

Technical Review of the Mound Site

Summary

by **EHS TECHNOLOGY GROUP, LLC**

Reference Document: Building 30 (Demolition in accordance with Action Memo/EE/CA for Contingent Removal Actions for Contaminated Soils, Addendum 1: Structures) ; Public Review Draft, June 2004

Purpose: The purpose of this document is to notify the public of the Demolition Activity proposed for Building 30. This Building Data Package satisfies the Public Notification requirements as outlined in the Action Memorandum/Engineering Evaluation/Cost Analysis, Contingent Removal Action for Contaminated Soils, Addendum 1: Structures, April 2004, Final.

Assessment of Review: Building 30 (Health Physics Count Lab/SM (Special Metallurgical) Storage Building) was originally constructed as a storage facility for SM Area Storage; however, it has also housed a scanning facility for drums and boxes of radioactively contaminated materials, and a counting facility for the analysis of radionuclides. Three fixed contamination areas (FCAs) are present on the floor. Since residual contamination is present, Building 30 is designated as impacted. The contaminant found within Building 30 includes plutonium-238. Confirmation that activities within Building 30 did not impact the building footprint will be accomplished via the Building 38 VSAP. Soil contamination above acceptable levels will be managed per the Building 38 VSAP.

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. An addendum to this document, titled Action Memo/EE/CA for Contingent Removal Actions for Contaminated Soils Addendum 1: Structures was issued as a draft in June of 2004. The purpose of this addendum is to allow certain structures, depending upon type and extent of contamination and contaminant concentrations, to also be fast tracked using 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 Building Data Package 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 on this Building Data Package. We concur with the planned removal action (RA) for the Building 30 due to elevated levels of plutonium-238.

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 Building 30. We understand that confirmation of any impact to the footprint of the building will be accomplished via the Building 38 VSAP and any soils contamination will be managed in the Building 38 VSAP. 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.