

300302-0604060002



**CH2MHILL**

CH2M HILL  
Mound, Inc.  
1 Mound Road  
P.O. Box 3030  
Miamisburg, OH  
45343-3030

SMO-039-05  
April 13, 2005

Miamisburg Closure Project  
U. S. Department of Energy  
Attention: Margaret Marks, Director  
1075 Mound Road  
Miamisburg, OH 45342

ATTENTION: Paul Lucas  
  
SUBJECT: Contract No. DE-AC24-03OH20152  
Contract Clause C.2.3.1.3  
Contract Deliverable #39  
**PRS 17, PUBLIC FACT SHEET, FINAL**

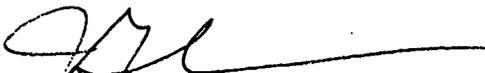
Dear Ms. Marks:

Attached is the following final document:

- PRS 17, Public Fact Sheet, Final

If you or members of your staff have any questions regarding the document, or if additional support is needed, please contact Dave Rakel at 937-865-4203.

Sincerely,

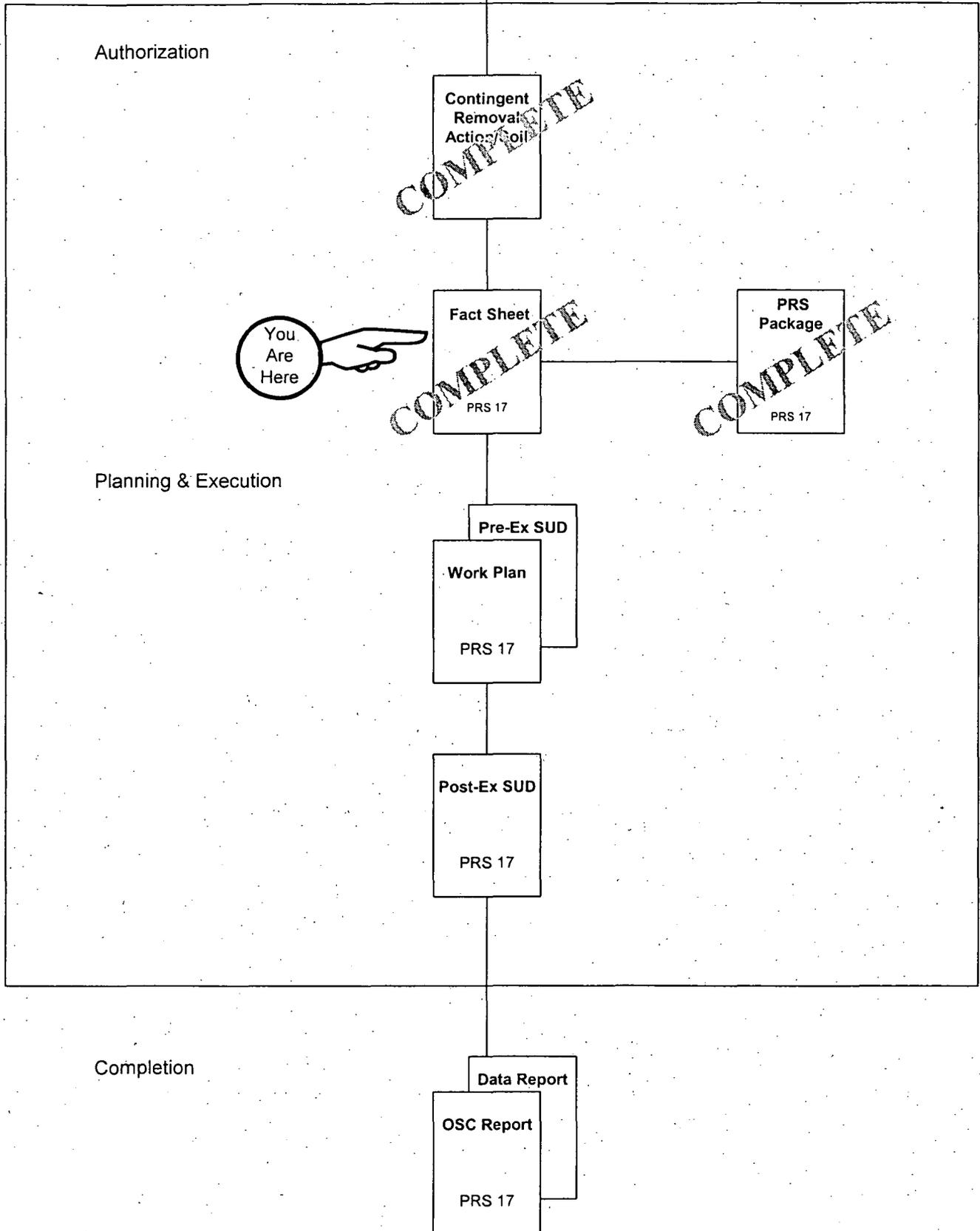
  
John Lehw  
Site Manager

JL/ms  
Enclosures

cc: T. Fischer, USEPA, w/attachments  
B. Nickel, OEPA, w/attachments  
R. Vandegrift, ODH, w/attachments  
M. Wojciechowski, Tetra Tech, w/attachments  
S. Smiley, DOE/MCP, w/attachments  
L. Rawls, MCP, w/o attachments  
R. Tormey, DOE/OH, w/attachments  
G. Desai, DOE/HQ, w/attachments  
J. Nichols, w/attachments  
K. Arthur, w/attachments  
F. Bullock, MMCIC (2) w/attachments  
Public Reading Room (4) w/attachments  
  
ER Records, w/attachments  
DCC, w/attachments  
Admin Record (2) w/attachments  
J. Lehw, w/o attachments  
D. Rakel, w/o attachments  
V. Darnell, w/o attachments  
J. Fontaine, w/o attachments  
W. Webb, w/o attachments  
M. McDougal, w/o attachments  
MOAT Coordinator, w/o attachments  
File

# PRS 17

PRS 17



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**The Mound Core Team**  
 500 Capstone Circle  
 Miamisburg, Ohio 45342

