 = disintegrations per minute per picocurie.
- A_A = picocuries of actinide added.
- E_C = counting efficiency, counts per minute per disintegration per minute.

T = counting time in minutes, specified in Section 6.11 as 1000 minutes.

- 6.13 Determine the average counting efficiency for each detector by calculating the average of the six determinations.
- 7.0 Preparation of Standardized Solution of Polonium-209.
- 7.1 Obtain polonium-209 solution from an available supplier. Add a quantity of the Po-209 solution to a 100 ml volumetric flask so that the final concentration when diluted to a 100 ml volume will be approximately 1 pCi/ml. Add 10 ml of 16 M HNO₃ and dilute to 100 ml with distilled water.
- 7.2 Add 20 ml of 1 M HCl to each of six 150 ml beakers.
- 7.3 Add 1.0 ml of lanthanum carrier, 0.1 mg lanthanum per ml, to the acid solution in each beaker.
- 7.4 Add 1.0 ml of polonium-209 tracer from Section 7.1 to each beaker.
- 7.5 Add 3.0 ml of 15 M ammonium hydroxide to each beaker.
- 7.6 Cover beakers and allow to stand for a minimum of 30 minutes.
- 7.7 Filter the contents of each beaker through a separate filter membrane.
- 7.8 After each filtration, wash membrane with 10 ml of distilled water and 5 ml of ethanol.
- 7.9 Allow filter membrane to dry on filter apparatus.
- 7.10 Carefully remove the filter membrane and mount with double-side tape on the inner surface of a planchet. Mount filter with filtration side up.
- 7.11 Place planchet in alpha spectrometry system and count each planchet for 1000 minutes.
- 7.12 The activity of the polonium solution can be calculated using Eq. 111-7.

(Eq. 111-7)

$$F = \frac{C_S - C_B}{2.22 E_C T}$$

where:

- F = activity of polonium-209 solution, in pCi.
- C_S = gross counts of polonium-209 in the 4.88 MeV region of the spectrum in the counting time T.
- C_B = background counts in the 4.88 MeV region of spectrum in the counting time T.
- 2.22 = disintegrations per minute per picocurie.
- E_C = counting efficiency of detector used, counts per minute per disintegration per minute.
- T = counting time, specified in Section 7.11 as 1000 minutes.
- 7.13 Determine the average activity of the polonium-209 solution from the six determinations.
- 7.14 Aliquots of the solution from Section 7.1 are to be used as tracer with each polonium-210 analysis.
- 8.0 Standardization of Internal Proportional Counter.

- 8.1 Obtain a standardized solution of an alpha-emitting actinide element such as plutonium-239 or americium-241. Add a quantity of the standardized solution to a 100 ml volumetric flask so that the final concentration when diluted to a 100 ml volume will be approximately 100 pCi/ml. Add 10 ml of 16 M HNO₃ and dilute to 100 ml with distilled water.
- 8.2 Add 20 ml of 1 M HCl to each of six 150 ml beakers.
- 8.3 Add 1.0 ml of lanthanum carrier, 0.1 mg lanthanum per ml, to the acid solution in each beaker.
- 8.4 Add 1.0 ml of the actinide solution from Section 8.1 to each beaker.
- 8.5 Add 5.0 ml of 3 M HF to each beaker.
- 8.6 Cover beakers and allow solutions to stand for a minimum of 30 minutes.
- 8.7 Filter each solution through a filter membrane using the suction filter apparatus.
- 8.8 After each filtration, wash membrane with 10 ml of distilled water and 5 ml of ethanol.
- 8.9 Allow filter membrane to dry on filter apparatus.
- 8.10 Carefully remove filter membrane and mount with double-side tape on the inner

surface of a planchet. Mount filter with filtration side up.

- 8.11 Place planchet in internal proportional counter and count for 100 minutes.
- 8.12 The counting efficiency of the internal proportional counter is determined as follows from the six samples:

(Eq. 111-8)

$$E_B = \frac{C_S - C_B}{2.22 A_A T}$$

where:

- E₁ = counting efficiency of proportional counter, counts per minute per disintegration per minute.
- C_S = gross counts of standard.
- C_B = gross counts of procedure background.
- 2.22 = disintegrations per minute per picocurie
- A_A = picocuries of actinide added.
- T = counting time in minutes, specified in Section 8.11 as 100 minutes.

- 8.13 Determine the average counting efficiency of the six determinations.

9.0 Quality Assurance.

9.1 General Requirements

- 9.1.1 All analysts using this method are required to demonstrate their ability to use the method and to define their respective accuracy and precision criteria.

- 9.1.2 The minimum requirements for the establishment of accuracy and precision criteria is four replicate analyses of an externally prepared performance evaluation sample.

9.2 Specific Requirements

- 9.2.1 Each sample will be analyzed in duplicate.

- 9.2.2 Every tenth sample will be an externally prepared performance evaluation sample submitted by the Quality Assurance Officer.

- 9.2.3 Duplicate measurements are considered acceptable when the difference between them is less than two standard deviations as described in EPA 600/4-77-001 or subsequent revisions.

[FR Doc. 85-2321 Filed 2-5-85; 8:45 am]

BILLING CODE 6560-50-M

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:25 PM
To: Thornton, Marisa
Subject: Fw: Web Update: Additional Reference to that page
Attachments: FR5190.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:51 PM
To: Collections.SubW
Subject: FW: Web Update: Additional Reference to that page

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Friday, August 01, 2014 4:53 PM
To: Thornton, Marisa
Cc: Romero, Carmen
Subject: Web Update: Additional Reference to that page

Dear Marisa:

We have some updates to:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

FR (Federal Register) 1985a. [EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities](#), Volume 50, p. 7280, February 8, 1985. (8 pp, 4.02 MB) [About PDF](#).

Please replace the above reference with:

FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985.

Please link the title in the ERRATUM to the attached file, FR5190.pdf

Metadata:

- **Title:** Standards for Radionuclides
- **Author:** EPA/OAR/Office of Radiation and Indoor Air
- **Subject:** Standards for Elemental Phosphorous Plants, NRC, and DOE facilities
- **Keywords:** "FR505190" "EPA" "radionuclide standards" "Phosphorous Plants" "NRC facilities" "DOE Facilities"

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:25 PM
To: Thornton, Marisa
Subject: Fw: Web Update: Additional Reference to that page
Attachments: FR5190.pdf

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:51 PM
To: Collections.SubW
Subject: FW: Web Update: Additional Reference to that page

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Friday, August 01, 2014 4:53 PM
To: Thornton, Marisa
Cc: Romero, Carmen
Subject: Web Update: Additional Reference to that page

Dear Marisa:

We have some updates to:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

FR (Federal Register) 1985a. [EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities](#), Volume 50, p. 7280, February 8, 1985. (8 pp, 4.02 MB) [About PDF](#).

Please replace the above reference with:

FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985.

Please link the title in the ERRATUM to the attached file, FR5190.pdf

Metadata:

- **Title:** Standards for Radionuclides
- **Author:** EPA/OAR/Office of Radiation and Indoor Air
- **Subject:** Standards for Elemental Phosphorous Plants, NRC, and DOE facilities
- **Keywords:** "FR505190" "EPA" "radionuclide standards" "Phosphorous Plants" "NRC facilities" "DOE Facilities"

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

ENVIRONMENTAL PROTECTION AGENCY**40 CFR Part 61****[AD-FRL-2764-7]****National Emission Standards for Hazardous Air Pollutants; Standards for Radionuclides****AGENCY:** Environmental Protection Agency (EPA).**ACTION:** Final rules.

SUMMARY: On April 6, 1983, the Environmental Protection Agency, pursuant to Section 112 of the Clean Air Act, published in the Federal Register proposed standards for sources of emissions of radionuclides to air. These included the following source categories: (1) Department of Energy (DOE) facilities; (2) Nuclear Regulatory Commission (NRC)-licensed facilities and non-DOE Federal facilities; (3) elemental phosphorus plants; and (4) underground uranium mines. Subsequently, on October 23, 1984, the Agency withdrew its proposed standards for the first three source categories on the grounds that current emission control and operational practices provide an ample margin of safety in protecting the public health from the hazards associated with exposure to airborne radionuclides from these sources. EPA continues to believe existing emissions from these sources are so low that the public health is already protected with an ample margin of safety, even without regulations. EPA also concluded it was impossible at the time to issue a legally valid final standard for uranium mines.

However, the U.S. District Court for the Northern District of California has ordered the Agency to either promulgate standards for the first three source categories by January 10, 1985, or to find that radionuclides are clearly not a hazardous pollutant, in essence "delisting" the pollutant from regulatory consideration under Section 112 of the Act. EPA believes that this order exceeds the District Court's jurisdiction and is appealing it to the Court of Appeals for the Ninth Circuit. As set forth in its withdrawal decision, EPA believes that, although emission levels from these three source categories are not hazardous, radionuclides cannot properly be delisted under Section 112 because radionuclide emissions from uranium mines appear to reach hazardous levels that warrant regulation. Under the provisions of the Court's order, however, the Agency is nonetheless required to issue standards

governing these three source categories. Accordingly, the Agency is promulgating final rules for DOE facilities, NRC-licensed and non-DOE Federal facilities, and elemental phosphorus plants. EPA continues to believe that its original position was correct and intends to pursue its appeal of the District Court's order. The Court also ordered EPA to promulgate final standards for underground uranium mines. EPA expects to promulgate these standards by April 10, 1985, the date specified in the Court order.

EFFECTIVE DATE: Final rules are effective on February 6, 1985. For existing sources, the standards shall not apply until 90 days after the effective date.

The information collection requirements contained in 40 CFR 61.94, 61.95, 61.96, 61.97, 61.104, 61.105, 61.107, 61.108, 61.123, 61.124, 61.125, 61.126, and, as they apply to radionuclide sources, 61.07, 61.09, 61.10, and 61.13 have not been approved by the Office of Management and Budget (OMB) and are not effective until OMB has approved them.

ADDRESSES: The rulemaking record is contained in Docket No. A-79-11. This docket is available for public inspection between 3:00 a.m. and 4:00 p.m., Monday through Friday, at EPA's Central Docket Section, West Tower Lobby, Gallery One, Waterside Mall, 401 M Street, S.W., Washington, D.C. 20460. A reasonable fee may be charged for copying.

FOR FURTHER INFORMATION CONTACT: James M. Hardin, Environmental Standards Branch (ANR-460), Criteria and Standards Division, Office of Radiation Programs, U.S. Environmental Protection Agency, Washington, D.C. 20460, (703) 557-8977.

SUPPLEMENTARY INFORMATION:**I. Supporting Documents**

A final Background Information Document has been prepared and single copies may be obtained by writing the Program Management Office, Office of Radiation Programs (ANR-458), U.S. Environmental Protection Agency, Washington, D.C. 20460, or by calling (703) 557-9351. Please refer to "NESHAPS—Radionuclides: Background Information Document for Final Rules, Volumes 1 and 2, [EPA 520/1-84-022-1, EPA 520/1-84-022-2], October 1984. Volume 1 of the Background Information Document contains a complete description of the Agency's methodology used in its risk assessment of the hazards associated with airborne emissions of radionuclides. Volume 2 contains a description of how the Agency applied

this methodology to each source category subject to this rulemaking.

The Agency has also prepared a final economic analysis of the impact of its standards on the elemental phosphorus industry, entitled "Regulatory Impact Analysis of Environmental Standards for Elemental Phosphorus Plants" [EPA 520/1-84-025], October 1984. In addition, a final report on control technology for radionuclide emissions to air at DOE facilities has been completed and is entitled "Control Technology for Radioactive Emissions to the Atmosphere at U.S. Department of Energy Facilities" [PNL-4621], October 1984. Single copies of both reports may be obtained from the Program Management Office, Office of Radiation Programs.

The Agency's decision to withdraw its proposed standards for radionuclide emissions from elemental phosphorus plants, DOE facilities, and NRC-licensed and non-DOE Federal facilities was published in the Federal Register on October 31, 1984 (43906). The notice contains a complete history of the rulemaking up to the withdrawal action, a summary of the major issues raised in public comments and the Agency's responses, alternatives considered, and the Agency's rationale for its decision to withdraw the proposed standards. Single copies of this document may be obtained by contacting the Program Management Office, Office of Radiation Programs.

II. History of Standards Development

On April 6, 1983, EPA announced in the Federal Register its proposed standards for sources of emissions of radionuclides from four categories: (1) DOE facilities; (2) NRC-licensed facilities and non-DOE Federal facilities; (3) elemental phosphorus plants; and (4) underground uranium mines. The notice also identified several additional source categories which emit radionuclides. However, the Agency concluded that good reasons existed to propose not to regulate these categories, which included: (1) coal-fired boilers; (2) the phosphate industry; (3) other extraction industries; (4) uranium fuel cycle facilities, uranium mill tailings, and management of high-level radioactive waste; and (5) low energy accelerators (48 FR 15076, April 6, 1983). At the time of proposal, these nine source categories were considered to be all that might potentially release radionuclides to air at levels that could warrant regulatory attention.

On February 17, 1984, the Sierra Club filed suit to compel final action in the U.S. District Court for the Northern

District of California, pursuant to the citizens' suit provision of the Act (*Sierra Club v. Ruckelshaus*, No. 84-0656 WHO). On July 25, 1984, the Court granted Sierra Club's summary judgment motion and ordered EPA to promulgate standards or make a finding that radionuclides are not a hazardous air pollutant within 90 days of the date of the order.

