



BWX Technologies, Inc.

Babcock & Wilcox, a McDermott company

3003-9805050005

1 MOUND ROAD
P.O. Box 3030
Miamisburg, Ohio 45343-3030
(937) 865-4020

ESC-094/98
April 2, 1998

Mr. Tim Fischer
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Mr. Brian Nickel
Ohio Environmental Protection Agency
Southwest District Office
401 E. Fifth Street
Dayton, Ohio 45402-2911

**SUBJECT: Contract No. DE-AC24-97OH20044
PRS 63, 405, 409, 410, 411: DELIVERY OF REVISED FINAL
VERSION OF POTENTIAL RELEASE SITE DATA PACKAGES**

**REFERENCE: Statement of Work Requirement C 5.3.2 -- Stakeholder
Participation in Mound**

Dear Mr. Fischer and Mr. Nickel:

The attached change pages for the Potential Release Site Data Package for PRS 63, 405, 409, 410, and 411 have been authorized for release to USEPA, OEPA, ODH, MMCIC, and the Public Reading Room by Art Kleinrath of MEMP. These documents has been revised to address stakeholder comments.

Page 2 PRS 63, 405, 409, 411, & 411

If you require further information, please contact Dave Rakel at extension 4203.

Sincerely,



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

LRB/nmg

Enclosures as stated

cc: Lisa Anderson, OEPA, (1) w/attachments
Ray Beaumier, OEPA, (1) w/attachments
Ruth Vandegrift, ODH, (1) w/attachments
Dann Bird, MMCIC, (1) w/attachments
Jeff Raines, TechLaw, (1) w/attachments
Administrative Record, (1) w/attachments
Public Reading Room, (5) w/attachments
DCC

PRS 63

REV	DESCRIPTION	DATE
0 PUBLIC RELEASE	Available for comments.	Aug. 25, 1997
1 FINAL	Comment period expired. Comments. Recommendation page annotated.	Nov. 20, 1997
2 FINAL	MESH comments received in "Review of Annual Report To The Stockholders On The Mound Plant - 1996." Comments and responses inserted in document.	Apr. 01, 1998



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

M.E.S.H., Inc.
Miamisburg Environmental Safety and Health
P.O. Box 773
Miamisburg, OH
45343-0773

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M.E.S.H. INC.

MIAMISBURG ENVIRONMENTAL SAFETY AND HEALTH

P.O. Box 773
MIAMISBURG, OH
45343-0773

REVIEW OF ANNUAL REPORT TO THE STOCKHOLDERS ON THE MOUND
PLANT-1996

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PRS 405

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0 PUBLIC RELEASE	Available for comments.	Aug. 25, 1997
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PRS 409

REV	DESCRIPTION	DATE
<p>0</p> <p>PUBLIC RELEASE</p>	<p>Available for comments.</p>	<p>Aug. 06, 1997</p>
<p>1</p> <p>FINAL</p>	<p>Comment period expired. Comments. Recommendation page annotated.</p>	<p>Nov. 20, 1997</p>
<p>2</p> <p>FINAL</p>	<p>MESH comments received in "Review of Annual Report To The Stockholders On The Mound Plant - 1996." Comments and responses inserted in document.</p>	<p>Apr. 01, 1998</p>



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PRS 411

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#63 is near Building 19. A small area contaminated with low levels of solvents and radionuclides. Instead of further investigations of this small area, clean-up is recommended because it is more cost effective. I concur.



BWX Technologies, Inc.

Babcock & Wilcox, a McDermott company

Babcock & Wilcox of Ohio, Inc.

1 Mound Road
P.O. Box 3030
Miamisburg, Ohio 45343-3030
(937) 865-4020

ESC-094/98
April 2, 1998

Mr. Tim Fischer
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Mr. Brian Nickel
Ohio Environmental Protection Agency
Southwest District Office
401 E. Fifth Street
Dayton, Ohio 45402-2911

SUBJECT: Contract No. DE-AC24-97OH20044
**PRS 63, 405, 409, 410, 411: DELIVERY OF REVISED FINAL
VERSION OF POTENTIAL RELEASE SITE DATA PACKAGES**

REFERENCE: Statement of Work Requirement C 5.3.2 -- Stakeholder
Participation in Mound

Dear Mr. Fischer and Mr. Nickel:

The attached change pages for the Potential Release Site Data Package for PRS 63, 405, 409, 410, and 411 have been authorized for release to USEPA, OEPA, ODH, MMCIC, and the Public Reading Room by Art Kleinrath of MEMP. These documents has been revised to address stakeholder comments.

