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CH2MHILL

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

ER/WM-131/05
March 30, 2005

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

ATTENTION: Paul Lucas

SUBJECT: Contract No. DE-AC24-03OH20152
Statement of Work Requirement 055 - Regulator Reports
PRs 67-70, PUBLIC FACT SHEET, FINAL

Dear Ms. Marks:

Attached is the following Final document for your records:

- PRs 67-70: Site Stormwater Drainage System, 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 me at 937-865-4203.

Sincerely,

Val K Darnell for DAR

David A. Rakel
CERCLA Lead

DAR/ms

Enclosures

cc: Tim Fischer, USEPA, (1) w/attachments
Brian Nickel, OEPA, (1) w/attachments
Ruth Vandegrift, ODH, (1) w/attachments
Mary Wojciechowski, Tetra Tech, (1) w/attach
Sue Smiley, DOE/MCP, (1) w/attachments
Lisa Rawls, MCP, w/o attachments
Randy Tormey, DOE/OH, (1) w/attachments
Git Desai, DOE/HQ, (1) w/attachments
Mark Spivey, CH2M Hill, (1) w/attachs
Karen Arthur, CH2M Hill, (1) w/attachs
Frank Bullock, MMCIC (2) w/attachments

Public Reading Room (4) w/attachments
ER Records, CH2M Hill, (1) w/attachs
DCC (1) w/attachments
Admin Record (2) w/attachments
John Lehew, CH2M Hill, w/o attachments
Dave Rakel, CH2M Hill, w/o attachments
Val Darnell, CH2M Hill, w/o attachments
Jim Fontaine, CH2M Hill, w/o attachments
MOAT Coordinator
file

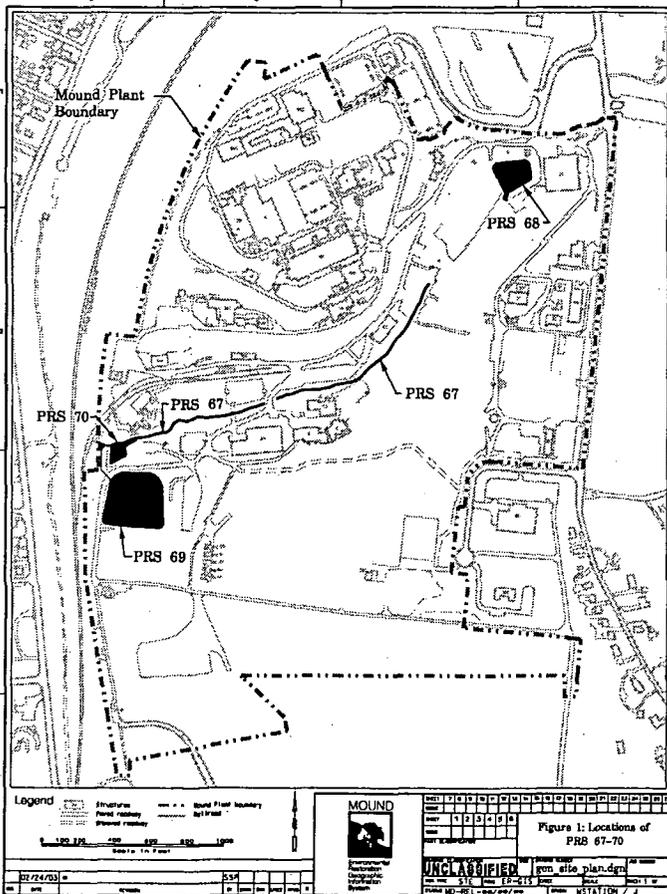
PUBLIC FACT SHEET

PRSS 67, 68, 69, & 70: Site Stormwater Drainage System

This Fact Sheet satisfies the Public Notification requirement set forth in the Contingent Action Memorandum¹.

