



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF HAZARDOUS WASTE MANAGEMENT

20 East Clementon Road  
Gibbsboro, NJ 08026  
609 - 346 - 8000

May 14, 1990

Shieldalloy Metallurgical Corporation  
West Boulevard  
P.O. Box 768  
Newfield, NJ 08344

Re: December 4, 1989 and May 4, 1990 and May 14, 1990 Notices of Violation,  
Shieldalloy Metallurgical Corporation, Newfield, Gloucester County,  
89-12-01-1107s, 90-05-02-0949 and 90-05-08-1651

Dear Mr. Smith:

This letter will memorialize agreements between Shieldalloy Metallurgical Corporation ("SMC") and this office obtained during my May 8, 1990 meeting with you.

You agreed that all drummed material and materials spilled from drums in the area south of unit T-12 (see sketch) will be immediately isolated in a container and removed to a building inside the plant providing that radioactive screening reveals compliance with Federal standards for radioactive exposure. Sampling for hazardous waste characteristics and appropriate radioactive screening will take place promptly. The drums will be disposed of as solid waste providing that they comply with Federal and State standards for disposal of radioactive materials. You further agreed that O&M/Design problems with the wastewater treatment system will be assessed and documented by SMC. A report will be submitted to this office detailing the findings of and providing a schedule of corrective actions for all deficiencies. You also agreed that the discharges from the Caustic tank and the piping along T-10/T-11 will be corrected within two weeks.

I agreed that this office will confer with Donna Gaffigan of BFCM regarding previous requirements for the disposal of contaminated soil. However, SMC shall obtain discreet samples of staged soils for Total and Hexivalent Chromium and submit the results to this office. Copies of all correspondence to this office shall be submitted to Donna Gaffigan of BFCM.

**NOTE:** Do not implement design changes at this time. All design changes must be reviewed and approved by the Department prior to implementation.

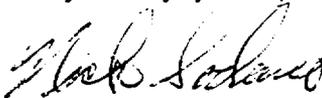
The wastewater treatment system assessment and schedule of corrective action must be submitted within thirty (30) calendar days of receipt of this letter. The schedule must detail O&M corrective measures and include design plans and specifications where design changes are indicated. The assessment shall, at a minimum, consider the following: permeability of secondary containment walls to liquids handled; lack of adequate secondary containment for treatment chemicals and for pump houses; design/O&M contributors to pipe leak/failure (including failure to correct leaks, "hammering" of fluids in pipes, inaccessibility of pipes for O&M, lack of lights); design/O&M contributors to T-12 overtopping; piping through containment wall; lack of backflow preventer or valve between T-12 and T-10/T-11; and lack of alarms in all containment units. Please recall that design changes of the treatment system shall not be implemented without written approval from the Department.

The May 4, 1990 Notice of Violation ("NOV2") was not enclosed with the May 4, 1990 cover letter but is enclosed herein. Also enclosed is a Notice of Violation for the discharge of caustic and wastewaters noted during my May 8, 1990 inspection ("NOV3"). Please note that compliance with NOV2 and NOV3 will require a chronology of events for the discharges and remedial measures, an explanation of the cause of the discharges, a diagram of the extent and volume of the discharges, and sampling of the staged soils. Donna Gaffigan must be copied on all correspondence in this matter. Ms. Gaffigan will address any in situ soils contamination within the context of the site RI/FS. A response to NOV2 and NOV3 is required within thirty (30) calendar days of receipt of this letter.

Based on the observations made during our meeting and my inspection of the wastewater treatment system, it was clear that SMC environmental staff was unaware of the many deficiencies in the system. As I stated during our May 8, 1990 meeting, unexplained and unreasonable delays in compliance will result in further enforcement action directed towards your New York office.

Do not hesitate to contact me should you have any questions regarding this matter.

Very truly yours,



Nick Sodano  
Sr. Env. Specialist

NS

cc: William Dunfee, SBFO  
Robert Oberthaler, BIDP  
Alan Edwards, Bureau Release Prevention  
John Kinneman, NRC  
Jack Allen, SBFO  
Donna Gaffigan, BFCM  
case file

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

