

40-7102



State of New Jersey
Department of Environmental Protection and Energy

Robert C. Shinn, Jr.
Commissioner

APR 15 1994

Penny Hallett
104 Maddison Avenue
Newfield, NJ 08344

Re: Shieldalloy Metallurgical Corporation

Dear Ms. Hallett:

I am writing to you in response to your letter to Governor Whitman dated January 30, 1994. In your letter, you expressed your concerns about the Shieldalloy Metallurgical Corporation. You state your belief that studies should be done on the environment and that a cancer cluster study should be conducted for the surrounding areas. Because both environmental and human health studies have been conducted, this letter will summarize the status of the studies conducted to date and will provide you with contacts so that you may follow up with any additional questions.

As a preface to this letter, please understand that the New Jersey Department of Environmental Protection and Energy (NJDEPE) does not have the authority to regulate the radioactive aspects of the slags and dusts, rather, they are regulated by the United States Nuclear Regulatory Commission (USNRC). NJDEPE can and will regulate the non-radioactive aspects of these materials and will have input into any decisions made by the USNRC.

Also, please understand that NJDEPE does not conduct cancer or other epidemiological studies. Those issues are handled by the New Jersey Department of Health (NJDOH) and the Federal Agency for Toxic Substances and Disease Registry (ATSDR).

ENVIRONMENTAL STUDIES

Because Shieldalloy is a Superfund site, an extensive Remedial Investigation was initiated in 1988 and portions of this investigations are still ongoing. During the Remedial Investigation, samples of the ground water, soil, air, and stream are analyzed for contaminants. The results are briefly discussed below. In general, the focus of NJDEPE has been on the non-radioactive contamination. With regard to potential radioactive contamination, NJDEPE and the United States Environmental Protection Agency (EPA) have provided comments to the USNRC. For more information on the USNRC environmental studies which have been conducted, you may contact Mr. Gary Comfort at (301) 504-2667.

Ground Water Contamination - The ground water on and off the site is contaminated with inorganic (i.e., metals, including chromium) and volatile organic compounds that originated at the Shieldalloy facility. However, in 1986, NJDEPE established a well restriction area that prohibited the use of private wells for potable use. The State of New Jersey used public funds to connect the homes to the public water system and to install a treatment unit on the municipal well located nearby. Therefore, the residents are protected from the contaminated ground water.

NJDEPE plans on issuing a Record of Decision early this summer for the remediation of the ground water contamination.

Soil Contamination - The soil on and off the site is contaminated with inorganic (metals) contamination, such as chromium and beryllium.

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Additional testing of soil should be conducted later this year to further define the extent of the contamination and how best to deal with it.

Air Contamination - Shieldalloy has numerous permits regulating air emissions from their active processes. Because Superfund specifically excludes permitted emissions from investigation, air samples for the Remedial Investigation were taken when the plant was not in operation. These samples did not show contamination. To ensure that Shieldalloy complies with its permits, NJDEPE performs routine inspections. For more information on the air permits, please contact Mr. Vincent Garbarino at (609) 346-8071.

Stream Contamination - The stream and sediment had elevated amounts of contamination. Additional testing should be conducted later this year to further define the extent of the contamination and how best to deal with it.

HUMAN HEALTH STUDIES

This issue of epidemiological studies has come up in the past and as stated above, NJDEPE does not conduct these studies. Those issues are handled by NJDOH.

However, as part of the Superfund cleanup process, a "Risk Assessment" is conducted. Part of this assessment estimates the human health and ecological risk which could result from contamination if no remedial action is taken at the site. This is different from a cancer study in that it determines the need for remediation of the site to prevent future exposures, rather than evaluating the health impacts of past exposures. The risk assessment for Shieldalloy is currently a draft document, however, a revision is due to NJDEPE this month. We will gladly answer any questions you may have after this document is finalized.

In addition, the Superfund process requires that the ATSDR conduct a "Public Health Assessment" to determine if the site warrants follow up health related investigatory activities. The Preliminary Health Assessment for Shieldalloy was conducted in 1988. A "Site Review and Update" (SRU) for Shieldalloy was conducted in 1992 to discuss the current status of the site and to identify future ATSDR activities for the site. ATSDR also conducts "Health Consultations" for site-specific public health issues. ATSDR has no plans to conduct an epidemiological study in the Newfield/Vineland area. ATSDR will be developing a national "Exposure Reconstruction Model" for ground water pathways starting this year. Part of the study is to develop the evaluation criteria which will be used to identify exposed populations and the duration of the exposure for ground water pathways only. I have enclosed a copy of a letter from Arthur Block of ATSDR to Donald Schneider of Gloucester County for your information because it nicely summarizes ATSDR's activities. For further information, you may contact Mr. Block at (212) 264-9255.