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December 2004

Mr. Frank Bullock, PE  
 Director of Operations  
 Miamisburg Mound Community Improvement Corporation  
 720 Mound Road  
 COS Bldg. 4221  
 Miamisburg, Ohio 45342-6714

Dear Mr. Bullock:

The Core Team, consisting of the U.S. Department of Energy Miamisburg Closure Project (DOE-MCP), U.S. Environmental Protection Agency (USEPA), and the Ohio Environmental Protection Agency (OEPA), appreciates your comments on the PRS 17, Public Fact Sheet. Attached is our response.

Should the responses to comments require additional detail, please contact Paul Lucas at (937) 847-8350, x314 and we will gladly arrange a meeting or telephone conference.

Sincerely,

DOE/MCP:	<i>Paul Lucas</i> Paul Lucas, Remedial Project Manager	12/15/04 date
USEPA:	<i>Timothy J. Fisher</i> Timothy J. Fisher, Remedial Project Manager	12/15/04 date
OEPA:	<i>Brian K. Nickel</i> Brian K. Nickel, Project Manager	12/15/04 date

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**Response to MMCIC Comments on the  
PRS 17 Public Fact Sheet  
Public Review Draft  
April 2004**

**Comment 1.**

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.

**Response 1.** We appreciate your input and review of our document. The Core Team understands MMCIC's request and encourages MMCIC to meet with DOE to obtain an agreeable end state.

Responses to comments are included in the Final version of the document that the comments were pertaining to. Accordingly, these responses will be included in the Final version of the PRS 17 Public Fact Sheet.

# PUBLIC FACT SHEET

## PRS 17: Building 34 Oil Burn Structure

This Fact Sheet satisfies the Public Notification requirement set forth in the Contingent Action Memorandum<sup>1</sup>.

