

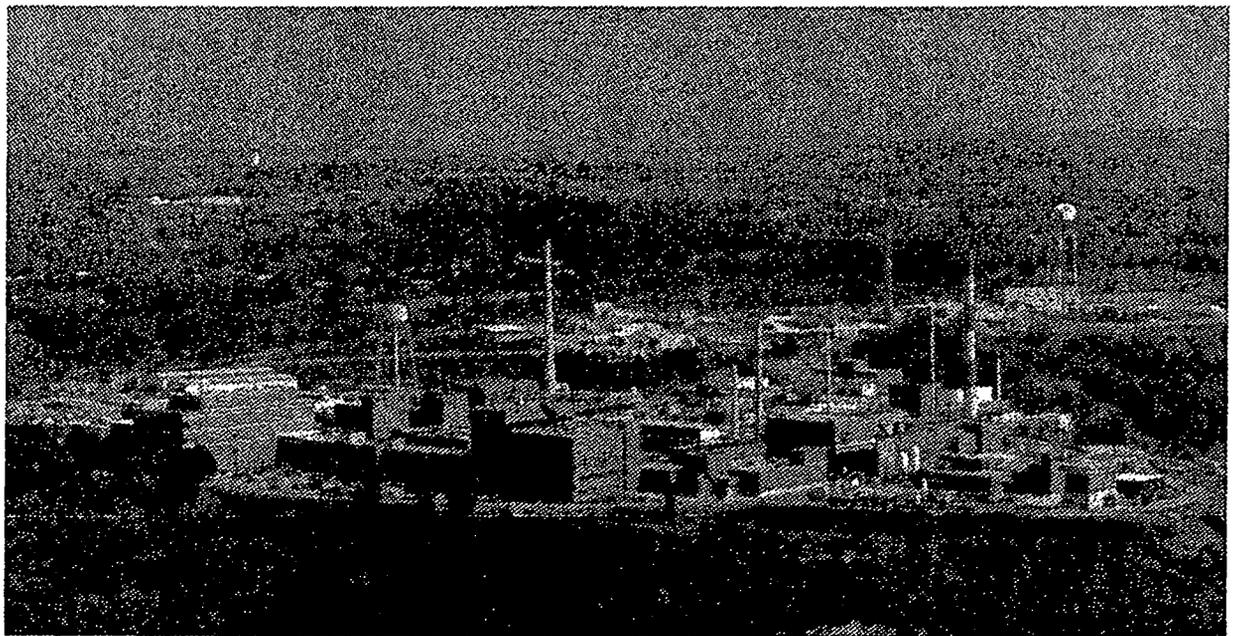
# MOUND

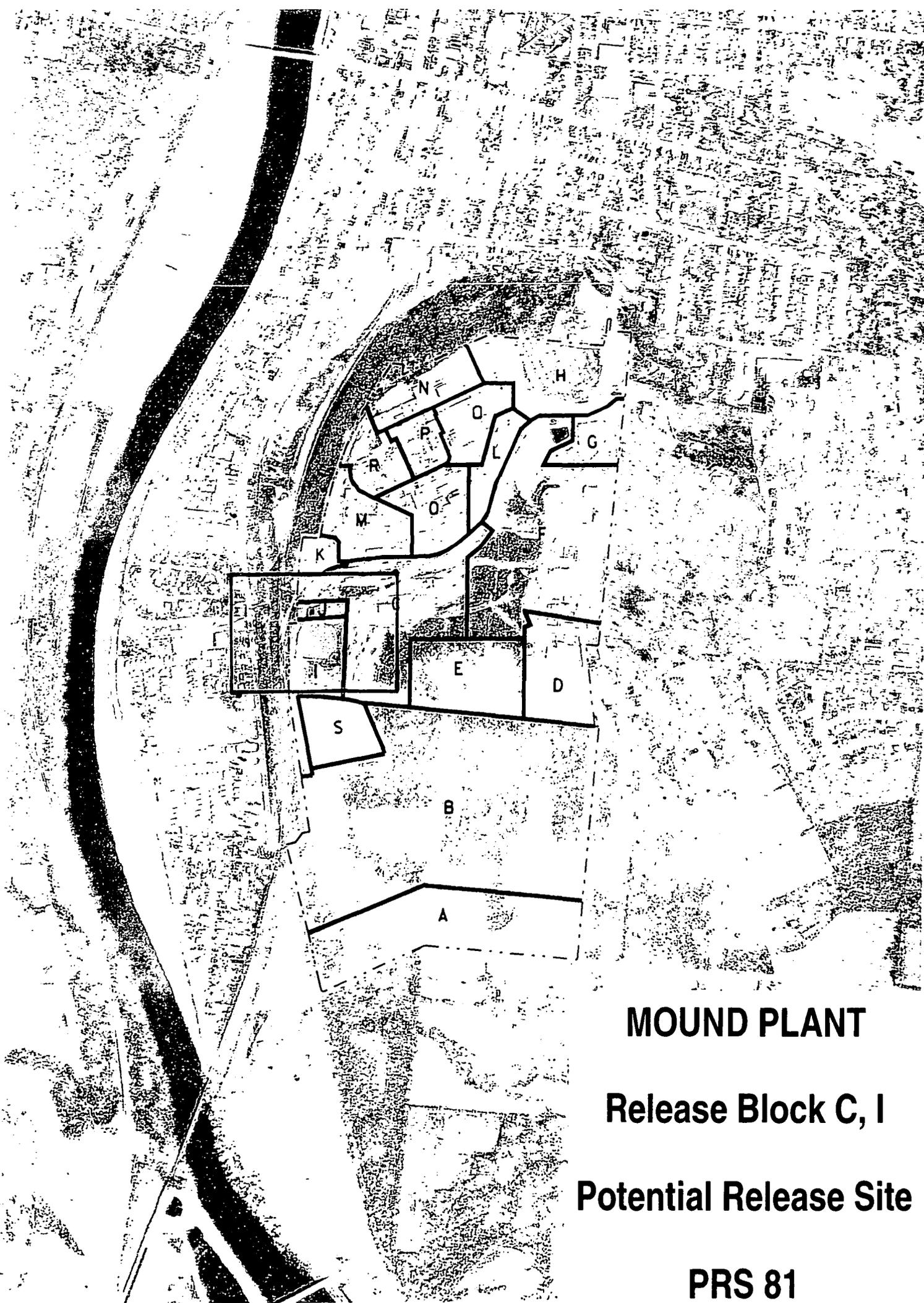


**Environmental  
Restoration  
Program**



# **MOUND PLANT Potential Release Site Package