150505
9903080001 Admin. Record

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Babcock & Wilcox, a McDermott company

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ESC-052/99
March 2, 1999

99-TC/03-02

Mr. Richard B. Provencher, Director
Miamisburg Environmental Management Project
U.S. Department of Energy
P.O. Box 66
Miamisburg, OH 45343-0066

ATTENTION: Dewain Eckman

SUBJECT: Contract No. DE-AC24-97OH20044
DELIVERY OF PRS 304 ON SCENE COORDINATOR REPORT, FINAL, REV 1

REFERENCE: Statement of Work Requirement C 7.1e -- Regulator Reports

Dear Mr. Provencher:

Attached is the PRS 304 On Scene Coordinator Report, Final, Rev 1. This version of the document includes responses to comments received during public review of the Release Block D Proposed Plan. The release of this document has been authorized by Art Kleinrath of MEMP.

Please advise if additional copies are required for distribution within DOE. If you require further information, please contact Dave Rakel at extension 4203.

Sincerely,

Linda R. Bauer, Ph.D.
Manager, Environmental Safeguards & Compliance

LRB/nmg

Enclosures as stated

cc: Tim Fischer, USEPA, (1) w/attachment
Dave Meredith, TechLaw, (1) w/attachment
Brian Nickel, OEPA, (1) w/attachment
Anthony Campbell, OEPA, (1) w/attachment
Kathy Lee Fox, OEPA, (1) w/attachment
Ruth Vandergrift, ODH, (1) w/attachment
Terrence Tracy, DOE/HQ, (1)w/attachment
Art Kleinrath, MEMP, (1) w/attachment
Public Reading Room, (5) w/attachment
Administrative Record, (2) w/attachment
DCC

150505-9903080001

ON SCENE COORDINATOR (OSC) REPORT

PRS 304

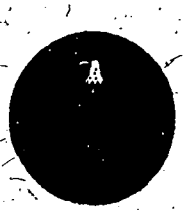
REMOVAL ACTION

MOUND PLANT
MIAMISBURG, OHIO

February 1999

Final

(Revision 1)



Department of Energy

Babcock & Wilcox of Ohio

The Mound Core Team
P.O. Box 66
Miamisburg, Ohio 45343-0066

Mr. Jeff Fisher
7470 Sheelin Ct.
Dayton, OH
45415

Dear Mr. Fisher:

The Core Team, consisting of the U.S. Department of Energy Miamisburg Environmental Management Project (DOE-MEMP), U.S. Environmental Protection Agency (USEPA), and the Ohio Environmental Protection Agency (OEPA), appreciates your comments on the Proposed Plan for Release Block D, the Residual Risk Evaluation-Release Block D Revision Summary, and the PRS 304 On-Scene Coordinator Report. Attached are our responses. These comments and responses will be included in the Responsiveness Summary section of the Final Record Of Decision (ROD) for Release Block D. In addition, responsiveness summaries are being added to the RRE-Revision Summary and the PRS 304 OSC Report.

Should the responses to comments require additional detail, please contact Alan S. Spesard at (937) 865-3859, and we will gladly arrange a meeting or telephone conference.

Sincerely,

DOE/MEMP: _____ 2/1/99
Alan S. Spesard, Acting Remedial Project Manager

DOE/MEMP: _____ 2/9/99
Timothy J. Fischer, Remedial Project Manager

DOE/MEMP: _____
Brian K. Nickel, Project Manager

Response to comments received from Jeff Fisher on 1/19/99

Comment:

The derivation of the "not to exceed 3 pCi/g" Objective for ^{232}Th in Table 2, page 4 needs to be included in the text. How was this value calculated?

Response:

The clean-up objective for ^{232}Th was identified in the Action Memo. It was derived by adding the 10^{-5} risk level (1.6 pCi/gm) and the observed Mound background level (1.4 pCi/g, "Operable Unit 9 Background Soils Investigation Soil Chemistry Report," Sept. 1994). The 10^{-5} risk level was calculated using the latest ^{228}Th + daughters slope factor.

