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Mound Site Environmental Report for Calendar Year 1992

July 1993

MOUND

operated by
EG&G MOUND APPLIED TECHNOLOGIES
P.O. Box 3000, Miamisburg, Ohio 45343-3000

for the
U. S. DEPARTMENT OF ENERGY
Contract No. DE-AC04-88DP43495

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Fractions and Multiples of Units

Multiple	Decimal Equivalent	Prefix	Symbol
10^6	1,000,000	mega	M
10^3	1,000	kilo	k
10^2	100	hecto	h
10	10	deka	da
10^{-1}	0.1	deci	d
10^{-2}	0.01	centi	c
10^{-3}	0.001	milli	m
10^{-6}	0.000001	micro	μ
10^{-9}	0.000000001	nano	n
10^{-12}	0.000000000001	pico	p
10^{-15}	0.000000000000001	femto	f
10^{-18}	0.000000000000000001	atto	a

Conversion Table

Multiply	by	to Obtain	Multiply	by	to Obtain
in	2.54	cm	cm	0.394	in
ft	0.305	m	m	3.28	ft
mi	1.61	km	km	0.621	mi
lb	0.4536	kg	kg	2.205	lb
qt (U.S.)	0.946	L	L	1.057	qt
ft ²	0.093	m ²	m ²	10.764	ft ²
ft ³	0.028	m ³	m ³	35.31	ft ³
L	1×10^{-3}	m ³	m ³	1000	L
Ci	3.7×10^{10}	Bq	Bq	2.7×10^{-11}	Ci
rad	0.01	Gy	Gy	100	rad
mrem	0.01	mSv	mSv	100	mrem

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Prepared by

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for the

U.S. Department of Energy
under Contract
No. DE-AC04-88DP43495

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TABLE OF CONTENTS

TABLE OF CONTENTS	iii
LIST OF FIGURES	vii
LIST OF TABLES	ix
LIST OF ACRONYMS	xi
ACKNOWLEDGEMENTS	xiii
EXECUTIVE SUMMARY	ES-1
 1.0 INTRODUCTION.....	 1-1
1.1 Description of Mound Site and Operations	1-1
Location	1-1
Population and Land Use	1-2
Climate	1-4
Geology	1-4
Topography	1-6
Mission and Operations	1-6
1.2 Perspective on Radiation	1-8
2.0 COMPLIANCE SUMMARY	2-1
2.1 Major Environmental Statutes, Regulations, and Orders	2-1
Clean Air Act	2-1
Clean Water Act	2-2
Safe Drinking Water Act	2-3
Resource Conservation and Recovery Act	2-3
Toxic Substance Control Act	2-4
Comprehensive Environmental Response, Compensation, and Liability Act	2-4
Emergency Planning and Community Right-to-Know Act (SARA Title III)	2-5
Federal Facilities Compliance Act	2-6
National Environmental Policy Act	2-6
Endangered Species Act	2-6
Executive Order 11988, "Floodplain Management"	2-6
Executive Order 11990, "Protection of Wetlands"	2-7
2.2 Other Key Environmental Compliance Issues	2-7
Low Specific Activity (LSA) Waste Shipments	2-7
Tiger Team Action Plan	2-7
DP/TSA	2-7
Major External Environmental Audits in 1992	2-7
Pending Lawsuit	2-8
2.3 Highlights for the the First Quarter of 1992	2-8
2.4 Summary of Permits	2-8
3.0 ENVIRONMENTAL PROGRAM INFORMATION	3-1
3.1 Effluent Monitoring	3-1
Air Emissions	3-1
Liquid Releases	3-1
3.2 Environmental Monitoring	3-1
Radionuclides of Concern	3-1
Rationale	3-5
Environmental Levels	3-5

TABLE OF CONTENTS (Continued)