Background. Potential Release Sites (PRSS) 67 through 70 are the primary components of the site stormwater drainage system as identified in the following table:

PRSS	Description
67	Plant Drainage Ditch
68	Asphalt Lined Pond - North
69	Plant Overflow Pond - South
70	Retention Basins and Weir Basin



PRSS 67 is an open, unlined channel that constitutes the primary plant drainage ditch (see Figure 1).

PRSS 68 is the asphalt lined pond in the northeast corner of the site. The pond was constructed in the 1970s to receive stormwater runoff from the

east central portion of the site to support reduction in suspended solids in runoff.

PRSS 69 is the overflow pond and outfall pipe located at the south end of the drainage ditch. It is used to retain storm water flows, settle sediment, and support compliance with the National Pollutant Discharge Elimination System (NPDES) discharge standards for suspended solids. The pond is fed by two inlets, one being the PRSS 67 drainage ditch and the other being a drainage structure (PRSS 418) which was binned No Further Assessment. This PRSS addresses only the stormwater sediment within the pond.

PRSS 70 is also located at the south end of the drainage ditch (PRSS 67) and consists of an open impoundment with earthen sides used to control the flow of water and settle sediment. The bottom is partitioned into three basins by concrete dividers. PRSS 70 discharges into the weir basin. This PRSS also includes the weir basin that moderates the flow so that the discharge volume can be measured.

Characterization. Several investigations have been conducted at or near the subject PRSSs. Water and sediment samples have been collected and analyzed. All contaminants detected in the composited water samples were at concentrations less than applicable guideline values. The sediment sample results indicated exceedances to cleanup objectives (risk criteria), maximum results of which are presented in pCi/g in the table below.

Analyte	PRSS	Maximum Result	Cleanup Objective
Plutonium-238	67	535	55
	68	257	55
	69	34	55
	70	749	55
Thorium-228	67	1.23	2.6
	68	9.44	2.6
	69	1.4	2.6
	70	1.27	2.6
Thorium-232	67	1.09	2.1
	68	0.44	2.1
	69	2.70	2.1
	70	1.57	2.1

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

PUBLIC FACT SHEET

PRs 67, 68, 69, & 70: Site Stormwater Drainage System

The maximum sample result of the only chemical found above cleanup objective is benzo(a)pyrene (8.0 mg/kg vs. 4.1 mg/kg CO). Benzo(a)pyrene is present in urban environments as a result of incomplete combustion in motor vehicles and is a component of asphalt based products. Five sample results were above the cleanup objectives; four were located within the asphalt-lined pond (PRS 68) and one at the discharge pipe from the asphalt-lined pond.

The Core Team originally recommended Further Assessment for these PRs. Subsequently, the Department of Energy determined that a **Removal Action (RA)** per the Contingent Action Memo¹ is appropriate based on results above COs. RA COCs are Pu-238, Th-232, and isolated instances of benzo(a)pyrene.

The **Work Plan** for Contingent Removal Actions², supplemented by the Unique Work Package, includes procedures, instructions, and applicable permits and notifications required to safely conduct the work. Erosion and runoff controls will be managed per the SWP3³.

The RA will consist of excavation of contaminated soil and sediment in areas indicated by sample results above the cleanup objectives and shipping this soil to an approved disposal facility. Post-excavation sampling will be performed within the excavations per a Core Team-approved **Verification Sampling & Analysis Plan (VSAP)**.

Schedule. This Fact Sheet will be in public review for 30 days, ending April 29, 2004. The RA is planned to begin in late summer 2004. As currently planned, removal activities for PRs 67-70 will not begin until all upgradient contamination has been remediated. However if the removal of upgradient contamination is not completed by the time removal activities begin in PRs 67-70, additional precautions such as supplemental sediment and silt controls will be put in place on all upgradient projects at the project perimeters to ensure that upgradient contamination does not re-contaminate these PRs. Subsequent confirmatory sampling at the appropriate outfalls into the drainage system will occur to ensure cross contamination did not

take place. These precautions will be further specified within the Core Team approved Removal Work Plan and Verification Sampling Plan. 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.

