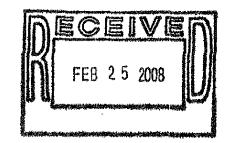
SEC Petition Office of Compensation Analysis and Support NIOSH 4676 Columbia Parkway, MS-C-47 Cincinnati, Ohio 45226



## To Whom It May Concern:

I am filing this petition in behalf of the General Steel Industries employees and or their survivors with full intentions of assisting them in giving them their right to dispute any decisions made by NIOSH through the Dose Reconstruction techniques that have been used to deny their claim.

NIOSH has come to their conclusion in case as well as many others that the employee did not receive enough radiation internally and externally to have been "most likely as not" to have caused their cancer. NIOSH did not have a body to conclude this with in case, nor did they have the quantity or quality of the use of the two betatron machines and facility conditions to properly conclude their findings.

NIOSH has also stated in their report that records were not available for monitoring radiation. According to the enclosed affidavits dosimetry badges were not given to wear. These badges were available in 1950, so there was no reason for this kind of negligence.

I have contacted Denise Brock on several occasions asking for assistance with filing this petition. Her response has been very slow in returning my phone calls maybe because she is single-handedly trying to assist several other employees from not only General Steel Industries, but also from the Dow Chemical Plant, and Mallincrodt as well as other affected plants. I have not been offered any other contact number or name from Denise as an alternative advocate in the event she is unable to assist me with her expertise. Therefore this has left me on my own to fill out the necessary forms and to submit to you what you hopefully need to conclude that a petition is in order for all General Steel Industries employees.

# I am enclosing the following:

- 1. Affidavits from my who were both employees with GSI during the petition years.
- 2. A drawing of the interior of GSI from my showing the tracks that ran the betatron from one building to another building. (Please notice the location of the restrooms)
- 3. An additional letter my wrote after researching how claims for Agent Orange were conducted. (Interesting!)
- 4. A reference sheet I have compiled for your consideration. This includes two articles that state GSI had custody of not ONE, but TWO government owned betatron machines, which can only mean it too was in use and the radiation

1

exposure from it was probably not taken into consideration. I did not see this mentioned in the NIOSH report?)

If you have any questions or need any additional documentation, please contact me at

Thank you for your consideration,

## REFERENCES

- 1. Website... nuke.worker.com (General Steel Cleanup 1993) Go to Illinois-Granite City Steel states previous occupant General Steel Industries 1417 State St. GSI was custodian of (2) betatron-government owned machines. 1993 cleanup residual radioactive material survey shows amounts in excess of government guidelines
- 2. Website.... betatron and betatron machines dangers... tried to quantify radiation exposure through dosimetry. Device or badge was available as of 1950. (Badges were available, not used per attached affidavits)
- 3. Website.... Office of Legacy Management Granite City Steel site.... (States (2) betatron machines housed at this site. Doesn't give GSI as previous occupant but cleanup dates are the same. Granite City Steel is located on 20th street. No address given in this article. General Steel Industrics is at 1417 State St. (full address should be mandatory)
- 4. Website.... ACS Radiation Exposure and Cancer... This site explains the dangers of ionizing radiation, how it may not show up for years after exposure and its effects on DNA. This website relates beta rays to ionizing radiation and much more
- 5. Website...DOE listings of nuclear facilities.... Gives a list of facilities beryllium metal was provided to by beryllium vendors. Granite City Steel listed as one, no address given. AWE/DOE (represents ownership change) Granite City Steel used to own General Steel Industries at 1417 State St.
- 6. Website...Energy Employees Occupational Illness Compensation Act of 2000. (States AWE/DOE represents ownership change. (Granite Steel was General Steel Industries)
- 7. Website...Residual Radioactive Summary...States..."Documentation reviewed indicates that there is potential for SIGNIFICANT RESIDUAL CONTAMINATION in which weapons-related production occurred 1958-1994- Granite City Steel formerly was General Steel Industries (no street address given; address should be given in reports)

