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Technical Review - PRS 17 Building 34-revised

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Technical Review of the Mound Site

Summary

by **EHS TECHNOLOGY GROUP, LLC**

Reference Document: PRS 17: Building 34 Oil Burn Structure Public Fact Sheet

Purpose: The purpose of this document is to notify the public of the Removal Action (RA) at the PRS 17: Building 34 Oil Burn Structure. This Fact Sheet satisfies the Public Notification requirements as outlined in the Action Memorandum/Engineering Evaluation/Cost Analysis, Contingent Removal Action for Contaminated Soil, June 2002, Final.

Assessment of Review: In 1979, the structure known as Building 34 was removed. This structure had been used as the location for flame tests on aviation fuel shipping containers. In 1991, further sampling was conducted as part of the OU-3 Limited Field Investigation. Sampling in the soils outside the structure indicated elevated levels of cobalt, copper, lead, and benzo(g,h,i)perylene. Water samples collected inside the structure indicated elevated thallium levels. Because Hazard Indices (HIs) are now available for thallium, cobalt and copper, and because the levels detected of these contaminants did not exceed the HI values, they are no longer considered Contaminants of Concern (COCs). The remaining COCS are lead and benzo(g,h,i)perylene.

Technical Analysis: In 2002, the Action Memorandum, Engineering Evaluation/Cost Analysis was prepared as a Contingent Removal Action for Contaminated 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. This Fact Sheet fulfills these requirements.

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.

EHS has had the opportunity to review and comment of this Fact Sheet. We concur with the planned removal action (RA) for the soils and sediments around the Building 34 Oil Burn Structure due to elevated levels of lead and benzo(g,h,i)perylene.

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

Substantive Comments: EHS concurs with the planned removal action (RA) for the soils and sediments around the Building 34 Oil Burn Structure. Coordination between CH2M Hill, the DOE and MMCIC to ensure the building area is left in a condition consistent with the Mound Reuse Plan.

If EHS's understandings are correct, no specific response to the above comment is necessary, and we understand that these comments will be included in the OSC report.