



State of New Jersey

Department of Environmental Protection

James E. McGreevey
Governor

Bradley M. Campbell
Commissioner

November 4, 2004

Allen D. Roos, Project Manager
U.S. Army Corps of Engineers
100 West Hunter Avenue
Maywood, NJ 07607

Re: *Draft* Post Remedial Action Report
Wayne Township (Sheffield) Park Property
Wayne Interim Storage Site
Wayne Township, Passaic County

Dear Mr. Roos:

On September 22, 2004, the New Jersey Department of Environmental Protection (NJDEP) received the *Draft* Post Remedial Action Report for the Wayne Township (Sheffield) Park Property dated February 2004

Upon review NJDEP has the following minor comments

1. Section 1.1 - Wayne Interim Storage Site Background, page 1-2

The first paragraph should read: Th-232 nuclear decay emits ionization ionizing radiation primarily as alpha particles... U-238 nuclear decay emits ionization ionizing radiation as gamma rays...

2. Section 1.3 - Site Characterization, page 1-3

Should there be another subsection 1.3.3 Surface Scanning?

3. Section 4.1.1.1 - Remedial Action Support Surveys, page 4-2

The first paragraph should read: The entire survey unit was surveyed with a two inch by two inch sodium iodide detector coupled to a ratemeter/scaler, or separately, a microremroentgen (microR) exposure rate meter.

4. Section 4.1.4.2 - Air Monitoring Results, *External Gamma Dose Rate*, page 4-10

It is stated that "The highest exposure rate from an environmental monitoring station was 3.8 mrem above background." The time period to which this is referring must be specified.

5. Sections 5.8, 5.9 and 5-10 - Metals Sampling and Analysis, Sampling Locations and Data Evaluation, pages 5-5 and 5-6

The text in Section 4.1.2.3 -- Limits of Excavation, Mercury, implies the following timeline:

- Radiologically contaminated soil is excavated.
- Final Status Survey samples are collected and analyzed for both radionuclides and metals.
- Three of the 10 samples analyzed for metals exceed the cleanup criteria for mercury.
- Mercury contaminated soil is excavated guided by field test results.
- The area was "resampled" for metal analyses.

The above time line indicates that 2 rounds of samples were collected for metals analyzes, while the discussion in Section 5.8 includes only one round and does not state which sampling event is referenced.

Sections 5.8, 5.9 and 5.10 reference Table 5-1, Figure 5-3 and Table 5-2, respectively, stating that they contain the metals data and sampling locations. Table 5-1 is actually Survey Unit FSS Data (radionuclides) and Figure 5-3 and Table 5-2 do not exist.

The metals data presented in Table 9 of Appendix 5.1 seems to refer to the Final Status Survey samples, but only one, not three, of 10 samples exceed the mercury cleanup criteria, in contradiction to Section 4.1.2.3.

These discrepancies must be resolved. In addition, further clarification of the metals sampling and analyses must be provided, including data and figures. Of particular concern is the lack of information on the "resampling" event. The Report must include information regarding the resampling locations and analytical results (i.e. were they field tests or laboratory analyses?).

6. Section 6.2.1.2 – Accuracy, page 6-7

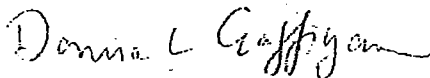
This section needs a last sentence to summarize if accuracy goals were met.

7. Section 6.2.1.6 – Comparability, page 6-7

This section also needs a sentence to summarize if comparability goals were met.

If you have any questions regarding this letter, you may contact me at (609) 633-1494.

Sincerely,



Donna L. Gaffigan, Case Manager
Bureau of Case Management

C: Patricia Gardner, NJDEP/BER
Emmet Keveney, USEPA