3.3	Effluent Treatment and Waste Management	3-6
	Effluent Treatment	3-6
	Waste Management	3-6
3.4	Environmental Permits	3-6
3.5	Environmental Training	3-7
3.6	Waste Minimization and Pollution Prevention (WM/PP).....	3-7
3.7	Environmental Restoration (ER)	3-9
4.0	RADIOLOGICAL ENVIRONMENTAL PROGRAM INFORMATION	4-1
4.1	Radionuclides Releases from Mound	4-1
	1992 Data	4-1
	5-Year Trends in Radionuclide Releases	4-2
4.2	Effluent Monitoring Program	4-5
	Air	4-5
	Water	4-7
4.3	Environmental Surveillance	4-7
	Environmental Concentrations	4-7
	Lower Detection Limit	4-7
4.4	Air Sampling Program	4-7
	Applicable Standards	4-12
	Results for 1992	4-12
4.5	Surface Water and Sediment Sampling Program.....	4-12
	Applicable Standards	4-17
	Results for 1992	4-17
4.6	Foodstuffs and Vegetation	4-25
	Results for 1992	4-25
4.7	Offsite Dose Impacts	4-29
	Dose Estimates Based on Measured Concentrations	4-29
	Dose Estimates for NESHAPs Compliance	4-30
5.0	NONRADIOLOGICAL ENVIRONMENTAL PROGRAM INFORMATION.....	5-1
5.1	Air Monitoring Program	5-1
5.2	Water Monitoring Program	5-3
	NPDES Monitoring Requirements	5-3
	Results	5-7
5.3	Submissions Under SARA Title III	5-9
5.4	Environmental Occurrences	5-9
6.0	GROUNDWATER MONITORING PROGRAM.....	6-1
6.1	Regional Geohydrology	6-1
	Uses of Groundwater in the Vicinity	6-2
6.2	Hydrology at Mound	6-2
	Seeps	6-6
	Surface Water Features	6-6

TABLE OF CONTENTS (Continued)

6.3	Offsite Groundwater Monitoring Program	6-7
	Tritium in Production and Private Wells	6-7
	Tritium in Community Drinking Water Supplies	6-8
	Tritium in Offsite Monitoring Wells	6-8
	Offsite Monitoring Activities for other Radionuclides	6-10
	VOCs in Offsite Monitoring Wells	6-12
6.4	Onsite Groundwater Monitoring Program	6-13
	Tritium in Mound's Production Wells	6-13
	Tritium in the BVA	6-13
	Tritium in the Seeps	6-15
	Tritium in the Capture Pits	6-15
	Onsite Monitoring Activities for other Radionuclides	6-18
	VOC Monitoring Activities	6-20
6.5	Five-Year Trends for Wells of Interest	6-25
	Trend Data for Offsite Drinking Water	6-25
	Trend Data for Onsite Production Wells and Seeps	6-26
7.0	QUALITY ASSURANCE PROGRAMS FOR ENVIRONMENTAL DATA	7-1
	EML QA Program	7-1
	NPDES QA Program	7-1
	APG QA Program	7-5
	Mound QA Program	7-5
8.0	REFERENCES.....	8-1
	APPENDIX Dose Assessment Methodology	A-1

LIST OF FIGURES

1-1.	Locations of the Mound Plant and surrounding communities	1-1
1-2.	Location of the Mound Plant	1-2
1-3.	Distribution of population within 50 miles (80 km) of Mound	1-3
1-4.	Monthly rainfall for 1992	1-4
1-5.	1992 wind speeds and directions	1-5
1-6.	Mound site topography	1-7
1-7.	Average annual radiation dose in the U.S.	1-9
3-1.	Organizational structure of Mound's Waste Minimization Program	3-8
3-2.	Mound Plant Operable Unit Boundaries	3-10
4-1.	Tritium releases from Mound to the atmosphere	4-2
4-2.	Tritium releases from Mound to the Great Miami River	4-3
4-3.	Plutonium-238 releases from Mound to the atmosphere	4-3
4-4.	Plutonium-238 releases from Mound to the Great Miami River	4-4
4-5.	Plutonium-239,240 releases from Mound to the atmosphere	4-4
4-6.	Plutonium-239,240 releases from Mound to the Great Miami River	4-5
4-7.	Uranium releases from Mound to the atmosphere	4-6
4-8.	Uranium-233,234 releases from Mound to the Great Miami River	4-6
4-9.	Liquid effluent sampling locations for radionuclides	4-8
4-10.	Onsite air sampling locations	4-10
4-11.	Offsite air sampling locations	4-11
4-12.	Sampling locations for river water, ponds, and private wells	4-16
4-13.	Exposure pathways for dose calculations based on measured data for 1992	4-29
5-1.	NPDES sampling locations	5-4
5-2.	NPDES exceptions for the five-year period 1988 - 1992	5-7
6-1.	Location and extent of the Buried Valley Aquifer	6-1
6-2.	Production and monitoring well locations	6-4
6-3.	Mound Plant groundwater elevations	6-3
6-4.	Geologic cutaway of the Mound Plant	6-6
6-5.	Seep and capture pit sampling locations	6-16
6-6.	Tritium concentrations in capture pits, June 1992 samples	6-17
6-7.	Tritium trend data for offsite drinking water	6-25
6-8.	Tritium trend data for onsite drinking water	6-26
6-9.	VOC trend data for onsite drinking water	6-27
6-10.	Tritium trend data for Seep 0601	6-28
6-11.	VOC trend data for Seep 0601	6-28