Comment:

The sequence of sampling at this site (pages 4 and 5) suggests that final verification of adequate soil removal was based on two samples. What was the surface area of soil that was contaminated? How was it determined that two samples represent the extent of contamination at this hot spot?

Response:

Seven samples were identified as verification samples (004373, 004374, 004375, 004376, 004377, 004313, and 004416). See Figure B-2 of the OSC report. The off-site laboratory results for sample 004416 exceeded the cleanup objective (4 pCi/g vs. 3 pCi/g). An additional 2 cubic feet of soil was removed at this location. Two samples (004428 and 004429) were used to confirm that the hot spot identified by sample 004416 was removed by the additional excavation. This additional excavation encompassed a volume described by 2 ft. x 2 ft. x 0.5 ft. deep. Using the two samples for this location was a field judgement based on the limited surface area (2 ft. x 2 ft.) involved in the additional excavation. In addition, investigatory samples and field screening were used to guide the entire excavation. The locations of the investigory samples are shown in Figure B-3 of the OSC report and measurement results of those samples are summarized in Table B-1 of the OSC report.

Comment:

The results of this risk assessment were not verified because of inadequate documentation, however if the concentration terms FOR SOIL are accurate, the conclusions drawn in this risk assessment for the on-site surface soil exposure pathway are reasonable. The exposure parameter values and

equations used for each exposure pathway for soil need to be included in the text for the construction worker and site employee. The document should stand on its own without extensive citation.

Response:

All exposure parameter values and equations are shown in Appendix D of the 1996 Residual Risk Evaluation (RRE). The text of the 1998 RRE Revision Summary has been expanded to refer the reader to this Appendix. The 1998 Revision Summary includes all soil data used to update the soil component of the RRE. Therefore, the information presented in these two documents allows a reviewer to reproduce any of the soil risk calculations reported in the Revision Summary.

Comment:

Please provide the equations, raw analytical data, and spreadsheet calculations used to calculate intake for Benzo(a)pyrene (B(a)P) in soil. This is a good spot check for this risk assessment (for chemicals). It seems odd that with GV values of 0.41 and 0.78 mg/kg for B(a)P in soil for the construction worker and site employee, respectively, risks of 6.0E-6 or less are calculated using 95% UCL of 2.4 and 1.17 mg B(a)P per Kg of surface soil.

Response:

The calculations for benzo(a)pyrene have been reproduced as an attachment. (Please see the last page of this Responsiveness Summary.) As seen on the attachment, the calculations in the Responsiveness Summary are correct. Based on those calculations, the guideline values are appropriate for benzo(a)pyrene. Specifically, since 0.41 mg/kg corresponds to a 1×10^{-6} risk level for the construction worker, then a concentration six times higher (2.4 mg/kg) would correspond to a risk level that is six times higher (6×10^{-6}). Similarly, since 0.78 mg/kg corresponds to a 1×10^{-6} risk level for the site employee, then a concentration 1.5 times higher (1.2 mg/kg) would correspond to a risk level that is 1.5 times higher (1.5×10^{-6}).

Comment:

The site is contaminated with some type of diesel fuel and several radionuclides. Is TPH or free product of concern?

Response to comments received from Jeff Fisher on 1/19/99

Response:

Neither diesel fuel nor TPH represent unacceptable risks for the construction or site worker scenarios analyzed for Release Block D. No free product was identified in Release Block D.

Comment:

I still need clarification on the construction worker scenario. Do you assume that a person wears protective gear for inhalation? If not, inhalation of dust is greater than incidental ingestion of soil and dust.

Response:

The residual risk evaluation methodology does not take credit for an individual wearing protective gear for inhalation. On a per unit soil concentration basis, for a five-year exposure period, the construction worker inhales 5.85×10^{-6} mg of dust. Conversely, the incidental soil ingestion rate specified in the RRE methodology document is 480 mg/d, or 600,000 mg per five-year period. Therefore, unless extremely high soil concentrations were encountered, intake via inhalation of dust would not be expected to be greater than intake by incidental ingestion.

