



Oak Ridge Corporate Center
151 Lafayette Drive
P.O. Box 350
Oak Ridge, Tennessee 37831-0350

Facsimile: (615) 220-2100

Job No. 14501, FUSRAP Project
DOE Contract No. DE-AC05-81OR20722
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MAY 30 1991

U.S. Department of Energy
Oak Ridge Operations
Post Office Box 2001
Oak Ridge, TN 37831-8723

Attention: William M. Seay, Deputy Director
Former Sites Restoration Division

Subject: Letters for Transmittal to EPA and NJDEP for ARAR
Determinations for the Maywood and Wayne Sites

Dear Mr. Seay:

Please find enclosed a transmittal letter to EPA Region II and NJDEP for your signature. The EPA letter is to provide information as required by the Federal Facility Agreements (FFA) for Maywood and Wayne. This letter will complete several of the initial requirements of the FFAs. The NJDEP letter is intended to initiate the development of state ARARs as required by the FFAs.

If you have any questions, please call me at 576-4718.

Very truly yours,

M. E. Redmon
Acting Project Manager - FUSRAP

MER:

Enclosures: (1) Transmittal letter to EPA Region II
(2) Transmittal letter to NJDEP





Department of Energy

Oak Ridge Operations

P.O. Box 2001

Oak Ridge, Tennessee 37831 —

**Mr. Edgar G. Kaup, P. E., Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
CN 028
Trenton, New Jersey 08625-0028**

Dear Mr. Kaup:

INITIATION OF NEW JERSEY STATE ARAR IDENTIFICATION THE MAYWOOD AND WAYNE SITES IN NEW JERSEY

The purpose of this letter is to initiate discussions for development of New Jersey state applicable or relevant and appropriate requirements (ARAR) for the Wayne and Maywood sites. As we discussed in our May 30, 1991 telephone conversation, the development of state ARARs is required by CERCLA as well as Section XI of the Federal Facility Agreements (FFA) which DOE and EPA have signed.

At both sites, the primary contaminants are radiological, and most of this radiological contamination is found in soils. Therefore, we would appreciate the state list of ARARs to focus in this area. Additionally, groundwater, surface water, and air are media of radiological concern and will require ARAR determinations. Chemical constituents have been detected at these sites, but below limits that would require the waste to be hazardous. Any pertinent ARARs for chemicals in the above mentioned media are also needed for DOE to complete the remedial investigation reports, baseline risk assessments, and feasibility studies for these sites. As stated in our phone conversation, NJDEP will provide DOE with a proposed list of state ARARs specific to the Maywood and Wayne sites. We would appreciate these lists as soon as possible so we can factor state requirements into our RI/FS process in the early stages.

As you may know, DOE recently conducted a recompetition for the FUSRAP contract. During this recompetition, the scope of work was split for two contractors, and it will be important for NJDEP to understand the roles of each contractor. For your information, these two contractors have now been identified and their tasks are as follows.

Bechtel National, Inc. will continue to serve as FUSRAP's Project Management Contractor (PMC). As PMC, Bechtel will be responsible for implementing all field activities including remedial investigations, response actions, and site surveillance, maintenance, and operation. Bechtel will also be responsible

for environmental compliance activities, final remedial design and remedial action, and overall project management including cost/schedule control and records retention/document control.

Science Applications International Inc. (SAIC) will serve as the Environmental Studies Contractor (ESC) for FUSRAP. In this role, SAIC will prepare all environmental documentation for FUSRAP with the exception of a few documents which Bechtel will retain to ensure a smooth transition while continuing progress of the RI/FS process at our sites. SAIC will plan our field investigations; perform data evaluation and reporting; complete risk assessments, feasibility studies, and remedial alternative analysis; and conduct regulatory analysis.

For Maywood and Wayne, Bechtel will continue to prepare the Work Plans for each site and the Maywood remedial investigation report. SAIC will be preparing the baseline risk assessments, feasibility studies, and proposed plans for both Maywood and Wayne. In addition, SAIC will prepare the remedial investigation report for Wayne.

I look forward to continued cooperation between DOE and NJDEP to ensure a successful completion of the Maywood and Wayne cleanup actions. If you have any questions, please contact me at (615) 576-1830.

