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Formerly Utilized Sites Remedial Action Program (FUSRAP)

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# ADMINISTRATIVE RECORD

for Maywood, New Jersey

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U.S. Department of Energy

United States Government

Department of Energy

Oak Ridge Operations Office

# memorandum

DATE: MAY 12 1994

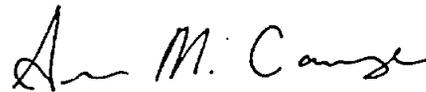
REPLY TO  
ATTN OF: EW-93:Cange

SUBJECT: MAYWOOD SITE - PUBLIC RELEASE OF THE EE/CA TO REMEDIATE THE STORAGE PILE

TO: Al Johnson, Environmental Scientist, Division of Off-Site Programs, TREV II,  
EM-421

The purpose of this memorandum is to inform you that the engineering evaluation/cost analysis (EE/CA) for remediation of the storage pile has been released for a 30-day public comment period. Five copies of this report have been attached for your information. The public comment period is scheduled to end on June 13. A summary of the comments received and their responses will be attached to the final EE/CA and placed in the administrative record file for the site.

Please feel free to contact me at (615) 576-5724, if you have any questions or comments.



Susan M. Cange, Site Manager  
Former Sites Restoration Division

Attachment



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94-290

**Department of Energy**

Oak Ridge Operations  
P.O. Box 2001  
Oak Ridge, Tennessee 37831—

**MAY 12 1994**

Mr. Nicholas Marton  
Bureau of Federal Case Management  
New Jersey Department of Environmental  
Protection and Energy  
Division of Hazardous Waste Management  
401 E State Street  
CN 028  
Trenton, New Jersey 08625-0028

Dear Mr. Marton:

**MAYWOOD SITE - PUBLIC RELEASE OF THE EE/CA TO REMEDIATE THE STORAGE PILE**

The purpose of this letter is to inform you that the engineering evaluation/cost analysis (EE/CA) for remediation of the storage pile has been released for a 30-day public comment period. A copy of this report has been enclosed for your information as well as the response to comments that you submitted on an earlier draft of this document. The public comment period is scheduled to end on June 13. A summary of all of the comments received and their responses will be attached to the final EE/CA and placed in the administrative record file.

Please feel free to contact me at (615) 576-5724, if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Cange".

Susan M. Cange, Site Manager  
Former Sites Restoration Division

Enclosures

**Review of the Engineering Evaluation/Cost Analysis for the Proposed Removal of Contaminated Materials from  
the Maywood Interim Storage Site, Maywood, NJ (Draft, April 1994)**