Comment:

Soil was the only medium evaluated for Release Block D for this risk assessment even though [the] groundwater pathway was included in several Tables. I think policy about how groundwater is handled for this risk assessment needs to be clearly articulated in this text. Consumption of water is expected for both worker scenarios. As it stands, this pathway has been excluded from the risk analysis. Is leaching of soil to groundwater or streams considered as a pathway of exposure?

Response:

The availability of new soil data served as the basis for revisiting the RRE. As a result, the focus of the Revision Summary is on soil data, and minimal text on groundwater has been included. Although no new groundwater concentration data were generated for the RRE, the risks from groundwater-related pathways were captured in the risk tables that appear in the Revision Summary (see pp. 30 - 32). Subsequent to the development of the Revision Summary, the groundwater risk data were re-validated. The results of that re-validation effort are summarized in a stand- alone report entitled

Response to comments received from Jeff Fisher on 1/19/99

"Technical Position Report in Support of the Release Block D Residual Risk Evaluation." The technical position report has been added to the CERCLA Public Reading Room. The text of the Revision Summary has been modified to more clearly state the role of the groundwater pathway and to highlight the presence of groundwater risk data in Tables V.7 through V.9 of the Revision Summary.

Comment:

For the construction worker, are both surface soil contaminant levels and subsurface levels used for calculating risks? It appears that some chemicals increase in concentration below the shallow surface dirt. This is important when considering the construction worker scenario for excavation of soil. The health risks may be understated for this situation. It is unclear how many samples are near the surface or subsurface and how the samples were lumped for risk assessment purposes.

Response:

Both surface and subsurface data were used to determine a 95th percentile upper confidence limit (UCL) or maximum soil concentration value for the construction worker scenario. (Maximum concentrations are used when the data set contains fewer than 20 points.) Typically, surface and subsurface sample results are given equal weight for the construction worker exposure scenario. By including the subsurface results, and using the 95th% UCL or maximum concentration detected, a conservative estimate of the exposure to the construction worker is developed.

Comment:

The methods used to detect radionuclides and chemicals in soil and water and a list of the compounds tested for need to be included in the text. In other words, what materials were tested for but not detected?

Response:

The methods used are specified in the Methods Compendium which is available in the CERCLA Public Reading Room. Though not used for the RRE process, data regarding contaminants tested for, but not detected in, Release Block D were reported in PRS packages, Building Data Packages (BDPs) and the "OU5 Operational Area Phase I Investigation Non-AOC Field Report, Volume 1 - Text, Final, Revision 0, June 1, 1995." All of these documents are available in the Public Reading Room.

Response to comments received from Jeff Fisher on 1/19/99

Comment:

It is not clear from the risk assessment if off-site migration of contaminates in soil or groundwater was considered. Release Block D is on the Mound property border.

Response:

Offsite migration was considered but is not of concern for RB D. More detailed explanations follow below.

Soil to air. The potential for airborne movement of soil was examined in the 1996 RRE. The RRE is believed to bound the risks likely to be encountered from continuous exposure to radionuclides driven aloft by resuspension.

Soil to surface water. RB D surface water runoff is not expected to move offsite. Stormwater runoff drains toward the south and then west -- ultimately discharging into the Mound Plant overflow pond or the main drainage channel. Based on results from Mound's effluent and environmental monitoring programs, contaminants are not present in stormwater at levels of concern.

Groundwater. As reported in the 1996 RRE, the movement of groundwater from bedrock toward the Buried Valley Aquifer and the Mound Plant production well field has been estimated using a conservative transport model. The risk values reported for future groundwater include these concentration estimates.