On October 23, 1984, EPA withdrew its proposed standards for radionuclide emissions from the following categories: (1) elemental phosphorus plants; (2) DOE facilities; (3) NRC-licensed facilities and non-DOE Federal facilities; and (4) underground uranium mines. The Agency also affirmed its original decision not to regulate emissions from the five other source categories considered (49 FR 43906, October 31, 1984). The proposed standards for the first three categories were withdrawn because the Administrator determined that current practice provides an ample margin of safety in protecting the public health from the hazards associated with exposure to radionuclides from these sources.

In the case of underground uranium mines, the Administrator withdrew the proposed standard because it did not meet the legal requirements of section 112 of the Clean Air Act. Simultaneous with this action, the Agency published an Advance Notice of Proposed Rulemaking for radon-222 emissions from underground uranium mines to solicit additional information on control methods such as bulkheading and other forms of operational controls for radon-222 which would meet the legal requirements of section 112 (49 FR 43915, October 31, 1984).

On October 31, 1984, the U.S. District Court, Northern District of California issued an order requiring the Administrator and the Agency to show cause why they should not be held in contempt of the Court's July 25 order. A Court hearing was held on November 21, 1984, to consider the issue. In a ruling on December 11, 1984, the Court found the Administrator and the Agency in contempt and ordered the following remedial action:

1. (a) Issue within 30 days of the date of the order final radionuclide emission standards for DOE facilities, NRC-licensed and non-DOE Federal facilities, and elemental phosphorus plants, and
- (b) Issue within 120 days of the date of the order final radionuclide emission standards for uranium mines; or
2. Make a finding based on the information presented at hearings during the rulemaking, that radionuclides are clearly not a hazardous pollutant.

On December 21, 1984, EPA requested a stay of the District Court's order; this request was denied on January 3, 1985. The Agency subsequently requested a stay from the 9th Circuit Court of Appeals on January 8, 1985. This request was also denied. However, the Court did allow the Agency an additional seven days to provide time for further appeal to the U.S. Supreme Court. These efforts also failed. Therefore, to comply with the District Court's EPA is promulgating standards for radionuclide emissions to air from DOE facilities, NRC-licensed and non-DOE Federal facilities, and elemental phosphorus plants. Litigation regarding these three standards is continuing.

III. Summary of Decision

As stated above, EPA withdrew proposed standards for the three categories that are the subject of this notice based on the judgment that emissions from these source categories are presently controlled at levels that provide an ample margin of safety in protecting public health from the hazards associated with exposure to airborne radionuclides. In reaching this judgment, EPA considered the available evidence, including public comments on its proposed standards and information developed since that proposal.

In the case of DOE facilities and NRC-licensed and non-DOE Federal facilities, the risk was judged too small to warrant regulation. Since the beginning of regulation under section 112, EPA has interpreted this section as not requiring regulation in cases where the risks from a category of sources do not exceed a certain minimum threshold. Indeed, contrary interpretations lead to results that are hard to defend from any logical or policy perspective. The risks presented by radionuclide emissions from these source categories are not as great as risks that EPA has found insufficient to trigger regulation in prior rulemakings under section 112. The health gains from regulation, as represented by the difference between the risk before and after regulation, are smaller still.

In the case of elemental phosphorus plants, the risks are also very small. In addition, the cost of controls compared to the amount that the risk is reduced is far higher than EPA has imposed in prior regulatory decisions under section 112.

At the same time, EPA believed that radionuclides could not properly be delisted because a fourth category of sources, uranium mines, did emit radionuclides in amounts that appeared to warrant regulation.

None of these circumstances has changed since October 23. EPA

continues to believe that its original position was correct and hopes that future litigation will permit the Agency to return to that position. However, the District Court's December 11 order and the subsequent denials of stays, compel issuance of standards for these three categories absent a decision by EPA to delist radionuclides. For the reasons discussed in detail in the Advance Notice of Proposed Rulemaking for underground uranium mines and the **Federal Register** notice published on October 31, EPA cannot conclude that radionuclides are clearly not hazardous, and thereby delist.

The standards established today limit radionuclide emissions from DOE facilities to an amount that causes a dose equivalent rate of 25 mrem/y to the whole body or a dose equivalent rate of 75 mrem/y to the critical organ of any member of the public. This standard excludes doses due to radon-220, radon-222, and their respective decay products. For NRC-licensed and non-DOE Federal facilities, EPA is promulgating a standard which limits radionuclide emissions from these facilities to an amount that causes a dose equivalent rate of 25 mrem/y to the whole body or a dose equivalent rate of 75 mrem/y to the critical organ of any member of the public. This standard also excludes doses due to radon-220, radon-222, and their respective decay products. EPA will grant a waiver of the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public and issue alternative standards, if a facility operator demonstrates that no member of the public will receive a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. In the case of elemental phosphorus plants, EPA is promulgating a standard which limits the total emissions of polonium-210 from calciners and nodulizing kilns at these plants to 21 Ci/y. These limits will assure that emissions do not increase over present levels.

IV. Rationale for Standards

A. Department of Energy Facilities

The DOE administers many government-owned, contractor-operated facilities that emit radionuclides to the air. Operations at these facilities include research and development, production of nuclear weapons, enrichment of uranium and production of plutonium for nuclear weapons and reactors, and

processing, storing, and disposing of radioactive wastes. These facilities are on large sites, some of which cover hundreds of square miles in remote areas, and are located in about 20 different states. Some smaller facilities resemble typical industrial sites and are located in suburban areas.

The Agency estimates that the total population risk from radionuclide emissions to air from all DOE facilities is about 0.07 fatal cancer cases per year, or one case every 14 years. The risk to nearby individuals exposed to the most concentrated of the plants' emission is about one in ten thousand to seven in ten thousand.

DOE facilities currently operate under a policy of keeping radionuclide emissions "as low as reasonably achievable" (ALARA). This policy has generally led to low emissions from most facilities and EPA expects that this current policy will continue.

The Agency is promulgating a final standard that will limit radionuclide emissions to air from DOE facilities to that amount which will cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These limits generally reflect current emission levels achieved by existing control technology and operating practices at DOE facilities.

This final rule does not apply to radon-220, radon-222 and their respective decay products. These radionuclides are exempted because the Agency currently has very little information regarding the emissions of these radionuclides from DOE facilities. However, available information suggests that the DOE facilities that are covered by this standard are likely only to have relatively small total quantities of materials containing radium-224 and radium-226, the sources of radon-220 and radon-222, respectively. The quantities of these materials will be much smaller than uranium mill tailings piles, for example. In practice, EPA expects DOE will seal up all significant sources of radon emissions to air or take other appropriate control action as part of their ALARA program. In addition, it would not be appropriate to establish a dose equivalent standard for radon-220 and radon-222 because radon decay products cause exposure primarily to only a small part of the lung—the bronchial epithelia cells. Such an exposure cannot be accurately expressed as a dose equivalent to the lung.

For DOE facilities that exceed the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public, EPA will issue

alternative standards, if DOE demonstrates that no member of the public will receive a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. This provision applies to those specific DOE facilities where emissions may exceed the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These provisions embody the recommendations of the National Council on Radiation Protection and Measurements for exposure to external radiation ("Control of Air Emissions of Radionuclides," National Council on Radiation Protection and Measurements, September 18, 1984).

B. Nuclear Regulatory Commission-Licensed Facilities and Non-DOE Federal Facilities

NRC-licensed and non-DOE Federal facilities include research and test reactors, shipyards, the radiopharmaceutical industry, and other research and industrial facilities. This category includes both facilities licensed by NRC and facilities licensed by a State under an agreement with NRC. These facilities number in the thousands and are located in all fifty States. Uranium fuel cycle facilities are not included because radionuclide emissions from these facilities are limited by standards promulgated previously by EPA (40 CFR Part 190).

The Agency estimates that the total population risk from radionuclide emissions to air from all NRC-licensed facilities and non-DOE Federal facilities is no more than 0.001 fatal cancer case per year, or one case every one thousand years. The risk to nearby individuals exposed to the most concentrated of the plants' emissions is about two in one hundred thousand.

The NRC and all non-DOE Federal facilities currently operate under a policy of keeping radionuclide emissions "as low as reasonably achievable" (ALARA). This policy has generally led to low emissions from most facilities and the Agency expects that this policy will continue.

The Agency is promulgating a final standard that will limit radionuclide emissions to air from these facilities to that amount which will cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These limits reflect current emission levels achieved by existing control technology

and operating practices at NRC-licensed facilities and non-DOE Federal facilities.

This standard, similarly, does not apply to radon-220, radon-222, and their respective decay products. Facilities covered by this standard are likely only to have relatively small quantities of the sources of these radionuclides and are expected to take appropriate control action to limit emissions as part of the NRC's ALARA program.

For facilities that exceed the limits of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public, EPA will issue alternative standards, if a facility operator demonstrates that no member of the public will receive a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. This provision applies to those specific NRC-licensed and non-DOE Federal facilities where emissions may exceed 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. These provisions embody the recommendations of the National Council on Radiation Protection and Measurements for exposure to external radiation ("Control of Air Emissions of Radionuclides," National Council on Radiation Protection and Measurements, September 18, 1984).

After reviewing comments, EPA has concluded that the great majority of NRC-licensed facilities are licensed to possess such small quantities of radionuclides, that even given the most conservative assumptions, they are unlikely to emit radionuclides at a level that would violate the standard during normal operation. Therefore, these facility owners will not be required to submit an initial report (40 CFR 61.10). EPA has established a simple procedure (40 CFR 61.106) to exempt most of these licensees from the initial reporting requirements of the Clean Air Act. EPA expects that all but a few (less than 100) facilities licensed by the NRC could make use of this exemption; the remainder are major facilities using large amounts of radionuclides. Radiation safety personnel at these facilities are expected to have the skill necessary to demonstrate compliance.

Many facilities are licensed by NRC to obtain and use sealed sources of radionuclides. Such sources have no potential to routinely release radionuclides to air and have, therefore, been exempted from this final rule. In addition, low energy accelerators have

been exempted because EPA concluded that emissions from these sources are negligible (49 FR 43906, October 31, 1984).

C. Elemental Phosphorus Plants

There are six elemental phosphorus plants in the United States which process phosphate rock into elemental phosphorus that is used in the production of phosphoric acid, phosphate-based detergents, and organic chemicals. Some of the uranium decay products, polonium-210 and lead-210, contained in the phosphate rock are volatilized by the high temperatures in the plant calciners.

The Agency estimates that the total population risk from radionuclide emissions to air from all elemental phosphorus plants in about 0.06 fatal cancer cases per year, or one case every seventeen years. The risk to nearby individuals exposed to the most concentrated of the plants' emissions is about one in one thousand.

The Agency is promulgating a standard which limits the total emissions of polonium-210 from calciners and nodulizing kilns at these plants to 21 Ci/y. This standard reflects current emission levels achieved by existing control technology and operating practices at elemental phosphorus plants.

The areas surrounding two plants, the FMC plant in Pocatello, Idaho, and the Monsanto plant in Soda Springs, Idaho, are characterized by high total levels of radiation from a variety of sources. The storage and widespread use of slag and possibly other waste products from these plants have significantly increased the natural background radiation levels in parts of the communities. In particular, phosphate slag from these plants has been widely used as aggregate in road and house construction in these areas. EPA and the State of Idaho will initiate a total assessment of the various sources and will investigate ways to reduce or prevent risks from growing.

V. Miscellaneous

A. Docket

The docket is an organized and complete file of all information considered by EPA in the development of the standards. The docket allows interested persons to identify and locate documents so they can effectively participate in the rulemaking process. It also serves as the record for judicial review.

Transcripts of the hearings, all written statements, the Agency's response to comments, and other relevant

documents have been placed in the docket and are available for inspection and copying during normal working hours.

B. General Provisions

The general provisions of 40 CFR Part 61, Subpart A apply to all sources regulated by this rule.

C. State Implementation of Enforcement and Emission Standards

Under section 112(d)(1) of the Act, any State may develop and submit to the Administrator a procedure for implementing and enforcing emission standards for hazardous air pollutants for stationary sources located in such State. If the Administrator finds a State's procedure for implementing the standard adequate, the Federal authority then is delegated to the State. To streamline this procedure, some of EPA's Regional offices have entered into agreements with certain States for "automatic" delegation of new section 112 standards. Under this arrangement, States are delegated authority to implement and enforce all new section 112 standards when they are issued.

The Agency has decided that "automatic" delegation shall not be made for the radionuclide final rules. When EPA entered into these agreements, the State's capabilities and expertise with respect to radionuclides were not considered. Therefore, States must reapply for delegation in the case of radionuclide final rules.

D. Measurement Techniques and Waivers of Compliance

The Agency recognizes that today's notice does not contain descriptions of EPA's approved measurement techniques for measuring emissions and estimating dose. The Agency will publish a list shortly of methods it believes suitable for the purpose of implementing its final rules for DOE facilities and NRC-licensed and non-DOE Federal facilities. Owners of such facilities are invited to submit procedures for inclusion on this list of Agency approved procedures. Submissions should be sent to the Director, Criteria and Standards Division (ANR-460), Office of Radiation Programs, U.S. Environmental Protection Agency, 401 M Street, SW., Washington, D.C. 20460.