PRS # 81**





**MOUND PLANT**

**Release Block C, I**

**Potential Release Site**

**PRS 81**

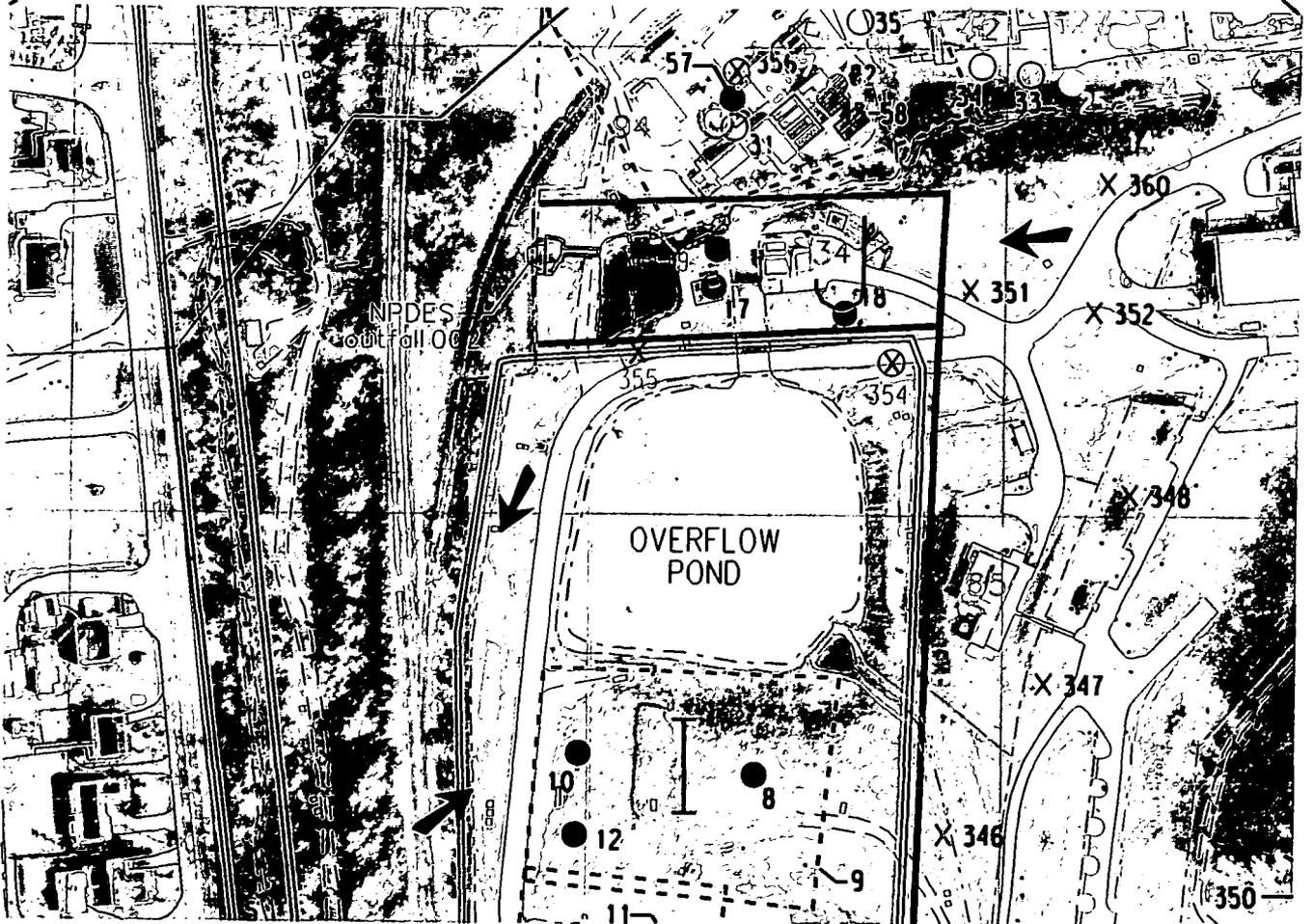
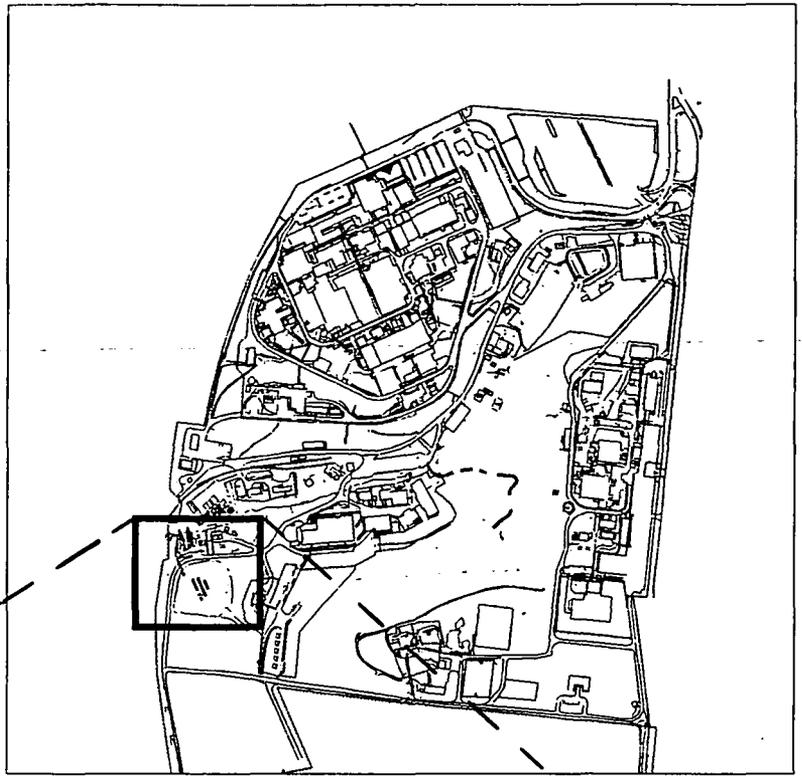