LIST OF FIGURES (Continued)

7.1	Mound's performance in the DOE Quality Assurance Program in 1992	7-3
7.2a	Mound's performance in the APG Proficiency Environmental Testing Program for 1992: Trace metal analysis	7-6
7.2b	Mound's performance in the APG Proficiency Environmental Testing Program for 1992: Miscellaneous parameters	7-7

LIST OF TABLES

E-1.	Radiological Effluent Data for 1992	ES-2
E-2.	Radiation Dose Limits for Protection of the Public from All Routine DOE Operations	ES-3
E-3.	Maximum Committed Effective Dose Equivalents to a Hypothetical Individual in 1992.....	ES-3
1.1	Population Totals from the 1990 Census	1-2
1-2.	Percent Frequency of Wind Direction and Wind Speed from the Mound Meteorological Tower, Miamisburg, Ohio, for 1992	1-6
3-1.	Effluent Monitoring at Mound.....	3-2
3-2.	Environmental Surveillance at Mound.....	3-4
3-3.	Environmental Permits Issued to Mound	3-7
4-1.	Radiological Effluent Data for 1992	4-1
4-2.	Environmental Concentrations of Radionuclides in Sample Media in 1992	4-9
4-3.	Incremental Concentrations of Tritium Oxide in Air in 1992	4-13
4-4.	Concentrations of Plutonium-238 in Air in 1992	4-14
4-5.	Incremental Concentrations of Plutonium-239, 240 in Air in 1992	4-15
4-6.	Concentrations of Tritium in the Great Miami River in 1992	4-18
4-7.	Incremental Concentrations of Plutonium-238 in the Great Miami River in 1992	4-18
4-8.	Concentrations of Plutonium-239,240 in the Great Miami River in 1992.....	4-19
4-9.	Incremental Concentrations of Uranium-233,234 and Uranium-238 in the Great Miami River in 1992	4-20
4-10.	Concentrations of Tritium in Pond Water in 1992	4-21
4-11.	Concentrations of Plutonium-238 in Pond Water in 1992.....	4-21
4-12.	Incremental Concentrations of Plutonium-239, 240 in Pond Water in 1992	4-22
4-13.	Incremental Concentrations of Plutonium-238 in River and Pond Sediments in 1992 ..	4-23
4-14.	Incremental Concentrations of Plutonium-239,240 in River and Pond Sediments in 1992	4-24
4-15.	Concentrations of Tritium in Foodstuffs and Vegetation in 1992	4-26
4-16.	Incremental Concentrations of Plutonium-238 in Foodstuffs and Vegetation in 1992	4-27
4-17.	Incremental Concentrations of Plutonium-239,240 in Foodstuffs and Vegetation in 1992	4-28
4-18.	Maximum Committed Effective Dose Equivalents to a Hypothetical Individual in 1992	4-30
5-1.	Nonradiological Airborne Effluent Data for 1992	5-1
5-2.	1992 Particulate Concentrations	5-2
5-3.	National Pollution Discharge Elimination System Data for 1992	5-5
5-4.	Summary of Organic Compounds Detected in Mound Effluents in 1992	5-8
5-5.	1992 Emergency and Hazardous Chemical Data for Mound	5-9

