

**BECHTEL NATIONAL, INC.  
FUSRAP PROJECT - JOB 14501  
COMMUNICATIONS DISTRIBUTION**

CCN 052215  
COMM TYPE 1 G D  
COMM REF \_\_\_\_\_

SUBJECT EPA Response to Rad & Chem Results from Property G

FROM Simon TO Campbell

COMM DATE 4 / 11 / 88 ADDR CODE \_\_\_\_\_ CLOSING CCN \_\_\_\_\_  
NUMBER ST

SUBJECT CODE 7440 WBS 202

AFFECTED DOCUMENT \_\_\_\_\_

**RESPONSE  
TRACKING  
INFORMATION**

DUE DATE 4 / 28 / 88 RESPONSIBLE ORG EH RC B  
RESPONSIBLE PERSON Leichtweis CLOSING DATE 1 / 1  
CLOSING CCN \_\_\_\_\_ CLOSING COMM REF \_\_\_\_\_

DISTRIBUTION	CODE	W/A	W/O	DISTRIBUTION	CODE	W/A	W/O
PROGRAM MANAGER	PD			PROJECT MANAGER J. ARENSON	PM	1	
DEPUTY PROGRAM MANAGER	DP			D. LIEDLE	PM		
CONSTRUCTION	FC			B. CLEMENS			
OPERATIONS	OP			D. HARBERT			
ENVIRONMENTAL, HEALTH & SAFETY <del>*</del>	EH	1	<del>*</del>	R. ROBERTSON		1	
				J. BECK			
TMA/EBERLINE	EH						
HAZARDOUS WASTE	HW						
PROCUREMENT	PO						
PROJECT ADMINISTRATION	PA						
TECHNICAL REPORTS	TR			SITES:			
PROJECT CONTROLS	PC			102 ALBANY RESEARCH CENTER			
PROJECT ENGINEERING	PE			115/202 NFSS			
				116 ST. LOUIS DOWNTOWN SITE (SLDS)			
PUBLIC AFFAIRS	PR			117/118 MIDDLESEX (MML/MSP)			
QUALITY ASSURANCE	QA			137/138 WAYNE (WISS)/MAYWOOD (MISS)			
				139 COLONIE (CISS)			
PDCC	DC	<u>ORIB</u>		140/153 HAZELWOOD (HISS)/SLAPS			

COMMENTS \_\_\_\_\_

**PLEASE RETURN TO PDCC FOR CORRECTIONS**

☐ PDCC, PLEASE REMOVE MY NAME FROM DISTRIBUTION FOR THIS TYPE OF DOCUMENT \_\_\_\_\_

NFSS\_0703

052215

## ROUTING AND TRANSMITTAL SLIP

Date

4/14/88

TO: (Name, office symbol, room number,  
building, Agency/Post)

Initials

Date

1. Joel Aronson - BNI

2.

3.

4.

5.

<input checked="" type="checkbox"/> Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

Please prepare a response  
to this letter.

DO NOT use this form as a RECORD of approvals, concurrences, disposals,  
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Deborah A. [Signature]

Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

• U.S. GOVERNMENT PRINTING OFFICE: 1981-4-11-000-0110

052215

AKIN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

26 FEDERAL PLAZA

NEW YORK, NEW YORK 10278

APR 11 1988

Mr. Lowell F. Campbell  
Acting Director  
Technical Services Division  
United States Department of Energy  
Post Office Box E  
Oak Ridge, Tennessee 37831

Re: Response to Radiological and Chemical Results from  
Property G Located on SCA-Chemical Waste Property,  
Model City, New York

Dear Mr. Campbell:

The Radiation Branch and the Hazardous Waste Compliance Branch of the Air and Waste Management Division, United States Environmental Protection Agency (EPA), Region II, have reviewed your December 7, 1987 submittal summarizing both the chemical and radiological data from the above mentioned site and request a response to the following comments.

a) Comments generated from review of chemical data

The results of the chemical data for the material sampled in the 31 drums from Property G indicate the presence of numerous hazardous waste constituents (as defined in 40 CFR Part 261 Appendix VIII, as well as appropriate New York State regulations). Similar materials were reportedly observed in soils within the excavated area and were removed as had been directed by the staff from the New York State Department of Environmental Conservation (NYSDEC). Leaching from this material into the unexcavated soils and/or into the aquifer may have occurred. In light of this, EPA would appreciate the opportunity to review the results of "confirmation sampling" of the soils and groundwater which may be conducted to ensure that adequate removal of hazardous waste constituents has been accomplished.

EPA will assist you in preparing a confirmation sampling work plan. Such a work plan should consist of four parts: (1) a plan for the construction, installation, and development of groundwater monitoring wells that will be capable of detecting any release of hazardous constituents from the drums into the aquifer; (2) a groundwater sampling and analysis plan including the selection of parameters consistent with those found in the containers; (3) a plan for the sampling of soils at depths and locations necessary to determine soil contamination; and (4) a schedule of implementation.

000001

052215

The methodologies included in these plans should be consistent with the methodologies included in plans being developed by Chem-Waste on this same property. This includes, for example, well installation procedures and quality assurance/quality control measures. Mr. Ted Gabel of my staff at (212) 264-5920 will assist you in obtaining this information.

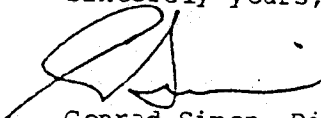
b) Comments generated from review of the radiological data

Because EPA has a continuing interest in this matter, we would appreciate a response to the following comments. Your response should be directed to the attention of Ms. Nina Ewall of the Radiation Branch.

- 1) On August 10, 1987, a letter was sent from S.W. Ahrend, Director of Technical Services Division, U.S. Department of Energy to Ted Gabel, of my office, regarding the above mentioned drums. The letter stated that a drum was encountered which was labeled "K-65" waste. We have concerns about K-65 wastes because when these have been encountered previously, they have proven to be very radioactive residue material. Please provide any analytical data you have developed to characterize this waste and any similarly labeled wastes.
- 2) Results of only 40 out of 49 drums of soil initially excavated are given. Are there radiological results of the other nine drums and what are they?
- 3) EPA has learned that an additional 41 drums were excavated following an inspection by the NYSDEC. Was radiological analysis performed on these drums? If so, what are the results? If they were not sampled, please explain why.
- 4) Please describe the composite sample referred to as "EB."

If you require any additional information on these comments, please do not hesitate to call Mr. Gabel at (212) 264-5920 or Ms. Ewall (212) 264-0503.

Sincerely yours,



Conrad Simon, Director  
Air & Waste Management Division

cc: Mr. Dean Nelson  
SCA Chemical Waste Management

Dr. William Wertz  
New York State Department of  
Environmental Conservation