Response to comments received from Jeff Fisher on 1/19/99

ATTACHMENT

Response to Comments
Release Block D Revision Summary
Risk Calculations for Benzo(a)pyrene Soil Ingestion

Soil Concentration

2.44	mg/kg	Construction Worker	(Ref: Revision Summary, p. 15)
1.17	mg/kg	Site Employee	(Ref: Revision Summary, p. 15)

Slope Factor

7.3	mg/kg-d	(Ref: Revision Summary, p. 17)

Construction Worker Intake

(Ref: Equation and parameter values from Appendix D, 1996 RRE)

Intake, mg/kg-d = (CS*EF*ED*10-6 kg/mg*IR)/(AT*BW*365 d/yr)

CS =	2.44	mg/kg (CS = concentration in soil)
EF =	250	days/year (EF = exposure frequency)
ED =	5	years (ED = exposure duration)
IR =	480	mg/day (IR = ingestion rate)
AT =	70	years (AT = averaging time)
BW =	70	kilograms (BW = body weight)
Intake =	8.19E-07	mg/kg-d

Construction Worker Risk, Soil Ingestion, B(a)P

(Reference for equation: Page 5-1 of 1996 RRE)

Risk = Intake * Slope Factor

Risk =	**5.98E-06**	
vs.		
Risk =	**6.0E-06**	(reported on p. 20 of Revision Summary)

Site Employee Intake

(Ref: Equation and parameter values from Appendix D, 1996 RRE)

Intake, mg/kg-d = (CS*EF*ED*10-6 kg/mg*IR)/(AT*BW*365 d/yr)

CS =	1.17	mg/kg (CS = concentration in soil)
EF =	250	days/year (EF = exposure frequency)
ED =	25	years (ED = exposure duration)
IR =	50	mg/day (IR = ingestion rate)
AT =	70	years (AT = averaging time)
BW =	70	kilograms (BW = body weight)
Intake =	2.04E-07	mg/kg-d

Site Employee Risk, Soil Ingestion, B(a)P

(Reference for equation: Page 5-1 of 1996 RRE)

Risk = Intake * Slope Factor

Risk =	**1.49E-06**	
vs.		
Risk =	**1.5E-06**	(reported on p. 21 of Revision Summary)

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EXECUTIVE SUMMARY

This removal action was performed at Potential Release Site 304 (also known as the Excavated Materials Disposal Area and as Rader's Hill) of the Department of Energy's Mound Environmental Management Project site.

PRS 304 contained overburden soils excavated during the decontamination and decommissioning of the Waste Transfer Line (PRS 300) and from Area 12 (PRS 273). Soils from these areas were segregated according to thorium concentration. Soils with thorium concentrations greater than 5 pCi/g were boxed and shipped off-site for disposal; those soils with less than 5 pCi/g of thorium were placed in the area of PRS 304/313. In September 1998, a hot spot of thorium contamination was discovered during routine radiological surveys. The core team decided a removal action was warranted. The objective of the removal action was the excavation and disposal of soil contaminated with more than 3 pCi/g of ^{232}Th or 55 pCi/g of ^{238}Pu. In October and November 1998, approximately 6482 ft^3 of soil were excavated and verification sampling was performed. Verification sampling confirmed the clean up goal was achieved.

Art Kleinrath, On-Scene Coordinator
U.S. Department of Energy
Miamisburg, Ohio

Tim Fischer, Remedial Project Manager
U.S. EPA
Chicago, Illinois

Brian Nickel, Project Manager
Ohio EPA
Dayton, Ohio

1 SUMMARY OF EVENTS

1.1 SITE CONDITIONS AND BACKGROUND

The Mound Plant is a 305-acre site on the southern border of the city of Miamisburg in Montgomery County, Ohio. The site is approximately 10 miles south-southwest of Dayton and 45 miles north of Cincinnati. This removal action was performed at Potential Release Site 304 (also known as the Excavated Materials Disposal Area and as Rader's Hill). The location of PRS 304 is shown in Figure 1.1.

PRS 304 consisted of the overburden soils excavated during the decontamination and decommissioning of the Waste Transfer Line (PRS 300) and from Area 12 (PRS 273). Soils from these areas were segregated according to thorium concentration. Soils with thorium concentrations greater than 5 pCi/g were boxed and shipped off-site for disposal; those soils with less than 5 pCi/g of thorium were placed in the area of PRS 304/313.