Expected excavation of approximately 3220 yd³ (2460 m³) with possible maximum excavation of 8730 yd³ (6675 m³) and verification are expected to cost less than \$500,000.

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

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

MOUND PLANT PRS 67, 68, 69, and 70

RECOMMENDATION:

Potential Release Sites (PRSs) 67 through 70 are the primary components of the site stormwater drainage system. Several investigations have been conducted at or near the subject PRSs. Water and sediment samples have been collected and analyzed. All contaminants detected in the composited water samples were at concentrations less than applicable guideline values. The sediment/soil sample results indicated exceedances to cleanup objectives (CO) and the maximum results of which are 749 pCi/g Pu-238 (CO 55 pCi/g), 9.44 pCi/g Th-228 (CO 2.6), and 2.7 pCi/g Th-232 (CO 2.1 pCi/g) in the surface and subsurface sediments/soils. The depth of contamination varies from the surface to a maximum of about 6 feet within the PRSs. Additional sampling has and will occur over the course of the remediation. The area continues to be evaluated. (Note: A CD including more recent data than are included in the original PRS Packages is attached.)

Therefore, a RESPONSE ACTION is recommended for the removal of the contamination.

CONCURRENCE:

DDE/MCP:	<i>Paul Lucas</i>	12/15/04
	Paul Lucas, Remedial Project Manager	Date
USEPA:	<i>Timothy Fischer</i>	12/15/04
	Timothy Fischer, Remedial Project Manager	Date
OEPA:	<i>Brian Nickel</i>	12/15/04
	Brian Nickel, Remedial Project Manager	Date

SUMMARY OF COMMENTS AND RESPONSES:

Comment period from _____ to _____

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

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The Mound Core Team
500 Capstone Circle
Miamisburg, OH 45342

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 67-70 Fact Sheet, Public Review Draft. 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:	<u>Paul Lucas</u>	12/2/04
	Paul Lucas, Remedial Project Manager	date
USEPA:	<u>Timothy J. Fischer</u>	12/2/04
	Timothy J. Fischer, Remedial Project Manager	date
OEPA:	<u>Brian K. Nickel</u>	12/2/04
	Brian K. Nickel, Project Manager	date

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**Response to MMCIC Comments on the
PRS 67-70 Fact Sheet
Public Review Draft
March 2004**

Substantive Comments

Comment 1. The fact sheet indicates that sampling results in each of the four PRS had results that exceed the cleanup level for the site. To support this information, MMCIC would request a copy of the sampling data collected to date for these PRSs, including sample locations, levels of contamination and date of sampling event. Due to the size of each of these PRSs and their continued use as part of the future site, MMCIC believes it is imperative that each PRS be adequately characterized.

Response 1. A compact disk is being made available which contains a map of PRS 68 and a map of PRSs 67, 69, 70 and the 41 Ditch; these maps show samples and location (detects in black and > cleanup in red). The complete sample databases (2) for the asphalt pond, the ditch, retention basin, and overflow pond is also on the CD. The CD will be sent to MMCIC under separate cover, when available. Please note, additional sampling has and will occur over the course of the remediation. The area continues to be evaluated.

Comment 2. With the above stated concern in mind, MMCIC would request to review the work plan as soon as it becomes available. It is MMCIC's current understanding that only select "hot spots" will be targeted for remediation. Again, given the size of these PRSs and the ability of any potential contamination to migrate with the storm water, MMCIC is concerned that targeted removal will allow a higher risk of leaving contamination on the site.

Response 2. A copy of the Core Team approved Removal Work Plan and subsequent updated excavation maps will be provided under separate cover for your information.