## U.S. Department of Health and Human Services Special Exposure Cohort Petition Centers for Disease Control and Prevention under the Energy Employees Occupational National Institute for Occupational Safety and Health Illness Compensation Act Expires: 05/31/2007 OMB Number: 0920-0639 Page 1 of 7 Special Exposure Cohort Petition — Form B Use of this form and disclosure of Social Security Number are voluntary, Failure to use this form or disclose this number will not result in the denial of any right, benefit, or privilege to which you may be entitled. General Instructions on Completing this Form (complete instructions are available in a separate packet): Except for signatures, please PRINT all information clearly and neatly on the form. Please read each of Parts A — G in this form and complete the parts appropriate to you. If there is more than one petitioner, then each petitioner should complete those sections of parts A - C of the form that apply to them. Additional copies of the first two pages of this form are provided at the end of the form for this purpose. A maximum of three petitioners is allowed. If you need more space to provide additional information, use the continuation page provided at the end of the form and attach the completed continuation page(s) to Form B. If you have questions about the use of this form, please call the following NIOSH toll-free phone number and request to speak to someone in the Office of Compensation Analysis and Support about an SEC petition: 1-800-356-4674. Start at D on Page 3 A Labor Organization, Start at C on Page 2 An Energy Employee (current or former), If you Start at B on Page 2 A Survivor (of a former Energy Employee), are: ☐ A Representative (of a current or former Energy Employee), Start at A on Page 1 Representative Information — Complete Section A if you are authorized by an Employee or Survivor(s) to petition on behalf of a class. Are you a contact person for an organization? Yes (Go to A.2) ☐ No (Go to A.3) A.1 Organization Information: A.2 Name of Organization Position of Contact Person Name of Petition Representative: A.3 Last Name Middle Initial Mr./Mrs./Ms. First Name Address: A.4 P.O. Box Apt # Street Zip Code State City **A.5** Email Address: A.6 ☐ Check the box at left to indicate you have attached to the back of this form written authorization to petition by the survivor(s) or employee(s) indicated in Parts B or C of this form. An authorization A.7 If you are representing a Survivor, go to Part B; if you are representing an Employee, go to Part C.

### U.S. Department of Health and Human Services Special Exposure Cohort Petition Centers for Disease Control and Prevention under the Energy Employees Occupational National Institute for Occupational Safety and Health Illness Compensation Act Expires: 05/31/2007 OMB Number: 0920-0639 Page 2 of 7 Special Exposure Cohort Petition — Form B Survivor Information — Complete Section B if you are a Survivor or representing a Survivor. Name of Surviyor: B.1 Social Security Number of Survivor: **B.2** Address of Survivor: B.3 P.O. Box Apt# Street Žip Code State City Telephone Number of Survivor: **B.4** Email Address of Survivor:-B.5 Parent ☐ Spouse Relationship to Employee: **B.6** Grandchild Grandparent Go to Part C. Employee Information — Complete Section C UNLESS you are a labor organization. 11 Name of Employee: C.1 Last Name Middle Initial Former Name of Employee (e.g., maiden name/legal name change/other): C.2Last Name Middle Initial Mr./Mrs./Ms. First Name Social Security Number of Emplo C.3 Address of Employee (if living): C.4 DECERSED P.O. Box Apt# Street Zip Code State City Telephone Number of Employee: L C.5Email Address of Employee: C.6 Employment Information Related to Petition: C.7Employee Number (if known): C.7a End Start Dates of Employment: C.7b Employer Name: C.7c Work Site Location: C.7d Supervisor's Name: C.7e Go to Part E.

## U.S. Department of Health and Human Services Special Exposure Cohort Petition Centers for Disease Control and Prevention under the Energy Employees Occupational National Institute for Occupational Safety and Health Illness Compensation Act Expires: 05/31/2007 OMB Number: 0920-0639 Page 3 of 7 Special Exposure Cohort Petition — Form B Labor Organization Information — Complete Section D ONLY if you are a labor organization. **Labor Organization Information:** D.1 Name of Organization Position of Contact Person Name of Petition Representative: D.2 Address of Petition Representative: D.3P.O. Box Apt# Street Zip Code State City Telephone Number of Petition Representative: D.4 Email Address of Petition Representative: D.5 Period during which labor organization represented employees covered by this petition D.6 End (please attach documentation): Start Identity of other labor organizations that may represent or have represented this class of D.7 employees (if known):

Go to Part E.

