

Technical Review of the Mound Site

Summary

by **EHS TECHNOLOGY GROUP, LLC**

Reference Document: PRS 410 Addendum 1 Data Package, Public Review Draft, December 2004

Purpose: The purpose of this document is to notify the public of the status (No Further Action) of the Potential Release Site (PRS) 410.

Assessment of Review: EHS has had the opportunity to review and comment on this PRS Data Package. We concur that based on the sampling results from fourteen locations in and around the PRS 410 area, it does not appear that a petroleum hydrocarbon problem remains in this area. We are concerned however, that radionuclide screening was not included in the sampling activity. Due to the close proximity to the OU-1 area, PRS 11 and PRS 409 which all include radionuclide contamination, field screening of the soil samples should have been completed. Although the original PRS 410 data package, dated August 1997, found no radioactive contamination using a FIDLER survey, further investigation in this area, which is larger than the original soil stained area, would have added comfort to the previous data results. In addition, the Core Team response to comments by MMCIC on the original data package stated that “The Core Team shares your concern about the extent of contaminants in this area. This topic will be addressed in the Action Memo (which will be available for public comment) and the Work Plan for the Removal Action.” If information became available to the Core Team which relieved their concern regarding the possibility of radiological contamination, it should be included in this Addendum package.

Technical Analysis: PRS 410 was described in the original PRS data package, prepared in 1997, as an area of soils/gravel in the vicinity of the site perimeter road. PRS 410 was identified based on visual observation of a soil stain that had an odor (thought to be that of diesel fuel) encountered during the removal and replacement of a storm water drainage pipe. The stained soil was sampled and found to contain elevated levels of Total Petroleum Hydrocarbons (TPH). The stained soil was removed and the area was backfilled with clean gravel. The area was subsequently paved with asphalt. Since the location was not verified, The Core Team recommended a removal action in lieu of further assessment characterization as a more cost-effective alternative.

Characterization sampling was conducted to provide information for the PRS 410 Removal Action Work package. A total of fourteen sample locations were spaced across an area larger than the original location of the stained soils so that the extent of the contamination could be adequately bounded. All sampling results for Total Petroleum Hydrocarbons were below cleanup objectives for soils. In addition, the soil leaching equations were run on this data and the sampling results did not exceed the soil screening levels. Because of these results, the Core Team has binned PRS 410 as No Further Assessment.

Substantive Comments: EHS concurs with the analysis of the soils sampling and soils leaching equations for Total Petroleum Hydrocarbons in the vicinity of PRS 410. Although field screening with a FIDLER did not detect radiological contamination in the area of the original soils staining, this field screening should have been carried through on subsequent sampling activities, particularly since it encompassed a larger area than the original sampling activity. Due to the PRS 410 location (near other area of known radiological contamination) EHS is concerned that this contamination may have extended into the sampling boundary.

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.