Comment 3. The fact sheet states "As currently planned, removal activities for PRSs 67-70 will not begin until all upgradient contamination has been remediated." However, if the removal of upgradient contamination is not completed by the time removal activities begin in PRSs 67-90, additional precautions such as supplemental sediment and silt controls will be put in place on all upgradient projects at the project perimeters to ensure that upgradient contamination does not re-contaminated these PRSs." MMCIC has significant concerns about the timing of the remediation activity. Although MMCIC agrees that every attempt will be made to control stormwater flow from areas with contamination still upgradient from these PRSs, it is our opinion that even the best stormwater BMPs (Best Management Practices) are not always effective or efficient. Storm Water BMPs are certainly not immune from being damaged or destroyed and may require significant monitoring to ensure effectiveness. Heavy rains could easily

wash upgradient contamination into these PRSs, creating the potential for recontamination. MMCIC would seriously urge the DOE to reschedule the remediation of these PRSs until upgradient sources have been remediated and confirmed clean.

Response 3. Work on the site drainage system will be managed in accordance with site priorities, potential contamination risks, and the site terminal objective in mind. The projects will be managed such that they will be regulatory compliant and provide clear evidence of an end state condition in accordance with cleanup criteria. If DOE and CH2M Hill elect to remediate PRS 67 prior to remediating and verifying all upgradient sources, DOE and CH2M Hill do so at the risk of repeating some cleanup in the site drainage system.

Comment 4. It was not possible to determine from the information in the fact sheet what the extent of removal will be for PRS 68, the asphalt lined pond. Will the asphalt lining also be removed and disposed? Will sampling, and removal if necessary, extend to the soils under the pond? It is MMCIC's understanding that based on the approval of the Mound Reuse Plan, this pond will be not only remediated but also removed. The current reuse plan shows Vanguard Boulevard located through the center of what is currently the pond. (Please see the attached map of the future site). MMCIC is concerned that if the asphalt is left in place, potential contamination found in or beneath the asphalt could cause additional environmental problems in the future. We would request that the entire pond, along with the asphalt, be removed and the area filled and regraded.

Response 4. Any radiological contamination found above the cleanup objective in the sediment and asphalt lining was removed in accordance with the approved work package. DOE recognizes the Comprehensive Reuse Plan (CRP) represents the MMCIC's vision for the MATC; however, the CRP does not dictate the scope of environmental remediation performed by DOE under CERCLA and the Mound 2000 process. DOE will clean parcels to an Industrial/Commercial land use, and will convey parcels upon completing the CERCLA 120(h) process for property transfer. Further, an additional PRS (PRS 442) has been established to address the soil/fill below the pond.

Comment 5. As you will find detailed in the Mound Reuse Plan discussed above, MMCIC will develop a series of detention basins to control stormwater runoff from the site. It may then become appropriate for MMCIC to fill in the drainage channel (PRS 67) or other areas in the current detention system. MMCIC wants to confirm that altering the current drainage system and/or constructing the future system will not cause any environmental impact issues.

Response 5. This is outside the scope of the current Site Storm Water Drainage System project (PRS 67-70 Removal Action). DOE must remediate the MCP site consistent with CERCLA requirements for industrial/commercial re-use. DOE recognizes that the CRP represents the MMCIC's vision for the MATC, and that achieving that vision could entail reconfiguring portions of the former DOE real property & infrastructure. Once DOE has met the CERCLA requirements and has transferred the

property to the MMCIC, the MMCIC may proceed with property improvements envisioned by the CRP, so long as those improvements comply with the CERCLA remedy. It is also the MMCIC's responsibility to comply with other applicable Federal, State or local regulations designed to prevent environmental impacts (e.g., to wetlands), if proposed property improvements in the CRP have the potential to negatively impact those natural resources.

Comment 6. MMCIC understands that as part of the remediation project, the current drainage channel (PRS 67) will be dredged, regraded and corrected to prevent erosion so that it will operate as a clear functioning channel. As it currently stands, the channel is not being maintained and is clogged with undergrowth.