Special Exposure Cohort Petition under the Energy Employees Occupational Illness Compensation Act

U.S. Department of Health and Human Services
Centers for Disease Control and Prevention
National Institute for Occupational Safety and Health

OMB Number: 0920-0639

Expires: 05/31/2007

Specia	al Exposure Cohort Petition — Form B Page 4 or a
E	Proposed Definition of Employee Class Covered by Petition — Complete Section E.
E.1	Name of DOE or AWE Facility: GENERAL STEEL INDUSTRIES
E.2	Locations at the Facility relevant to this petition:
	1417 State St, Granite City, Ib
E.3	List job titles and/or job duties of employees included in the class. In addition, you can list by name any individuals other than petitioners identified on this form who you believe should be included in this class:  All job titles to be included in the class. All job titles to be included in the class. In addition, you can list by name any individuals other than petitions.
E.4	Employment Dates relevant to this petition:
	Start January 1, 1950 End January 31, 1973
	Start End
	Start End
E.5	Is the petition based on one or more unmonitored, unrecorded, or inadequately monitored or recorded exposure incidents?: ☐ Yes ☐ No
	If yes, provide the date(s) of the incident(s) and a complete description (attach additional pages as necessary):
	neuer recovoir or was affered any monitaring
	States did not were any monitoring device nor was he offered one during his years at GSI Affidavit enclosed
	That during their years of Employment with GSI, were warned har received any type of written discussive stating the danger they were in. No waiver was offered
	Go to Part F.

# Special Exposure Cohort Petition

under the Energy Employees Occupational Illness Compensation Act

# U.S. Department of Health and Human Services

Centers for Disease Control and Prevention National Institute for Occupational Safety and Health

OMB Number: 0920-0639

Expires: 05/31/2007 Page 5 of 7

Special Exposure Cohort Petition — Form B

Basis for Proposing that Records and Information are Inadequate for Individual Dose — Complete Section F.

Complete at least one of the following entries in this section by checking the appropriate box and providing the required information related to the selection. You are not required to complete more than one entry.

F.1 We have attached either documents or statements provided by affidavit that indicate that radiation exposures and radiation doses potentially incurred by members of the proposed class, that relate to this petition, were not monitored, either through personal monitoring or through area monitoring.

(Attach documents and/or affidavits to the back of the petition form.)

Describe as completely as possible, to the extent it might be unclear, how the attached documentation and/or affidavit(s) indicate that potential radiation exposures were not monitored.

DO dievice waren or offered to
Employees that registers amounts
no dievice worn or offered to Employees that registers amounts of radiation Exposure.

F.2 M I/ We have attached either documents or statements provided by affidavit that indicate that radiation monitoring records for members of the proposed class have been lost, falsified, or destroyed; or that there is no information regarding monitoring, source, source term, or process from the site where the employees worked.

(Attach documents and/or affidavits to the back of the petition form.)

Describe as completely as possible, to the extent it might be unclear, how the attached documentation and/or affidavit(s) indicate that radiation monitoring records for members of the proposed class have been lost, altered illegally, or destroyed.

According to signed affidavits, mentacing Dadges as maniforms of any sect was not done at this site.
bol of montanny of any sert was
not done at this site.
To the Dose Reconstruction, DIOSH States
For records were not quarlable.

Part F is continued on the following page.

