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Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for Maywood, New Jersey



U.S. Department of Energy

Bechtel

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Job No. 14501, FUSRAP Project
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U.S. Department of Energy
Oak Ridge Operations
P.O. Box 2001
Oak Ridge, TN 37831-8723

Attention: Susan M. Cange, Site Manager
Former Sites Restoration Division

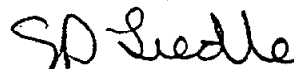
Subject: Annual Reports for the Maywood and Wayne Sites as
Required by Federal Facility Agreements

Dear Ms. Cange:

Enclosed for your signature is a letter to Mr. Jeffery Gratz of EPA Region II. This letter transmits the quarterly reports for the Maywood and Wayne sites in accordance with each site's Federal Facility Agreement.

If you have any questions, please call me at 6-3997.

Very truly yours,



S. D. Liedle
Project Manager - FUSRAP

MER:
Enclosures (1) Letter to Mr. Jeffery Gratz w/ enclosures



Bechtel National, Inc.



Department of Energy

Field Office, Oak Ridge
P.O. Box 2001
Oak Ridge, Tennessee 37831—

Mr. Jeffery Gratz
Federal Facilities Section
U.S. Environmental Protection Agency
Region II
Jacob K. Javits Federal Building
New York, New York 10278

Dear Mr. Gratz:

ANNUAL REPORTS FOR THE MAYWOOD AND WAYNE SITES AS REQUIRED BY THE FEDERAL FACILITY AGREEMENTS

The purpose of this letter is to transmit the annual reports for the Maywood and Wayne sites as required by Section XX(A) of the Federal Facility Agreement (FFA) for each site. If you have any questions or need additional information, please contact me at (FTS) 626-5724 or (615) 576-5724.

Sincerely,

Susan M. Cange, Site Manager
Former Sites Restoration Division

Enclosures

cc: M. E. Redmon, BNI
S. D. Liedle, BNI
W. McNeill, SAIC

ANNUAL REPORT FOR THE MAYWOOD SITE
FEDERAL FACILITY AGREEMENT REQUIREMENT XX(A)

Reporting Period 4/22/91 - 12/31/91
Report Date: 1/23/92

I. GENERAL INFORMATION

The Federal Facility Agreement (FFA) between the Department of Energy (DOE) and Environmental Protection Agency (EPA) became effective April 22, 1991.

DOE has issued copies of the FFA to the contractors responsible for performing work under the FFA as required by Section XXVII.

Ms. Susan Cange has been named the new DOE project manager for the FUSRAP New Jersey sites, including Maywood. EPA was notified of this change on October 25, 1991 as required by Section XXII of the FFA.

On November 5, 1991, Mr. Jeffery Gratz was designated as the EPA project manager for the Maywood site in accordance the section XXII of the FFA.

II. FFA COMPLIANCE

On June 4, DOE submitted proposed schedules for deliverables as required under Section XVI of the FFA. Comments on these schedules were received from EPA on July 12.

On May 29 and May 30, DOE initiated discussions with EPA and NJDEPE regarding the identification of state and federal applicable or relevant and appropriate requirements (ARAR) as required by Section XI; several verbal requests have been made to NJDEPE following the initial request. We have received no response to date.

On May 31, DOE informed EPA, per Section III, of the two primary contractors responsible for specific tasks under the FFA.

On June 21, a conference call was held between DOE and EPA in lieu of a meeting as required by Section XIV of the FFA. This call provided for an exchange of general information and to discuss a proposed approach to a Technical Assistance Grant (TAG) for the Maywood site.

The NESHAPS air emissions annual report and results of radon flux monitoring were forwarded to Mr. Paul Giardina, Radiation Branch Manager, EPA Region II; a copy of each was provided with the April 22 - July 22 quarterly report as required by Section XXVIII.

A meeting was held at the EPA Region II offices on August 20 to discuss the proposed schedules for deliverables under Section XVI of the FFA. This meeting also served as the 60 day project managers meeting as required by Section XIV of the FFA.

In lieu of a bi-monthly meeting as required by Section XIV, a conference call was held between EPA and DOE on October 21. The major topics of discussions related to DOE's support of the Stepan RI and meetings with local groups and DOE. Another conference call served as the 60 day meeting on December 6; general site activities were discussed.