Response 6. The project associated with PRS 67 provides for the "remediation" of the radioactively contaminated soil; it does not include maintenance activities. DOE performs the necessary level of maintenance to keep the site drainage system functional. DOE has evaluated whether drainage areas (either those engineered by DOE, or those that develop over time in naturally-occurring low areas) are jurisdictional wetlands or Waters of the State (i.e., wetlands/streams that would be subject to Federal or State regulations designed to protect natural resources such as wetlands). DOE has complied with those regulations for all regulated bodies of water on the MCP site.

Comment 7. MMCIC considers PRS 69 – Overflow Pond to have the potential for some of the most serious environmental impact to this site. PRS 69 was constructed to collect stormwater runoff from the site and to allow for the settling of suspended solids in order to meet the NPDES permit requirements. As such, this PRS received storm water from any associated contamination from the majority of the developed site. In addition, the PRS 69 Data Package dated August 2001 states that "During its construction in 1979, leachate from the adjacent landfill reportedly entered the pond." Finally, the pond was constructed in the location of a landfill, which would allow for potential contamination below the pond liner. It is with this information in mind that MMCIC believes that the sediments in the pond and the soils under the pond could have serious levels of contamination. In fact, PRS 69 was discussed at length as part of the OU-1 area in the recent OU-1 Technical Working Group meetings.

The current fact sheet shows only one contaminate in excess of current cleanup standards for PRS 69; this contaminant being Thorium 232 at 2.70 pCi/g as compared to the cleanup objective of 2.1 pCi/g. However, the PRS 69 data package from 2001 lists thirteen different contaminants that exceed Guideline Criteria from limited sampling conducted at PRS 69. These contaminants include benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i) perylene, beryllium, dibenz(a,h) anthracene, ideno(1,2,3-cd)pyrene, plutonium-238, potassium-40, radium-226, thorium-228, thorium-230, thorium-232, and uranium-234. MMCIC respectfully believes that this PRS warrants much more investigation and consideration than outlined in this fact sheet.

Response 7. PRS 69 addresses the overflow pond, which is part of the site storm drainage system. The PRS is concerned with potential contamination, which may have accumulated in the pond. The PRS is not meant to address OU1 or anything beneath the pond; however, the Core Team is addressing this area as part of an evaluation of the OU1 remedy.

Comment 8. As always, MMCIC would appreciate the opportunity to work with the DOE to coordinate and integrate any cleanup and reuse activities for these PRSs. In this effort, MMCIC would welcome the opportunity for a meeting with MMCIC, City of Miamisburg, and DOE representatives to explore opportunities for partnering on this removal and restoration effort.

Response 8. Thank you for your review and input to the document. The DOE acknowledges MMCIC's request and encourages MMCIC to provide DOE with a written proposal on a partnering option for reaching an end state for PRSs 67-70 that is compliant with CERCLA, and is also compatible with future property improvements envisioned by the MMCIC in its Comprehensive Reuse Plan.

Errata

Comment 1. No comments.



The Mound Core Team
 500 Capstone Circle
 Miamisburg, OH 45342

December 2004

Ms. Beth Moore
 Environmental Manager
 City of Miamisburg
 600 North Main
 Miamisburg, Ohio 45342

Dear Ms. Moore:

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 Public Fact Sheet for PRSs 67-70. 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>	12/2/04
	Paul Lucas, Remedial Project Manager	date
USEPA:	<i>Timothy J. Fischer</i>	12/2/04
	Timothy J. Fischer, Remedial Project Manager	date
OEPA:	<i>Brian K. Nickel</i>	12/2/04
	Brian K. Nickel, Project Manager	date

**Response to City of Miamisburg Comments on the
Public Fact Sheet for PRSs 67-70
Public Review Draft
March 2004**

Comment 1. PRSs 67-70 comprise a large portion of the storm water collection system at the Mound. It is not evident from the data presented in the fact sheet table how many samples were actually taken to characterize this portion of the storm water collection system. PRS 67, in particular, covers a large spread out area. The City has concerns that the extent of contamination in these PRSs has not been fully characterized. Please provide a map showing all sample locations and an accompanying data table showing all sample results.

