

## DERP-FUDS Contaminated with Radioactive Material

The DERP statute [10 USC 2701 (a)(2)] requires that projects addressing hazardous substances, pollutants, and contaminants be conducted consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Title 40 Part 302 identifies radionuclides as a hazardous substance and therefore eligible DERP-FUDS properties contaminated with radioactive material must follow the CERCLA guidance.

The North Atlantic Division has identified several eligible properties where radioactive contamination is present and is in the process of addressing these sites. The presentation will focus on several unique issues associated with work performed on these sites.

- The St. Albans Veterans Administration (VA) Extended Care Center located in Queens, NY. The site operated as a Navy Hospital prior to being transferred to the VA in 1976. The Navy operated a Nuclear Medicine Laboratory with the basement of one of the buildings. Strontium 90 contamination was identified in and around the former nuclear medicine laboratories, which required remediation.
- The Watertown GSA property located in Watertown, MA. The site was associated with operations of the former Watertown Arsenal. The property was used for a variety of support activities, which resulted in depleted uranium contamination.
- The Watertown Mall Property located in Watertown, MA. The site was the former Watertown Arsenal and conducted depleted uranium research and testing. The property was transferred and redeveloped into a mall. The site had elevated levels of depleted uranium in the sewer lines of the former Arsenal Buildings.
- The former Frankfort Arsenal located in Philadelphia, PA. The site is currently under review to determine if it is an eligible FUDS property. There is a potential for depleted uranium contamination and other residual radioactive contamination.

Some of the factors to consider are gathering the appropriate team members, NRC licensing issues, NEPA vs. CERCLA, disposal issues and others.