## U.S. Department of Health and Human Services Special Exposure Cohort Petition Centers for Disease Control and Prevention under the Energy Employees Occupational National Institute for Occupational Safety and Health Illness Compensation Act Expires: 05/31/2007 OMB Number: 0920-0639 Page 6 of 7 Special Exposure Cohort Petition — Form B ☐ \We have attached a report from a health physicist or other individual with expertise in F.3 radiation dose reconstruction documenting the limitations of existing DOE or AWE records on radiation exposures at the facility, as relevant to the petition. The report specifies the basis for believing these documented limitations might prevent the completion of dose reconstructions for members of the class under 42 CFR Part 82 and related NIOSH technical implementation quidelines. (Attach report to the back of the petition form.) I/We have attached a scientific or technical report, issued by a government agency of the F.4 Executive Branch of Government or the General Accounting Office, the Nuclear Regulatory Commission, or the Defense Nuclear Facilities Safety Board, or published in a peer-reviewed journal, that identifies dosimetry and related information that are unavailable (due to either a lack of monitoring or the destruction or loss of records) for estimating the radiation doses of employees covered by the petition. (Attach report to the back of the petition form.) Go to Part G. Signature of Person(s) Submitting this Petition — Complete Section G. All Petitioners should sign and date the petition. A maximum of three persons may sign the petition. J - J タ- Q & Signature Date Signature Date Signature Any person who knowingly makes any false statement, misrepresentation, concealment of Notice: fact or any other act of fraud to obtain compensation as provided under EEOICPA or who knowingly accepts compensation to which that person is not entitled is subject to civil or administrative remedies as well as felony criminal prosecution and may, under appropriate criminal provisions, be punished by a fine or imprisonment or both. I affirm that the information provided on this form is accurate and true. SEC Petition Send this form to: Office of Compensation Analysis and Support NIOSH 4676 Columbia Parkway, MS-C-47

If there are additional petitioners, they must complete the Appendix Forms for additional petitioners.

The Appendix forms are located at the end of this document.

Cincinnati, OH 45226

To: SEC Petition
Office of Compensation Analysis Support
NIOSH
4676 Columbia Parkway, MS-C-47
Cincinnati, OH 45226

Date: 02-09-08

To Whom It May Concern,

Concerning File Number
I have to say that I strongly disagree with your findings concerning the likelihood of the causation of his cancer from which he died.

I, like worked at General Steel Industries. Though I worked there for only a few years, I worked during the years of 1967 and 1968 and then again in 1970 until they closed their doors about two years later. My break in service occurred when I joined the US Army to go serve in Viet Nam. As you might note, the years I worked at General Steel Industries are the crucial years for which the ACT pertains. In my own case, I have had a PET scan in previous years and they have found a spot on my left lung and one on my right kidney. At this point in time it is not known if there is any malignancy and the doctors are watching these spots closely for any growth.

As I understand it, the primary source being considered for radiation contamination was from the betatron machines used to x-ray most of the casting produced at the State Street facility in Madison, IL where and I worked. I can tell you from personal experience that I saw working many times in the vicinities where these machines were used because I also worked in these same vicinities and it would seem more than coincidental that he would have worked in those same locations many times before I started work there. Primarily they would use the betatron machines to x-ray castings in buildings 8, 9, and 10. I was a working with the overhead cranes that set many of the castings in place to be x-rayed and then later would turn them over or remove them to another location. The betatron machines themselves were portable so they too were moved place to place.

What is most disturbing to me is that they used this equipment to x-ray primarily their Westinghouse turbine castings in the aforementioned buildings. These castings weighed on the order of 250 to 300 tons. Something this heavy would require outrageous bursts of energy to penetrate so I am not sure exactly what would be a safe distance when these machines were in use and I also am not so sure there was not any residual beta radiation in the area or on the castings following the use of this equipment.

The betatron machines were also used in 6 and 7 buildings to x-ray tank hulls and turrets which were eastings of considerably less weight but I am not sure if there was a corresponding power reduction of the betatrons because of the lesser weight of these

castings. Even if this were the case, the throughput for the tank hulls and turrets was much greater so the frequency of use of the machine was also much greater as a result. I, like my father, also worked extensively in buildings 6 and 7.

The problem I have with a theoretical equation to determine causation is that there were many other factors of concern that I am sure had absolutely no weighting in your mathematical equations. These buildings all had poor ventilation. Besides lingering beta particles there was a good deal of smoke from the burning and welding of the castings that was not properly being vented to the atmosphere. Asbestos was extremely prevalent throughout the mill as well. In short, the entire atmosphere was ripe with violations against basic human health and there appeared to be very few precautions undertaken in general by management to reduce many of these risks.