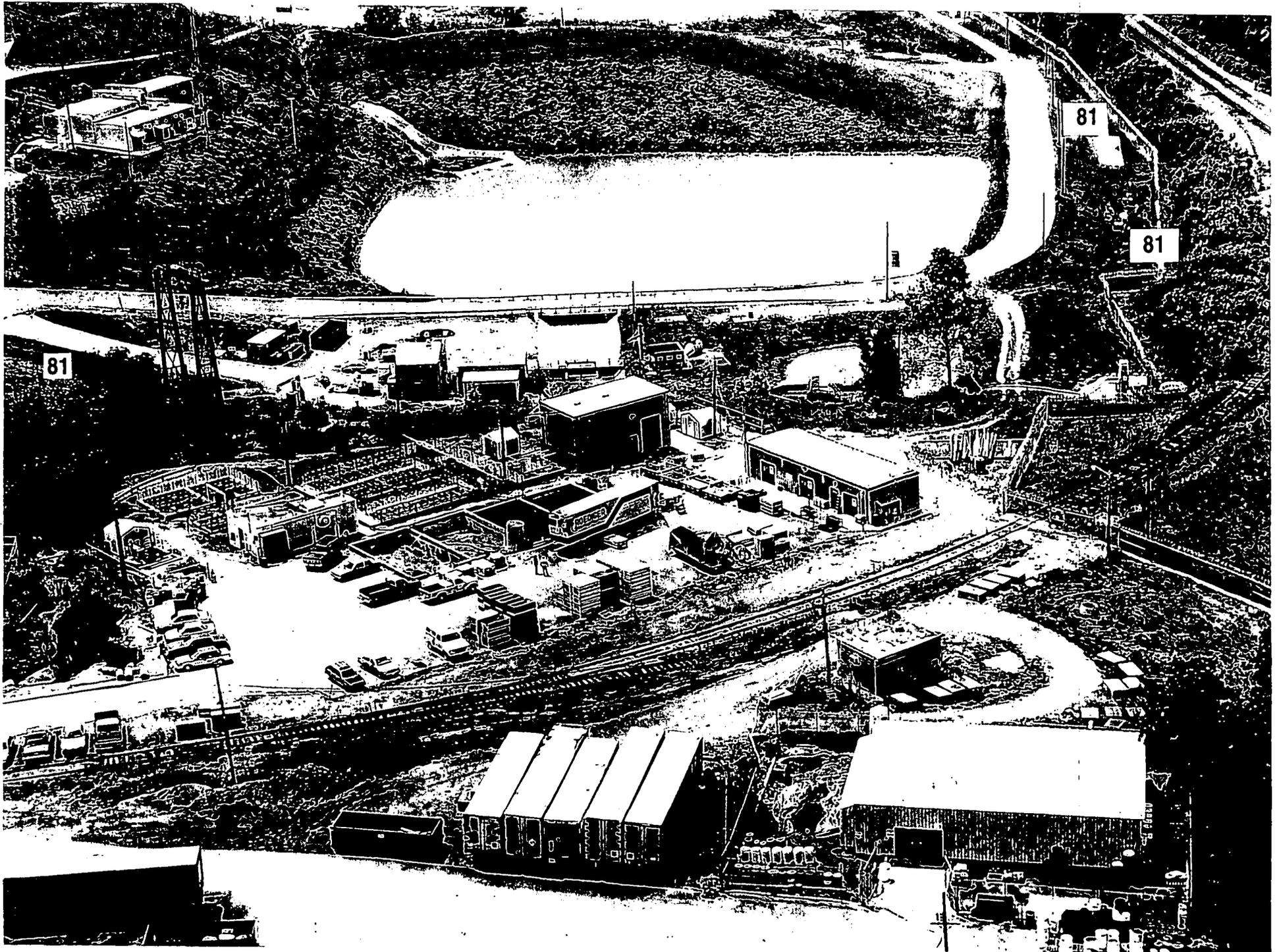
# MOUND PLANT

## Release Block C, I

### Potential Release Site

#### PRS 81





## PRS 81

### **PRS HISTORY:**

The "Drilling Mud Drum Storage Areas" were located near the groundwater monitoring wells (151/44-1, 152/46-2, and 153/55-2) adjacent to the overflow pond, in the southwest portion of Mound. The areas were used from the summer of 1987 to approximately 1989<sup>2</sup>.

### **PROCESS DESCRIPTION:**

The cuttings (i.e. muds) from cable-tool rig operations were stored in 55-gallon sealed drums. Approximately 12 drums were stored outside on bare soil at each storage area. The drums were disposed of at an approved off-plant facility following chemical analysis<sup>2</sup>. There is no data that indicates a release, nor is a release suspected<sup>1</sup>.

### **CONTAMINATION:**

The potential contaminant of concern is Barium<sup>1</sup>. More recent reports contend that the cuttings (mud) contained barium, an additive used in well construction but, the root documents do not support this contention. Per the project manager of the drilling program that generated the soil cuttings drums, drilling mud was never used in the construction of the wells. The drums were mislabeled thus becoming a PRS<sup>5</sup>. The geologic logs for the wells support this information<sup>3</sup>.

### **READING ROOM REFERENCES:**

- 1) Operable Unit 9 Site Scoping Report 12 - Site Summary Report, Dec 1994. (Pages 5-6)
- 2) OU9, Site Scoping Report: Vol. 7 - Waste Management, February 1993 (Pages 7-10)
- 3) OU9, Site Scoping Report: Volume 2 - Geologic Log and Well Information Report, May 1992 (Pages 11-19)
- 4) OU9, Site -Wide Remedial Investigation/Feasibility Study Work Plan - May 1992. (Pages 20-24)

### **OTHER REFERENCES:**

- 5) Memo: From 1987 DOE Environmental Survey Drilling Program Project Manager: John Price, September 1995 (Page 25)

### **PREPARED BY:**

Dennis J. Gault, Member of EG&G Technical Staff

**MOUND PLANT  
PRS 81  
FORMER WASTE STORAGE SITE  
DRILLING MUD DRUMS**

**RECOMMENDATION:**

This area was designated a Potential Release Site (PRS) due to suspected barium contamination from borehole cuttings that were stored in drums. This was based upon erroneous information as documented by the geologic logs and project manager's memorandum. Barium was never used in the borehole drilling operations and therefore cannot be a contaminant from the storage of the borehole cuttings. PRS 81 is therefore designated NO FURTHER ASSESSMENT.

