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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 ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

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Ms. Susan Cange, Site Manager  
Former Sites Restoration Division  
Department of Energy  
Oak Ridge Operations Field Office  
P.O. Box 2001  
Oak Ridge, TN 37831-8723

Re: *Maywood Site - Proposed Use of Supplemental Standards*

Dear Ms Cange:

The Environmental Protection Agency (EPA) is in receipt of the Department of Energy's (DOE) December 4, 1995 proposal to use supplemental cleanup criteria for some of the Phase I Maywood vicinity properties. Based on our review of the details presented in the proposal and as we discussed in our conversation of January 18, 1996, we concur that the use of supplemental standards for the properties located at 18, 20, and 22 Long Valley Road can be evaluated further. Our review of the "guiding principles" and assumptions associated with your overall proposal to use supplemental standards identified several areas of concern that we feel require further discussion and clarification prior to the application of supplemental standards at additional properties. After further discussion and clarification as noted above EPA would be willing to evaluate the use of supplemental standards at other properties on a case-by-case basis as may further be requested by DOE, but, we do not view the use of supplemental standards as a substitute for active remediation. Since the properties at 18, 20, and 22 Long Valley Road would not be affected by the outcome of these discussions, we do not wish to delay their remediation pending resolution of these issues.

With regards to 18, 29, and 22 Long Valley Road as described in the DOE's proposal EPA understands that there is a limited area of contaminated soils which contain mature trees in the rear of these particular properties. These trees act as both an aesthetic and sound barrier to traffic on Interstate 80. Furthermore, EPA understands that DOE will be proposing the use of supplemental criteria only where the residual risks are estimated to be within EPA Superfund target risk range of  $10^{-4}$  to  $10^{-6}$  as demonstrated in a hazard assessment prepared using conservative assumptions. After reviewing the preliminary modeling prepared for these properties we strongly recommend that DOE include the following modifications in the final hazard assessment package:

- (1) To be consistent with the approach utilized in the *Baseline Risk Assessment for the Maywood Site*, SAIC 1993, the drinking water pathway from an onsite well should be evaluated for future use scenarios.
- (2) The initial proposal was prepared using the arithmetic mean of the data points available, the hazard assessment should evaluate the  $UCL_{95}$  to determine radionuclide concentrations for input into the model.
- (3) Future use scenarios for these properties should include a scenario which evaluates soil disturbance (e.g., removal of trees and associated root systems).

I will be contacting you to discuss the guiding principals and assumptions for use at additional properties. If in the interim you have any questions on these comments please feel free to contact me at (212) 637-4433.

Sincerely yours,



Angela Carpenter, Project Manager  
Federal Facilities Section

cc: N. Marton, NJDEP