This rule is effective immediately for new sources and after 90 days for existing facilities. Those facilities that are not in compliance with the final rule based on information currently available to them and who may wish to request a waiver from the Administrator under the provisions of section 112(c)(1)

shall follow the procedures established under § 61.10 for waiver of compliance, as modified in this rule.

E. Communications

Communications with the Administrator regarding the reporting and recordkeeping requirements of this rule, as well as requests for waivers, shall follow the provisions of § 61.10, except as otherwise noted in this rule.

F. Executive Order 12291

Under Executive Order 12291, issued February 17, 1981, EPA must judge whether a rule is a "major rule" and, therefore, requires that a Regulatory Impact Analysis be prepared. EPA has determined that this rule is not a major rule as defined in section 1(b) of the Executive Order because the annual effect of the rule on the economy will be less than \$100 million. Also, it will not cause a major increase in costs or prices for any sector of the economy or for any geographic region. Further, it will not result in any significant adverse effects on competition, employment, investment, productivity, innovation, or the ability of United States enterprises to compete with foreign enterprises in domestic or foreign markets. Under Executive Order 12291, this regulation was submitted to the Office of Management and Budget (OMB) for review. Any comments from OMB to EPA and any response to those comments are included in the docket.

G. Paperwork Reduction Act

Under the Paperwork Reduction Act of 1980 U.S.C. 3501, *et seq.*, the information collection provisions in this rule will be submitted for approval to the Office of Management and Budget (OMB). They are not effective until OMB approves them. A notice of that approval will be published in the **Federal Register**. Further, EPA will not require reporting until it publishes the list of acceptable measurement techniques described in §§ 61.93 and 61.103.

H. Regulatory Flexibility Analysis

Section 603 of the Regulatory Flexibility Act, 5 U.S.C. 603, requires EPA to prepare and make available for comment an "initial regulatory flexibility analysis" in connection with any rulemaking for which there is a statutory requirement that a general notice of proposed rulemaking be published. The "initial regulatory flexibility analysis" describes the effect of the proposed rule on small business entities.

However, section 604(b) of the Regulatory Flexibility Act provides that section 603 "shall not apply to any proposed . . . rule if the head of the Agency certifies that the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."

EPA believes that virtually all small businesses covered by this final rule already comply. Therefore, this rule will have little or no impact on small businesses. A small business is one that has 750 employees or fewer.

For the preceding reasons, I certify that this rule will not have significant economic impact on a substantial number of small entities.

I. Judicial Review

Judicial review of these standards is available only by filing a petition for review in the United States Court of Appeals for the District of Columbia Circuit within 60 days of today's publication date. The requirements established in this notice may not be challenged later in civil or criminal proceedings brought by EPA to enforce them.

List of Subjects in 40 CFR Part 61

Air pollution control, Hazardous materials, Asbestos, Beryllium, Mercury, Vinyl chloride, Benzene, Arsenic, Radionuclides.

Dated: January 17, 1985.

Lee M. Thomas,
Acting Administrator.

PART 61—[AMENDED]

Part 61 of Chapter I of Title 40 of the Code of Federal Regulations is amended as follows:

1. By adding Subparts H, I, and K to read as follows:

Subpart H—National Emission Standard for Radionuclide Emissions From Department of Energy (DOE) Facilities

- Sec.
- 61.90 Designation of facilities.
 - 61.91 Definitions.
 - 61.92 Emission standard.
 - 61.93 Emission monitoring and compliance procedures.
 - 61.94 Reporting.
 - 61.95 Recordkeeping. [Reserved]
 - 61.96 Waiver of compliance.
 - 61.97 Alternative emission standards.
 - 61.98 Exemption from reporting and testing requirements of 40 CFR 61.10.

Subpart I—National Emission Standard for Radionuclide Emissions From Facilities Licensed by the Nuclear Regulatory Commission (NRC) and Federal Facilities Not Covered by Subpart H

- Sec.
- 61.109 Designation of facilities.
 - 61.101 Definitions.
 - 61.102 Emission standard.
 - 61.103 Emission monitoring and compliance procedures.
 - 61.104 Reporting. [Reserved]
 - 61.105 Recordkeeping. [Reserved]
 - 61.106 Exemption from reporting and testing requirements of 40 CFR 61.10.
 - 61.107 Waiver of compliance.
 - 61.108 Alternative emission standards.

Subpart K—National Emission Standard for Radionuclide Emissions From Elemental Phosphorus Plants

- 61.120 Applicability.
- 61.121 Definitions.
- 61.122 Emission standard.
- 61.123 Emission testing.
- 61.124 Test methods and procedures.
- 61.125 Monitoring of operations.
- 61.126 Waiver of compliance.

Authority: Secs. 112 and 301(a), Clean Air Act, as amended (42 U.S.C. 7412, 7601(a)).

Subpart H—National Emission Standard for Radionuclide Emissions From Department of Energy (DOE) Facilities

§ 61.90 Designation of facilities.

The provisions of this subpart apply to all facilities that are owned or operated by the Department of Energy, except any facility regulated under 40 CFR Parts 190, 191, or 192.

§ 61.91 Definitions.

(a) "Dose equivalent" means the product of absorbed dose and appropriate factors to account for differences in biological effectiveness due to the quality of radiation and its distribution in the body. The unit of the dose equivalent is the rem.

(b) "Critical organ" means the most exposed human organ or tissue exclusive of the integumentary system (skin) and the cornea.

(c) "Radionuclide" means any nuclide that emits radiation. (A nuclide is a species of atom characterized by the constitution of its nucleus and hence by the number of protons, the number of neutrons, and the energy content.)

(d) "Whole body" means all human organs or tissue exclusive of the integumentary system (skin) and the cornea.

(e) "Effective dose equivalent" means the sum of the products of the dose

equivalents to individual organs and tissues and appropriate weighing factors representing the risk relative to that for an equal dose to the whole body.

§ 61.92 Emission standard.

Emissions of radionuclides to air from DOE facilities shall not exceed those amounts that cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. Doses due to radon-220, radon-222, and their respective decay products are excluded from these limits.

§ 61.93 Emission monitoring and compliance procedures.

To determine compliance with the standard, radionuclide emissions shall be determined and dose equivalents to members of the public shall be calculated using EPA approved sampling procedures, EPA models AIRDOS-EPA and RADRISK, or other procedures, including those based on environmental measurements, that EPA has determined to be suitable. Compliance with this standard will be determined by calculating the dose to members of the public at the point of maximum annual air concentration in an unrestricted area where any member of the public resides or abides.

List of approved methods: [Reserved]

§ 61.94 Reporting.

(a) The following provisions of § 61.10 are applicable to DOE-owned facilities: paragraphs (b)-(d).

(b) The following provisions are also applicable:

(1) The owner or operator of any existing source, or any new source to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(i) Name and address of the owner or operator.

(ii) The location of the source.

(iii) The types of radionuclides emitted by the stationary source and the annual quantity (in Ci/y for the most recent calendar year) of each radionuclide emitted.

(iv) A brief description of the nature, size, design, and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(v) Estimate of dose equivalent rate to the member of the public at the point of maximum annual air concentration in an unrestricted area where an individual resides or abides.

(vi) A description of the existing control equipment for each emission point.

(A) Primary control device(s) for radionuclide emissions.

(B) Secondary control device(s) for radionuclide emissions.

(C) Estimated control efficiency (percent) for each control device.

(vii) A statement by the owner or operator of the source as to whether he can comply with the standards prescribed in this part within 90 days of the effective date.

All information collection provisions in this subpart are not effective until the Office of Management and Budget approves them.

(c) In addition to the reporting requirements described in paragraphs (a) and (b) of this section, DOE shall submit to EPA an annual report, by June 1, 1986, and annually thereafter, that includes the results of monitoring emissions from points subject to this final rule and associated dose calculations. This information shall be based on data collected during the calendar year immediately preceding the required date of submission of the annual report. This report shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, Washington, D.C. 20460.

§ 61.95 Recordkeeping. [Reserved]

§ 61.96 Waiver of compliance.

To request a waiver, applicants shall provide the information required in § 61.11 and § 61.94 (a) and (b). Waiver requests shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, Washington, D.C. 20460.

§ 61.97 Alternative emission standards.

If a facility may exceed the values established in § 61.92, DOE may apply to EPA for an alternative emission standard. The Administrator will review such applications and will establish an appropriate alternative emission standard that will ensure that no member of the public being exposed to emissions from the facility will receive a continuous exposure of than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent

from all sources, excluding natural background and medical procedures.

The application shall include the following:

(a) An assessment of the additional effective dose equivalents to the individual receiving maximum exposure from the facility due to all other sources.

(b) The information required in § 61.94.

(c) The effective dose equivalent shall be calculated using the following weighting factors:

Organ	Weighting factor
[Reserved]	[Reserved]

Requests for alternative emission standards shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, 401 M Street, Washington, D.C. 20460.

§ 61.98 Exemption from reporting and testing requirements of 40 CFR 61.10.

Facilities having emissions of radionuclides to air that do not exceed those amounts that cause a dose equivalent of 5 mrem/y to the whole body or 15 mrem/y to the critical organ of any member of the public residing or abiding at the point of maximum annual air concentration in an unrestricted area, are exempt from the reporting requirements of 40 CFR 61.10.

Subpart I—National Emission Standard for Radionuclide Emissions From Facilities Licensed by the Nuclear Regulatory Commission (NRC) and Federal Facilities Not Covered by Subpart H

§ 61.100 Designation of facilities.

The provisions of this subpart apply to NRC-licensed facilities and to facilities owned or operated by any Federal agency other than the Department of Energy that emit radionuclides to air. This subpart does not apply to facilities regulated under 40 CFR Parts 190, 191, or 192, to any low energy accelerator, or to any user of the sealed radiation sources.

§ 61.101 Definitions.

(a) "Agreement State" means any State with which the Atomic Energy Commission or the Nuclear Regulatory Commission has entered into an effective agreement under subsection 274(b) of the Atomic Energy Act of 1954, as amended.

(b) "Dose equivalent" means the product of absorbed dose and appropriate factors to account for differences in biological effectiveness

due to the quality of radiation and its distribution in the body. The unit of dose equivalent is the rem.

(c) "NRC-licensed facility" means any facility licensed by the Nuclear Regulatory Commission or any Agreement State to receive title to, receive, possess, use, transfer, or deliver any source, byproduct, or special nuclear material, except facilities regulated by 40 CFR Parts 190, 191, or 192.

(d) "Critical organ" means the most exposed human organ or tissue exclusive of the integumentary system (skin) and the cornea.

(e) "Radionuclide" means any nuclide that emits radiation. (A nuclide is a species of atom characterized by the constitution of its nucleus and hence by the number of protons, the number of neutrons, and the energy content.)

(f) "Whole body" means all organs or tissues exclusive of the integumentary system (skin) and the cornea.

(g) "Effective dose equivalent" means the sum of the products of the dose equivalents to individual organs and tissues and appropriate weighting factors representing the risk relative to that for an equal dose to the whole body.

§ 61.102 Emission standard.

Emissions of radionuclides to air from facilities subject to this subpart shall not exceed those amounts that cause a dose equivalent of 25 mrem/y to the whole body or 75 mrem/y to the critical organ of any member of the public. Doses due to radon-220, radon-222, and their respective decay products are excluded from these limits.

§ 61.103 Emission monitoring and compliance procedures.

To determine compliance with the standard, radionuclide emissions shall be determined and dose equivalent to members of the public shall be calculated using EPA-approved sampling procedures, EPA codes AIRDOS-EPA and RADRISK, or other procedures, including those based on environmental measurements, that EPA has determined to be suitable. In most cases, compliance with this standard will be determined by calculating the dose to members of the public at the point of maximum annual air concentration in an unrestricted area where any member of the public resides or abides.

List of approved procedures: [Reserved]

§ 61.104 Reporting. [Reserved]

§ 61.105 Recordkeeping. [Reserved]

§ 61.106 Exemption from reporting and testing requirements of 40 CFR 61.10.

Facilities in possession of a radionuclide in annual quantities less than the activity shown in Table 1 are exempt from the reporting requirements of 40 CFR 61.10. If a facility possesses more than one radionuclide, and the sum of the annual amount possessed divided by the equivalent activity in Table 1 is summed for all radionuclides in possession, and the sum is less than unity, then the facility is exempt from the reporting requirements of 40 CFR 61.10. For radionuclides not on this list, a facility may apply to the Administrator for an exemption from the reporting requirements.

Table 1 [Reserved]

§ 61.107 Waiver of compliance.

(a) To request a waiver, applicants shall follow the requirements of § 61.10 (b)-(d).

(b) The following provisions also apply:

(1) the owner or operator of any existing source, or any new source to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(i) Name and address of the owner or operator.

(ii) The location of the source.

(iii) The types of radionuclides emitted by the stationary source and the annual quantity (in Ci/y for the most recent calendar year) of each radionuclide emitted.

(iv) A brief description of the nature, size, design, and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(v) Estimate of dose equivalent rate to the member of the public at the point of maximum annual air concentration in an unrestricted area where any member of the public resides or abides.

(vi) A description of the existing control equipment for each emission point.

(A) Primary control device (s) for radionuclide emissions.

(B) Secondary control device(s) for radionuclide emissions.

(C) Estimated control efficiency (percent) for each control device.

(vii) A statement by the owner or operator of the source as to whether he

can comply with the standards prescribed in this part within 90 days of the effective date.

§ 61.108 Alternative emission standard.