**CONCURRENCE:**

DOE/MB: Arthur W. Kleinrath 5/7/96  
Arthur W. Kleinrath, Remedial Project Manager (date)

USEPA: Timothy J. Fischer 5/8/96  
Timothy J. Fischer, Remedial Project Manager (date)

OHIO EPA: Brian K. Nickel 5/8/96  
Brian K. Nickel, Project Manager (date)

**SUMMARY OF COMMENTS AND RESPONSES:**

Comment period from \_\_\_\_\_ to \_\_\_\_\_.

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

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**Reference Material**  
**PRS 81**

Environmental Restoration Program

**OPERABLE UNIT 9 SITE SCOPING REPORT:  
VOLUME 12 – SITE SUMMARY REPORT**

**MOUND PLANT  
MIAMISBURG, OHIO**

**December 1994**

**Final**

**U.S. Department of Energy  
Ohio Field Office**



**EG&G Mound Applied Technologies**

Description of History and Nature of Waste Handling						Hazardous Conditions and Incidents			Environmental Data		
No.	Site Name	Location	Status	Potential Hazardous Substances	Ref	Releases	Media	Ref	Analytes <sup>a</sup>	Results	Ref
72	Area 13, Polonium-Contaminated Wood from Dayton Unit IV	H-7	Historical	Polonium-210	1, 4, 5	None Suspected	S	6	14	Tables B.1 and B.9	6
73	Evaporator Storage Area (AKA Lower storage area)	H-7	Historical	Actinium-227, Cesium-137, Radium-226	4				14, 15, 16	Table B.9 RSS <sup>c</sup> Locations S0692 and S0697 (Appendix E in Ref. 6)	6
74	Quonset Hut (former)	H-7	Historical	Polonium-210, cobalt-60, bismuth					14	Table B.9 RSS <sup>c</sup> Locations S0684, S0685, and S0689 (Appendix E in Ref. 6)	6
75	Railroad Siding	G-6 G-7	Inactive	Thorium and daughters	4	Suspected thorium	S	4	14	Table B.1	6
76	Warehouse 9	G-7	Historical	Thorium-232	4	Suspected thorium	S	4	No Data		
77	Warehouse 10	G-9	Historical	Polonium-210	4	None suspected			No Data		
78	Warehouse 13	G-9	Historical	Reactor waste including Strontium-90, Cesium-137, and Nickel-63	4	Cesium 137	S	4	No Data		
79	Warehouse 15	E-8	Historical	Radioactive waste  Plutonium-238 wastes and sludge  Thorium sludge constituents (c)  Plutonium-238, thorium	4	Suspected	S	4	See Area 7 (No. 66)	Table B.9	6
81	Drilling Mud Drum Storage Areas (3 locations)	H-5 I-4	Historical	Barium	4, 5, 18	None Suspected			No Data		
	Storage Tank (Tank 118)				3				No Data		
83	Building 2 Propane Storage Tank (Tank 122)	H-7	Inactive	Propane	3				No Data		
84	Building 56 Diesel Fuel Storage Tank (Tank 223)	F-5	Historical	Diesel fuel	3	Tank Removed			No Data		