Response 1. A compact disk is being made available which contains a map of PRS 68 and a map of PRSs 67, 69, 70 and the 41 Ditch; these maps show samples and location (detects in black and > cleanup in red). The complete sample databases (2) for the asphalt pond, the ditch, retention basin, overflow pond is also on the CD. Please note, additional sampling has and will occur over the course of the remediation. The area continues to be evaluated.

Comment 2. PRS 67 is the primary drainage ditch. The ditch line has heavy foliage in certain areas. Were the heavy foliage areas characterized? From the centerline of the ditch, how many feet out were characterization samples taken?

Response 2. The data provided on the compact disk for Comment #1 shows extensive sampling was done in the drainage ditch and the PRS 41 ditch upstream of the retention basins. This set of sampling included the foliage areas. Please note, additional sampling has and will occur over the course of the remediation. The area continues to be evaluated.

Comment 3. PRS 68 is the asphalt lined pond. This pond does not exist in the reuse plan, in fact a roadway will be located there. Will all contaminated sediments of the pond, all contaminated portions of the asphalt lining and any contamination beneath the pond be removed?

Response 3. Any radiological contamination found above the cleanup objective in the sediment and asphalt lining was removed in accordance with the approved work package. DOE recognizes the Comprehensive Reuse Plan (CRP) represents the MMCIC's vision for the MATC; however, the CRP does not dictate the scope of environmental remediation performed by DOE under CERCLA and the Mound 2000 process. DOE will clean parcels to an Industrial/Commercial land use, and will convey parcels upon completing the CERCLA 120(h) process for property transfer. Further, an additional PRS (PRS 442) has been established to address the soil/fill below the pond.

Comment 4. PRS 69 is the clay lined pond in the OU-1 area. This pond does not exist in the reuse plan, in fact a building lot will be located there. Merely addressing the pond sediment is insufficient when it is a well known fact that this pond was constructed over portions of the historic landfill area. The clay liner of the pond and the soils beneath the pond need to be evaluated for all contaminants of concern and remediated as necessary.

Response 4. DOE recognizes the CRP represents the MMCIC's vision for the MATC; however, the CRP does not dictate the scope of environmental remediation performed by DOE under CERCLA and the Mound 2000 process. DOE will clean parcels to an Industrial/Commercial land use, and will convey parcels upon completing the CERCLA 120(h) process for property transfer. PRS 69 addresses the overflow pond, which is part of the site storm drainage system. The PRS is concerned with potential contamination, which may have accumulated in the pond. The PRS is not meant to address OU1 or anything beneath the pond; however, the Core Team is addressing this area as part of an evaluation of the OU1 remedy.

Comment 5. The City would appreciate the opportunity to review the Work Plan as soon as it becomes available, as the Fact Sheet does not provide enough details as to when the work will take place or the exact locations of removal activities.

Response 5. A copy of the Core Team approved Removal Work Plan and subsequent updated excavation maps will be provided under separate cover for your information.

Comment 6. The City has serious concerns that the fact sheet suggests there is the possibility of beginning remediation of PRSs 67-70 prior to completion of all up gradient remedial activity. Storm water BMPs are not 100% effective. Outfall sampling will not likely show any cross contamination as the radioactive contaminants will be in the sediment or surrounding soils. The City strongly urges that PRSs 67-70 remediation should not begin until all up gradient work is complete.

Response 6. Work on the site drainage system will be managed in accordance with site priorities, potential contamination risks, and the site terminal objective in mind. The projects will be managed such that they will be regulatory compliant and provide clear evidence of an end state condition in accordance with cleanup criteria. If DOE and CH2M Hill elect to remediate PRS 67 prior to remediating and verifying all upgradient sources, DOE and CH2M Hill do so at the risk of repeating some cleanup in the site drainage system.