LIST OF TABLES (Continued)

6-1.	Tritium Concentrations in Offsite Production and Private Wells in 1992	6-7
6-2.	Tritium Concentrations in Community Drinking Water Supplies in 1992	6-8
6-3.	Tritium Concentrations in in Offsite Monitoring Wells in 1992	6-9
6-4.	Plutonium Concentrations in Offsite Drinking Water and an Offsite Private Well in 1992	6-10
6-5.	Uranium Concentrations in Offsite Drinking Water and an Offsite Private Well in 1992	6-11
6-6.	Volatile Organic Concentrations in Offsite Monitoring Wells in 1992	6-12
6-7.	Tritium Concentrations in Onsite Production Wells in 1992	6-13
6-8.	Tritium Concentrations in Onsite Monitoring Wells in 1992	6-14
6-9.	Tritium Concentrations in Seeps in 1992	6-15
6-10.	Plutonium Concentrations in Onsite Production Wells in 1992	6-18
6-11.	Uranium Concentrations in Onsite Production Wells in 1992	6-19
6-12.	VOC Concentrations in Onsite Production Wells in 1992	6-20
6-13.	VOC Concentrations in Onsite Monitoring Wells in 1992	6-21
6-14.	VOC Concentrations in Seeps, June 1992 Samples	6-23
6-15.	VOC Concentrations in Capture Pits, June 1992 Samples	6-24
7-1.	Mound DOE Quality Assessment Program Results for 1992: Radionuclides in Environmental Samples	7-2
7-2.	Mound's Performance in the NPDES Quality Assurance Program for 1992	7-4
A-1.	Factors Used to Calculate 1992 CEDEs	A-2
A-2.	1992 CAP-88 Input Data	A-3

LIST OF ACRONYMS

AIL	ALARA Investigation Level
ALARA	As Low As Reasonably Achievable
APG	Analytical Products Group, Inc.
ATSDR	Agency for Toxic Substances and Disease Registry
BOD	Biological Oxygen Demand
BVA	Buried Valley Aquifer
CAA	Clean Air Act
CBOD	Carbonaceous Biochemical Oxygen Demand
CEDE	Committed Effective Dose Equivalent
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	Chlorinated Fluorocarbons
CFR	Code of Federal Regulations
COD	Carbonaceous Oxygen Demand
CWA	Clean Water Act
DAO	Dayton Area Office
DCG	Derived Concentration Guide
D&D	Decommissioning and Decontamination
DOE	U.S. Department of Energy
DP/TSA	Defense Programs Technical Safety Appraisal
DWS	Drinking Water Standard
EA	Environmental Assessment
EDE	Effective Dose Equivalent
EML	Environmental Measurements Laboratory
EPA	Environmental Protection Agency
ER	Environmental Restoration
ESA	Endangered Species Act
ES&H	Environment, Safety, and Health
FFA	Federal Facilities Agreement
FFCA	Federal Facilities Compliance Agreement or Act
FONSI	Finding of No Significant Impact
FWPCA	Federal Water Pollution Control Act
HEPA	High efficiency particulate air
HSWA	Hazardous and Solid Waste Amendments
HT	Tritium, elemental
HTO	Tritium, oxide
LDL	Lower Detection Limit
LSA	Low Specific Activity
MCL	Maximum Contaminant Level
MDL	Method Detection Limit
MGD	Million Gallons per Day
MRC	Monsanto Research Corporation
NEPA	National Environmental Policy Act
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NPDES	National Pollutant Discharge Elimination System

LIST OF ACRONYMS (Continued)

NPL	National Priorities List
NTS	Nevada Test Site
OU	Operable Unit
PCBs	Polychlorinated Biphenyls
PUCO	Public Utilities Commission of Ohio
QA	Quality Assurance
RAPCA	Regional Air Pollution Control Agency
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
RMMA's	Radioactive Materials Management Areas
RQ	Reportable Quantity
SARA	Superfund Amendments and Reauthorization Act
SDWA	Safe Drinking Water Act
TSCA	Toxic Substances Control Act
TTOs	Total Toxic Organics
VOCs	Volatile organic compounds
WM/PP	Waste minimization / Pollution prevention

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EXECUTIVE SUMMARY

The purpose of this report is to inform the public about the impact of Mound operations on the population and the environment. Mound is a government-owned facility operated by EG&G Mound Applied Technologies for the U.S. Department of Energy (DOE). This integrated production, development, and research site performs work in support of DOE's weapon and energy related programs, with emphasis on explosive, nuclear and energy technologies.

