



# NUCLEAR INFORMATION AND RESOURCE SERVICE

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September 12, 2015

RE: Opposition to proposed amendment for 10 Fold-Plus Expansion of US  
ECOLOGY MICHIGAN, INC.; DETROIT, MICHIGAN MID 074 259 565  
hazardous waste facility

Comments to Michigan Department of Environmental Quality  
c/o Richard A. Conforti, [confortir@michigan.gov](mailto:confortir@michigan.gov), 517-284-6558

Nuclear Information and Resource Service has a long history of working with individuals, organizations and local and state governments to keep nuclear power and weapons radioactive and mixed waste out of landfills, incinerators, sewage systems, recycling and other facilities that are not specifically licensed or otherwise legally controlled for isolation of ionizing radioactivity. We worked with the State of Michigan to prevent its own laws and regulations from being preempted by the Midwest Compact which intended to force the state to site a radioactive burial site in wetlands. We support states' authority to regulate radioactivity more protectively than the federal government when necessary.

Fracking waste can be highly radioactive but in many cases, it is not subject to regulatory controls for its radioactivity. There is no safe level of ionizing radiation. Apparently, neither federal nor compatible agreement state regulations which apply to nuclear power and weapons fuel chain radioactive wastes, materials, emissions or practices apply to highly radioactive fracking waste. Thus, disposition of radioactive fracking waste circumvents radioactive regulation. Michigan must assert all possible authority to prevent its disposition in an unregulated and unsafe manner. We support Michigan using its powers to protect the resources of the state and the residents of the state from unnecessary radiation contamination, releases and potential exposure.

We oppose the expansion of US Ecology's facility which would allow large amounts of radioactive materials to be treated as if they are not radioactive. This is unacceptable. No analysis has been made public that provides estimates or limits on the amount of radioactive material the site could accept, treat, store and release (intentionally or inadvertently) to the local communities. No scientific evaluation has been provided thus there is no basis for permitting unidentified and unregulated ionizing radioactivity into facilities such as US Ecology Michigan.

Although the facility has both Thermal and Catalytic Vapor Incinerators there is no mention of monitoring for radioactivity in the Boiler Plate license materials on the webpage announcing the opportunity for public comment on the expansion. There is no discussion of the synergistic effects of radioactive and hazardous chemicals—the potential for even greater than additive negative health effects. None of monitoring, training or emergency response and remediation plans include mention of let alone plans for dealing with radioactive materials, wastes, emissions or releases. At a minimum, radioactive wastes and materials should be kept out of the US Ecology facility in Detroit.

We ask that the full application be made available on line and that the comment period be extended until 60 days after it is publically noticed that it is available.

We join local and state groups and individuals including Ban Michigan Fracking in their comments and opposition to US Ecology's application and to the disposition of radioactive waste and additional radioactive wastes and materials at this and other facilities that are not specifically licensed to manage and isolate radioactive waste and materials.

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