

April 20, 2004

Mr. Paul Lucas  
DOE/MCP  
P.O. Box 66  
Miamisburg, Ohio 45343-0066

Re: Comments Regarding PRS 67-70 Fact Sheet, Public Review Draft  
Mound Plant, Ohio

Dear Mr. Lucas:

The Miamisburg Mound Community Improvement Corporation (MMCIC) appreciates the opportunity to review the Fact Sheet for PRS 67-70, Public Review Draft. Our comments are included on the attached sheet. For your convenience, and where applicable, we have arranged the comments in two categories labeled "Substantive" and "Errata". The "Substantive" comments are ones that we believe are critical to our interpretation of the document. "Errata" comments are comments of an editorial nature and do not have a significant impact on the document.

If you have any questions, please contact me.

Sincerely,

MMCIC

Daniel D. Bird, FAICP  
Planning Manager

cc: Michael Grauwelman, MMCIC  
Ellen Stanifer, EHS  
David Rakel, CH2M Hill  
Frank Schmaltz, DOE/MCP  
Danny Punch, DOE/MCP

## MMCIC Comments

Subject	PRS 67-70 Fact Sheet, Public Review Draft
Version	Public Review Draft March 2004

## Substantive Comments

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.
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.
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 67-70, 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 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.
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 use 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 regarded.

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.
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.
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 and 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.

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.

## Errata

1. No Comments.

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Daniel D. Bird, FAICP  
Planning Manager  
MMCIC

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Date