On February 19, 1997, the Core Team consisting of representatives of DOE/MEMP, USEPA, and OEPA recommended No Further Assessment for PRS 304. This recommendation was available for public review and comment from May 8 to June 16, 1997. In September 1998, a hot spot of thorium contamination was discovered during routine radiological surveys. The DOE is obligated to remove hot spots by its implementing rules and regulations for the Atomic Energy Act. The applicable DOE Order is 5400.5. On October 1, 1998, the Core Team signed the Action Memorandum for PRS 304. This was available for public review and comment from October 1 to October 31, 1998.

Since the DOE is the sole responsible party for the clean up of Mound, no other Potentially Responsible Parties (PRPs) were sought to clean up PRS 304.

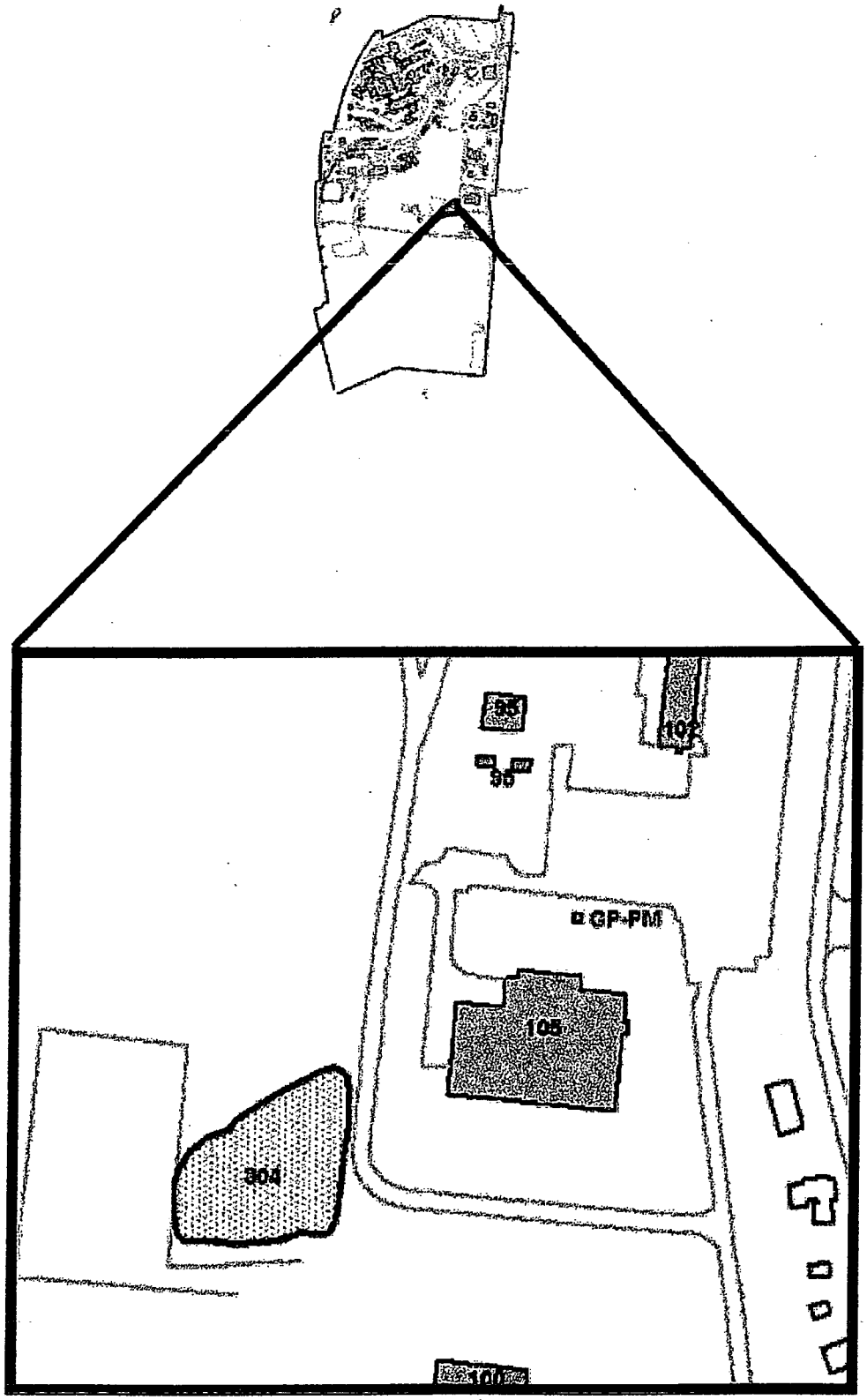

Figure 1.1 Location of PRS 304

1.2 ORGANIZATION OF THE RESPONSE

Table 1 lists the groups responding to this Action, and their responsibilities.

Table 1. Organization of the Response

Agencies or Parties Involved	Contact	Description of Participation
US EPA SRF-5J 77 W. Jackson Blvd. Chicago, IL 60604	Tim Fischer 312-886-5787	Federal agency responsible for response oversight.
Ohio EPA 401 E. Fifth St. Dayton, OH 45402-2911	Brian Nickel 937-285-6468	State agency responsible for response oversight.
DOE-MEMP P.O. Box 66 1 Mound Road Miamisburg, OH 45343-0066	Art Kleinrath 937-865-3597	Lead agency for the response.
BWO 1 Mound Road Miamisburg, OH 45343-3030	John Price 937-865-3954	Performed planning and field work for the response. Provided the OSC with technical assistance, administrative support, photo and site documentation, and preparation of OSC report.

1.3 OBJECTIVES

