Sustainability in Action

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June 11, 2026

VIA EMAIL

Tracy Kecskemeti
Acting Director
Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division

RE: 2025 Annual Radiological Environmental Summary Report – Review Summary – Wayne Disposal, Inc.: MID 048 090 633

Dear Tracy Kecskemeti:

Wayne Disposal, Inc. (WDI) is responding to the May 12, 2026, Review Summary submitted by Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Radiological Protection Section (RPS) regarding the 2025 Annual Radiological Environmental Summary Report. Below, please find WDI's itemized responses to each of the requested corrections.

1. *Appendix E Perimeter Passive Gamma, the following control badges were incorrectly entered into the summary table. The following reported values should be used in the summary table:*
    - *Quarter 1, 2025*
        - *82H - 21 mrem/qtr*
        - *4E - 36 mrem/qtr*
    - *Quarter 2, 2025*
        - *84E – 33 mrem/qtr*
    - *Quarter 4, 2025*
        - *82H - 22 mrem/qtr*

    WDI has updated the report to reflect the deep dose equivalent.

2. *The dose conversion factor used in the Potential Public Annual Dose Calculation for the intake of U-238 needs to be changed to a more conservative class type (3.2E-5 vs 1.9E-6).*

   WDI has updated the calculations.

3. *The third paragraph in the Groundwater section of the report contains unused information and states the following, "The radiological data for the groundwater is compared to WDI's proposed thresholds, which are conservatively set at 50% of the effluent levels published by the US Nuclear Regulatory Commission or the State of Michigan regulatory limits." Because of the magnitude of the State of Michigan regulatory limits, they are not used for any radionuclide and will continue to not be used in future monitoring reports. Although this statement is not incorrect, it is vague and could be misleading. In future reports, MMD will not comment on this item and interpret this statement as "The radiological data for the groundwater is compared to WDI's proposed thresholds, which are conservatively set at 50 percent (%) of the effluent levels published by the United States Nuclear Regulatory Commission (US NRC) or [100% of] the State of Michigan regulatory limits."*

   WDI acknowledges MMD's statement. WDI is not aware of a State of Michigan regulatory limit. WDI's license requires that WDI comply with approved thresholds in Attachment 17 Radiological Monitoring Program. Future reports will remove reference to State of Michigan regulatory limits unless MMD provides the applicable regulatory citation.

4. *The second paragraph in the Perimeter Air Monitoring section of the report contains similarly incorrect information as the previous comment and the thresholds will be interpreted as 25% of the US NRC limits and 100% of the State of Michigan regulatory limits.*

   WDI acknowledges MMD's statement. WDI is not aware of a State of Michigan regulatory limit. WDI's license requires that WDI comply with approved thresholds in Attachment 17 Radiological Monitoring Program. Future reports will remove reference to State of Michigan regulatory limits unless MMD provides the applicable regulatory citation.

5. *As stated in the previous 2024 Annual Radiological Environmental Summary Report comment letter, MMD recommends sampling all locations groundwater monitoring locations during one campaign. This would allow all locations to be representative of consistent environmental conditions. WDI stated in the 07/21/2025 response letter that "sampling will be conducted in a single event beginning in 2025".*

   WDI previously communicated that the first sampling event for 2025 was conducted prior to receiving EGLE's request for a consolidated sampling event. The sampling schedule has since been revised to reflect a single annual event beginning in 2026 and continuing thereafter.

6. *In future reports, WDI should utilize more varied colors or trend line designs within the figures provided to more easily distinguish between different monitoring locations.*

   Additional color variation will be provided in future reports.

7. *MMD does not agree with WDI's determination of Ra-226 detections at M-24 and MW-50 being associated with the surficial application of Calcium Chloride for deicing since all the impacted wells are screened below the regional clay present that would effectively eliminate any potential vertical migration of any surficial contamination. In addition, if Calcium Chloride was causing an increase in Radium detections at the site, MMD would expect this trend to continue and not only be detected during a singular event. WDI shall provide further explanation as to how this determination was made.*

   An assessment was performed based on the location of the two groundwater wells, the time of year, and seasonal activities that occur at the facility. Since sampling is no longer occurring during winter months when calcium chloride is applied, the detections no longer seem to be outliers.

All corrections have been incorporated into an amended report which was provided electronically to the department. If you have any questions concerning the above, please let me know.

Sincerely,

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