**Background.** Potential Release Site (PRS) 17<sup>2</sup>, also known as the Building 34 Oil Burn Structure, is located on the west central portion of the site as shown on Figure 1. The process performed at PRS 17 involved burning aviation fuel to conduct flame tests on shipping containers to confirm they meet Department of Transportation requirements. The structure was removed from service in 1979.

**Further Assessment Sampling** in and around the structure conducted as part of the OU-3 Limited Field Investigation (LFI) in 1991 indicated that all soil results around PRS 17 were below comparison values with the exception of thallium, with a maximum observed concentration of 0.53 mg/kg (estimated). Mound's background value for thallium is 0.46 mg/kg. Samples of the sediment inside the structure indicate the following contaminants above comparison values: cobalt (28 mg/kg vs. 19 mg/kg background), copper (92.8 mg/kg vs. 26 mg/kg background), lead (3100 mg/kg vs. 400 mg/kg US EPA guidance for residential receptor), and benzo(g,h,i)perylene (2.2 mg/kg vs. 0.41 mg/kg guideline).

Analytical results of water collected from inside the structure were also below contaminant comparison values except for thallium which was found at 0.0024 mg/L. The Maximum Contaminant Level (MCL) for thallium is 0.002 mg/L.

Based on the above results, the Core Team recommended a **Removal Action (RA)**. This RA will be performed per the Contingent Action Memo<sup>1</sup>. Based on the information above, the Contaminants of Concern (COCs) are thallium, cobalt, copper, lead, and benzo(g,h,i)perylene. However, Hazard Indices (HIs) are now available for thallium, cobalt, and copper (17, 12800, and 8520 mg/kg respectively). Since the sampling results do not exceed the HIs for thallium, cobalt, or copper; the COCs for the RA are lead and benzo(g,h,i)perylene.

Analyte	Bkgd (mg/kg)	Maximum Concentration (mg/kg)	Cleanup Objective (mg/kg)
Lead	48	3100	448
Benzo(g,h,i)perylene	N/A	2.2	0.41

The USEPA guidance value for residential exposure to lead (400 mg/kg) is used to calculate the cleanup objective because toxicity values are not available to calculate a site-specific Risk Based Guideline Value. The Risk Based Guideline Value for benzo(a)pyrene (0.41 mg/kg) is used as the cleanup objective for benzo(g,h,i)perylene because there is no guideline or background value for benzo(g,h,i)perylene and the benzo(a)pyrene guideline value is the most conservative of any of the Polynuclear Aromatic Hydrocarbon (PAH) compounds.

The **Work Plan** for Contingent Removal Actions<sup>3</sup>, supplemented by the Unique Work Package, includes procedures, instructions, and applicable permits and notifications required to safely conduct the work. Erosion and runoff/runoff controls will be managed per the SWP<sup>4</sup>.

The RA will consist of demolition of the remaining structure and removal of contaminated soil within the building footprint. Post-excavation sampling will be performed within the excavation per the Core Team-approved **Verification Sampling & Analysis Plan (VSAP)**.

**Schedule.** This Fact Sheet will be in public review for 30 days, ending May 26, 2004. The RA may be ongoing during the review time. A summary of the RA & the verification data will be included in the On-Scene Coordinator (OSC) Report. The OSC Report will be placed in the public reading room after the conclusion of the verification sampling and approval by the Core Team.

Excavation & verification are expected to cost less than \$50,000.

Additional information can be found in the public reading room, or by contacting Danny Punch at 847-8350 ext 301.