The Action Memorandum (DOE September, 1998, p 5-2) identified the objective of this removal action as the excavation and disposal at a licensed low level waste disposal facility of soil with contaminant concentrations greater than the clean up objectives (Table 2). The contaminants of concern for soil near PRS 304 were ^{232}Th and ^{238}Pu. The results of verification sampling are included in Appendix B and summarized in Table 2.

Table 2. Verification Sample Results for PRS 304 Soils

Radionuclide	Objective	Verification Sampling Results
^{238}Pu	Not to exceed 55 pCi/g	Did not exceed 2.34 pCi/g.
^{232}Th	Not to exceed 3 pCi/g	Did not exceed 1.09 pCi/g.

1.4 CHRONOLOGICAL NARRATIVE OF RESPONSE ACTIONS

The following is a chronological narrative of events, as they occurred for the PRS 304 Removal Action.

November 1989: Mound Plant is placed on the National Priorities List (NPL).

February 1997: Core team designates PRS 304 for No Further Assessment.

May 1997: The recommendation starts formal public review period.

June 1997: The formal public review period ends.

September 1998: During routine radiological surveys, a thorium hot spot is identified in the vicinity of PRS 304. The core team decides a Removal Action is warranted. An Action Memorandum is written, signed, and sent to public review on October 1, 1998.

October 1998: A Work Plan including the approach to Verification Sampling was prepared and approved by DOE and the regulators. A Health and Safety Plan was prepared and approved by DOE. DOE/OH authorized the field work. On October 20, excavation started. The initial excavation is illustrated in Figure B-1. By October 21, thirteen hauler loads of soil were removed. The first five verification samples were taken (004373, 004374, 004375, 004376, and 004377) The location of these samples is illustrated in Figure B-1 and B-2. These samples were measured at the Mound Soil Screening Lab by gamma-ray spectrometry and at an off-site lab by alpha spectrometry. The

