

The Richland Township Zoning Hearing Board met on May 2, 2023, at 6:30 p.m., as per the request of ASC Engineered Solutions, LLC, 269 Jari Drive, Richland Township, who requested a use as authorized by Section 240-74B(28) of the Richland Township Zoning Ordinance and/or a use variance to operate a facility that will inspect materials which may contain a low level of radioactive contamination in an L-1 Light Industrial District. This hearing was conducted in the Richland Township meeting room, 322 Schoolhouse Road, Johnstown PA 15904.

Present:

William Patrick, Chairman

Mark Rychak

Rodney Kniss

Patrick Wess

PJ McGowan

Attorney Eric Hochfeld, Solicitor

Tiffany Shomo, Secretary

Attorney Hochfeld began the hearing by listing exhibits. Board Exhibit #1 was the appeal application with attachments. Board Exhibit #2 was the Richland Township Zoning Ordinance, by reference, and Board Exhibit #3 was the posting of the municipal building, the property involved, advertising in the Tribune-Democrat and notification of this hearing to adjoining property owners.

The following people were sworn in by Court Stenographer Lori Behe:

Jamie Palmer, Plant Manager

David DiCello, Certified Health Physicist

Ms. Carissa McClellan, office manager of ASC, was present, but not sworn in.

Mr. Palmer has worked for ASC for 15 years. They manufacture, test, and repair snubbers. Snubbers are safety devices designed to protect piping systems in nuclear power plants. Snubbers stabilize and restrain plates and pipes from bursting. The pipes are filled with nuclear materials.

Mr. David DiCello is a Pitt graduate with a degree in Public Health Radiation Safety and has over 30 years of experience. He supports getting the license for PA DEP to use small amounts of radioactive material at the facility.

Mr. DiCello gave a real-life comparison of the quantity of radioactive material handling and the average background radiation is 300 mg of radiation - terrestrial and cosmic radiation. There is radioactivity in everyone's own body. The amount of radioactive material they are talking about using here and getting a license for is a small amount. He explained if someone were working in the facility for 1 year, they would have 99 mg, which is 1/3 of natural radioactivity dose. When receiving nuclear medicine treatments (thyroid therapies, chemotherapy, etc.), injections of sixty millicuries are released into the public after hospital stay. ASC would be working with less than those patients. The license limit they are applying for will be a maximum of sixty millicuries of radioactivity.

Mr. DiCello explained that the snubbers have fixed contamination, which is little to no loose contamination to spread. There is an allowance in the application for a minute amount of loose contamination, which is not significant.

#### Applicant Exhibit A – Presentation

Mr. DiCello explained that ASC will evaluate and repair snubbers in an engineered, enclosed 900 square foot Radiological Control Area (RCA) designed with HEPA filtered exhaust system. The staff operating the center will be fully trained, under federal guidelines, to operate the center. This service center does not require dose monitoring per the regulation, but to remove any risk, monitoring will be installed to ensure safety of employees and the community. State-of-the-art monitoring instruments will be used to alarm staff if abnormal levels are detected. The capacity of the service center is limited to 120 snubbers, which means transports carrying the snubbers to and from the center will not require radioactive signage. Radwaste will be minimized and shipped to a licensed low level radioactive waste facility.

Mr. DiCello gave an example that if a rag is used to wipe a snubber, they are no longer going to use it in the facility. It will be bagged and sent back to the plant. If there is a bearing in the snubber that needs to be replaced and it is radioactive, it will get sent back to the nuclear plant.

Mr. DiCello told the board that there are a lot of requirements and regulations with this license and permit. There is staff training on the instruments, procedures, etc. for full process and material compliance.

Mr. DiCello gave the following timeline for the license:

Quarter 2 of 2023: apply for PA DEP Radioactive Material License.

Quarter 3 of 2023: receive PA Dep License, construct RCA structure inside the existing building, purchase radiation detection equipment.

Quarter 4 of 2023: complete staff training, establish business contracts for the new facility.

Quarter 1 of 2024: initiate work with slightly contaminated product.

Mr. DiCello is certain that they will get a license from DEP. ASC is looking for Zoning Hearing Board approval prior to submitting to PA DEP.

Mr. DiCello explained the ASC Johnstown Service Center Staff chain. Corporate ASC will be in the loop. There will be a Vice President of filed Service, Facility General Manager, Radiation Safety Officer (Jamie Palmer), and two Radioactive Protection Technicians. The workforce will be trained in radiation workers training. Mr. Palmer will be the in-house compliance officer.