If a facility may exceed the emission standard established in § 61.102, the operator may apply to EPA for an alternative emission standard. The Administrator will review such applications and will establish an appropriate alternative emission standard that will ensure that no member of the public being exposed to emissions from the facility receives a continuous exposure of more than 100 mrem/y effective dose equivalent and a noncontinuous exposure of more than 500 mrem/y effective dose equivalent from all sources, excluding natural background and medical procedures. The application shall include the following:

(a) An assessment of the additional effective dose equivalents to the member of the public receiving maximum exposure from the facility due to all other sources. The natural radiation background shall be part of this assessment.

(b) The information required in § 61.107.

(c) The effective dose equivalent shall be calculated using the following weighting factors:

Organ	Weighting factor
[Reserved]	[Reserved]

Requests for alternative emission standards shall be sent to the Assistant Administrator for Air and Radiation (ANR-443), U.S. Environmental Protection Agency, 401 M Street SW., Washington, D.C. 20460. This action shall be taken, for existing facilities by April 17, 1985.

Subpart K—National Emission Standard for Radionuclide Emissions From Elemental Phosphorus Plants

§ 61.120 Applicability.

The provisions of this subpart are applicable to owners and operators of calciners and nodulizing kilns at elemental phosphorus plants.

§ 61.121 Definitions.

(a) "Elemental phosphorus plant" means any facility that processes phosphate rock to produce elemental phosphorus using pyrometallurgical techniques.

(b) "Calciner" or "Nodulizing kiln" means a unit in which phosphate rock is heated to high temperatures to remove organic material and/or to convert it to a nodular form. For the purpose of this

subpart, calciners and nodulizing kilns are considered to be similar units.

(c) "Curie" is a unit of radioactivity equal to 37 billion nuclear transformations (decays) per second.

§ 61.122 Emission standard.

Emissions of polonium-210 to air from calciners and nodulizing kilns at an elemental phosphorus plant shall not exceed a total of 21 curies in a calendar year.

§ 61.123 Emission testing.

(a) Unless a waiver of emission testing is obtained under § 61.13, each owner or operator of an elemental phosphorus plant shall test emissions from his plant according to the following requirements:

(1) Within 90 days of the effective date of this standard for a source that has an initial start-up date preceding the effective date of this standard; or

(2) Within 90 days of start-up for a source, that has an initial startup after the effective date of the standard.

(b) The Administrator shall be notified at least 30 days prior to an emission test so that EPA may, at its option, observe the test.

(c) An emission test shall be conducted at each operational calciner or nodulizing kiln. If emissions from a calciner or nodulizing kiln are discharged through more than one stack, then an emission test shall be conducted at each stack and the total emission rate from the calciner or kiln shall be the sum of the emission rates from each of the stacks.

(d) Each emission test shall consist of three valid sampling runs. The phosphate rock processing rate during each run shall be recorded. An emission rate in curies per metric ton of phosphate rock processed shall be calculated for each run. The average of all three runs shall apply in computing the emission rate for the test. The annual polonium-210 emission rate from a calciner or nodulizing kiln shall be determined by multiplying the measured polonium-210 emission rate in curies per metric ton of phosphate rock processed by the annual phosphate rock processing rate in metric tons. In determining the annual phosphate rock processing rate, the values used for operating hours and operating capacity shall be values that will maximize the expected processing rate. For determining compliance with the emission standard of Section 61.122 the total annual emission rate is the sum of the annual emission rates for all operating calciners or nodulizing kilns.

(e) If the owner or operator changes his operation in such a way as to increase his emissions of polonium-210, such as changing the type of rock processed, the temperature of the calciners or kilns, or increasing the annual phosphate rock processing rate, then a new emission test shall be conducted under these conditions.

(f) Each owner or operator of an elemental phosphorus plant shall furnish the Administrator a written report of the results of the emission test within 60 days of conducting the test.

(g) Records of emission test results and other data needed to determine total emissions shall be retained at the source and made available for inspection by the Administrator for a minimum of 2 years.

All information collection provisions in this subpart are not effective until the Office of Management and Budget approves them.

§ 61.124 Test methods and procedures.

(a) Each owner or operator of a source required to test emissions under § 61.213, unless an equivalent or alternate method has been approved by the Administrator, shall use the following test methods:

(1) Test Method 1 of Appendix A to Part 60 shall be used to determine sample and velocity traverses;

(2) Test Method 2 of Appendix A to Part 60 shall be used to determine velocity and volumetric flow rate;

(3) Test Method 3 of Appendix A to Part 60 shall be used for gas analysis.

(4) Test Method 5 of Appendix A to Part 60 shall be used to collect particulate matter containing the polonium-210; and

(5) Test Method 111 of Appendix B to this part shall be used to determine the polonium-210 emissions.

§ 61.125 Monitoring of operations.

(a) The owner or operator of any source subject to this subpart using a wet-scrubbing emission control device shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate with ± 250 pascals (± 1 inch of water). Records of these measurements shall be maintained at the source and made available for inspection by the Administrator for a minimum of 2 years.

(b) The owner or operator of any source subject to this subpart using an electrostatic precipitator control device shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the primary

and secondary current and the voltage in each electric field. Baseline operating values for these parameters shall be maintained with ± 30 percent of their baseline operating values.

(c) For the purpose of conducting an emission test under Section 61.123, the owner or operator of any source subject to the provisions of this subpart shall install, calibrate, maintain, and operate a device for measuring the phosphate rock feed to any affected calciner or nodulizing kiln. The measuring device used must be accurate to within ± 5 percent of the mass rate over its operating range.

§ 61.126 Waiver of compliance.

(a) To request a waiver, applicants shall follow the requirements of § 61.10(b)-(d).

(b) The following provisions also apply:

(1) The owner or operator of any existing source, or any new source to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(i) Name and address of the owner or operator.

(ii) The location of the source.

(iii) The annual quantity of polonium-210 emitted (in Ci/y for the most recent calendar year).

(iv) A brief description of the nature, size, design, and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(v) The average amount of polonium-210 being processed by the source over the last 12 months preceding the date of the report.

(vi) A description of the existing control equipment for each emission point.

(A) Primary control device(s) for radionuclide emissions.

(B) Secondary control device(s) for radionuclide emissions.

(C) Estimated control efficiency (percent) for each control device.

(vii) A statement by the owner or operator of the source as to whether he can comply with the standards prescribed in this part within 90 days of the effective date.

2. Appendix B to Part 61 is amended by adding Test Method 111 as follows:

Appendix B—[Amended]

Method 111—Determination of Polonium-210 Emissions From Stationary Sources

Performance of this method should not be attempted by persons unfamiliar with the use of equipment for measuring radioactive disintegration rates.

1.0 Applicability and Principle.

1.1 Applicability

This method is applicable to the determination of polonium-210 emissions in particulate samples collected in stack gases. Samples should be analyzed within 30 days of collection to minimize error due to growth of polonium-210 from any lead-210 present in the sample.

1.2 Principle

A particulate sample is collected from stack gases as described in Method 5 of Appendix A to 40 CFR Part 60. The polonium-210 in the sample is put in solution, deposited on a metal disc, and the radioactive disintegration rate measured. Polonium in acid solution spontaneously deposits on surfaces of metals that are more electropositive than polonium. This principle is routinely used in the radiochemical analysis of polonium-210.

2.0 Apparatus.

2.1 Alpha spectrometry system consisting of a multichannel analyzer, biasing electronics, silicon surface barrier detector, vacuum pump and chamber.

2.2 Constant temperature bath at 85 °C.

2.3 Polished silver discs, 3.8 cm diameter, 0.4 mm thick with a small hole near the edge.

2.4 Glass beakers, 400 ml, 150 ml.

2.5 Hot plate, electric.

2.6 Fume hood.

2.7 Teflon¹ beakers, 150 ml.

2.8 Magnetic stirrer.

2.9 Stirring bar.

2.10 Plastic or glass hooks to suspend plating discs.

2.11 Internal proportional counter for measuring alpha particles.

2.12 Nuclepore¹ filter membranes, 25 mm diameter, 0.2 micrometer pore size or equivalent.

2.13 Planchets, stainless steel, 32 mm diameter with 1.5 mm lip.

2.14 Transparent plastic tape, 2.5 cm wide with adhesive on both sides.

2.15 Epoxy spray enamel.

2.16 Suction filter apparatus for 25 mm diameter filter.

2.17 Wash bottles, 250 ml capacity.

2.18 Plastic graduated cylinder, 25 ml capacity.

3.0 Regents.

3.1 Ascorbic acid, Reagent grade.

3.2 Ammonium hydroxide (NH₄OH) 15 M, Reagent grade.

3.3 Distilled water meeting ASTM specifications for Type 3 Reagent Water. ASTM Test Method D 1193-77 (incorporated by reference-Section 61.18).

3.4 Ethanol (C₂H₅OH), 95 percent, Reagent grade.

3.5 Hydrochloric acid (HCl), 12 M, Reagent grade.

- 3.6 Hydrochloric acid, 1 M, dilute 83 ml of the 12 M Reagent grade HCl to 1 liter with distilled water.
- 3.7 Hydrofluoric acid (HF), 29 M, Reagent grade.
- 3.8 Hydrofluoric acid, 3 M, dilute 52 ml of the 29 M Reagent grade HF to 500 ml with distilled water. Use a plastic graduated cylinder and storage bottle.
- 3.9 Lanthanum carrier, 0.1 mg La⁺³/ml. Dissolve 0.078 gram Reagent grade lanthanum nitrate, La(NO₃)₃·6H₂O in 250 ml of 1 M HCl.
- 3.10 Nitric acid (HNO₃), 16 M, Reagent grade.
- 3.11 Perchloric acid (HNO₄), 12 M, Reagent grade.
- 3.12 Polonium-209 solution.
- 3.13 Commercial silver cleaner.
- 3.14 Degreaser.
- 3.15 Standard solution of plutonium or americium.
- 3.16 Volumetric flask, 100 ml, 250 ml.
- 4.0 Procedure.
- 4.1 Sample Preparation
- 4.1.1 Place filter collected by EPA Method 5 of Appendix A to 40 CFR Part 60 in Teflon beaker, add 30 ml of 29 M hydrofluoric acid, and evaporate to near dryness on hot plate in a properly operating fume hood. *Caution:* Do not allow residue to go to dryness and overheat. This will result in a loss of polonium.
- 4.1.2 Repeat the procedure described in Section 4.1.1 until the glass fiber filter is dissolved.
- 4.1.3 Add 100 ml of 16 M nitric acid to residue in Teflon beaker and evaporate to near dryness. *Caution:* Do not allow residue to go to dryness and overheat.
- 4.1.4 Add 50 ml of 16 M nitric acid to residue from Section 4.1.3 and heat to 85 °C.
- 4.1.5 Transfer acid solution into a 150 ml glass beaker and add 10 ml of 12 M perchloric acid.
- 4.1.6 Heat acid mixture until dense perchloric acid fumes are evolved.
- 4.1.7 Dilute sample with 1 M HCl to a volume of 250 ml in a volumetric flask.
- 4.2 Sample Screening
- The samples are checked for radioactivity levels to avoid contamination of the alpha spectrometry system. Use the following screening method:
- 4.2.1 Twenty ml of 1 M HCl are added to a 150 ml beaker.
- 4.2.2 One ml of the lanthanum carrier solution, 0.1 mg lanthanum per ml, is added to beaker.
- 4.2.3 A 1 ml aliquot of solution from Section 4.1.7 is added to the beaker.
- 4.2.4 Three ml of 15 M ammonium hydroxide are added to the beaker.
- 4.2.5 The solution from Section 4.2.4 is allowed to stand for a minimum of 30 minutes.
- 4.2.6 The solution is filtered through a filter membrane using suction.
- 4.2.7 The membrane is washed with 10 ml of distilled water and 5 ml of ethanol.

4.2.8 The membrane is allowed to air dry and then mounted, filtration side up, on a planchet lined with double-side plastic tape.

4.2.9 The membrane is radioassayed using an internal proportional alpha counter.

4.2.10 The activity of the original solution from Section 4.1.7 is calculated using Eq. 111-1.

(Eq. 111-1)

$$P = \frac{250 C_S - C_B}{2.22 E_A A_L T}$$

where:

P = total activity of original solution from Section 4.1.7, in pCi.

C_S = total counts of screening sample.

C_B = total counts of procedure background. (See 4.6).

(Eq. 111-2)

250 (desired picocuries in aliquot)

A_L

E_A = counting efficiency as determined in Section 8.0, counts per minute per disintegration per minute.

2.22 = disintegrations per minute per picocurie.

A_L = aliquot used in Section 4.2.3 in ml if different from 1 ml.

T = counting time in minutes for sample and background (which must be equal).

250 = volume of solution from Section 4.1.7 in ml.

4.2.11 Determine the aliquot volume of solution from Section 4.1.7 to be analyzed for polonium-210 using results of the calculation described in Section 4.2.10. The aliquot used should contain an activity between 1 and 4 picocuries.

A_g = aliquot to be analyzed in ml.

P = total activity, as calculated with Eq. 111-1.

4.3 Preparation of silver disc for spontaneous electrodeposition.

4.3.1 Clean both sides of disc with a mild abrasive commercial silver cleaner.

4.3.2 Clean both sides of disc with degreaser.

4.3.3 Place disc on absorbent paper and spray one side with epoxy spray enamel. This should be carried out in a well-ventilated area, with the disc lying flat to keep paint on one side only.