Date: 5/9/94

New Jersey Dept. of Environmental Protection and Energy Comments	DOE Response
<p>1. As a general item, the report repeatedly states, "While the contaminated materials in the MISS pile are not considered to present an immediate risk to human health or the environment, the proposed removal action would further reduce the potential for exposure to humans or the environment." Nevertheless, the report also states that gamma exposure rates are elevated at fence line locations, "The gamma exposure rates in this area of the fence line exceed the DOE primary radiation dose limit of 100 mrem/yr above background for all exposure pathways to members of the public." This apparent disparity must be reconciled.</p>	<p>As stated in the EE/CA (Section 1.4), "The exposure rates at the boundary locations are elevated primarily because of localized soil contamination in the northeastern corner of the [MISS] property in the area of Building 76, the old thorium processing facility". These elevated exposure rate measurements are attributed to this localized area of soil contamination and are not directly related to the waste storage pile, which is located over 200 feet to the west.</p>
<p>2. While the NJDEPE supports the offsite disposal of the MISS pile wastes, the issue of achieving appropriate cleanup levels through soil washing to reduce disposal volumes appears problematic. As indicated on page 19 of the subject document, it is DOE's intention to comply with the substantive requirements of all applicable or relevant and appropriate requirements (ARARs) in accordance with CERCLA and the NCP. Furthermore, as indicated in Appendix A of the report, the New Jersey Industrial Site Recovery Act (P.L. 1993, c. 139) is identified as potentially relevant and appropriate. As discussed in previous correspondence (Marton to Cange, April 1994), noncompliance with this law in regard to cleanup levels and the stated 15 pCi/g goal for the soil washing technology remains a concern.</p>	<p>DOE has determined that the New Jersey Industrial Site Recovery Act is neither applicable nor relevant and appropriate for the Maywood site (Cange to Marton, March 17, 1994). Appendix A has been revised accordingly. Even if it had been determined to be an ARAR, this statute would have no bearing on the proposed removal action, which calls for excavation of the entire contents of the waste storage pile, regardless of radionuclide concentration; it would only be potentially germane to the development of cleanup criteria for contaminated soils and criteria for replacement of treated soils, and these activities will occur during the final remediation of the Maywood site, not during this removal action. (Also see response to comment 3 below.)</p>
<p>3. In light of the issues outline in item #2 above, reuse of soils cleaned to a maximum of 15 pCi/g without permanent institutional/access restrictions is also of concern.</p>	<p>As stated in the EE/CA, DOE will propose to modify the remedy to include treatment if the treatability studies conducted this fall demonstrate that soil washing is effective in achieving a significant reduction in the volume of waste requiring offsite disposal, at a favorable cost. Treated soils (i.e., with residual thorium and radium contamination below 15 pCi/g), would be stored onsite, for eventual use as subsurface backfill material during the final remedial action for the Maywood site. DOE is committed to treating the Maywood soils to a level as low as reasonable achievable (ALARA), such that the residual radionuclide concentration in the treated soils may be well below 15 pCi/g. At areas where the treated soils with residual radionuclide concentrations between 5 and 15 pCi/g are replaced onsite, institutional controls will be maintained to ensure that DOE is notified of any change in land use which might affect the protectiveness of the remedy, and periodic reviews will be conducted to ensure that the remedy continues to provide adequate protection of human health and the environment.</p>

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94-290

**Department of Energy**

Oak Ridge Operations  
P.O. Box 2001  
Oak Ridge, Tennessee 37831—

**MAY 12 1994**

Mr. Jeffrey Gratz  
Federal Facilities Section  
U.S. Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

Dear Mr. Gratz:

**MAYWOOD SITE - PUBLIC RELEASE OF THE EE/CA TO REMEDIATE THE STORAGE PILE**

The purpose of this letter is to inform you that the engineering evaluation/cost analysis (EE/CA) for remediation of the storage pile has been released for a 30-day public comment period. A copy of this report has been enclosed for your information as well as the response to comments that you submitted on an earlier draft of this document. The public comment period is scheduled to end on June 13. A summary of all of the comments received and their responses will be attached to the final EE/CA and placed in the administrative record file.

Please feel free to contact me at (615) 576-5724, if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Cange".

Susan M. Cange, Site Manager  
Former Sites Restoration Division

Enclosures

Review of the Engineering Evaluation/Cost Analysis for the Proposed Removal of Contaminated Materials from the Maywood Interim Storage Site, Maywood, NJ (Draft, April 1994)

Date: 5/9/94

U.S. EPA Region II Comments	DOE Response
1. It is not clear in the document how treatment, which would produce a pile of cleaned material (later to be used as backfill), would "facilitate preparation of the MISS property for later waste treatment and staging activities." (page 18)	As implied by this comment, the site preparation of the MISS property for subsequent waste treatment and staging activities might be better served under Alternative 2, with offsite commercial disposal of all materials removed from the waste storage pile. However, the treatment of materials removed from the waste storage pile (Alternative 3) would provide valuable experience in optimizing the effectiveness of the treatment process on a production scale and in the materials management of all process streams, which would facilitate Phase II operations during the final remediation of the Maywood site. Therefore, both Alternatives 2 and 3 would, in fact, "facilitate the preparation of the MISS property for later waste treatment and staging activities" as currently stated.
2. The removal action schedule should be separate and not contingent on the time schedule for the treatability study process (i.e., we would oppose any removal schedule delay connected with the treatability study process).	The schedule for the removal action is not contingent upon, and will not be delayed by, the schedule for the treatability study. The schedules for these two activities currently appear to be very compatible; however, in the event of a delay in the treatability study schedule, the removal action would proceed as currently presented in the EE/CA, with offsite commercial disposal of the materials removed from the waste pile.

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