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## **Technical Review - Water Distribution Lease Package**

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# Technical Review of the Mound Site

## Summary

by **EHS TECHNOLOGY GROUP, LLC**

**Reference Document:** Water Distribution System, Leasing Data Package, October 2004

**Purpose:** The purpose of this document is to notify the public of the Transition (Lease) Activity proposed a portion of the potable water system at the Mound facility.

**Assessment of Review:** EHS has had the opportunity to review and comment on this Leasing Data Package for the Water Distribution System. We concur with the planned lease action for a portion of the potable water lines. This data package was prepared in accordance with the requirements specified in the *Work Plan for Environmental Restoration (ER) of the DOE Mound Site, The Mound 2000 Approach*. As such, all appropriate inquiry was made into the condition of the building and any associated environmental concerns that would impact the demolition activities were assessed.

**Technical Analysis:** The portion of the potable water system to be leased by MMCIC was reviewed for environmental risks. Certain conditions on the lease exist, including future use of the potable water system will be restricted to commercial/industrial use and will only be used to supply facilities located on the former DOE Mound property. In addition, any soils excavated during work activities on the water distribution system are required to remain on-site.

The MEIMS database system was accessed to obtain data for samples with elevated contaminant levels located within 15 feet of the drinking water lines. Although no samples had results that exceeded the HI (Hazard Index) of 1, there were seven samples with results that exceed the 10-5 RBGV (Risk Based Guidance Value). However, since none of these seven samples exceed the 10-4 Risk Based Guideline Values, no additional protective assurances and conditions for migration of environmental contamination are required.

The Data Package was clear that this assessment applied to only the CERCLA process and is separate and distinct from the Drinking Water Plan Review and all other functions of the Ohio EPA Division of Drinking and Ground Waters.

**Substantive Comments:** EHS concurs with the planned transition (leasing) action for a portion of the potable water distribution system. EHS agrees that the transfer of this system does not result in additional risk, particularly with outlined restrictions in place. Although the data package provides information to approve the lease of the water lines, it is clear that this applies only the CERCLA process. This is separate from the Drinking Water Plan Review and all other functions of the Ohio EPA Division of Drinking Water and Groundwater. In addition, review and approval from the Ohio Department of Health may be necessary before using this potable water system. This information should be investigated and, if appropriate, referenced.

Coordination between CH2M Hill, the DOE and MMCIC is necessary to ensure the water line lease is transferred 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 Final Status Report.