measurement results are compiled in Table B-1. Measurement results reports are also included in Appendix B. On October 21, representatives of DOE/MEMP and OEPA visited the site and identified six additional sampling locations (004378, 004379, 004380, 004381, 004382, and 004383). The location of these samples is illustrated in Figure B-3. These samples were measured at the Mound Soil Screening Lab by gamma-ray spectrometry and the results are included in Table B-1. In addition, four locations were trenched and sampled (004386 through 004400). The trench and sample locations are shown in Figure B-3. The gamma-ray spectrometry results from the Mound Soil Screening Lab are included in Table B-1. In general the excavated soil was returned to the trench locations in approximately the original location. Elevated survey readings were obtained at the center trench (see Figure B-3). Screening results for samples 004396, 004397, 004410, and 00441 confirmed levels above the clean up objective for ^{230}Th of 3 pCi/g. The "Center Trench", "East Pile", and "West Pile" were then excavated on October 26-27, 1998. (See Figure B-3.) Verification samples (004413 and 004416) were taken. The location of these samples is illustrated in Figure B-2 and B-4. These samples were measured at the Mound Soil Screening Lab by gamma-ray spectrometry and an off-site lab by alpha spectrometry. The measurement results are compiled in Table B-1. Measurement results reports are also included in Appendix B. By October 27, the excavation was believed to be complete. Twenty-four hauler loads of soil had been removed. Photographs taken during this removal action are in Appendix A.

November 1998: Results of analysis of verification samples were received from the independent, off-site laboratory (See Appendix B.) One sample exhibited contamination in excess of the clean up objective (sample ID 004416 with 4 pCi/g ^{232}Th). As specified in the Work Plan, this location was excavated further. Approximately 2 ft^3 of additional soil was removed. This location was sampled (Sample ID 004428 and 004429) and the samples analyzed by gamma-ray spectrometry. The results (0.55 pCi/g and 0.52 pCi/g repetitively labeled confirmatory in Table B-1) indicated the ^{232}Th concentration is below the clean up objective.

1.5 RESOURCES COMMITTED

Table 3 summarizes the disposition of materials from PRS 304. The cost summary for the removal action is in Table 4.

Table 3. Materials and Disposition

Waste Type	Volume (cubic f)	Disposal Costs ($)	Destination
Rad debris (concrete & soil)	6482	$53988	Envirocare of Utah
Totals	6482	$53988	

Table 4. Removal Project Cost Summary

Total Clean-up Contractor Costs	$71, 972

2 EFFECTIVENESS OF THE REMOVAL ACTION

2.1 ACTIONS TAKEN BY MOUND PERSONNEL

BWO personnel planned and performed the soil removal, on-site transportation and staging of soil and debris, and site restoration. BWO personnel performed the on-site measurements reported in Appendix B. BWO personnel reviewed these results and the results of the off-site analyses of the Verification samples. As Appendix B indicates, the clean up objectives were met. Table 2 summarizes the clean up goals and the measurement results for the PRS 304 samples. The objectives of the removal action were achieved.

2.2 ACTIONS TAKEN BY LOCAL, STATE, AND FEDERAL AGENCIES

DOE/MEMP was the lead agency for the removal action. US EPA, and OEPA had oversight responsibility for the removal action.

2.3 ACTIONS TAKEN BY CONTRACTORS

Quanterra Environmental Services, Richland Laboratory, performed the analysis of the verification samples.

3 DIFFICULTIES ENCOUNTERED

3.1 ITEMS THAT AFFECTED THE RESPONSE

The extent of soil contamination was uncertain.

The field crew reported that the distribution of contaminated soil encountered was consistent with the distribution of soil by a dump truck. Contamination did not extend below the original surface of the area.

3.2 ISSUES OF INTERGOVERNMENTAL COORDINATION

There were no issues of intergovernmental coordination.

4 RECOMMENDATIONS

4.1 MEANS TO PREVENT A RECURRENCE OF THE DISCHARGE OR RELEASE

This section does not apply at Mound. This removal action was part of the remediation and closure of the Mound Plant.

5 REFERENCE LIST OF SUPPLEMENTAL DOCUMENTS

The following reports and documents are pertinent to the removal action and can be found in the CERCLA public reading room at the Miamisburg Senior Adult Center, 305 Central Avenue, Miamisburg or by contacting Arthur Kleinrath, On-Scene Coordinator PRS 304 Removal Action, at 937-865-3597.

- PRS 304/313 Potential Release Site Package
- Action Memorandum/Removal Site Evaluation, PRS 304 (DOE Final September, 1998)
- PRS 304, Removal Action Work Plan (BWO Final October, 1998)