The agreement on the proposed schedules for deliverables could not be agreed to by the project manager; therefore the informal dispute resolution was invoked by DOE under Section XV of the FFA on August 30. A revised proposal was submitted by DOE on September 13. On September 25, the dispute process was elevated to the Dispute Resolution Committee by DOE. EPA provided a statement of dispute on October 24. By mutual agreement of both parties, the deadline for resolution by the DRC was extended on November 18. On November 25, the DRC resolved the dispute and deadlines have now been established for deliverables as required by Section XVI of the FFA.

As required by Section XXIII, DOE provided EPA draft data from the Maywood RI on November 1, 1991.

III. ON-SITE ACTIVITIES

A time-critical removal action at the 90 Avenue C property in Lodi, NJ was conducted July 9 through July 17. The waste material was placed in interim storage at the Maywood Interim Storage Site (MISS).

On August 20, members of the FUSRAP staff met with Stepan and CH2M Hill representatives to discuss DOE support to the Stepan RI/FS. Several issues were discussed; the most critical issue identified was access agreements that will allow DOE to support on-site activities. This issue is still being resolved as DOE must obtain its own access agreements to support Stepan's activities.

On October 17 and 18, members of the FUSRAP staff held meetings with the Maywood Board of Realtors, the Rochelle Park Environmental Commission, and a representative of Bergen County Executive's office. The purpose of these meetings were to update these groups on DOE activities and to provide a brief presentation on radiation in the environment. The purpose of the meeting with the Bergen County Executive's office was to initiate discussions regarding the formation of a local coalition made up of Bergen County, Maywood, Rochelle Park, and Lodi officials to review DOE activities. Letters were sent to each community describing the functions of the coalition and the possibility of DOE funding technical assistance for such a group.

A meeting with the local coalition being formed to review DOE activities was held on November 25. Representatives of Bergen County, the Borough of Maywood, and the Borough of Lodi were present.

A meeting with the Maywood Board of Health was held on November 25 to discuss DOE activities and progress at the Maywood site.

IV. ENVIRONMENTAL DOCUMENTATION

The remedial investigation report, baseline risk assessment, and feasibility study-environmental impact study have been assigned to the appropriate contractors. The preparation of these documents has been initiated. DOE received a preliminary draft of the remedial investigation report on November 1, 1991. Bechtel is now revising the document to address DOE comments; DOE expects to issue an informal review copy to EPA by the end of February 1992.

As required by CERCLA, the administrative record for the Maywood site was updated on September 3 to include documents related to the time critical removal action at 90 Avenue C in Lodi, New Jersey. A notice of availability for this operable unit update was placed in local newspapers on September 3. A copy of the update was forwarded to EPA on October 3.

DOE received a letter from NJDEPE that provided a determination that the materials contained in the Maywood interim storage pile are not a RCRA hazardous waste. This determination was based on sampling and analysis of the storage pile conducted as part of the Maywood RI in 1990.

V. PLANNED SIGNIFICANT EVENTS

DOE has plans to open an information office for the Maywood site. The location of this office will be on West Pleasant Avenue in Maywood, New Jersey. DOE plans to have the office open and operational in March 1992. DOE plans to conduct an "open house" in the spring of 1992 and make several public announcements related to the information office.

DOE is finalizing plans to support the Stepan RI. Test pit installation in areas of radioactivity and health physics support are the primary support functions of DOE. These activities are planned to start in February/March of 1992.

Several treatment technologies will be tested on Maywood soils contaminated with thorium in support of the FS preparation. Some samples are currently being collected, and the testing will occur over the next several months.

The following documents are due to EPA during 1992; both informal and formal submittals are listed with the due date. Currently, all documents are on schedule to meet these dates.

RI Report	2/29/92 (informal)	6/30/92 (formal)
Baseline Risk Assessment	5/31/92 (informal)	9/30/92 (formal)
FS-EIS/Proposed Plan	7/31/92 (informal)	11/30/92 (formal)

VI. ISSUES/RESOLUTIONS

Rejection of data using the EPA Region II validation procedures was raised as an issue during a review of the remedial investigation data. This issue was discussed with EPA Region II; DOE will issue a position paper to EPA on this matter for further consideration. In general, EPA understood the problem and stated the procedures were not clear. DOE has validated all data in accordance with the functional guidelines in order to continue progress on the RI/FS-EIS reports and the baseline risk assessment.