4.3.4 Allow paint to dry for 24 hours before using disc for deposition.

4.4 Sample Analysis

4.4.1 Add the aliquot of solution from Section 4.1.7 to be analyzed as determined in Section 4.2.11 to a suitable 200 ml container to be placed in a constant temperature bath. Note, aliquot volume may require a larger container.

4.4.2 Add an aliquot of polonium-209 tracer solution (see Section 7.0) that contains approximately the same amount of activity as that in the aliquot of the sample to be analyzed as determined in Section 4.2.11.

4.4.3 If necessary, bring the volume to 100 ml with 1 M HCl. If the aliquot volume exceeds 100 ml, use total aliquot.

4.4.4 Add 200 mg of ascorbic acid and heat solution to 85 °C in a constant temperature bath.

4.4.5 Stirring of the solution must be maintained while the solution is in the constant temperature bath for plating.

4.4.6 Suspend a silver disc in the heated solution using a glass or plastic rod with a hook inserted through the hole in the disc. The disc should be totally immersed in the solution at all time.

4.4.7 Maintain the disc in solution for 3 hours while stirring.

4.4.8 Remove the silver disc, rinse with distilled water and allow to air dry at room temperature.

4.5 Measurement of Polonium-210

4.5.1 Place the silver disc, with deposition side (unpainted side) up, on a planchet and secure with double-side plastic tape.

4.5.2 Place the planchet with disc in alpha spectrometry system and count for 1000 minutes.

4.6 Determination of Procedure Background

Background counts used in all equations are determined by performing the specific analysis required using the analytical reagents only. This should be repeated every 10 analyses.

4.7 Determination of Instrument Background

Instrument backgrounds of the internal proportional counter and alpha spectrometry system should be determined on a weekly basis. Instrument background should not exceed procedure background. If this occurs, it may be due to a malfunction or contamination.

5.0 Calculation of Polonium-210 Activity.

5.1 Calculate the activity of polonium-210 on a sample filter using Eq. 111-3

Eq. 111-3

$$A = \frac{C_T - C_B L}{2.22 E_V E_C T D}$$

where:

A = picocuries of polonium-210 per filter.

C_T = total counts in polonium-210 spectral region.

C_B = procedure background counts in polonium-210 spectral region.

L = dilution factor. This is the volume in ml of solution in Section 4.1.7 (250 ml) divided by volume in ml used in Section 4.4.1.

2.22 = disintegrations per minute per picocurie.

E_V = fraction of polonium recovered on the planchet. Given by:

¹ Mention of registered trade names or specific products does not constitute endorsement by the Environmental Protection Agency.

$$E_V = \frac{B_T - B_B}{2.22 F E_C T}$$

where:

- B_T = polonium-209 tracer counts in sample.
- B_B = procedure background counts measured in polonium-209 spectral region.
- F = activity in picocuries of polonium-209 added to sample—from Eq. 111-7.
- 2.22 = disintegrations per minute per picocurie.
- E_C = See below.
- T = See below.
- E_C = counting efficiency of detector used, given by Eq. 111-6, as counts per minute per disintegration per minute.
- T = counting time, specified in Section 4.5.2 and 7.11 as 1000 minutes for all alpha spectrometry sample and background counts.
- D = decay correction for time "t" (in days) from sample collection to sample counting, given by: $D = e^{-\lambda t}$

5.2 Procedure for Calculating Emission Rate in Curies per Metric Ton of Phosphate Rock Processed

Calculate the polonium-210 emission per metric ton of rock processed from each run at each stack using equation 111-4. The emission rate from each stack is determined by averaging the emission rates calculated for each of the three runs at each stack.

(Eq. 111-4)

$$R_S = \frac{1 \times 10^{-12} A Q_{SD}}{V_{SD} M_H}$$

Where:

- R_S = emission rate from stack, in curies of polonium-210 per metric ton of rock processed.
- A = picocuries of polonium-210 in filter sample as determined by A in Eq. 111-3.
- Q_{SD} = volumetric flow rate of effluent stream in dry standard m³/hr as determined by Method 2 of Appendix A to 40 CFR Part 60.
- V_{SD} = total volume of air sample in dry standard m³ as determined by Method 5 of Appendix A to 40 CFR Part 60.
- M_H = rock processing rate during sampling in metric tons/hr.
- 1 × 10⁻¹² = curies per picocurie.

5.3 Average Stack Emission Rate Calculation

Determine the average stack emission rate from the average of the three emission rates calculated in Section 5.2. Perform these calculations for each stack of each calciner.

5.4 Calciner Emission Rate Calculation

Determine each calciner's emission rate (X_i) by taking the sum of the emission rates from all stacks of each calciner.

5.5 Annual Polonium-210 Emission Calculation

Determine the annual elemental phosphorus plant emissions of polonium-210 by taking the sum of emission rates at each calciner (X_i in 5.4) and

multiplying this sum by the annual metric tons of phosphate rock processed by that calciner, according to Eq. 111-5.

(Eq. 111-5)

$$S = X_1 M_1 + X_2 M_2 + \dots + X_N M_N$$

Where:

- S = annual polonium-210 emissions in curies from the elemental phosphorus plant.
- X_i = emission rate from a calciner (I) in curies per metric ton, as determined in Section 5.4.
- N = number of calciners at the elemental phosphorus plant.
- M_i = phosphate rock processed per year, in metric tons for each calciner.

6.0 Standardization of Alpha Spectrometry System.

- 6.1 Obtain a standardized solution of an alpha-emitting actinide element such as plutonium-239 or americium-241. Add a quantity of the standardized solution to a 100 ml volumetric flask so that the final concentration when diluted to a volume of 100 ml will be approximately 1 pCi/ml. Add 10 ml of 16 M HNO₃ and dilute to 100 ml with distilled water.
- 6.2 Add 20 ml of 1 M HCl to each of six 150 ml beakers.
- 6.3 Add 1.0 ml of lanthanum carrier, 0.1 mg lanthanum per ml, to the acid solution in each beaker.
- 6.4 Add 1.0 ml of actinide solution from Section 6.1 to each beaker.
- 6.5 Add 5.0 ml of 3 M HF to each beaker.
- 6.6 Cover beakers and allow solutions to stand for a minimum of 30 minutes.
- 6.7 Filter each solution through a filter membrane using this suction filter apparatus.
- 6.8 After each filtration, wash the filter membrane with 10 ml of distilled water and 5 ml of ethanol.
- 6.9 Allow the filter membrane to air dry on the filter apparatus.
- 6.10 Carefully remove the filter membrane and mount with double-side tape on the inner surface of a planchet. Mount filter with filtration side up.
- 6.11 Place planchet in an alpha spectrometry system and count each planchet for 1000 minutes.
- 6.12 The counting efficiency of each detector can be calculated using Eq. 111-6.

(Eq. 111-6)

$$E_C = \frac{C_S - C_B}{2.22 A_A T}$$

where:

- C_S = gross counts in actinide peak.
- C_B = background counts in same peak area as C_S.
- 2.22 = disintegrations per minute per picocurie.
- A_A = picocuries of actinide added.
- E_C = counting efficiency, counts per minute per disintegration per minute.

T = counting time in minutes, specified in Section 6.11 as 1000 minutes.

- 6.13 Determine the average counting efficiency for each detector by calculating the average of the six determinations.
- 7.0 Preparation of Standardized Solution of Polonium-209.
- 7.1 Obtain polonium-209 solution from an available supplier. Add a quantity of the Po-209 solution to a 100 ml volumetric flask so that the final concentration when diluted to a 100 ml volume will be approximately 1 pCi/ml. Add 10 ml of 16 M HNO₃ and dilute to 100 ml with distilled water.
- 7.2 Add 20 ml of 1 M HCl to each of six 150 ml beakers.
- 7.3 Add 1.0 ml of lanthanum carrier, 0.1 mg lanthanum per ml, to the acid solution in each beaker.
- 7.4 Add 1.0 ml of polonium-209 tracer from Section 7.1 to each beaker.
- 7.5 Add 3.0 ml of 15 M ammonium hydroxide to each beaker.
- 7.6 Cover beakers and allow to stand for a minimum of 30 minutes.
- 7.7 Filter the contents of each beaker through a separate filter membrane.
- 7.8 After each filtration, wash membrane with 10 ml of distilled water and 5 ml of ethanol.
- 7.9 Allow filter membrane to dry on filter apparatus.
- 7.10 Carefully remove the filter membrane and mount with double-side tape on the inner surface of a planchet. Mount filter with filtration side up.
- 7.11 Place planchet in alpha spectrometry system and count each planchet for 1000 minutes.
- 7.12 The activity of the polonium solution can be calculated using Eq. 111-7.

(Eq. 111-7)

$$F = \frac{C_S - C_B}{2.22 E_C T}$$

where:

- F = activity of polonium-209 solution, in pCi.
- C_S = gross counts of polonium-209 in the 4.88 MeV region of the spectrum in the counting time T.
- C_B = background counts in the 4.88 MeV region of spectrum in the counting time T.
- 2.22 = disintegrations per minute per picocurie.
- E_C = counting efficiency of detector used, counts per minute per disintegration per minute.
- T = counting time, specified in Section 7.11 as 1000 minutes.
- 7.13 Determine the average activity of the polonium-209 solution from the six determinations.
- 7.14 Aliquots of the solution from Section 7.1 are to be used as tracer with each polonium-210 analysis.
- 8.0 Standardization of Internal Proportional Counter.

- 8.1 Obtain a standardized solution of an alpha-emitting actinide element such as plutonium-239 or americium-241. Add a quantity of the standardized solution to a 100 ml volumetric flask so that the final concentration when diluted to a 100 ml volume will be approximately 100 pCi/ml. Add 10 ml of 16 M HNO₃ and dilute to 100 ml with distilled water.
- 8.2 Add 20 ml of 1 M HCl to each of six 150 ml beakers.
- 8.3 Add 1.0 ml of lanthanum carrier, 0.1 mg lanthanum per ml, to the acid solution in each beaker.
- 8.4 Add 1.0 ml of the actinide solution from Section 8.1 to each beaker.
- 8.5 Add 5.0 ml of 3 M HF to each beaker.
- 8.6 Cover beakers and allow solutions to stand for a minimum of 30 minutes.
- 8.7 Filter each solution through a filter membrane using the suction filter apparatus.
- 8.8 After each filtration, wash membrane with 10 ml of distilled water and 5 ml of ethanol.
- 8.9 Allow filter membrane to dry on filter apparatus.
- 8.10 Carefully remove filter membrane and mount with double-side tape on the inner

surface of a planchet. Mount filter with filtration side up.

- 8.11 Place planchet in internal proportional counter and count for 100 minutes.
- 8.12 The counting efficiency of the internal proportional counter is determined as follows from the six samples:

(Eq. 111-8)

$$E_B = \frac{C_S - C_B}{2.22 A_A T}$$

where:

- E₁ = counting efficiency of proportional counter, counts per minute per disintegration per minute.
- C_S = gross counts of standard.
- C_B = gross counts of procedure background.
- 2.22 = disintegrations per minute per picocurie
- A_A = picocuries of actinide added.
- T = counting time in minutes, specified in Section 8.11 as 100 minutes.

- 8.13 Determine the average counting efficiency of the six determinations.

9.0 Quality Assurance.

9.1 General Requirements

- 9.1.1 All analysts using this method are required to demonstrate their ability to use the method and to define their respective accuracy and precision criteria.

- 9.1.2 The minimum requirements for the establishment of accuracy and precision criteria is four replicate analyses of an externally prepared performance evaluation sample.

9.2 Specific Requirements

- 9.2.1 Each sample will be analyzed in duplicate.

- 9.2.2 Every tenth sample will be an externally prepared performance evaluation sample submitted by the Quality Assurance Officer.

- 9.2.3 Duplicate measurements are considered acceptable when the difference between them is less than two standard deviations as described in EPA 600/4-77-001 or subsequent revisions.

[FR Doc. 85-2321 Filed 2-5-85; 8:45 am]

BILLING CODE 6560-50-M

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:27 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W--two more changes, and I hope we are done.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 5:13 PM
To: Collections.SubW
Subject: FW: EPA Subpart W--two more changes, and I hope we are done.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:59 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Done!

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 2:51 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Thanks! There is an extra line where you deleted the reference between "RK Consulting" and "Rogers."

And sorry if I wasn't clear, but I have one last change on the reference that I just added:

Please change from this:
FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

To this:

FR (Federal Register) 1985a. . EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities,, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

Tony Nesky.
Center for Radiation Information and Outreach

Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:03 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W

done

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 1:33 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W

Dear Marisa:

On the new references page:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Please delete that copyrighted reference:

Nielson, K.K., and V.C. Rogers, 1986. "Surface Water Hydrology Considerations in Predicting Radon Releases from Water Covered Areas of Uranium Tailings Ponds," Proc. 8th Annual Symposium on Geotechnical & Geohydrological Aspects of Waste Management, Geotechnical Engineering Program, Colorado State University & A.A. Balkema, Fort Collins, Colorado, pp. 215–222, February 5–7, 1986. (3 pp, 190 KB) [About PDF](#)

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 12:21 PM
To: Nesky, Anthony
Subject: FW: EPA Subpart W

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 9:00 AM
To: Thornton, Marisa; Miller, Beth
Subject: RE: EPA Subpart W

Marisa,

The offending document is:

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 8:52 AM
To: Miller, Beth; Rosnick, Reid
Subject: RE: EPA Subpart W

Reid and Beth,

Can you send me a list of items that need to be remove from the Subpart W site? I'm the only web person here today and I have a few other projects that I need to complete today.