The Mound Plant, named after the Miamisburg Indian Mound adjacent to the site, comprises 120 buildings on 124 hectares (306 acres) of land in Miamisburg, Ohio, approximately 16 km (10 mi) southwest of Dayton. The Great Miami River, which flows through the city of Miamisburg, dominates the landscape of the five-county region surrounding Mound. The river valley is highly industrialized. The rest of the region is predominately farm land dotted with light industry and small communities. The climate is moderate. The geologic record preserved in the rocks underlying Mound indicates that the area has been relatively stable since the beginning of the Paleozoic Era more than 500 million years ago. No buildings at Mound are located in a floodplain or in areas considered wetlands.

ES.1 Perspective on Radiation

Radionuclides, radioactive species of atoms, emit ionizing radiation. Ionizing radiation is radiation possessing enough energy to remove electrons from the substances through which it passes. Most consequences to humans from exposure to radionuclides arise from the interactions of ionizing radiation with human tissue. These interactions are measured based on the amount of energy deposited in the tissue. This value is the absorbed dose. Since different types of ionizing radiation cause different degrees of biological harm, it is necessary to weight doses to account for those differences. The unit used to make this comparison possible is the dose equivalent. The units used to report dose equivalents are the rem and the Sievert (Sv). Because doses associated with environmental exposures are typically only fractions of a rem or Sievert, it is common to report doses in terms of millirems (mrem) or millisieverts (mSv). There are 1000 mrem per rem; 1000 mSv per Sv.

Our bodies are exposed to ionizing radiation each day. Most of this radiation comes from natural sources. The average dose to a resident of the United States from natural sources is about 300 mrem (3 mSv) per year. The primary contributors to this average dose are radon, cosmic and terrestrial sources, and medical sources such as x-rays or other diagnostic exposures.

ES.2 Radionuclide Releases from Mound

Table E-1 lists the quantities of radionuclides released by Mound into the air and water during 1992. The unit used to report these quantities is the curie (Ci), a unit of radioactivity equal to 3.7×10^{10} disintegrations per second. The quantities, or activities, shown in Table E-1 were measured at the point of release.

Table E-1. Radiological Effluent Data for 1992

Radionuclide	Released to	Activity, Ci
Tritium	Air	825 ^a
	Water	3.2
Plutonium-238	Air	5.6×10^{-6}
	Water	4.6×10^{-4}
Plutonium-239,240	Air	3.8×10^{-8}
	Water	5.6×10^{-6}
Uranium-233,234	Air	2.1×10^{-8}
	Water	3.5×10^{-4}
Uranium-238	Air	1.4×10^{-8}
^a Tritium in air consists of: Tritium oxide, 616 Ci Elemental tritium, 209 Ci		

ES.3 Dose Limits

Dose limits, or more precisely, dose equivalent limits, for members of the public are presented in Table E-2. These limits are expressed in terms of a committed effective dose equivalent (CEDE) and an effective dose equivalent (EDE) for the DOE and U.S. Environmental Protection Agency (EPA), respectively. Values shown in Table E-2 represent annual limits on dose equivalents established by the DOE and EPA.

- breathed only air containing the highest average radionuclide concentrations measured at an onsite air sampling station,
- drawn all of his drinking water from the offsite well with the highest average radionuclide concentration, and
- consumed produce exhibiting the concentrations measured in the samples collected from the Miamisburg area.

ES.4 Doses from Mound Operations

In calculating the maximum dose received by a member of the public from Mound operations, a committed effective dose equivalent is used. The CEDEs are the doses received by a hypothetical individual who remained at the site boundary 24 hours per day throughout 1992. This individual was assumed to have:

The CEDEs from all of these pathways are added to obtain an estimate of a maximum CEDE received by this hypothetical individual. Table E-3 shows the results for Mound in 1992. The results are reported for tritium, plutonium-238, and plutonium-239. The other radionuclides released by Mound were present in concentrations that were below environmental levels or were too small to affect the overall doses reported in Table E-3.