This was also a time when smokestack particulates to the atmosphere were not monitored so the health and safety of the entire community was much more at risk than it would be today if the plant were still in operation and subject to EPA regulations but none-the-less, a contributing factor of those times. Many of the homes in the Granite City area have had their lawns replaced due to lead emissions by National Lead located right next door to General Steel. Nearly every home and automobile in Granite City was discolored with a reddish brown residue due to a coating caused by the emissions from the smoke stacks of the 20<sup>th</sup> Street Granite City Steel location and accompanying coke plant on Edwardsville Road. Even frequent washings of homes did not help much and the only recourse was to repaint your home on a regular basis.

The point being illustrated here is not so much the possibility of other sources of causation but rather the overall basic attitude of irresponsibility displayed by nearly all the mills in Granite City toward the citizens in the community. With such pervasive attitudes it would not seem to be a large stretch to come to the realization that not many precautions were taken in regard to the protecting the workers at General Steel Industries in regards to radiation exposure levels. It seems that attitude was more along the lines that the workers were expendable.

I know that radiation exposure levels increase with the time spent in the vicinity where radiation sources exists so it is incomprehensible to me how anyone can come up with a statistically sound formula that accurately depicts a percentage of causation. You might as well just pick the number right out of thin air.

I am further disturbed by the whole process of making such determinations. It seems there are unnecessary and purposeful built-in delays and complexities meant only to stall, dis-hearten, and frustrate any would be claimants to the point they are willing to relinquish any and all claims and simply throw their hands up in the air. Sometimes conditions are such that you just know things and it doesn't take a big scientific study to come to the proper conclusions. In fact, one of the most disturbing aspects of this whole affair is that there really is not any measured or recorded data to go by so how can anyone realistically espouse any believable results based on mathematics or science? If an error is to be made, in my estimation it should be made on the side of the claimants.

I would hope that we are dealing with people of high moral integrity that will stand up and do the right thing and compensate these people and their families for the suffering and hardships they have had to endure simply because they had no choice but to make a living to support themselves and their families. Decency demands that death and suffering should not be part of that equation.

Respectfully,

"OFFICIAL SEAL" Marilyn Burdzilauskas
Notary Public, State of Himois
My Commission Exp. 08/28/2008

# To Whom It May Concern:

The following is presented as reason for reconsideration of the decision made in relation to the case of

The following is information I have discovered in regard to Vict Nam Veterans compensation for exposure to Agent Orange that is paid out in the form of a monthly disability payment. I bring this to light because I believe it sets a precedent for establishing a process for calculating compensation by the government in other types of cases where unintended exposure may exist that has some degree of probability of causing a long term health problem for those exposed. I believe a similar standard of compensation determination should be invoked for the employees of GSI that were exposed to nuclear radiation as a result of work performed where such exposure was the direct result of government contracts that required use of equipment that was responsible for this exposure.

Rather than calculating some arbitrary percentage of causation figure based on what appears to be an abstract fuzzy math calculation, the Veterans Administration contracted the NAS (National Academy of Science) to collect data related to the health affects to exposure to Agent Orange. NAS was chosen for this study because it is an independently functioning entity separate from the federal government. In relation and comparison to radiation exposure associated with my father's case, the health affects have likewise already been determined.

In the case of Agent Orange, it was the responsibility of the Veteran's Administration to translate the conclusions of the NAS into a compensation policy for veterans. As a result of this study, the VA decided to recognize a range of illnesses as **presumptively** service connected for Viet Nam era veteran who served in Viet Nam. The Agent Orange Act of 1991 also defines a "presumption of exposure" that gives veterans the benefit of the doubt by presuming that a Viet Nam veteran diagnosed with one or more service-connected illnesses was also exposed to Agent Orange or related herbicides. This got around earlier controversies about who was exposed to herbicides while in Viet Nam, because military record did not allow researchers to identify who was exposed nor the extent of their possible exposure. Likewise, the records of GSI employees are not defined as to the identity of those exposed to the radiation of the betatron machines or the extent of that exposure.

