



Sustainability in Action

June 26, 2025

The Honorable Debbie Dingell
102 Cannon House Office Building
Washington, DC 20515

Dear Congresswoman Dingell,

First, thank you for the opportunity to answer your recent questions regarding the operations of the Wayne Disposal, Inc. ("WDI") landfill in Belleville, Michigan. Per our recent telephone conversation, we would like to provide some answers to questions we believe were raised by participants at your Western Wayne Town Hall event on Wednesday, June 18, 2025.

Specifically, we would like to provide details regarding the testing and characterization procedures in place for all waste being shipped to WDI for disposal by the U.S. Army Corps of Engineers (USACE) as part of its Formerly Utilized Sites Remedial Action Program ("FUSRAP").

Site Characterization & Pre-Approval

As you know, Congress tasked the USACE with the responsibility to manage the environmental cleanup at sites involved in the historic activities of two predecessor agencies of the U.S. Department of Energy. These site cleanups are implemented under FUSRAP and in accordance with well-established procedures pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"). The procedures detail the remedial investigation, field sampling, analysis, data quality assurance and control planning, risk assessment, and remedial design aspects of the work.

In the case of any FUSRAP waste being shipped to and disposed of at WDI, planning documents are developed for each phase of the site work to address every step of the proposed project activity, including the collection of samples and characterization data to delineate material at the



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site and evaluate whether material generated at the site meets the disposal limitation for radiological waste authorized by WDI's operating license and Part 111 of Michigan's Natural Resources and Environmental Protection Act ("Part 111"). Field monitoring equipment is used as remedial activities are ongoing to support the stockpiling of material that would be permitted for disposal at WDI. Prior to loading any material for transport to WDI, the stockpiles are again assessed for compliance with WDI's permitted disposal limits and to support the creation of proper Department of Transportation (DOT) shipping paperwork.

It should be noted that prior to any FUSRAP material being shipped to WDI, both the WDI technical approvals personnel and EGLE's Radiological Protection Program staff have also reviewed the characterization data for the material and have concurred with USACE's determination that the material is within the facilities permitted limits. In addition, each transported load is also screened by WDI upon arriving at the facility to again ensure that the material is within its permitted limits for disposal. Contrary to recent false comments that some FUSRAP material may arrive at WDI and require additional treatment prior to disposal in order to meet the permitted radiological limits, FUSRAP material meets WDI's permitted radiological limits at the time it is loaded for transport to the site.

WDI is not permitted to accept waste any more radioactive than a traditional non-hazardous solid waste landfill in Michigan – USACE simply chooses to dispose of this material at WDI because of its highly engineered construction and robust environmental monitoring programs.

Downblending of TENORM

The term "downblending" refers to a process that involves the controlled mixing of TENORM waste with dirt in sufficient ratios to reduce the overall concentration of radionuclides in the larger volume to a point where the material is below the permitted disposal limit for a given facility. While this process is permitted by EGLE's Radioactive Materials Unit, the FUSRAP material received from the USACE by WDI has not been downblended. It meets WDI's



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permitted radiological limits when it is loaded for transport to the site for disposal. The process is permitted and used most commonly to downblend wastes generated by the oil and gas sector or the wastewater treatment industry. In 2024, for example, only 0.5% of the TENORM material required any downblending to meet the radiological disposal limits for WDI prior to disposal.

Radiological Monitoring and Reporting

WDI has an approved Radiological Monitoring Plan for the collection of data specifically designed to ensure the safe management and disposal of radiological waste. As part of that plan, the site monitors worker exposure, perimeter air samples, leachate, surface water, radon and groundwater data for radionuclides. All data collected is submitted to EGLE for its review. Site worker exposure has always been well below occupational safety levels, all monitoring results are consistent with natural background concentrations and below established action levels, and landfill leachate meets drinking water standards for radioactivity even before it is treated. In summary, WDI has a robust radiological monitoring program and makes the data publicly available via submission to EGLE as part of its regular compliance reporting cadence.

TENORM vs. LLRW

In Michigan, Technologically Enhanced Naturally Occurring Radioactive Material (“TENORM”) is defined under Part 111, as naturally occurring radioactive material whose radionuclide concentrations have been increased as a result of human practices. TENORM does not include Low-Level Radioactive Waste (“LLRW”) which is regulated by the Nuclear Regulatory Commission (“NRC”). WDI does not now, nor has it ever, accepted LLRW waste. Although Michigan utilities, academic programs, industry, medical facilities, and governmental institutions generate significant quantities of LLRW every year, it is all stored and then transported through and out of the state for disposal at an NRC permitted facility elsewhere in the country. In fact, to put the import/export issue into context, in a given year WDI may dispose of approximately 3,000 millicuries in the form of very low activity TENORM, while Michigan



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generates, stores, and then exports approximately 7,000,000 millicuries of LLRW. In summary, the functioning of our modern society will continue to generate both TENORM and LLRW and it is critical that appropriate facilities exist whether in Michigan or elsewhere to support the responsible management of these materials. WDI has been safely managing the disposal of TENORM for both in-state and out-of-state generators since 2006.

WDI's Commitment

WDI remains firmly committed to transparency, active community engagement, and the responsible management of all materials accepted at the facility. We are confident in the strength and rigor of our environmental monitoring programs, which are designed to ensure that site operations remain protective of human health and the environment, with no adverse offsite impacts. We are proud of the role WDI plays in supporting community revitalization, the strength of our industrial base, commercial advancements, the evolution of our energy and utility sectors, and the broader local and regional economy as a whole and there is nothing we take more seriously than our commitment to providing the safe and responsible handling of materials that require careful, long-term stewardship.

We would also like to extend our sincere thanks to you, Congresswoman Dingell, for your vigilance and longstanding commitment to ensuring your constituents are well informed. Your engagement on matters of environmental and public health reflects a deep dedication to the communities you represent, and we welcome the opportunity to provide accurate information and maintain an open and transparent dialogue with you and your community stakeholders.

Respectfully,

A handwritten signature in black ink that reads "Russ Knocke".

Russ Knocke

Vice President, Public & Government Affairs