Environmental Restoration Program

**OPERABLE UNIT 9, SITE SCOPING REPORT:  
VOLUME 7 - WASTE MANAGEMENT**

**MOUND PLANT  
MIAMISBURG, OHIO**

February 1993

**FINAL  
(Revision 0)**

**Department of Energy  
Albuquerque Field Office**

Environmental Restoration Program  
EG&G Mound Applied Technologies



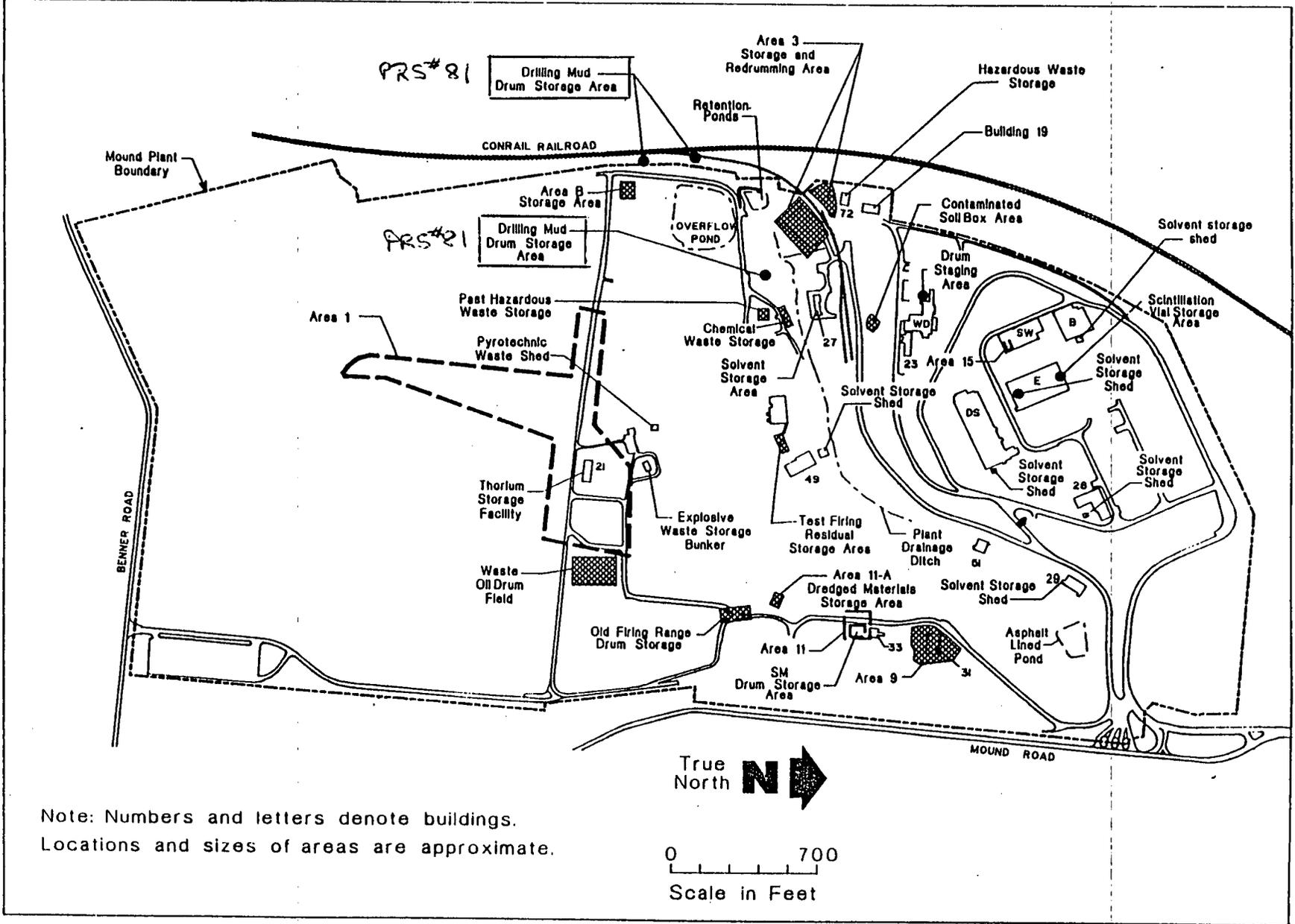


Figure 5.1 Waste storage areas.

conformance with geotechnical specifications before and during construction (DOE 1991a). In the construction of the overflow pond, glacial till was excavated and used for construction of the surrounding road embankments. On the east side, the pond embankment was benched into the hillside. Areas with steep slopes and areas of potentially concentrated runoff were lined with riprap, asphalt, or concrete for erosion protection. On the north and west sides, the road was elevated and constructed to specifications for water impoundment. The north side contains an overflow channel from the plant drainage ditch and the low-flow retention basins (DOE 1991a). The pond was constructed in the location of the past landfill. Wastes from the landfill were excavated and placed in the Lined Landfill to the south. A portion of the wastes from the past landfill still remains beneath the overflow pond.

The purpose of the pond is to retain storm water flows, settle sediment, and support compliance with the NPDES discharge standards for suspended solids. The pond receives storm water runoff and cooling water blowdown from the plant drainage ditch. During a 6-month period following construction of the sanitary landfill, leachate from the landfill dripped into the overflow pond (DOE 1991a).

The pond is designed to retain all facility effluents for five days in the event of a contaminant release. The retention time in the pond allows for settling of 95% of all silt. The overflow pond effluent is discharged through a standpipe in the northwest corner of the pond to the Miami-Erie Canal and the Great Miami River through NPDES Outfall 002.

Water and sediment samples have been collected from the overflow pond. Five full-column water samples were composited to form one sample for laboratory analysis; fifteen sediment plugs were composited to form one sample for laboratory analysis. The samples contained low-level radioactivity that probably resulted from surface erosion of soils within the watershed as well as erosion of the sediments along the plant drainage ditch. The sample analysis included RCRA EP toxicity parameters. Barium was found in the pond water and sediment leachate samples at concentrations of 0.028 mg/L and 0.52 mg/L, respectively. These concentrations are below the MCL of 1.0 mg/L for drinking water and the EP toxicity level of 100 mg/L for leachate from soils. Sample concentrations for all other parameters were below detection limits (IT 1987).

## 5.5. DRILLING MUD DRUM STORAGE AREAS

The drilling mud drum storage areas were located near the three groundwater monitoring wells (151/44-1, 152/46-2, and 153/55-2) adjacent to the overflow pond, in the southwestern portion of Mound (Figure 5.1) (DOE 1992g). The areas were used from the summer of 1987 to approximately 1989. The cuttings (i.e., muds) from cable-tool drilling rig operations were stored in 55-gallon sealed

drums. The cuttings contained barium, an additive used in well construction. Approximately 12 drums were stored outside on bare soil at each storage area. The drums were disposed of at an approved off-plant disposal facility following chemical analysis (Klingler 1991).

NOTE: THE ANALYSIS REFERENCED BY (KLWGLER, WASTE MANAGEMENT) COULD NOT BE LOCATED

Environmental Restoration Program

**OPERABLE UNIT 9,  
SITE SCOPING REPORT:  
VOLUME 2 - GEOLOGIC LOG  
AND WELL INFORMATION REPORT**

**MOUND PLANT  
MIAMISBURG, OHIO**

**May 1992**

**FINAL**

**Department of Energy  
Albuquerque Field Office**

Environmental Restoration Program  
Technical Support Office  
Los Alamos National Laboratory



<b>GEOLOGIC LOG</b>		<b>MOUND PLANT</b>		Project Manager John B. Price	PAGE: 1 of 3
Drilling Company	Bowser Morner	Borehole/Well Id	0151		
Drilling Method	Cable Tool	STATE PLANE COORDINATES			
Drilling Fluid	Water	North (ft)	597275.41		
Date Started	7/6/87	East (ft)	1495545.64		
Date Completed	7/6/87	Ground Surface Elev. (ft)	740.83		
Logged By	Mark Hampton	Top of Casing Elev. (ft)	742.83		
Checked By	Tom Tharp	Total Depth (ft)	48.8		
Comments:	Originally numbered 44-1.				

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description
	T	A	ID					
0				CASING: stainless steel, 4".  BACKFILL: Cement and bentonite grout.			SC	Brown clayey sand, trace gravel.
5	SS	LI	0001				SC	Brown clayey sand, trace gravel.
10	SS	LI	0002	SEAL: Bentonite pellets.			SC-SP	Gray clayey, gravelly sand.
15	SS	LI	0003				SC-SP	Gray clayey, gravelly sand.
20								

GROUNDWATER

DEPTH	HOUR	DATE
44.30	12:32	09/20/90



# GEOLOGIC LOG

# MOUND PLANT

Project Manager

~~John B. Price~~

PAGE:

2 of 3

Borehole/Well ID: **0151**

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description
	T	A	ID					
20	SS	LI	0004	FILTER PACK: #4 quartz sand.  SCREEN: 3/16" stainless steel, 4".			CL	Dark gray sandy, gravelly clay.
25	SS	LI	0005					Dark gray sandy, gravelly clay.
30	SS	LI	0006					Dark gray sandy, gravelly clay.
35	SS	LI	0007					Dark gray sandy, gravelly clay.
40	SS	LI	0008					Dark gray sandy, gravelly clay.
45	SS	LI	0009				CL	Dark gray sandy, gravelly clay, dense.

