

## Letter/Attachment for GTCC EIS Scoping Comment #87

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### WASTE CONTROL SPECIALISTS LLC

September 20, 2007

James L. Joyce, Document Manager  
Office of Regulatory Compliance (EM-10)  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, D.C. 20585-0119

RE: Notice of Intent to Prepare an Environmental Impact Statement for the Disposal of Greater-Than-Class-C Low-Level Radioactive Waste

Waste Control Specialists LLC (WCS) has reviewed the Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the Disposal of Greater-Than-Class-C Low-Level Radioactive Waste (GTCC LLW) (72 FR 40135, dated July 23, 2007) and has the following comments.

WCS commends the Department of Energy (DOE) for including commercial disposal facilities as possible disposal locations for GTCC LLW and GTCC-like LLW. Commercial facilities engaged in free enterprise may provide innovative or cost-efficient solutions that are not available through DOE facilities.

WCS is in the process of licensing enhanced, near-surface facilities for the safe disposal of federal and Texas Compact LLW. As a result of our licensing efforts, WCS has collected information for each of the issues listed in the NOI section titled "Identification of Environmental Issues" as they relate to Class A, B and C LLW. This information includes site characterization data from more than 200 boreholes, 160 monitoring locations and projects performance for more than 50,000 years. WCS invites DOE to use the WCS information already compiled as part of DOE's evaluation of a commercial arid site for disposal of GTCC LLW and GTCC-like LLW. Using the WCS site information will provide specific, tangible data for a non-DOE GTCC/GTCC-like LLW disposal site in a very timely and cost-effective manner. The information may be found in our LLW disposal license application by following the links on our web site at [www.wcstexas.com](http://www.wcstexas.com).

We would be pleased to discuss our comment with you in more detail. Please contact Jeff Skov at (972) 448-4483 or me at (972) 450-4235.

Sincerely,



Rodney A. Baltzer  
President

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