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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:
HSRM-6J

May 2, 1994

John H. Austin, Chief
Low-Level Waste and Decommissioning
Projects Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Chad Glenn RE: EIS Scoping Document for
SMC, Cambridge OH site

Dear Mr. Austin:

The United States Environmental Protection Agency (U.S. EPA), Region V, has completed its review of the Environmental Impact Statement (EIS) scoping process summary report for the Shieldalloy Metallurgical Corporation (SMC) facility in Cambridge, Ohio (April 5, 1994). At your request, the U.S. EPA is providing comment on the subject document.

Responses given by NRC to questions raised during the EIS scoping period, as documented in the summary report, are general, and it is difficult to provide detailed comment on their content. Therefore, the following General Comments are reflective of specific information that U.S. EPA has identified as important to the development of the EIS for the SMC Cambridge facility:

GENERAL COMMENTS

1. A Work Plan for the EIS, with detailed sampling and analysis plans, should be prepared, and subject to review by U.S. EPA. The preparation of a Work Plan will eliminate already apparent confusion concerning the content of the subsequent EIS, as well as assist all parties in identifying data gaps prior to the preparation of the Draft EIS. In general, comments 2-7 should be addressed in the Work Plan for the EIS.
2. The scoping summary stated that the EIS is intended to evaluate the extent of all contamination associated with activities at the Cambridge site. This evaluation should include the extent of the hazardous materials contamination as well as the radiological contaminants. Because of the placement of

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baghouse dust during decommissioning activities at the West Pile, U.S. EPA believes a "mixed waste" situation exists at the SMC site. Additionally, the extent of the current waste disposal as well as the future impact of the proposed decommissioning alternative on the wetlands and municipal drinking water supply should be evaluated.

3. There has been inadequate sampling and characterization of both the radiological as well as the hazardous materials composition of the Slag Piles. Previous sampling by SMC of the slag averaged radiation levels at each location throughout the depth of the piles. Presumably, this meant that capping material placed on the West Pile was averaged in with samples obtained at depth. Additional sampling should be conducted to obtain an accurate picture of both the levels of individual radioisotopes and hazardous materials in each of the waste piles.
4. The U.S. EPA expects that NRC will conduct a comprehensive evaluation of all Applicable or Relevant and Appropriate U.S. EPA Regulations which may apply to the site, during the evaluation of alternatives for decommissioning the SMC Cambridge facility.
5. Evaluation of risk to human health or the environment from hazardous materials disposal at the SMC Cambridge site should be conducted in accordance with current U.S. EPA guidance and policy.
6. Confirmatory sampling and analysis should be performed by NRC for all data being provided by SMC in support of the EIS. This applies specifically at this time to the groundwater and surface water sampling program being performed by SMC. Comparison of results should be presented in the EIS.
7. The U.S. EPA will participate in all technical meetings prior to generation of, and in support of, the Draft EIS document. In addition, we would appreciate the sharing of all information regarding the preparation of the Draft EIS, as it is generated.

The Following are specific changes which should be made to the EIS Scoping Summary:

SPECIFIC COMMENTS

1. **Section 3.1.1, Risk to Human Health and Safety.** Stating that there is no immediate threat to health and safety from the waste on site because of the nature of the waste and the existing site controls is misleading. The U.S. EPA does not feel that existing controls at the West Pile are adequate to prevent trespasser exposure to hazardous or radioactive materials contained in the West Pile. In addition, the materials currently pose a threat to the environment surrounding the facility, which may impact the recreational user of Chapman Run, as well as those utilizing Wills Creek as a drinking water source.

2. **Section 3.3.1, NRC Licensing and Decommissioning Procedures.** In response to comment #3 in this section, in consideration of applicable U.S. EPA regulations regarding remedial activities at a site, any decommissioning alternative selected for the Cambridge site should be reviewed no less often than every five years [CERCLA 121 (c)].

3. **Section 3.3.2, Interaction with Federal, State, and Local Agencies, Comment 4.** Please delete reference to U.S. EPA as a cooperating agency (as defined by NEPA). The level of participation of U.S. EPA Region V in the EIS has not been determined. However, the U.S. EPA does intend to fully cooperate in the development of the EIS.

4. **Section 3.3.2, Interaction with Federal, State and Local Agencies, Comment 5.** Please include in this response the requirement for U.S. EPA approval of the Final EIS, as a provision of NEPA.

5. **Section 3.4, Waste Management Technologies for the Proposed Action and Alternatives, Comments 20 and 21.** The U.S. EPA considers the material in the West Pile, at least, to represent mixed waste. Please add this statement to the response to the comments regarding the nature of waste materials at the SMC Cambridge site.

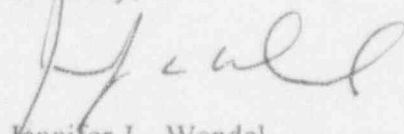
6. **Section 3.8.1, Out of Scope Comments.**

Comment 6. See Specific Comment 1.
Comment 7. Change "...NRC would look to USEPA to assume responsibility for remediating the site under Superfund." to "NRC would look to USEPA to assure remediation of potential threats to human health and the environment from the SMC Cambridge site using the authority granted that agency."
Comments 14 and 15. See Specific Comment 1.

Please include the above Specific Comments regarding the EIS Scoping Summary in the final version of that document. Again, this document was too general in itself to ensure that all data and areas of concern to the U.S. EPA are included in the EIS for the SMC Cambridge site. For that reason, we feel it is extremely important to develop a comprehensive Work Plan for development of the EIS.

If you have any questions, please call me at (312)-886-0394.

Sincerely,



Jennifer L. Wendel
Remedial Project Manager

cc: David Hunt, OEPA SEDO
Brian Barwick, USEPA ORC
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Jeanne Griffin, USEPA OSF
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