Sincerely,

William M. Seay, Deputy Director
Former Sites Restoration Division

Enclosures

cc: M. Redmon, BNI
B. McNeill, SAIC
J. Wagoner, GTN, EM-421
J. Gratz, EPA Region II
R. Wing, EPA Region II



Department of Energy

Oak Ridge Operations

P.O. Box 2001

Oak Ridge, Tennessee 37831—

**Mr. Robert J. Wing, Chief
Federal Facilities Section
U. S. Environmental Protection Agency
Region II
Jacob K. Javits Federal Building
New York, New York 10278**

Dear Mr. Wing:

INITIATION OF NEW JERSEY STATE ARAR IDENTIFICATION AND NOTIFICATION OF PROJECT MANAGER FOR THE MAYWOOD AND WAYNE SITES IN NEW JERSEY

The purpose of this letter is to complete several requirements of the Federal Facility Agreements (FFA) for the Maywood and Wayne sites in New Jersey. Specifically, Section XI of the FFAs requires that discussions be initiated to develop a proposed list of New Jersey state applicable or relevant and appropriate requirements (ARAR). On May 29, 1991, I spoke with Mr. Jeff Gratz of your office to initiate these discussions. Mr. Gratz indicated that EPA would assist DOE in developing the list of state ARARs along with the New Jersey Department of Environmental Protection (NJDEP). I also contacted NJDEP on May 30, 1991 to initiate the state ARAR identification process. I will keep you informed of our progress in this matter. As you know, we will soon be starting the remedial investigation report, baseline risk assessment and feasibility study for the Maywood site, and the list of ARARs will be an integral element in completing these documents.

Under Section XIV, Part F.1, project managers from DOE and EPA shall meet to identify all potential ARARs prior to the submittal of draft documents. DOE has previously submitted proposed lists of federal ARARs in both the draft Maywood and Wayne Work Plans and has received EPA comments. DOE will use the list of proposed ARARs in these Work Plans unless EPA notification is provided otherwise. However, we would appreciate any additional guidance EPA can offer on ARAR identification so DOE can factor these requirements into the RI/FS process in the early stages.

Section XXII, Part A of these FFAs also states that each party to the agreement will notify the other parties of the name and address of project manager. During my telephone conversation of May 29 with Mr. Gratz, I notified him that I would be the project manager for the Maywood and Wayne sites. My address is shown above on this letterhead. I also told Mr. Gratz that DOE is actively seeking a new project manager for the New Jersey sites,

and we will notify EPA when this person is identified. During this same conversation, Mr. Gratz, in turn, offered that you and he would be co-project managers for EPA. Mr. Gratz also indicated that he would eventually be taking over as the sole project manager for both sites.

In addition, Section III of the FFAs states that upon request by EPA, DOE will provide the identity and task, of contractors performing the work under these agreements. DOE recently conducted a recompetition for the FUSRAP contract. During this recompetition, the scope of work was split for two contractors, and it will be important for EPA to understand the roles of each contractor. These two contractors have now been identified and their tasks are as follows.

Bechtel National, Inc. will continue to serve as FUSRAP's Project Management Contractor (PMC). As PMC, Bechtel will be responsible for implementing all field activities including remedial investigations, response actions, and site surveillance, maintenance, and operation. Bechtel will also be responsible for environmental compliance activities, final remedial design and remedial action, and overall project management including cost/schedule control and records retention/document control.

Science Applications International Inc. (SAIC) will serve as the Environmental Studies Contractor (ESC) for FUSRAP. In this role, SAIC will prepare all environmental documentation for FUSRAP with the exception of a few documents which Bechtel will retain to ensure a smooth transition while continuing progress of the RI/FS process at our sites. SAIC will plan our field investigations; perform data evaluation and reporting; complete risk assessments, feasibility studies, and remedial alternative analysis; and conduct regulatory analysis.

For Maywood and Wayne, Bechtel will continue to prepare the Work Plans for each site and the Maywood remedial investigation report. SAIC will be preparing the baseline risk assessments, feasibility studies, and proposed plans for both Maywood and Wayne. In addition, SAIC will prepare the remedial investigation report for Wayne.

I look forward to continuing the positive relationships we have enjoyed with EPA Region II in the past and hope we can work together to ensure a successful completion of the Maywood and Wayne cleanup actions. If you have any questions, please contact me at FTS 626-1830.

Sincerely,

William M. Seay, Deputy Director
Former Sites Restoration Division

Enclosures

cc: M. Redmon, BNI
B. McNeill, SAIC
E. Kaup, NJDEP
J. Wagoner, GTN, EM-421
J. Gratz, EPA Region II

Formerly Utilized Sites Remedial Action Program (FUSRAP)

ADMINISTRATIVE RECORD

for Wayne/Pequannock, New Jersey



U.S. Department of Energy