Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for Maywood, New Jersey

U.S. Department of Energy

0489-0613.1

Department of Energy

Oak Ridge Operations
P.O. Box 2001
Oak Ridge, Tennessee 37831— 8723

95 132839

August 1, 1995

Ms. Angela Carpenter
U.S. EPA Region II
290 Broadway
New York, NY 10007-1866

Dear Ms. Carpenter:

MAYWOOD SITE - DOE ACCEPTANCE OF STEPAN'S DRUMMED INVESTIGATION DERIVED WASTE

The purpose of this letter is to confirm the conditions by which DOE can accept the drummed investigation derived waste (IDW) stored at various properties in the Borough of Maywood, New Jersey. This waste was generated by Stepan, and their subcontractor, during remedial investigation efforts on these properties. It is my understanding that over 300 drums of IDW are currently stored on these properties.

As you know, DOE has responsibility for specific wastes at the Maywood Site as outlined in the Federal Facilities Agreement (FFA). As such, any waste that we would consider accepting must meet this FFA definition of "FUSRAP" waste. The relevant components of the "FUSRAP" waste definition are:

- any waste that contains radioactivity (thorium-232) above DOE action levels
- any chemical or non-radiological contaminants that originated on the Maywood Interim Storage Site or were associated with thorium processing activities at the former Maywood Chemical Works site

Given that we do not know the depths from which this waste was generated, we propose to use an action level of 5 pCi/g above background to determine whether DOE can accept this material. In addition, during the DOE remedial investigation of the site, no specific chemical or non-radiological contaminants were found that was not commingled with radioactivity. Therefore, we know of no other contaminants that would indicated DOE responsibility as outlined in the FFA. As such, DOE must be provided sufficient data on this drummed IDW to show that radioactivity is above DOE's action level before we can consider acceptance of this waste.

In addition, we request that either Stepan or EPA Region II contact the Borough of Maywood regarding the proposal for DOE acceptance of this material. Borough approval for DOE to accept this material must be provided to us before we agree to take this material to MISS for either storage or shipment to Envirocare for disposal. Two important factors regarding DOE acceptance at MISS include that we only have limited storage capacity within Building 76 and before we can ship waste to Envirocare, we need additional data in order to modify our waste acceptance profile forms. Data requirements for Envirocare disposal are included on the enclosed sheet; we must also have this data before we can accept this material. We are currently making plans to ship our stored IDW for disposal in FY96 and prefer not to place more materials in storage.

In summary, before DOE agrees to accept this drummed waste, we must be provided radiological and Envirocare disposal data. After our review of this data, we will coordinate with the appropriate entity for delivery of any drummed IDW that meets our above criteria. Given our preference for shipping this waste to Envirocare, we would need to coordinate delivery of these drums while we have active shipment operations ongoing.

I hope this letter meets your needs in determining whether DOE can accept this material. We are certainly willing to provide any support we can to alleviate community concerns regarding this IDW, provided that DOE has responsibility for the material and can spend taxpayer dollars for this effort. If you have any questions, please feel free to call me at (615) 576-5724.

Sincerely,

Susan M. Cange, Site Manager
Former Sites Restoration Division

Enclosure

cc: J. O'Brien, Stepan Company

ENVIROCARE DISPOSAL DATA REQUIREMENTS
(from a Utah certified laboratory)

Radiological:

Alpha Spectroscopy for Radium-226, Isotopic Thorium, and
Isotopic Uranium

Chemical:

TCLP total (metals also including Cu and Zn; volatiles, BNAEs, pesticides, and herbicides)

Total metals

Total VOA

Total BNAE

Total Pesticides/PCBs

Total Herbicides

pH

Reactivity

Physical:

Paint Filter Test (free moisture/liquid)

Particle size analysis/hydrometer

Moisture content

Compaction tests (optimum moisture)

Specific Gravity