GROUNDWATER

DEPTH	HOUR	DATE
44.30	12:32	09/20/90



# GEOLOGIC LOG

# MOUND PLANT

Project Manager

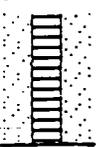
John R. Price

PAGE:

3 of 3

Borehole/Well Id

0151

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description
	T	A	ID					
50								
55								
60								
65								
70								
Total Depth = 48.8 feet.								

**GROUNDWATER**

DEPTH	HOUR	DATE
44.30	12:32	09/20/90



<b>GEOLOGIC LOG</b>		<b>MOUND PLANT</b>		Project Manager John B. Price		PAGE: 1 of 3	
Drilling Company Powser Morner			Borehole/Well Id 0152				
Drilling Method Cable Tool			STATE PLANE COORDINATES				
Drilling Fluid None			North (ft)		596982.64		
Date Started 7/7/87			East (ft)		1494955.35		
Date Completed 7/8/87			Ground Surface Elev. (ft)		705.81		
Logged By Mark Hampton			Top of Casing Elev. (ft)		707.81		
Checked By Tom Tharp			Total Depth (ft)		47.0		
Comments: Originally numbered 46-2.							

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description
	T	A	ID					
0				CASING: Stainless steel, 4".			CL	Dark gray to brown clay, soft, trace sand.
5	SS	LI	0001	BACKFILL: Cement and bentonite grout.			CL	Sandy, gravelly clay.
10	SS	LI	0002				SP	Gravelly sand.
15	SS	LI	0003				SP	Gravelly sand, some gravel consists of limestone fragments.
20				SEAL: Bentonite pellets.				

GROUNDWATER

DEPTH	HOUR	DATE
25.19	12:13	09/20/90

# GEOLOGIC LOG

# MOUND PLANT

Project Manager  
John B. Price

PAGE:  
2 of 3

Borehole/Well Id **0152**

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description								
	T	A	ID													
20	SS	LI	0004	FILTER PACK: #4 quartz sand.  SCREEN: Stainless steel, 4".			SP	Gravelly sand, some gravel consists of limestone fragments.								
25	SS	LI	0005						CL	Dark gray clay, dense, dry, some limestone fragments.						
30	SS	LI	0006								GP	Sand and gravel, wet, some limestone fragments, trace small clay lenses.				
35	SS	LI	0007										GC	Clayey sand and gravel.		
40	SS	LI	0008												SH	Dark gray shale, weathered, soft, dry.
45	SS	LI	0009													SH

GROUNDWATER

DEPTH	HOUR	DATE
25.19	12:13	09/20/90



# GEOLOGIC LOG

# MOUND PLANT

Project Manager  
John B. Price

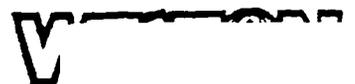
PAGE:  
3 of 3

Borehole/Well Id 0152

Depth	Sample			Well Con	Lith	USCS or Rock Type	Lithologic Description
	T	A	ID				
50							
55							
60							
65							
70							
							Total depth = 47.0 feet.

GROUNDWATER

DEPTH	HOUR	DATE
25.19	12:13	09/20/90



# GEOLOGIC LOG

# MOUND PLANT

Project Manager  
John B. Price

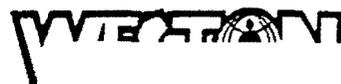
PAGE:  
1 of 2

Drilling Company	Bowser Morner	Borehole/Well Id	0153
Drilling Method	Cable Tool	STATE PLANE COORDINATES	
Drilling Fluid	None	North (ft)	596691.58
Date Started	7/9/87	East (ft)	1494953.87
Date Completed	7/10/87	Ground Surface Elev. (ft)	704.43
Logged By	Mark Hampton	Top of Casing Elev. (ft)	706.35
Checked By	Tom Tharp	Total Depth (ft)	41.5
Comments:	Originally numbered 55-2.		

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description
	T	A	ID					
0				CASING: Stainless steel, 4".			SW	Brown gravelly sand, fine to coarse grained, dry, trace silt and clay, gravel up to 2 inches in diameter.
5	SS	LI	0001	BACKFILL: Cement and bentonite grout.			SW	Brown gravelly sand, fine to coarse grained, dry, trace silt and clay, gravel up to 2 inches in diameter.
	SS	LI	0002				SW	Brown gravelly sand, fine to coarse grained, dry, trace silt and clay, gravel up to 2 inches in diameter.
10	SS	LI	0003				CL	Yellowish brown to grayish brown silty clay, moist, medium plasticity, trace of gravel.
15	SS	LI	0004	SEAL: Bentonite pellets.			CL	Yellowish brown to grayish brown silty clay, moist, medium plasticity, trace of gravel.
20								

GROUNDWATER

DEPTH	HOUR	DATE
23.00	07:40	07/10/87
24.15	12:11	09/20/90



# GEOLOGIC LOG

# MOUND PLANT

Project Manager  
John B. Price

PAGE:  
2 of 2

Borehole/Well Id **0153**

Depth	Sample			Well Materials	Well Con	Lith	USCS or Rock Type	Lithologic Description	
	T	A	ID						
20	SS	LI	0005	FILTER PACK: #4 quartz sand.  SCREEN: Stainless steel, 4".			CL	Yellowish brown to grayish brown silty clay, moist, medium plasticity, trace of gravel.	
25	SS	LI	0006					SC-SW	Grayish brown clayey gravelly sand, medium to coarse grained, wet, gravel up to 1 inch in diameter.
30	SS	LI	0007					GC	Grayish brown clayey sand and gravel, moist, sand is medium to coarse grained, clay is of low plasticity, gravel up to 2 inches in diameter.
35	SS	LI	0008					GW	Sand and gravel, moist, gravel composed of angular limestone fragments.
40	SS	LI	0009					SH	Grayish blue shale, hard.
45	Total Depth = 41.5 feet.								