NJDOH, Environmental Health Services, coordinates with ATSDR on Superfund related issues. For further information you may contact James Pasqualo at (609) 633-2034.

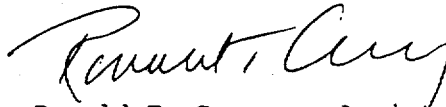
Also, as we have stated in the past, NJDOH, specifically the Environmental Health Services, conducts reviews of the Cancer Registry. In fact, one such study was conducted in 1988 which found that the incidence of cancer in Newfield was not above the county or state averages. NJDOH has no plans to conduct an epidemiological study in the Newfield/Vineland area. For additional information on the Cancer Registry Study or related topics, you may contact Michael Berry at (609) 633-2034.

Finally, in response to your concern about the ultimate cleanup of the slag and dust piles and the other contamination associated with the site, NJDEPE also wants to see that Shieldalloy, not the taxpayers, remediates the site in accordance with all laws and in a manner that is protective of human health and the environment.

I hope I have addressed your concerns. If you have any questions regarding this letter, you may contact Donna L. Gaffigan of my staff at (609) 633-1455.

Thank you for your interest in New Jersey's environment.

Sincerely,



Ronald T. Corcory, Assistant Director
Responsible Party Site Remediation

Enclosure

c: Donald Kakas, NJDEPE, Bureau of Community Relations
Vincent Garbarino, NJDEPE, Southern Field Office
James Pasqualo, NJDOH, Environmental Health Services
Michael Berry, NJDOH, Environmental Health Services
Arthur Block, ATSDR, Region II
Joseph Gowers, USEPA, NJSB
Gary Comfort, USNRC



February 8, 1994

Mr. Donald C. Schneider
Environmental Health Coordinator
County of Gloucester
State of New Jersey Department
of Health
160 Fries Mill Road
Turnersville, NJ 08012

Dear Mr. Schneider:

The Agency for Toxic Substances and Disease Registry (ATSDR), Region II office is in receipt of your correspondence regarding information and assistance from the ATSDR on the New Jersey State Superfund Site, Shield Alloy Metallurgical Corporation, Newfield, NJ. In your letter as well as the correspondence you attached from the Mayor of Newfield, there appear to be several requests made. I will address them individually and respond how best ATSDR can be of assistance.

Health Study:

Reference is made in both letters asking if a health study has been conducted or will be considered. In response, I want to make clear that in most peoples minds a Health Study generally refers to a controlled and longitudinal epidemiological study. If this is the understanding, then I would have to answer that I know of no such study. Such a study could be considered by ATSDR or New Jersey State Department of Health (NJSDOH) if warranted and justified by documented exposure to environmental contaminants. A "dose reconstruction" model is currently being developed by ATSDR in Atlanta, Georgia, to evaluate possible public health exposure to the groundwater. Based on the results and analysis of the dose reconstruction survey ATSDR could recommend further study.

Cancer Cluster:

Again in both letters reference is made on any cancer cluster survey that had occurred in the area. Cancer information, surveys and the registry are within the preview of the NJSDOH. I have contacted the NJSDOH/ATSDR representative, Mr. James Pasquale to request his assistance. I would refer you to his Trenton office at (609) 633-2043 for any questions you may have on cancer cluster follow-up.

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exposure to the groundwater is being reviewed in Atlanta. I would refer you to the survey coordinator, Mr. Morris Maslia (404) 639-0674, if you wish to have more information or an update on the survey. Given the fact that ATSDR in Atlanta is currently reviewing possible past groundwater exposure around the Shield Alloy site and that to our knowledge there are no current exposures to contaminated groundwater, unless you see any other reasons to review concerns, I would suggest revisiting these issues after the dose reconstruction survey is completed.

Exposure to Radioactive Slag:

At this time neither the ATSDR nor the NJSDOH have in their possession information/data on the slag piles. It would be impossible to review, analyze and conclude any possible public health threats associated with the slag piles without such information. Based upon your request, I have initiated the necessary first step which is gathering of available data.

Should you have any further questions or concerns, please feel free to contact myself or my associate Mr. Steven Jones at (212) 264-9255.

Sincerely,



Arthur Block
Sr. Regional Representative
ATSDR/Region II

Encl.

cc:

George Buynoski/OAA/ORO
Bob Williams/OAA/OD
Greg Ulirsch/DHAC/RPB
Steve Jones/Region II
Jim Pasqualo/NJSDOH
Louis Cresci/Vineland NJDOH
Donna Gaffigan/NJDEPE
Laura Lombardo/RPM/EPA