From: Similo, Ashley
To: Myralee Machol
Cc: Ellis Koch; Frank DeVita; Dudek, Heidi M (DEC); Burke, Gerard (DEC)
Subject: RE: Glen Isle: D & D-concrete reuse
Date: Tuesday, December 23, 2014 12:37:00 PM

EPA has reviewed the proposal and has finds that the material is ok to reuse, but would like to improve the documentation to demonstrate it. See comments below.

1. Comment: EPA recommends the letter be rewritten to include a brief summary discussion of the soil findings from beneath the slabs and to fix apparent data transfer errors in Table 1. If the soil data from directly beneath the slabs demonstrates the soil met the radiological release criteria then EPA accepts the reuse of the concrete as fill from a "radiological" standpoint.

2. Discussions: The letter states "Therefore in order to access the soils, it was necessary to remove the remaining concrete building foundations...." . If the soils were clean it provides sufficient evidence that the slabs would not have been contaminated from construction (placement) on the site. This would leave a concern over contaminated materials being used to make the concrete. The concrete surveys conducted adequately address this concern along with the 2 composite sample results [of which the Ra-226 values are considered screening (qualitative)].

(a) EPA requests that soil data under the slabs be discussed in general to supplement the lab stated qualitative (screening) Ra-226 data. On pdf page 112 of 149 the laboratory data quality summary states:

"The method requested by the client to report Ra-226, using its own 186 keV gamma-ray emission, is subject to interference and potential bias due to the 185.7 keV U-235 gamma ray. Experience also indicates gamma spectroscopy software does not consistently assign accurate peak areas to Ra-226 (186 keV), with the problem compounded by slight drift of the instrumentation. The laboratory considers Ra-226 reported based upon the 186 keV gamma-ray emission to be best used by the client in a qualitative fashion. The following samples were affected: (460-85314-1 DU), (LCS 160-154050/2-A), (MB 160-154050/1-A), WC019 (460-85314-1), WC020 (460-85314-2)."

(b) A review of the Ra-226 data presented in Table 1 indicates the Ra-226 for WC020 is misreported compared to the pdf page114 lab report (appears the qualified U-235 result was reported rather than the Ra-226 result). Other values were not checked. The lab report does demonstrate reasonable results for Ra-226, correcting the transfer error will resolve this issue.

(c) It is not clear in all cases if the concrete survey data was collected from the bottom (soil contact side) or top of concrete. By clarifying this or discussing the soil data, this issue can be resolved.

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From: Myralee Machol [mailto:mmachol@glencovecda.org]
Sent: Monday, December 15, 2014 5:09 PM
To: Dudek, Heidi M (DEC); Burke, Gerard (DEC); Similo, Ashley
Cc: Ellis Koch; Frank DeVita
Subject: FW: Glen Isle: D & D-concrete reuse

Hi
Attached you will find the SEC opinion on reusing the crushed concrete from Parcel A that Ellis forwarded to me
Myralee

From: Ellis Koch [mailto:ellis.koch@gmail.com]
Sent: Monday, December 15, 2014 4:39 PM
To: Myralee Machol
Cc: Thomas C Graham; Shashank Nemichand; Gregory J. Allen; Morgan G. Graham Esq.; Ann M. Waeger Esq.; Michael D. Zarin; Tony Evangelista; Frank Devita; Eric J. Laning
Subject: Glen Isle: D & D-concrete reuse

The SEC opinion on reusing the crushed concrete from Parcel A is attached.

Please forward it to the agencies.

If they have any questions, please direct them to me.

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