GROUNDWATER

DEPTH	HOUR	DATE
23.00	07:40	07/10/87
24.15	12:11	09/20/90



Environmental Restoration Program

**REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
OPERABLE UNIT 9, SITE-WIDE  
WORK PLAN**

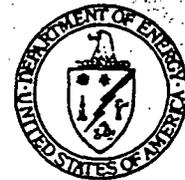
**MOUND PLANT  
MIAMISBURG, OHIO**

May 1992

**FINAL**

**Department of Energy  
Albuquerque Field Office**

Environmental Restoration Program  
Technical Support Office  
Los Alamos National Laboratory



D&D Program will complete a verification of residual radioactivity in soils at a given site. The ER Program will review the verification plans versus suitability for a CERCLA RI/FS, including adding sampling and analysis for hazardous chemicals, and then submit the plan to the EPA and the OEPA for regulatory review. The radiological verification and chemical characterization will be done simultaneously and constitute the remedial investigation. The concurrent sampling will take advantage of easy accessibility to the potentially contaminated surface of the excavation before it is backfilled with clean material.

- Verification Report, RI/FS: Using the combined data from the radiological verification and the hazardous chemical characterization, a verification report will be prepared for each contaminated soil area. The D&D Program normally prepares a verification report to certify a given soil area as clean. This is done for its internal programmatic closeout of an area.

The RI/FS for the D&D Program Sites will be assembled sequentially because of the sequencing of D&D soil excavation for different release sites over several years. Although it is anticipated that the D&D soil removal will satisfy CERCLA cleanup requirements as well, it is possible that a CERCLA remedial action could be required after the D&D cleanup is complete, and that a decision would be made during the RI/FS (verification). A baseline risk assessment based on CERCLA protocols has been scheduled for FY 1991 to provide the basis for a comparison of current D&D Program cleanup levels to CERCLA requirements.

It is anticipated that all radioactively contaminated soils at the Mound Plant, including the currently defined Operable Unit 5, Radioactively Contaminated Soils, and Operable Unit 3, D&D Program Sites, will eventually be consolidated into a single operable unit for the purposes of completing the remedial action and a CERCLA/NEPA ROD. If the D&D Program is able to clean up sufficiently to meet CERCLA requirements and it is verified that no significant levels of radionuclides or hazardous chemicals remain after D&D, no CERCLA remedial action will be required, and a "no action" ROD will be completed.

The conceptual site model is shown in Figure 3.14. The release sites included in this operable unit contain radioactively contaminated surface or near-surface soil scheduled for cleanup. However, the air, surface and ground water pathways will be investigated by other operable units. The site-wide operable unit will initiate investigations for all of these media.

### 3.7. LIMITED ACTION SITES

The Limited Action Sites include 35 sites brought forth from the RCRA Facilities Assessment (RFA 1988) as requiring "No Further Action" and are believed to have no contamination associated with them (Figure 3.15). These sites (Table III.5) were visually inspected by a joint DOE, EPA, and OEPA committee in August 1990. As of this writing, no further action will be taken on these sites, and no further documentation is planned. Appendix A contains individual descriptions of these sites.