As a result, when an eligible veteran shows that he or she served in Viet Nam and was diagnosed with one or more of the presumptively recognized illnesses, service connection becomes automatic. According to the Deputy Assistant General Counsel, an attorney in the VA Office of the General Counsel, the presumptions of service connection for the illnesses associated with Agent Orange are intended to ease the veteran's burden of producing scientific evidence directly showing that their illnesses or injuries were caused my military service.

For completeness, I will include a list of the particular illnesses associated with Agent Orange exposure. They are:

1.) Chloracne 2.) Non-Hodgkin's lymphoma 3.) Soft tissue sarcoma (other than osteosarcoma, chondrosarcoma, Kaposi's sarcoma, or mesothelioma) 4.) Hodgkin's disease 5.) Porphyria cutanea tarda 6.) Multiple myeloma 7.) Respiratory cancers, including cancers of the lung, larynx, trachea, and bronchus 8.) Prostrate cancer 9.) Acute and subacute transient peripheral neuropathy 10.) Type 2 diabetes 11.) Chronic lymphocytic leukemia.

Note that the presumptive connection of these illnesses is based simply on being able to ascertain service on land in Viet Nam during the Viet Nam era by anyone that has been diagnosed with any one of these illnesses. There is no need for a veteran to prove that he or she spent time in a hot zone where Agent Orange was actually known to be used and there is no need to prove length of exposure.

My point here is that there appears to be a double standard in calculating and administering monetary compensation to the employees of GSI when comparing to the standard used to provide monetary compensation to Viet Nam era veterans exposed to Agent Orange.

It is my belief that the Veterans Administration has set a precedent for identifying cases where monetary compensation is dictated where there is a known and identifiable health problem associated with that exposure. I further believe this is a more fair approach when there is not enough data to disprove that any of the associated illnesses were not caused by said exposure.

Further, note that many of the listed illnesses associated with Agent Orange could have other sources of causation. In spite of this fact, the VA took the high road on this since presumably from a scientific point of view, there is no real way to prove or disprove if the illness in question is from Agent Orange or from some other source.

Regards,

To The: SEC Petition Office of Compensation Analysis And Support NIOSH 4676 Columbia Parkway, MS-C-47Cinccinnati OH, 45226

To Whom It may Concern,

and I am a

former employee of General Steel Industries with employment dating back to 1964 thru 1973. This affidavit is being written in behalf of

I was a welder at General Steel during my employment years with them.

I worked primarily in buildings #8, #9, and #10 where the betatron machine was in operation. My responsibility was to weld the castings after they had been x-rayed. The castings to be x-rayed were lifted by overhead cranes, placed on tracks, and then rolled to the betatron for x-raying. The castings might be G.E. or Westinghouse turbine castings. Sometimes we would x-ray hulls or turrets for military tanks. This equipment was placed on a cart of some sort, and then placed on tracks to be rolled to the betatron machine for x-raying.

We were never given any type of badge or monitoring device that registered our exposure to radiation. The only warning received was when our foreman would tell everyone to leave the area before x-raying began. He then would tell us when to return and resume welding the castings, hulls or turrets. After the equipment was x-rayed, the temperature of these x-rayed parts was so high that we had to use blankets of asbestos under our feet to keep from being burned.

The environment in all the buildings was always smoked filled and dusty.

I can verify that did indeed work in and around the #10 building where the betatron was located. work title was but he had other duties such as replacing windows or sweeping floors in all the buildings throughout the steel mill.

I am enclosing a drawing I made of the interior of General Steel Industries.

Please contact me at

if additional information is needed.

Marilyn Burdzilauskas Notary Public, State of Illinois

My Commission Exp. 08/28/2008

You are viewing a page intended for frames viewing, for full website functionality, please go to the framed version here

Printer Friendly Version.