Thanks!
Marisa

From: Miller, Beth
Sent: Wednesday, August 06, 2014 8:46 AM
To: Rosnick, Reid
Cc: Thornton, Marisa
Subject: RE: EPA Subpart W

I will forward this to Marisa.
Thanks

Marisa can you please do this. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 8:43 AM
To: Miller, Beth
Subject: RE: EPA Subpart W

Beth,

Please pull the document and any reference to it from the website. Thanks

Reid

From: Miller, Beth
Sent: Wednesday, August 06, 2014 7:18 AM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Good question.



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 7:17 AM
To: Miller, Beth
Subject: FW: EPA Subpart W

Hi Beth,

Sarah Fields responded to me yesterday, saying that the docket item she wanted, even though it was not there because of copyright restrictions, is available on the Subpart W website (see below).

Is this something we need to worry about? Should we pull it from the website?

Reid

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Tuesday, August 05, 2014 1:25 PM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Dear Reid,

Thank you for your response.

I had totally forgotten about Ms. Stahle's e-mail about a year ago re NEPA. That information should have been included in the FRN, since others might have wondered why there was no NEPA review. An understanding of how NEPA does not apply to CAA rulemakings might instigate changes in the statute.

I do not have a spam blocker on my e-mail so don't know why I am not receiving notifications.

Appears the Surface Water Hydrology document is available on the Subpart W website, just not on the federal rulemaking docket:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

Sarah Fields
Uranium Watch

----- Original Message -----

Subject: RE: EPA Subpart W

From: "Rosnick, Reid" <Rosnick.Reid@epa.gov>

Date: Tue, August 05, 2014 10:37 am
To: "sarah@uraniumwatch.org" <sarah@uraniumwatch.org>

Dear Sarah,

Responses to your questions (below) are in **RED**

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Monday, August 04, 2014 12:00 AM
To: Rosnick, Reid
Subject: EPA Subpart W

Dear Reid,

I have a few questions and comment re the Subpart W rulemaking.

Question:

1. The EPA Rulemaking Docket does not include a NEPA Analysis, nor is there any mention of compliance with NEPA in the Proposed Rule in the section on Statutory and Executive Orders Review. Can you explain this lack of an NEPA review associated with the proposed rule or any mention of NEPA compliance in the FRN?

We have address this issue twice. During the October 17, 2013 stakeholders conference call (attached) and in an email from Susan Stahle, below;

From: Stahle, Susan
Sent: Thursday, October 17, 2013 5:37 PM
To: sarah@uraniumwatch.org
Cc: Rosnick, Reid
Subject: RE: Follow Up of Today's Subpart W Conference Call

Hi Sarah –

I cited Clean Air Act (CAA) section 307 not as support for why EPA is not required to comply with NEPA when taking action under the CAA; instead, I cited CAA section 307 as applicable to the public notice and comment process we were discussing on the call today.

Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)) exempts actions under the Clean Air Act from the requirements of NEPA. Section 793(c)(1) states: “No action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969 (83 Stat. 856) [[42 USCS §§ 4321](#) et seq.]” This is why EPA is not required to conduct a NEPA analysis for this Subpart W rulemaking.

I see that EPA issued a DEIS for the 1989 radionuclide rules, but I do not see a final EIS for those rules. I don't know whether that document was prepared for NEPA purposes, or whether it was prepared for other analytical purposes. The document itself does not indicate that it was for NEPA compliance purposes. It may be that EPA prepared that document for other analytical purposes, I just don't know. Regardless of the reasons for that document back in 1989, EPA does not have a legal obligation to prepare those documents for NEPA compliance purposes for this Subpart W rulemaking. However, please note that EPA is preparing the requisite background documents for this rulemaking and those

will be available for public review and comment when we publish the proposal for public notice and comment.

The analyses required under CAA section 312 is a “comprehensive analysis” of all EPA rules issued under the CAA prior to November 15, 1990. According to section 312(d), that report was due to Congress back in 1991. Thus, I do not believe section 312 is applicable to this rulemaking. However, please understand that EPA is preparing the appropriate cost and benefit analyses for this rulemaking as required by other statutes and Executive Orders, and those analyses will be available for your review once we publish the proposal.

The opportunity you note for oral presentations in CAA section 307(d)(5) will be addressed in the proposed rule. In the proposal, we will specifically offer the public the opportunity to request a public hearing on the proposed rule. If we receive such a request, we will hold a public hearing, and the public will have the opportunity to make oral presentations at that public hearing. More details on this process will be contained in the proposal.

I hope this answers your questions.

Susan Stahle
EPA/OGC/ARLO
202-564-1272

Documents:

2. Regarding availability of documents, the federal regulation docket lists the following document, but there is no link to the document:

"Surface Water Hydrology Considerations in predicting radon releases from water-covered areas of uranium tailings ponds
Supporting & Related Material Posted: 05/02/2014 ID: EPA-HQ-OAR-2008-0218-0002"

I checked with the docket, and the document you list is under copyright, and cannot be shown without permission of the authors. I am told the docket lists ways by which you can obtain the document.

3. Also, the EPA is posting documents and informait on on the Subpart W rulemaking docket webpage, but I am not receiving any notification of the posting of new material on the Subpart W webage as was done in the past.

You are still listed on our ListServ to receive an email when the website is changed. It is possible that your browser thinks this is spam, so I would check your spam filter. I hope these responses help.

I greatly appreciate the extension of time for submitting comments.

Thank you for looking into these matters,

Sarah Fields
Program Director
Uranium Watch
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:27 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W Letter to Tribes re Consultation and Comment

Importance: High

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:44 PM
To: Collections.SubW
Subject: FW: EPA Subpart W Letter to Tribes re Consultation and Comment

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 2:35 PM
To: Rosnick, Reid
Subject: FW: EPA Subpart W Letter to Tribes re Consultation and Comment
Importance: High

Dear Reid,

Would you be the one to get back to Ms. Fields on this?

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Thursday, August 07, 2014 2:33 PM
To: Nesky, Anthony
Subject: EPA Subpart W Letter to Tribes re Consultation and Comment

Dear Mr. Nesky,

Earlier this year the EPA sent out a letter to various tribes regarding the EPA 40 C.F.R. Part 40 Subpart W Rulemaking. The letter was signed by Jonathan D. Edwards, Director, EPA Radiation Protection Division. You were listed as the contact person.

The letter sent out in May is outdated. Since that time the EPA has agreed to a 90-extension of the comment period and will have a hearing in Denver

on September 2-4.

Has the EPA send out a letter to the tribes updating the information that was contained in the original letter to the tribes?

Also, did the EPA consider sending letters to the tribal Environmental Protection Agencies or equivalent tribal agencies? Sometimes the appropriate tribal agency is not informed by the office of the Chair of the tribe of an opportunity to comment or request consultation. The EPA should be aware of that and make a special effort to communicate with the appropriate tribal agencies, particularly for tribes that the EPA knows have an interest in the Subpart W Rulemaking, such as the Navajo Nation EPA.

Thank you for your response to this inquiry,

Sarah Fields
Program Director
Uranium Watch
PO Box 344
Moab, Utah 84532
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:27 PM
To: Thornton, Marisa
Subject: Fw: EIA Reference Page Ready for a last review

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:45 PM
To: Collections.SubW
Subject: FW: EIA Reference Page Ready for a last review

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 11:45 AM
To: Thornton, Marisa
Cc: Rosnick, Reid; Herrenbruck, Glenna
Subject: FW: EIA Reference Page Ready for a last review

Dear Marisa:

Please publish the reference page to the server. Please create a link for it that says: References and place it under this document on the Subpart W page:

[Background Information Document Economic Impact Analysis in Support of the Subpart W Proposed Rulemaking](#) (128 pp, 2.24 MB) April 2014

Thanks for your help with this!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Rosnick, Reid
Sent: Thursday, August 07, 2014 11:36 AM
To: Nesky, Anthony
Subject: RE: EIA Reference Page Ready for a last review

Tony,

Go with it!

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 10:01 AM
To: Rosnick, Reid
Subject: EIA Reference Page Ready for a last review

Dear Reid:

I think we finally have the EIA reference page in order. Please check it out and let me know what you think. We can then publish it to the website.

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:26 PM
To: Thornton, Marisa
Subject: Fw: EIA Reference Page Ready for a last review

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:46 PM
To: Collections.SubW
Subject: FW: EIA Reference Page Ready for a last review

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Thursday, August 07, 2014 10:01 AM
To: Rosnick, Reid
Subject: EIA Reference Page Ready for a last review

Dear Reid:

I think we finally have the EIA reference page in order. Please check it out and let me know what you think. We can then publish it to the website.

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:26 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W--two more changes, and I hope we are done.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:46 PM
To: Collections.SubW
Subject: FW: EPA Subpart W--two more changes, and I hope we are done.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 3:51 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Me again. Sorry, but this reference appears twice:

RK Consulting 2010a. "Powertech Uranium Corp., NI 43-101 Preliminary Assessment, Dewey-Burdock Project, Custer and Fall River Counties, South Dakota," July 6, 2010

Please delete the second occurrence of it after:

Spectrum Technologies.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:59 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Done!

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 2:51 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Thanks! There is an extra line where you deleted the reference between "RK Consulting" and "Rogers."

And sorry if I wasn't clear, but I have one last change on the reference that I just added:

Please change from this:

FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

To this:

FR (Federal Register) 1985a. . EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities,, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

Tony Nesky.
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:03 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W

done

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 1:33 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W

Dear Marisa:

On the new references page:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Please delete that copyrighted reference:

Nielson, K.K., and V.C. Rogers, 1986. "Surface Water Hydrology Considerations in Predicting Radon Releases from Water Covered Areas of Uranium Tailings Ponds." Proc. 8th Annual Symposium on Geotechnical & Geohydrological Aspects of Waste Management, Geotechnical Engineering Program, Colorado State University & A.A. Balkema, Fort Collins, Colorado, pp. 215–222, February 5–7, 1986. (3 pp, 190 KB) [About PDF](#)

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 12:21 PM
To: Nesky, Anthony
Subject: FW: EPA Subpart W

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 9:00 AM
To: Thornton, Marisa; Miller, Beth
Subject: RE: EPA Subpart W

Marisa,

The offending document is:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 8:52 AM
To: Miller, Beth; Rosnick, Reid
Subject: RE: EPA Subpart W

Reid and Beth,

Can you send me a list of items that need to be remove from the Subpart W site? I'm the only web person here today and I have a few other huge projects that I need to complete today.

Thanks!
Marisa

From: Miller, Beth
Sent: Wednesday, August 06, 2014 8:46 AM
To: Rosnick, Reid
Cc: Thornton, Marisa
Subject: RE: EPA Subpart W

I will forward this to Marisa.
Thanks

Marisa can you please do this. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 8:43 AM
To: Miller, Beth
Subject: RE: EPA Subpart W

Beth,

Please pull the document and any reference to it from the website. Thanks

Reid

From: Miller, Beth
Sent: Wednesday, August 06, 2014 7:18 AM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Good question.



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 7:17 AM
To: Miller, Beth
Subject: FW: EPA Subpart W

Hi Beth,

Sarah Fields responded to me yesterday, saying that the docket item she wanted, even though it was not there because of copyright restrictions, is available on the Subpart W website (see below).

Is this something we need to worry about? Should we pull it from the website?

Reid

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Tuesday, August 05, 2014 1:25 PM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Dear Reid,

Thank you for your response.

I had totally forgotten about Ms. Stahle's e-mail about a year ago re NEPA. That information should have been included in the FRN, since others might

have wondered why there was no NEPA review. An understanding of how NEPA does not apply to CAA rulemakings might instigate changes in the statute.

I do not have a spam blocker on my e-mail so don't know why I am not receiving notifications.

Appears the Surface Water Hydrology document is available on the Subpart W website, just not on the federal rulemaking docket:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

Sarah Fields
Uranium Watch

----- Original Message -----

Subject: RE: EPA Subpart W
From: "Rosnick, Reid" <Rosnick.Reid@epa.gov>
Date: Tue, August 05, 2014 10:37 am
To: "sarah@uraniumwatch.org" <sarah@uraniumwatch.org>

Dear Sarah,

Responses to your questions (below) are in RED

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Monday, August 04, 2014 12:00 AM
To: Rosnick, Reid
Subject: EPA Subpart W

Dear Reid,

I have a few questions and comment re the Subpart W rulemaking.

Question:

1. The EPA Rulemaking Docket does not include a NEPA Analysis, nor is there any mention of compliance with NEPA in the Proposed Rule in the section on Statutory and Executive Orders Review. Can you explain this lack of an NEPA review associated with the proposed rule or any mention of NEPA compliance in the FRN?

We have address this issue twice. During the October 17, 2013 stakeholders conference call (attached) and in an email from Susan Stahle, below;

From: Stahle, Susan
Sent: Thursday, October 17, 2013 5:37 PM
To: sarah@uraniumwatch.org
Cc: Rosnick, Reid
Subject: RE: Follow Up of Today's Subpart W Conference Call

Hi Sarah –

I cited Clean Air Act (CAA) section 307 not as support for why EPA is not required to comply with NEPA when taking action under the CAA; instead, I cited CAA section 307 as applicable to the public notice and comment process we were discussing on the call today.

Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)) exempts actions under the Clean Air Act from the requirements of NEPA. Section 793(c)(1) states: "No action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969 (83 Stat. 856) [[42 USCS §§ 4321](#) et seq.]." This is why EPA is not required to conduct a NEPA analysis for this Subpart W rulemaking.

I see that EPA issued a DEIS for the 1989 radionuclide rules, but I do not see a final EIS for those rules. I don't know whether that document was prepared for NEPA purposes, or whether it was prepared for other analytical purposes. The document itself does not indicate that it was for NEPA compliance purposes. It may be that EPA prepared that document for other analytical purposes, I just don't know. Regardless of the reasons for that document back in 1989, EPA does not have a legal obligation to prepare those documents for NEPA compliance purposes for this Subpart W rulemaking. However, please note that EPA is preparing the requisite background documents for this rulemaking and those will be available for public review and comment when we publish the proposal for public notice and comment.

The analyses required under CAA section 312 is a "comprehensive analysis" of all EPA rules issued under the CAA prior to November 15, 1990. According to section 312(d), that report was due to Congress back in 1991. Thus, I do not believe section 312 is applicable to this rulemaking. However, please understand that EPA is preparing the appropriate cost and benefit analyses for this rulemaking as required by other statutes and Executive Orders, and those analyses will be available for your review once we publish the proposal.

The opportunity you note for oral presentations in CAA section 307(d)(5) will be addressed in the proposed rule. In the proposal, we will specifically offer the public the opportunity to request a public hearing on the proposed rule. If we receive such a request, we will hold a public hearing, and the public will have the opportunity to make oral presentations at that public hearing. More details on this process will be contained in the proposal.

I hope this answers your questions.

Susan Stahle
EPA/OGC/ARLO
202-564-1272

Documents:

2. Regarding availability of documents, the federal regulation docket lists the following document, but there is no link to the document:

"Surface Water Hydrology Considerations in predicting radon releases from water-covered areas of uranium tailings ponds
Supporting & Related Material Posted: 05/02/2014 ID: EPA-HQ-OAR-2008-0218-0002"

I checked with the docket, and the document you list is under copyright, and cannot be shown without permission of the authors. I am told the docket lists ways by which you can obtain the document.

3. Also, the EPA is posting documents and informait on on the Subpart W rulemaking docket webpage, but I am not receiving any notification of the posting of new material on the Subpart W webage as was done in the past.

You are still listed on our ListServ to receive an email when the website is changed. It is possible that your browser thinks this is spam, so I would check your spam filter. I hope these responses help.

I greatly appreciate the extension of time for submitting comments.

Thank you for looking into these matters,

Sarah Fields
Program Director
Uranium Watch
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:26 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W--two more changes, and I hope we are done.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:48 PM
To: Collections.SubW
Subject: FW: EPA Subpart W--two more changes, and I hope we are done.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 3:00 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:59 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Done!

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 2:51 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Thanks! There is an extra line where you deleted the reference between "RK Consulting" and "Rogers."

And sorry if I wasn't clear, but I have one last change on the reference that I just added:

Please change from this:
FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National

Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

To this:

FR (Federal Register) 1985a. . EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities,, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

Tony Nesky.
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:03 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W

done

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 1:33 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W

Dear Marisa:

On the new references page:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Please delete that copyrighted reference:

Nielson, K.K., and V.C. Rogers, 1986. "Surface Water Hydrology Considerations in Predicting Radon Releases from Water Covered Areas of Uranium Tailings Ponds." Proc. 8th Annual Symposium on Geotechnical & Geohydrological Aspects of Waste Management, Geotechnical Engineering Program, Colorado State University & A.A. Balkema, Fort Collins, Colorado, pp. 215–222, February 5–7, 1986. (3 pp, 190 KB) [About PDF](#)

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 12:21 PM
To: Nesky, Anthony
Subject: FW: EPA Subpart W

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 9:00 AM
To: Thornton, Marisa; Miller, Beth
Subject: RE: EPA Subpart W

Marisa,

The offending document is:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 8:52 AM
To: Miller, Beth; Rosnick, Reid
Subject: RE: EPA Subpart W

Reid and Beth,

Can you send me a list of items that need to be remove from the Subpart W site? I'm the only web person here today and I have a few other huge projects that I need to complete today.

Thanks!
Marisa

From: Miller, Beth
Sent: Wednesday, August 06, 2014 8:46 AM
To: Rosnick, Reid
Cc: Thornton, Marisa
Subject: RE: EPA Subpart W

I will forward this to Marisa.
Thanks

Marisa can you please do this. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 8:43 AM
To: Miller, Beth
Subject: RE: EPA Subpart W

Beth,

Please pull the document and any reference to it from the website. Thanks

Reid

From: Miller, Beth
Sent: Wednesday, August 06, 2014 7:18 AM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Good question.



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 7:17 AM
To: Miller, Beth
Subject: FW: EPA Subpart W

Hi Beth,

Sarah Fields responded to me yesterday, saying that the docket item she wanted, even though it was not there because of copyright restrictions, is available on the Subpart W website (see below).

Is this something we need to worry about? Should we pull it from the website?

Reid

From: sarah@uraniumwatch.org [mailto:sarah@uraniumwatch.org]
Sent: Tuesday, August 05, 2014 1:25 PM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Dear Reid,

Thank you for your response.

I had totally forgotten about Ms. Stahle's e-mail about a year ago re NEPA. That information should have been included in the FRN, since others might have wondered why there was no NEPA review. An understanding of how NEPA does not apply to CAA rulemakings might instigate changes in the statute.

I do not have a spam blocker on my e-mail so don't know why I am not

receiving notifications.

Appears the Surface Water Hydrology document is available on the Subpart W website, just not on the federal rulemaking docket:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

Sarah Fields
Uranium Watch

----- Original Message -----

Subject: RE: EPA Subpart W
From: "Rosnick, Reid" <Rosnick.Reid@epa.gov>
Date: Tue, August 05, 2014 10:37 am
To: "sarah@uraniumwatch.org" <sarah@uraniumwatch.org>

Dear Sarah,

Responses to your questions (below) are in **RED**

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Monday, August 04, 2014 12:00 AM
To: Rosnick, Reid
Subject: EPA Subpart W

Dear Reid,

I have a few questions and comment re the Subpart W rulemaking.

Question:

1. The EPA Rulemaking Docket does not include a NEPA Analysis, nor is there any mention of compliance with NEPA in the Proposed Rule in the section on Statutory and Executive Orders Review. Can you explain this lack of an NEPA review associated with the proposed rule or any mention of NEPA compliance in the FRN?

We have address this issue twice. During the October 17, 2013 stakeholders conference call (attached) and in an email from Susan Stahle, below;

From: Stahle, Susan
Sent: Thursday, October 17, 2013 5:37 PM
To: sarah@uraniumwatch.org
Cc: Rosnick, Reid
Subject: RE: Follow Up of Today's Subpart W Conference Call

Hi Sarah –

I cited Clean Air Act (CAA) section 307 not as support for why EPA is not required to comply with NEPA when taking action under the CAA; instead, I cited CAA section 307 as applicable to the public notice and comment process we were discussing on the call today.

Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)) exempts actions under the Clean Air Act from the requirements of NEPA. Section 793(c)(1) states:

“No action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969 (83 Stat. 856) [[42 USCS §§ 4321](#) et seq.]” This is why EPA is not required to conduct a NEPA analysis for this Subpart W rulemaking.

I see that EPA issued a DEIS for the 1989 radionuclide rules, but I do not see a final EIS for those rules. I don't know whether that document was prepared for NEPA purposes, or whether it was prepared for other analytical purposes. The document itself does not indicate that it was for NEPA compliance purposes. It may be that EPA prepared that document for other analytical purposes, I just don't know. Regardless of the reasons for that document back in 1989, EPA does not have a legal obligation to prepare those documents for NEPA compliance purposes for this Subpart W rulemaking. However, please note that EPA is preparing the requisite background documents for this rulemaking and those will be available for public review and comment when we publish the proposal for public notice and comment.

The analyses required under CAA section 312 is a “comprehensive analysis” of all EPA rules issued under the CAA prior to November 15, 1990. According to section 312(d), that report was due to Congress back in 1991. Thus, I do not believe section 312 is applicable to this rulemaking. However, please understand that EPA is preparing the appropriate cost and benefit analyses for this rulemaking as required by other statutes and Executive Orders, and those analyses will be available for your review once we publish the proposal.

The opportunity you note for oral presentations in CAA section 307(d)(5) will be addressed in the proposed rule. In the proposal, we will specifically offer the public the opportunity to request a public hearing on the proposed rule. If we receive such a request, we will hold a public hearing, and the public will have the opportunity to make oral presentations at that public hearing. More details on this process will be contained in the proposal.

I hope this answers your questions.

Susan Stahle
EPA/OGC/ARLO
202-564-1272

Documents:

2. Regarding availability of documents, the federal regulation docket lists the following document, but there is no link to the document:

"Surface Water Hydrology Considerations in predicting radon releases from water-covered areas of uranium tailings ponds
Supporting & Related Material Posted: 05/02/2014 ID: EPA-HQ-OAR-2008-0218-0002"

I checked with the docket, and the document you list is under copyright, and cannot be shown without permission of the authors. I am told the docket lists ways by which you can obtain the document.

3. Also, the EPA is posting documents and information on the Subpart W rulemaking docket webpage, but I am not receiving any notification of the posting of new material on the Subpart W webpage as was done in the past.

You are still listed on our ListServ to receive an email when the website is changed. It is possible that your browser thinks this is spam, so I would check your spam filter. I hope these responses help.

I greatly appreciate the extension of time for submitting comments.

Thank you for looking into these matters,

Sarah Fields
Program Director
Uranium Watch
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:26 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W--two more changes, and I hope we are done.

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:49 PM
To: Collections.SubW
Subject: FW: EPA Subpart W--two more changes, and I hope we are done.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 2:51 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W--two more changes, and I hope we are done.

Thanks! There is an extra line where you deleted the reference between "RK Consulting" and "Rogers."

And sorry if I wasn't clear, but I have one last change on the reference that I just added:

Please change from this:

FR (Federal Register) 1985a. National Emissions Standards for Hazardous Air Pollutants: Standards for Radionuclides, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

To this:

FR (Federal Register) 1985a. . EPA promulgated final standards for Elemental Phosphorus Plants, DOE-Facilities, and NRC-Licensed Facilities,, Volume 50, p. 7280, February 8, 1985. {ERRATUM: The correct reference is: FR (Federal Register) 1983. National Emission Standards for Hazardous Air Pollutants: Standards for Radionuclides; Final Rule. Volume 50, p. 5190, February 6, 1985

Tony Nesky.
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 2:03 PM
To: Nesky, Anthony
Subject: RE: EPA Subpart W

done

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 1:33 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W

Dear Marisa:

On the new references page:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Please delete that copyrighted reference:

Nielson, K.K., and V.C. Rogers, 1986. "Surface Water Hydrology Considerations in Predicting Radon Releases from Water Covered Areas of Uranium Tailings Ponds." Proc. 8th Annual Symposium on Geotechnical & Geohydrological Aspects of Waste Management, Geotechnical Engineering Program, Colorado State University & A.A. Balkema, Fort Collins, Colorado, pp. 215–222, February 5–7, 1986. (3 pp, 190 KB) [About PDF](#)

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 12:21 PM
To: Nesky, Anthony
Subject: FW: EPA Subpart W

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 9:00 AM
To: Thornton, Marisa; Miller, Beth
Subject: RE: EPA Subpart W

Marisa,

The offending document is:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 8:52 AM
To: Miller, Beth; Rosnick, Reid
Subject: RE: EPA Subpart W

Reid and Beth,

Can you send me a list of items that need to be remove from the Subpart W site? I'm the only web person here today and I have a few other projects that I need to complete today.

Thanks!
Marisa

From: Miller, Beth
Sent: Wednesday, August 06, 2014 8:46 AM
To: Rosnick, Reid
Cc: Thornton, Marisa
Subject: RE: EPA Subpart W

I will forward this to Marisa.
Thanks

Marisa can you please do this. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 8:43 AM
To: Miller, Beth
Subject: RE: EPA Subpart W

Beth,

Please pull the document and any reference to it from the website. Thanks

Reid

From: Miller, Beth
Sent: Wednesday, August 06, 2014 7:18 AM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Good question.



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 7:17 AM
To: Miller, Beth
Subject: FW: EPA Subpart W

Hi Beth,

Sarah Fields responded to me yesterday, saying that the docket item she wanted, even though it was not there because of copyright restrictions, is available on the Subpart W website (see below).

Is this something we need to worry about? Should we pull it from the website?

Reid

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]
Sent: Tuesday, August 05, 2014 1:25 PM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Dear Reid,

Thank you for your response.

I had totally forgotten about Ms. Stahle's e-mail about a year ago re NEPA. That information should have been included in the FRN, since others might have wondered why there was no NEPA review. An understanding of how NEPA does not apply to CAA rulemakings might instigate changes in the statute.

I do not have a spam blocker on my e-mail so don't know why I am not receiving notifications.

