



[REDACTED]

**Supplemental Transmittal: Newly Released Job Hazard Records for Parcel A
(Ref: Case 26-0678-C)**

Garner, Nathan (CHFS DPH) <Nathan.Garner@ky.gov>

Fri, Jul 17 at 2:52 PM

To: [REDACTED]

Cc: Brock, Stephanie C (CHFS DPH) <StephanieC.Brock@ky.gov>, McKinley, Matthew W (CHFS DPH) <MatthewW.McKinley@ky.gov>

[REDACTED]

I appreciate you sending me these documents.

As you have requested, I have compiled here the questions we have not formally replied to, and answered them to the best of my ability:

1. *I recognize that this parcel falls under federal NEPA and CERCLA authority, and that the RHB does not directly regulate the site's daily clearing activities. However, given the state's concurrent role in public health oversight and environmental protectiveness, I respectfully request clarification on whether the documented:*

- a. *presence of non-natural radionuclides (U-236, Am-241)*

Given the site's history of processing some amount of recycled uranium during the cold war era, we have found and expect to find low level releases of radionuclides originating in nuclear waste streams (especially if the radionuclides are capable of making it through the feed process into a form that can be aerially dispersed). Because of this, we ensure that an exhaustive list of these radionuclides are sampled and analyzed for when making determinations of risk. These specific radionuclides you noted were detected in a small number of samples, but at levels well below what would typically exceed our regulatory thresholds for free release.

- b. *acknowledged calculation errors*

The errors in risk calculation were noted and examined by RHB, and although the way it was documented may be unusual, the resolution of these errors changes the output but not the determination. No risk thresholds (for industrial use) are exceeded

even with the appropriate calculation.

c. omission of residential COPC screening

As the initial risk assessment effort was designed around demonstrating an appropriateness for industrial use only, and on DOE property limited to industrial use, RHB has concerns about soil from this site being used in any residential or agricultural capacity without additional sampling efforts. Soils from the DOE site must be adequately demonstrated to be compliant with the 25 mrem/yr unrestricted-use public Total Effective Dose Equivalent (TEDE) limit in 902 KAR 100:042, and that has not yet occurred.

d. reliance on corrected-by-exclusion risk values

I assume that this is in reference to the exclusion of Cr(VI) from the assessment. While we do not regulate chemical hazards, we find DOE's position to be justifiable based on the extremely short (on the order of days to months) typical environmental half-life of Cr(VI) and the time since deposition at a site (over a decade since operation).

alter the Radiation Health Branch's advisory perspective regarding the protectiveness baseline for surrounding communities.

I hope our responses are helpful, and I want to ensure you that our agency is making it a priority to verify that any materials moved from the DOE site do not threaten public health.

Regards,

Nathan Garner

RADIATION HEALTH SPECIALIST

Kentucky Department for Public Health

Radiation Health Branch

100 Sower Blvd., Suite 108

Frankfort, KY 40601

Office: 502-564-8390

Cell: 502-229-7363

Radiological Emergency: 1-800-255-2587

From: [REDACTED]

Sent: Friday, July 10, 2026 6:16 PM

To: Garner, Nathan (CHFS DPH) <Nathan.Garner@ky.gov>

Cc: Brock, Stephanie C (CHFS DPH) <StephanieC.Brock@ky.gov>; McKinley, Matthew W (CHFS DPH) <MatthewW.McKinley@ky.gov>

Subject: Re: Supplemental Transmittal: Newly Released Job Hazard Records for Parcel A (Ref: Case 26-0678-C)

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