Back to U.S. Map Back to Granite City Steel

# **Complete Cleanup Criteria Information**

# **Granite City Steel**

Installation: Granite City Steel

State: IL... Site Name: Old Betatron Building

Subsite Name: Old Betatron Building

Medium: structural material/equipment - concrete/brick

Contaminant: beta-gamma

Cleanup Criteria: 5000 dpm/100 sqcm

Land use: unrestricted

Precleanup Concentrations (avg/max): not stated/30000.0 dpm/100 sqcm

Reference Document: Post-Action: Results of the Independent Verification Survey at the Old Betatron Building, Granite

City, Illinois (GSG001) -- Oak Ridge National Laboratory, Martin Marietta

Reference Document Date: 7/1/1994 Regulatory Program: CERCLA

**DOE Management Program: FUSRAP** 

Criteria Comments: The guideline is for average exposure conditions. Areas found to be above the guideline during the

independent verification were cleaned up so that post-action levels were within DOE guidelines.

Legal Basis: DOE Order 5400.5 Target Risk Level: not stated

Other Contaminants in structural material/equipment - concrete/brick at this Subsite: uranium-total

Installation: Granite City Steel

State: IL

Site Name: Old Betatron Building Subsite Name: Old Betatron Building

Medium: structural material/equipment - concrete/brick

Contaminant: uranium-total

Cleanup Criteria: 15000 dpm/100 sqcm

Land use: unrestricted

Precleanup Concentrations (avg/max): not stated/511.0 dpm/100 sqcm

Reference Document: Post-Action: Results of the Independent Verification Survey at the Old Betatron Building, Granite

City, Illinois (GSG001) - Oak Ridge National Laboratory, Martin Marietta

Reference Document Date: 7/1/1994 Regulatory Program: CERCLA

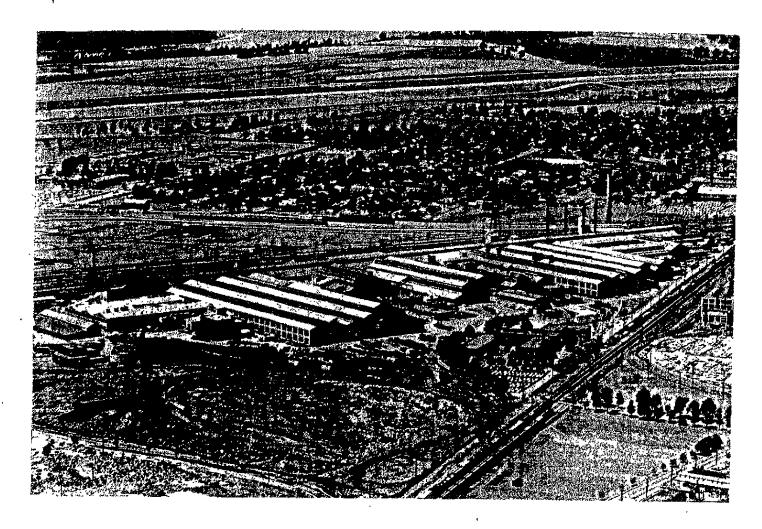
**DOE Management Program: FUSRAP** 

Criteria Comments: Reference document reports contaminant as Uranium-235/238/natural. The guideline is adapted from DOE Order 5400.5, April 1990; DOE Guidelines for Residual Radioactive Material at Formerly Utilized Sites Remedial Action Program and Remote Surplus Facilities Management Program Sites, Rev. 2, March 1987; and DOE Radiological Control Manual, DOE N 5480.6 (DOE/EH-256T), June 1992. The guideline is reported as maximum/average/removable. The independent survey showed that alpha levels were within the DOE guidelines 5000/15000/1000.

Legal Basis: DOE Order 5400.5 Target Risk Level: not stated

Other Contaminants in structural material/equipment - concrete/brick at this Subsite: beta-gamma

# CASTINGS DIVISION



General Steel's Castings Division at Granite City, Ill., in the St. Louis industrial area, covers 127 acres, 39 of which are under roof. This plant has a monthly capacity in excess of 4000 tons of finished carbon steel castings and 500 tons of wear-resistant castings. Production is devoted to cast steel products for railroads, general industry and the military. Also at this Division, GSI builds various types of railroad freight cars which utilize its one-piece cast steel underframes.