1: Action Memorandum/Engineering Evaluation/Cost Analysis, Contingent Removal Action for Contaminated Soil, June 2002, Final

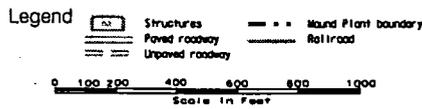
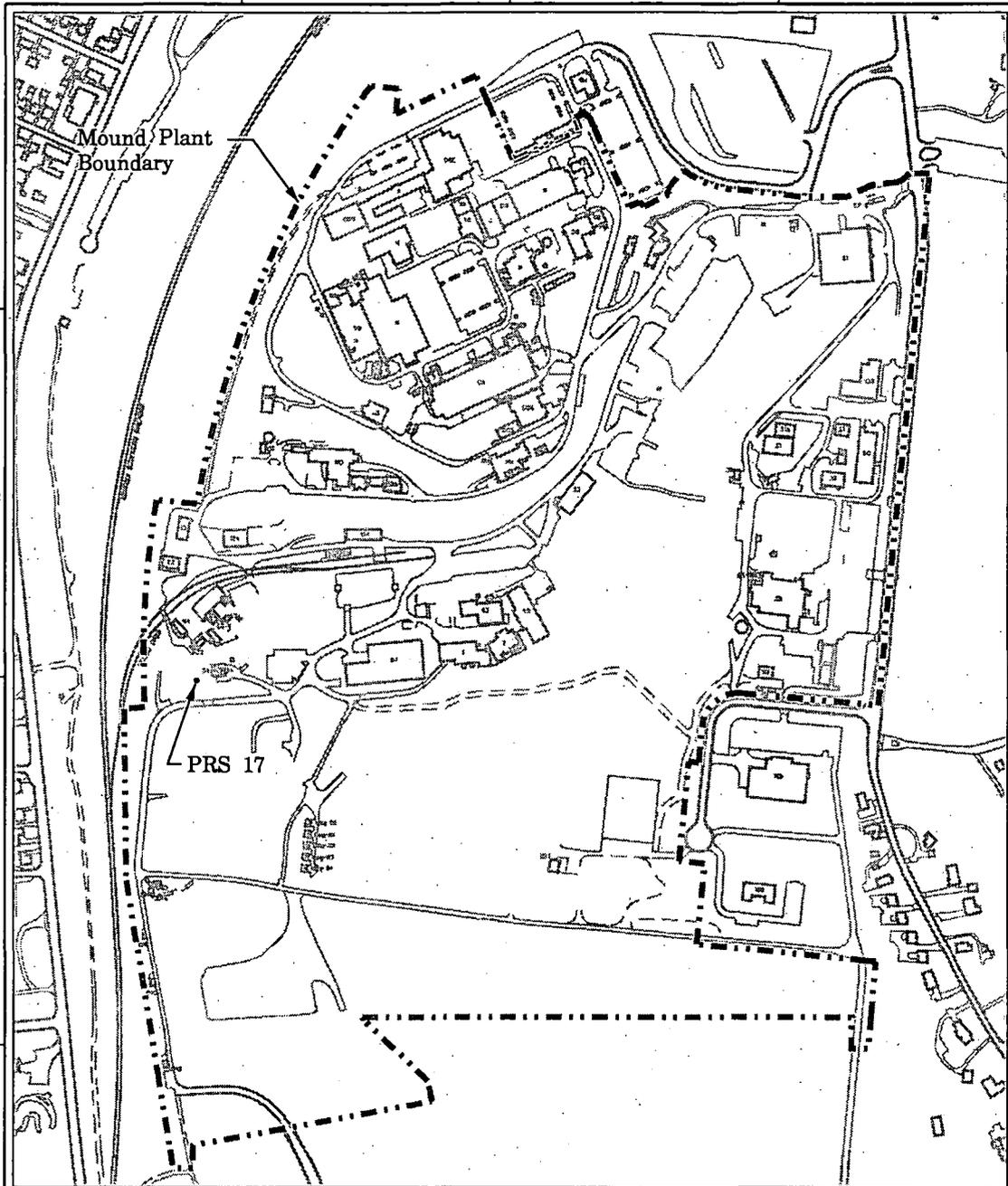
2: PRS 17 Package, Final, February 1997

3: Standard Work Package for Contingent Removal Actions, November 2001, Final

4: Storm Water Pollution Prevention Plan

# PUBLIC FACT SHEET

## PRS 17: Building 34 Oil Burn Structure



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02/24/03			SSP					
DATE	REVISION	BY	CHK	ENG	UNCL	APPR		