Mr. DiCello explained the Conceptual Design of the Radiological Control Area. There will be no drains and no running water in RCA. It will be constructed on a slab. There will be a snubber storage rack. The red dots depicted on the drawing show area radiation monitors on the outside of the RCA. They will be monitoring continuously.

The workers will wear an electronic dosimeter and protective clothing. They will have to write down doses of radiation prior to entering the RCA and leaving the RCA. They will walk through an Argos

machine to detect any radiation. The snubbers would be driven directly to the RCA and brought in via a truck bay.

They have a large competitor in Alabama where all contaminated snubbers from the nuclear industry are taken to. ASC wants to stay relevant in business and be competitive.

Mr. Palmer estimated that they would work on roughly 60 snubbers in 3 weeks. He explained they haven't bid yet but will mainly work on this portion of the business in the summer and winter times. They are anticipating 4-8 shipments per year.

Mr. Palmer explained that fixed contamination is fixed on the snubber and can be wiped with a cloth and the contamination comes off. Loose contamination is imbedded in the metal. Snubbers and parts rust and become porous. This can't be removed from cloth and are manually taken off by grinding. Loose contamination is not their intention but had to apply for that license in case it did happen.

Mr. DiCello said that PA DEP will inspect annually. They will inspect before license issuance, once the equipment is built and installed, and when training is done. They will then inspect annually. PA DEP will have unfettered access and can inspect when they want.

Mr. Palmer stated that about 95% of the products come from power plants only. They can receive from coal plants now but those aren't contaminated. They can receive items from the Alaska pipeline and churches - anywhere where there is pipe to control.

Mr. Palmer stated that there would be no water or sewage installed. There will be fire suppression once the RCA is built. Mr. DiCello said that the amount of material is small so even if there is a fire, there will be no danger to the public. There will be a procedure for natural disasters, fires, etc.

Mr. Palmer explained the main reason to send the snubbers to ASC is for new grease to get installed. The snubbers are initially assembled from ASC. They will tear down, regrease, put back together the snubber and send back. The physical items used (rags, grease, etc.), will be bagged and sent back to the nuclear plant to handle. There will be a HEPA filtering system installed. Mr. Palmer will have procedures for everything and nothing goes into or comes out of the room that is not monitored. He stated that the nuclear power plant tests before shipping to them. Mr. DiCello said the contract will have limits and they will be required to be under those limits.

Mr. Palmer stated that neighbors would not know differently if the RCA was constructed and active.

Mr. Palmer stated that this could create up to 10 part-time, seasonal jobs.

Mr. Palmer explained it would be a locked and secured facility. Mr. DiCello said there would be no cameras; they would have trained and qualified people in the facility. Mr. Palmer stated that only individuals trained will be allowed in the facility.

Mr. Palmer stated that they build snubbers all day every day and will have a brand-new setup for the RCA Room with new tools.

When asked if the requested level through PA DEP could be a lower level, Mr. DiCello stated they could get lower or higher. A radio pharmacy might have 10000x more activity than requested. They can go lower but were already on the low spectrum of licenses. He explained that universities have thousands of times more than this. Mr. DiCello said that hospitals have their own license from DEP with higher levels of radiation. Hospitals have a broad scope license that has thousands of times more than their request.

Mr. DiCello said they will have state of the air monitoring instruments. There will be a central dispatch. There will be an alarm in place, loud enough that in or out of the RCA, workers will be alerted.

If an alarm goes off, personnel will know what to do when it sounds. They will investigate, confirming if it was real or false. There are levels in the PA DEP procedures that tell when emergency personnel are to be notified.

Mr. Palmer stated that a snubber is good for roughly 30 years with no maintenance.

There were no residents or people present.

The Township had no comments.

Attorney Hochfeld read the following that was submitted by the applicant into the record:  
The proposed new use is not prohibited by the Light Industrial Zoning regulations and the new use does not present environmental risk greater than some of the pre-approved zoning activities such as a dry-cleaning plant, a dyeing plant or a major automotive repair facility. The facility will be designed and licensed to safely use the materials. Mr. DiCello explained that dry cleaning could have chemical and environmental impacts. He said that what ASC is proposing has no environmental impact.

Mr. DiCello stated he is a third-party consultant hired to assemble components for the licensing. He has worked for other organizations, as well. He is not an employee.

The board took a recess from 7:19 PM - 7:27 PM.

Mr. Wess motioned to grant a use authorized by Section 240-74B(28) of the zoning regulations to inspect materials which may contain a low level of radioactive contamination.

Seconded by R Kniss

Mr. Rychak motioned to adjourn the hearing at 7:29 PM. Seconded by Mr. McGowan. All in favor.

Respectfully submitted,

*T. Shomo*

Tiffany Shomo