Appears the Surface Water Hydrology document is available on the Subpart W website, just not on the federal rulemaking docket:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

Sarah Fields
Uranium Watch

----- Original Message -----

Subject: RE: EPA Subpart W
From: "Rosnick, Reid" <Rosnick.Reid@epa.gov>
Date: Tue, August 05, 2014 10:37 am
To: "sarah@uraniumwatch.org" <sarah@uraniumwatch.org>

Dear Sarah,

Responses to your questions (below) are in **RED**

From: sarah@uraniumwatch.org [mailto:sarah@uraniumwatch.org]

Sent: Monday, August 04, 2014 12:00 AM

To: Rosnick, Reid

Subject: EPA Subpart W

Dear Reid,

I have a few questions and comment re the Subpart W rulemaking.

Question:

1. The EPA Rulemaking Docket does not include a NEPA Analysis, nor is there any mention of compliance with NEPA in the Proposed Rule in the section on Statutory and Executive Orders Review. Can you explain this lack of an NEPA review associated with the proposed rule or any mention of NEPA compliance in the FRN?

We have address this issue twice. During the October 17, 2013 stakeholders conference call (attached) and in an email from Susan Stahle, below;

From: Stahle, Susan

Sent: Thursday, October 17, 2013 5:37 PM

To: sarah@uraniumwatch.org

Cc: Rosnick, Reid

Subject: RE: Follow Up of Today's Subpart W Conference Call

Hi Sarah –

I cited Clean Air Act (CAA) section 307 not as support for why EPA is not required to comply with NEPA when taking action under the CAA; instead, I cited CAA section 307 as applicable to the public notice and comment process we were discussing on the call today.

Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)) exempts actions under the Clean Air Act from the requirements of NEPA. Section 793(c)(1) states: “No action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969 (83 Stat. 856) [[42 USCS §§ 4321](#) et seq.]” This is why EPA is not required to conduct a NEPA analysis for this Subpart W rulemaking.

I see that EPA issued a DEIS for the 1989 radionuclide rules, but I do not see a final EIS for those rules. I don't know whether that document was prepared for NEPA purposes, or whether it was prepared for other analytical purposes. The document itself does not indicate that it was for NEPA compliance purposes. It may be that EPA prepared that document for other analytical purposes, I just don't know. Regardless of the reasons for that document back in 1989, EPA does not have a legal obligation to prepare those documents for NEPA compliance purposes for this Subpart W rulemaking. However, please note that EPA is preparing the requisite background documents for this rulemaking and those will be available for public review and comment when we publish the proposal for public notice and comment.

The analyses required under CAA section 312 is a “comprehensive analysis” of all EPA rules issued under the CAA prior to November 15, 1990. According to section 312(d), that report was due to Congress back in 1991. Thus, I do not believe section 312 is applicable to this rulemaking. However, please understand that EPA is preparing the appropriate cost and benefit analyses for this rulemaking

as required by other statutes and Executive Orders, and those analyses will be available for your review once we publish the proposal.

The opportunity you note for oral presentations in CAA section 307(d)(5) will be addressed in the proposed rule. In the proposal, we will specifically offer the public the opportunity to request a public hearing on the proposed rule. If we receive such a request, we will hold a public hearing, and the public will have the opportunity to make oral presentations at that public hearing. More details on this process will be contained in the proposal.

I hope this answers your questions.

Susan Stahle
EPA/OGC/ARLO
202-564-1272

Documents:

2. Regarding availability of documents, the federal regulation docket lists the following document, but there is no link to the document:

"Surface Water Hydrology Considerations in predicting radon releases from water-covered areas of uranium tailings ponds
Supporting & Related Material Posted: 05/02/2014 ID: EPA-HQ-OAR-2008-0218-0002"

I checked with the docket, and the document you list is under copyright, and cannot be shown without permission of the authors. I am told the docket lists ways by which you can obtain the document.

3. Also, the EPA is posting documents and informait on on the Subpart W rulemaking docket webpage, but I am not receiving any notification of the posting of new material on the Subpart W webage as was done in the past.

You are still listed on our ListServ to receive an email when the website is changed. It is possible that your browser thinks this is spam, so I would check your spam filter. I hope these responses help.

I greatly appreciate the extension of time for submitting comments.

Thank you for looking into these matters,

Sarah Fields
Program Director
Uranium Watch
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:26 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:49 PM
To: Collections.SubW
Subject: FW: EPA Subpart W

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 1:33 PM
To: Thornton, Marisa
Subject: RE: EPA Subpart W

Dear Marisa:

On the new references page:

<http://epastage.epa.gov/staging1/rpd/neshaps/subpartw/eiareferences.html>

Please delete that copyrighted reference:

Nielson, K.K., and V.C. Rogers, 1986. "Surface Water Hydrology Considerations in Predicting Radon Releases from Water Covered Areas of Uranium Tailings Ponds." Proc. 8th Annual Symposium on Geotechnical & Geohydrological Aspects of Waste Management, Geotechnical Engineering Program, Colorado State University & A.A. Balkema, Fort Collins, Colorado, pp. 215–222, February 5–7, 1986. (3 pp, 190 KB) [About PDF](#)

Thanks!

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 12:21 PM
To: Nesky, Anthony
Subject: FW: EPA Subpart W

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 9:00 AM
To: Thornton, Marisa; Miller, Beth
Subject: RE: EPA Subpart W

Marisa,

The offending document is:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 8:52 AM
To: Miller, Beth; Rosnick, Reid
Subject: RE: EPA Subpart W

Reid and Beth,

Can you send me a list of items that need to be remove from the Subpart W site? I'm the only web person here today and I have a few other huge projects that I need to complete today.

Thanks!
Marisa

From: Miller, Beth
Sent: Wednesday, August 06, 2014 8:46 AM
To: Rosnick, Reid
Cc: Thornton, Marisa
Subject: RE: EPA Subpart W

I will forward this to Marisa.
Thanks

Marisa can you please do this. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 8:43 AM
To: Miller, Beth
Subject: RE: EPA Subpart W

Beth,

Please pull the document and any reference to it from the website. Thanks

Reid

From: Miller, Beth
Sent: Wednesday, August 06, 2014 7:18 AM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Good question.



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 7:17 AM
To: Miller, Beth
Subject: FW: EPA Subpart W

Hi Beth,

Sarah Fields responded to me yesterday, saying that the docket item she wanted, even though it was not there because of copyright restrictions, is available on the Subpart W website (see below).

Is this something we need to worry about? Should we pull it from the website?

Reid

From: sarah@uraniumwatch.org [mailto:sarah@uraniumwatch.org]
Sent: Tuesday, August 05, 2014 1:25 PM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Dear Reid,

Thank you for your response.

I had totally forgotten about Ms. Stahle's e-mail about a year ago re NEPA. That information should have been included in the FRN, since others might have wondered why there was no NEPA review. An understanding of how NEPA does not apply to CAA rulemakings might instigate changes in the statute.

I do not have a spam blocker on my e-mail so don't know why I am not

receiving notifications.

Appears the Surface Water Hydrology document is available on the Subpart W website, just not on the federal rulemaking docket:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

Sarah Fields
Uranium Watch

----- Original Message -----

Subject: RE: EPA Subpart W

From: "Rosnick, Reid" <Rosnick.Reid@epa.gov>

Date: Tue, August 05, 2014 10:37 am

To: "sarah@uraniumwatch.org" <sarah@uraniumwatch.org>

Dear Sarah,

Responses to your questions (below) are in **RED**

From: sarah@uraniumwatch.org [<mailto:sarah@uraniumwatch.org>]

Sent: Monday, August 04, 2014 12:00 AM

To: Rosnick, Reid

Subject: EPA Subpart W

Dear Reid,

I have a few questions and comment re the Subpart W rulemaking.

Question:

1. The EPA Rulemaking Docket does not include a NEPA Analysis, nor is there any mention of compliance with NEPA in the Proposed Rule in the section on Statutory and Executive Orders Review. Can you explain this lack of an NEPA review associated with the proposed rule or any mention of NEPA compliance in the FRN?

We have address this issue twice. During the October 17, 2013 stakeholders conference call (attached) and in an email from Susan Stahle, below;

From: Stahle, Susan

Sent: Thursday, October 17, 2013 5:37 PM

To: sarah@uraniumwatch.org

Cc: Rosnick, Reid

Subject: RE: Follow Up of Today's Subpart W Conference Call

Hi Sarah –

I cited Clean Air Act (CAA) section 307 not as support for why EPA is not required to comply with NEPA when taking action under the CAA; instead, I cited CAA section 307 as applicable to the public notice and comment process we were discussing on the call today.

Section 7(c) of the Energy Supply and Environmental Coordination Act of 1974 (15 U.S.C. 793(c)(1)) exempts actions under the Clean Air Act from the requirements of NEPA. Section 793(c)(1) states:

“No action taken under the Clean Air Act shall be deemed a major Federal action significantly affecting the quality of the human environment within the meaning of the National Environmental Policy Act of 1969 (83 Stat. 856) [[42 USCS §§ 4321](#) et seq.].” This is why EPA is not required to conduct a NEPA analysis for this Subpart W rulemaking.

I see that EPA issued a DEIS for the 1989 radionuclide rules, but I do not see a final EIS for those rules. I don't know whether that document was prepared for NEPA purposes, or whether it was prepared for other analytical purposes. The document itself does not indicate that it was for NEPA compliance purposes. It may be that EPA prepared that document for other analytical purposes, I just don't know. Regardless of the reasons for that document back in 1989, EPA does not have a legal obligation to prepare those documents for NEPA compliance purposes for this Subpart W rulemaking. However, please note that EPA is preparing the requisite background documents for this rulemaking and those will be available for public review and comment when we publish the proposal for public notice and comment.

The analyses required under CAA section 312 is a “comprehensive analysis” of all EPA rules issued under the CAA prior to November 15, 1990. According to section 312(d), that report was due to Congress back in 1991. Thus, I do not believe section 312 is applicable to this rulemaking. However, please understand that EPA is preparing the appropriate cost and benefit analyses for this rulemaking as required by other statutes and Executive Orders, and those analyses will be available for your review once we publish the proposal.

The opportunity you note for oral presentations in CAA section 307(d)(5) will be addressed in the proposed rule. In the proposal, we will specifically offer the public the opportunity to request a public hearing on the proposed rule. If we receive such a request, we will hold a public hearing, and the public will have the opportunity to make oral presentations at that public hearing. More details on this process will be contained in the proposal.

I hope this answers your questions.

Susan Stahle
EPA/OGC/ARLO
202-564-1272

Documents:

2. Regarding availability of documents, the federal regulation docket lists the following document, but there is no link to the document:

"Surface Water Hydrology Considerations in predicting radon releases from water-covered areas of uranium tailings ponds
Supporting & Related Material Posted: 05/02/2014 ID: EPA-HQ-OAR-2008-0218-0002"

I checked with the docket, and the document you list is under copyright, and cannot be shown without permission of the authors. I am told the docket lists ways by which you can obtain the document.

3. Also, the EPA is posting documents and informait on on the Subpart W rulemaking docket webpage, but I am not receiving any notification of the posting of new material on the Subpart W webage as was done in the past.

You are still listed on our ListServ to receive an email when the website is changed. It is possible that your browser thinks this is spam, so I would check your spam filter. I hope these responses help.

I greatly appreciate the extension of time for submitting comments.

Thank you for looking into these matters,

Sarah Fields
Program Director
Uranium Watch
435-260-8384

Thornton, Marisa

From: Rosnick, Reid on behalf of Collections.SubW
Sent: Monday, November 17, 2014 12:25 PM
To: Thornton, Marisa
Subject: Fw: EPA Subpart W

From: Nesky, Anthony
Sent: Thursday, October 16, 2014 4:49 PM
To: Collections.SubW
Subject: FW: EPA Subpart W

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Nesky, Anthony
Sent: Wednesday, August 06, 2014 1:27 PM
To: Thornton, Marisa
Cc: Rosnick, Reid; Romero, Carmen
Subject: RE: EPA Subpart W

It looks like this has already been taken down. I also can't find any references to it on the website, so I think we are OK.

Tony Nesky
Center for Radiation Information and Outreach
Tel: 202-343-9597
nesky.tony@epa.gov

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 12:21 PM
To: Nesky, Anthony
Subject: FW: EPA Subpart W

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 9:00 AM
To: Thornton, Marisa; Miller, Beth
Subject: RE: EPA Subpart W

Marisa,

The offending document is:

<http://www.epa.gov/radiation/docs/neshaps/subpart-w/surfacewaterhydrology.pdf>

From: Thornton, Marisa
Sent: Wednesday, August 06, 2014 8:52 AM
To: Miller, Beth; Rosnick, Reid
Subject: RE: EPA Subpart W

Reid and Beth,

Can you send me a list of items that need to be remove from the Subpart W site? I'm the only web person here today and I have a few other huge projects that I need to complete today.

Thanks!
Marisa

From: Miller, Beth
Sent: Wednesday, August 06, 2014 8:46 AM
To: Rosnick, Reid
Cc: Thornton, Marisa
Subject: RE: EPA Subpart W

I will forward this to Marisa.
Thanks

Marisa can you please do this. Thanks



Please consider the environment before printing this e-mail.

Beth Miller
202-343-9223

From: Rosnick, Reid
Sent: Wednesday, August 06, 2014 8:43 AM
To: Miller, Beth
Subject: RE: EPA Subpart W

Beth,

Please pull the document and any reference to it from the website. Thanks

Reid

From: Miller, Beth
Sent: Wednesday, August 06, 2014 7:18 AM
To: Rosnick, Reid
Subject: RE: EPA Subpart W

Good question.