Figure 1: Location of PRS 17

- 1: Action Memorandum/Engineering Evaluation/Cost Analysis, Contingent Removal Action for Contaminated Soil, June 2002, Final
- 2: PRS 17 Package, Final, February 1997
- 3: Standard Work Package for Contingent Removal Actions, November 2001, Final
- 4: Storm Water Pollution Prevention Plan

**MOUND PLANT  
PRS 17  
OIL BURN STRUCTURE**

**RECOMMENDATION:**

This potential release site is the Building 34, Oil Burn Structure. It was identified as a potential release site because aviation fuel was used in the test-burning operation in the structure.

The 1993 OU3, Limited Field Investigation sampled the area in and around the structure. The analytical results of the soils outside the burn structure were below guideline criteria, but the sediment inside the structure showed levels above guideline criteria for cobalt, lead, and copper. Lead was detected at eight times the USEPA residential Guideline Criteria of 400 mg/kg. No petroleum compounds were detected in well 379 which is downgradient of this area. The level of lead in the well samples were at or below the USEPA drinking water Maximum Contamination Level (MCL).

Therefore, since evidence of contamination exists inside PRS 17, a REMOVAL ACTION is recommended. Lead concentrations in groundwater are being analyzed separately and will not be included in the response action.

**CONCURRENCE:**

DOE/MB:

Arthur W. Kleinrath 12/2/96  
Arthur W. Kleinrath, Remedial Project Manager (date)

USEPA:

Timothy J. Fischer 12/3/96  
Timothy J. Fischer, Remedial Project Manager (date)

OEPA:

Brian K. Nickel 12/17/96  
Brian K. Nickel, Project Manager (date)

**SUMMARY OF COMMENTS AND RESPONSES:**

Comment period from 1/9/97 to 2/13/97

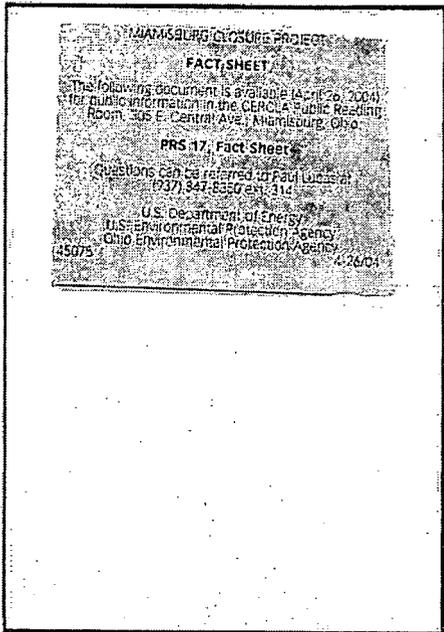
- No comments were received during the comment period.
- Comment responses can be found on page \_\_\_\_\_ of this package.

**AFFIDAVIT OF PUBLICATION**

State of Ohio

**SS: CH2MHILL**

Montgomery County



Before me, the undersigned, a Notary public in and for said County, personally came Tina Sears, who being first duly sworn says she is the Legal Advertising Agent of the DAYTON DAILY NEWS, which she says is a newspaper of general circulation in Montgomery, Clark, Warren, Butler, Clinton, Greene, Preble, Miami, Darke, Mercer, Shelby,

17 Lines, 1 Time(s), last day of publication

being 4/26/04, and he/she further says

that the bona fide daily paid circulation of the said DAYTON DAILY NEWS was over Twenty-five Thousand (25,000) at the time the said advertisement was published, and that the price charged for same does not exceed the rates charged on annual contract for the like amount of space to other advertisers in the general display advertising columns.

Signed Tina Sears

Sworn or affirmed to, and subscribed before me, this

26 day of April 2004

In Testimony Whereof, I have hereunto set my hand and affixed my official seal, the day and year aforesaid.

[Signature]  
Notary Public in and for the State of Ohio