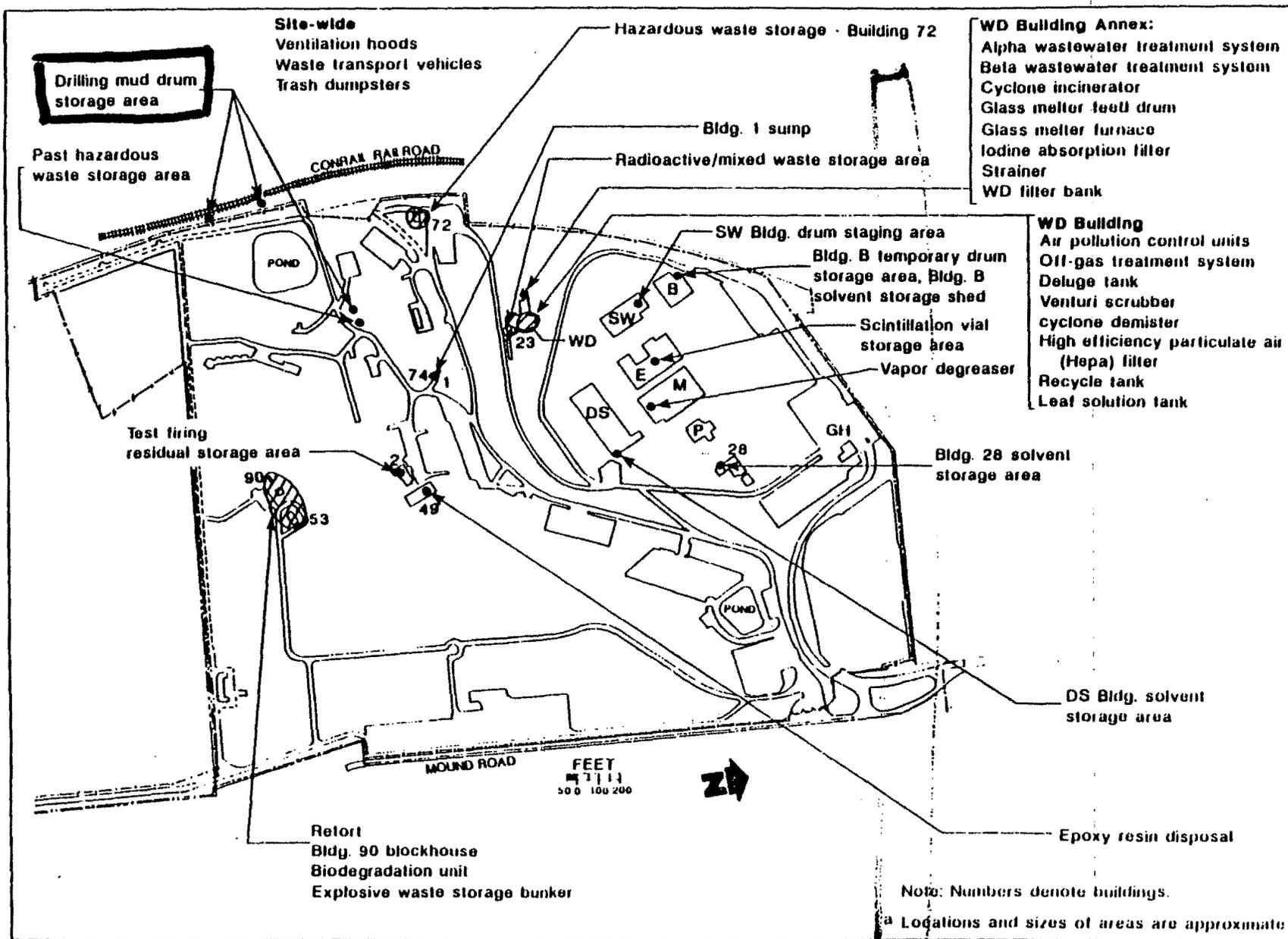


Figure 3.15. Limited Action Sites, Operable Unit 7a

Table III.5. Limited Action Sites, Operable Unit 7

Release Site	Suspected Contaminants
Scintillation vial storage area	No known contamination
Building 28 solvent storage area	No known contamination
DS Building solvent storage shed	No known contamination
Building B solvent storage shed	No known contamination
Hazardous waste storage building	No known contamination
Radioactive/mixed waste storage area	No known contamination
Drilling mud storage area	No known contamination
Building E temporary drum storage area	No known contamination
Test firing residual storage area	No known contamination
Strainer	No known contamination
Iodine absorption filter	No known contamination
Ventilation hoods	No known contamination
Retort	No known contamination
Building 90 blockhouse	No known contamination
Biodegradation unit	No known contamination
Explosive waste storage bunker	No known contamination
Building 1 sump	No known contamination
Waste transport vehicles	No known contamination
Glass melter feed drum	No known contamination
Trash dumpsters	No known contamination
Vapor degreaser	No known contamination
SW Building drum staging area	No known contamination
Glass melter furnace	No known contamination
Off-gas treatment system (7 components)	No known contamination
Epoxy resin disposal	No known contamination
Alpha wastewater treatment	No known contamination
Beta wastewater treatment	No known contamination
Cyclone incinerator	No known contamination
Past hazardous waste storage area (old Building 72)	No known contamination

Because no contamination is associated at any of the limited action sites, no conceptual transport model is presented, and no impacts to the public or environment are anticipated.

### 3.8. INACTIVE UNDERGROUND STORAGE TANKS, OPERABLE UNIT 8

This operable unit presently addresses six inactive underground storage tanks located by the WD building (Figure 3.16). Table III.6 lists the tanks and their contents. Additional information is given in Appendix A. However, Mound Plant has an ongoing program to remove underground storage tanks, primarily in compliance with regulations under RCRA Subtitle 1, administered by the Ohio Fire Marshall (EG&G 1989b).

The scope of the ER Program excludes those removals under state regulations, but does include the investigation and remediation of tanks subject to RCRA and CERCLA, including RCRA closures. The ER Program has an ongoing task to reevaluate the regulatory status of each of the underground tanks at Mound Plant (DOE 1991g). The Inactive Underground Storage Tank Program Plan - Mound UST Regulatory Status Review [DRAFT] (DOE 1991g) documented a total of 71 tanks in 24 separate buildings; 54 of which were documented in the Mound UST Management Plan (NUS 1989); documented in the Preliminary Review/Visual Inspection for the RCRA Facilities Assessment (RFA 1988); and one previously undocumented tank. After that evaluation is reviewed and concurred upon by the EPA and the OEPA, those tanks which are clearly subject to regulation by the Ohio Fire Marshall will continue to be managed and removed pursuant to those regulations, while tanks that are subject to CERCLA will be moved into the ER Program.

Figure 3.17 presents the preliminary conceptual site model for this operable unit. Operable Unit 8 contains one primary source type (underground tanks) and one primary release mechanism (leaks) resulting in a simplified conceptual site model. The impact to the public or the environment has not been evaluated.

### 3.9. SITE-WIDE (OPERABLE UNIT 9)

The Site-wide investigations are designed to collect information about the plant on a comprehensive basis and will focus on media and contaminants leaving the Site and background measurements of groundwater, soil, surface water/sediment, and air. Four of the 109 potential release sites--the retention basins, the overflow pond, the plant drainage ditch, and the asphalt-lined pond--are initially investigated by Operable Unit 9 (Figure 3.18).

M o u n d

Electronic Message/AOS

From : Price, John  
PRICEJ@WCPOST2.RFWESTON.COM@WINS@AOS1  
Dept. :  
Tel. No :  
Date : 07-Sep-1995 02:39pm EST  
Subject : Drilling Mud Drum Storage Site

→ Project Manager Listed  
on Geologic Logs

TO : gauldj@DOE-MD.GOV@WINS@AOS1  
CC : CRISWELC@ABQPOST.RFWESTON.COM@WINS@AOS1  
CC : "Criswell"  
CC : "Little"

Bill said that you were having some trouble with the write-up on the "Drilling Mud Drum Storage Site." Here's a suggested write-up.

In 1987 the DOE Environmental Survey, a program to collect reconnaissance environmental samples at all DOE sites, visited Mound and collected soil samples and drilled three monitoring wells. The drilling of these wells was done by the cable tool method and generated drill cuttings, which were containerized in 55-gallon drums and left on site. Because of delays in the return of analytical data to the DOE Survey teams, and because of additional delays in evaluating and releasing the data to Mound, the cuttings were left on site for over 2 years.

A RCRA Facility Assessment by a US EPA Contractor included visual inspection of the Mound Plant. During the visual inspection the drums of cuttings were observed and documented. For some reason these were erroneously labeled as "drilling mud", and it was stated that they were suspect for barium content (a common constituent of drilling muds). In fact, no drilling mud was used and the drums were merely cuttings.

When Mound was nominated to the National Priority List (NPL) and subsequently a Federal Facility Agreement was signed between DOE and EPA, CERCLA compliance took primacy over RCRA. As a result, the RFA was never formally published and errors in the draft were not corrected. One of the uncorrected errors was the mislabeling of the 1987 drill cuttings as "drilling mud."

The drill cuttings generated by the DOE Environmental Survey were disposed of in a manner consistent with the the disposition of all other investigation derived material from Mound.