Page 2 PRS 63, 405, 409, 411, & 411

If you require further information, please contact Dave Rakel at extension 4203.

Sincerely,



Linda R. Bauer, Ph.D.

Department Manager, Environmental Safeguards & Compliance

LRB/nmg

Enclosures as stated

cc: Lisa Anderson, OEPA, (1) w/attachments
Ray Beaumier, OEPA, (1) w/attachments
Ruth Vandegrift, ODH, (1) w/attachments
Dann Bird, MMCIC, (1) w/attachments
Jeff Raines, TechLaw, (1) w/attachments
Administrative Record, (1) w/attachments
Public Reading Room, (5) w/attachments
DCC

PRS 410

REV	DESCRIPTION	DATE
0 PUBLIC RELEASE	Available for comments.	Aug. 25, 1997
1 FINAL	Comment period expired. Comments. Recommendation page annotated.	Nov. 20, 1997
2 FINAL	MESH comments received in "Review of Annual Report To The Stockholders On The Mound Plant - 1996." Comments and responses inserted in document.	Apr. 01, 1998



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

M.E.S.H., Inc.
Miamisburg Environmental Safety and Health
P.O. Box 773
Miamisburg, OH
45343-0773

Thank you for reviewing the PRS Data Packages and recommendations for PRS 405, 409, 410, 411, and 63. Your concurrence with the recommendations for these PRSs is noted.

We note your concern about the TPH working group. As planning for these removals progresses and clean-up standards for Total Petroleum Hydrocarbons (TPH) in soil are developed for the action memo, the Core Team will ensure that the clean up standards meet the ARARs associated with these removal actions. We will review the TPH Working Group guidance for its potential applicability.

Sincerely,

DOE/MEMP: Arthur W. Kleinrath 2/26/98
Arthur W. Kleinrath, Remedial Project Manager

USEPA: Timothy J. Fischer 2/26/98
Timothy J. Fischer, Remedial Project Manager

OHIO EPA: Brian K. Nickel 2/26/98
Brian K. Nickel, Project Manager



"Protecting Your World"

M.E.S.H. INC.

MIAMISBURG ENVIRONMENTAL SAFETY AND HEALTH

P.O. Box 773
MIAMISBURG, OH
45343-0773

REVIEW OF ANNUAL REPORT TO THE STOCKHOLDERS ON THE MOUND
PLANT-1996

1. This report lists work activities conducted under the Agreement In Principle and Cost Recovery Grant by the Ohio EPA. I have the following comments.
2. State the objectives of the work, clearly and concisely in the beginning of the document. It is difficult to understand specifically what the project goals are and how the information will be used. These are two very important issues that need to be incorporated in the next report.
3. Attempts were made to summarize the results of the activities (Chapters 2,3,4) and conclusions were presented. However, there was no analysis of data provided to support their conclusions. This is a significant shortcoming that undermines all conclusions reported in this document. In addition, the text cites sampling results from other studies, but does not present the data or cite the references that the data were taken from. At best, this document is a compilation of raw data that needs analyses and interpretation, in light of specified project goals.
4. No maps were provided for the soil radiological and chemical analyses under the cost recovery grant. It is impossible to interpret the data if the location of the soil samples is not provided.
5. The comparison of analytical data risk based guidance values or other pertinent values is a good idea. But only the soil data was evaluated in this manner. All media needs this type of information for comparison purposes. Please include this in your next report.
6. For environmental samples that were taken off site, risk based values for residential exposure need to be used, not a construction worker scenario. Please provide more information on the assumptions used for specified risk based guideline values. Very little interpretation of the data was completed relative to MCLs or risk based guideline values for soil.
7. Thorium radionuclides are a concern because of conflicting clean-up guidance values for soil (5/15 pCi/g for Th232, 230 and 228 (DOE) vs 50, 44 and 0.85 pCi/g (Risk Based Guidance) for Th232, 230 and 228, respectively). The slope factors for these radionuclides have changed since DOE's policy on clean-up on Thorium, thus a risk based approach, that includes radionuclide daughters, is the only valid approach. I think that O EPA needs to revisit this issue and develop a policy that is protective of human health both on the Mound property and within the community that surrounds the Mound. Thorium is detected in the environment that surrounds the Mound.



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MIAMISBURG ENVIRONMENTAL SAFETY AND HEALTH

REVIEW OF ANNUAL REPORT TO THE STOCKHOLDERS ON THE MOUND PLANT-1996

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