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## **Technical Review - Contingent Removal**

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**Technical Review of the Mound Site**  
**Prepared for the Expericenter**  
by **EHS TECHNOLOGY GROUP, LLC**

**Reference Document:** Action Memo/EE/CA for Contingent Removal Actions for Contaminated Soils, Addendum 1: Structures, April 2004, Public Review Draft

**Purpose:** The purpose of this document is to add any applicable buildings and structures to the contingent removal action (CRA) process (see Action Memorandum, Engineering Evaluation/Cost Analysis, Contingent Removal Action for Contaminated Soil, June 2002).

**Background:** In 2002, the Action Memorandum, Engineering Evaluation/Cost analysis was prepared as a Contingent Removal Action for Contamination Soils. The idea was to streamline the cleanup process for specific types of soils contamination. The soils considered for the CRA would have similar properties including type of contamination, contaminant concentrations, and isolated areas of contamination. The Action Memorandum for these cleanups would be presented in the form of a Fact Sheet. The Fact Sheet would include all pertinent information associated with the PRS and cleanup, including a description/history of the PRS, contaminants of concern (COCs), risk criteria, background levels, cleanup objectives, environmental surveillance measures, verification sampling, schedule of activities, and cost estimate.

The Cleanup could be performed in conjunction with the public review of the Fact Sheets. The public would still have the opportunity to comment on all aspects of the Removal Action. Verification sampling would not be performed until after the public comment period, allowing regulators to consider all comments before verifying the Removal Action is complete.

The current Contingent Action Memorandum would propose the same review and comment process for specific buildings at the Mound site. The buildings considered appropriate for this type of review are all scheduled for industrial demolition activities. The justification for adding the buildings includes the demolitions of contaminated buildings frequently exhibit the same characteristics including a simple removal action, easy verification and a small number of contaminants of concern (COCs). In addition, the COC for the specified buildings are the same as those of the soils removal action memorandum. By using the CRA process, the DOE can combine work scope to improve efficiencies in budget and manpower. This will potentially reduce the overall schedule duration. It also streamlines the sampling and reporting documentation.

**Technical Assessment:** EHS has had the opportunity to review and comment on several of the Fact Sheets prepared under the Soils CRA process. These fact sheets were found to be informative yet concise. The comment process is consistent with other PRS data package and Removal Action Memorandums. EHS believes that the Building CRA process will also be productive for expediting the cleanup of the Mound Site.

As always, coordination between CH2M Hill, cleanup contractor at the Mound Site, and Miamisburg Mound Community Improvement Corp (developer of the site) will result in the result in the return of these areas to that proposed in the Mound Comprehensive Reuse Plan.

EHS, along with MMCIC would be interested in the scheduled cleanup and demolition of the buildings in question, as they work toward final remediation of the site. In addition, notification of the Verification Sampling and Analysis Plan and the On-Scene Coordinator Report for each of these buildings would be appreciated.