General Storm Water Comments

Comment 1. Mound currently holds a NPDES discharge permit for storm water. The future reuse of the site will not require a NPDES storm water permit. The outfall to the Great Miami River from the Mound will be incorporated into the City's MS4 general NPDES permit. What is the timeline for termination of the Mound NPDES storm water permit?

Response 1. Current plans call for terminating DOE's NPDES Permit on or before transfer of the final parcel to the MMCIC, which is currently scheduled for no later than March 2006.

Comment 2. The City understands that DOE intends on transferring the storm utility to the City. Following a similar process to that of the other utilities (water and sanitary) intended to be transferred to the City, the City would review the maintenance history of the system. PRS 67 appears to have some bank erosion issues that have not been dealt with over the years. Is there any plan to stabilize the eroding banks? Additionally, the City would base the transfer decision on the recommendation from the Core Team that the entire storm water collection system is acceptable for transfer.

Response 2. DOE concurs with your comment that the City of Miamisburg should base any reuse decision on the recommendation from the Core Team that the stormwater collection system is protective. With respect to the City's concern of bank erosion in PRS 67, the scope of PRS 67 provides for remediation of contaminated soil/debris. DOE performs the necessary level of maintenance to keep the site-wide drainage system functional. DOE has evaluated whether drainage areas (either those engineered by DOE, or those that develop over time in naturally occurring low areas) are jurisdictional wetlands or Waters of the State (e.g., wetlands/streams that would be subject to Federal or State regulations designed to protect natural resources such as wetlands). DOE has complied with those regulations for all regulated bodies of water on the MCP site.

Comment 3. Currently the OU-1 pump and treat system discharges to the Mound storm water collection system. It appears that the OU-1 pump and treat system will continue to be in operation after the site closure date in 2006. In order for DOE to continue discharging to the storm system, after the system transfers to the City, DOE would have to obtain permission to discharge to the City's storm system. The City has never granted permission for discharge of remediation effluent to the storm system. Typically the discharger makes a request to the City to discharge remediation effluent to the sanitary system and that request is evaluated by the City and may be either approved or denied based on the pollutant concentrations in the discharge stream. Where does DOE intend on discharging pump and treat effluent after the storm utility transfers to the City?

Response 3. It is DOE's intent to continue discharging the pump and treat effluent to the Mound storm water collection system. The Core Team understands that there may be several issues that need to be resolved prior to transfer of the system. The Core Team looks forward to resolving regulatory issues with the City of Miamisburg prior to the system transfer.



The Mound Core Team
500 Capstone Circle
Miamiisburg, OH 45342

December 2004

Mr. Jim Bonfiglio
TAG Advisor
Miamiisburg Environmental Safety & Health
Springboro, Ohio

Dear Mr. Bonfiglio:

The Core Team, consisting of the U.S. Department of Energy Miamiisburg Closure Project (DOE-MCP), U.S. Environmental Protection Agency (USEPA), and the Ohio Environmental Protection Agency (OEPA), appreciates your comments on the PRS 67-70 Fact Sheet, Public Review Draft. 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:	<u>Paul Lucas</u>	12/2/04
	Paul Lucas, Remedial Project Manager	date
USEPA:	<u>Timothy J. Fischer</u>	12/2/04
	Timothy J. Fischer, Remedial Project Manager	date
OEPA:	<u>Brian K. Nickel</u>	12/2/04
	Brian K. Nickel, Project Manager	date

Response to Public Comments

From Jim Bonfiglio
on PRS 67-70 Fact Sheet
April 2004

Comment 1. Page 1 Table, Th-228 @ 9.44 CO=2.6. Page 2, 2nd paragraph, no mention of Th-228 as a driver for removal.

Response 1. All historical results in the table were from sediment, and all sediment was removed and disposed of as low level waste via the Contingent Removal Action and this Fact Sheet.