**Table E-2. Radiation Dose Limits for Protection of the Public
from All Routine DOE Operations**

Pathway	Regulatory Standard	Effective Dose Equivalent ^a	
		mrem	mSv
All exposure media	DOE Order 5400.5	100	1
Air	40 CFR 61 (EPA)	10	0.1
Drinking water	40 CFR 141 (EPA)	4	0.04

^a Evaluated based on annual exposure conditions.

**Table E-3. Maximum Committed Effective Dose Equivalents
to a Hypothetical Individual for 1992**

Radionuclide	Pathway	mrem	mSv
Tritium	Air	0.01	0.0001
	Water	0.04	0.0004
	Vegetation/Foodstuffs	0.001	0.00001
	Total	0.05	0.0005
Plutonium-238	Air	0.05	0.0005
	Water	0.001	0.00001
	Vegetation/Foodstuffs	0.10	0.001
	Total	0.15	0.0015
Plutonium-239	Air	0.001	0.00001
	Vegetation/Foodstuffs	0.02	0.0002
	Total	0.02	0.0002
Total		0.22	0.0022

Executive Summary

The data presented in Table E-3 were calculated using environmental monitoring data measured on and near Mound. Mound also evaluates doses using the EPA's computer code CAP-88. CAP-88 uses air effluent data as input to transport, dispersion, and dosimetry codes. By executing these codes, one generates an estimate of a maximum offsite dose from airborne releases. For 1992, the CAP-88-estimated maximum offsite dose was 0.06 mrem. As reported in Table E-2, the EPA's annual dose limit for airborne releases is 10 mrem. Therefore, Mound's releases in 1992 represented 0.6% of the dose limit set by the EPA.

CAP-88 also estimates doses to populations surrounding Mound. The population (approximately 3,035,000 persons) within a radius of 80 km (50 mi) of Mound received an estimated 2.6 person-rem from Mound operations in 1992. CAP-88 arrived at that value first by calculating doses at specific distances, and in specific compass sectors, relative to Mound. The computer code then multiplied the average dose in a given area by the number of people living there. For example, an average dose of 0.001 rem x 10,000 people in the area yields a collective dose of 10 person-rem. CAP-88 then sums up all the collective doses for the 80-km radius region and reports a single number.

Since the average dose received each year by an individual is about 300 mrem, the collective background dose for the 80-km population is approximately one million person-rem (0.3 rem x 3,035,000 persons). Mound's contribution of 2.6 person-rem represents on the order of 0.00028% of the background value.

ES.5 Environmental Monitoring Program Results

Besides setting limits on the CEDE to any member of the public, DOE has established Derived Concentration Guides (DCGs) for individual radionuclides. The DCG is defined as the concentration of a radionuclide that will result in a CEDE of 100 mrem (1 mSv) following continuous exposure for one year. The concentrations of radionuclides resulting from Mound's 1992 releases were small fractions of the appropriate DCGs.

Radiological Monitoring of the Atmosphere

Ambient air is sampled for tritium and plutonium by an onsite network of seven perimeter stations and by an offsite network of 15 stations. Ten of the offsite samplers are located in the Miamisburg area. One sampler is located far enough away to receive virtually no impact from Mound operations. This sampler serves as a reference location to establish background levels of tritium and plutonium. The amount by which a sample exceeds the background or environmental level is reported as an incremental concentration.

Incremental concentrations measured at the onsite samplers were 0.008% and 0.024%, respectively, of the DOE DCGs for tritium and plutonium-238. Average incremental concentrations at the offsite samplers for tritium and plutonium-238 were 0.003% and 0.004%, respectively of the DOE DCGs. Incremental plutonium-239 concentrations averaged 0.001% and 0.0003% of the DOE DCGs for the onsite and offsite stations, respectively.

Radiological Monitoring of Water

Water samples were collected from locations along the banks of the Great Miami River and were analyzed for tritium, plutonium-238, plutonium-239,240, uranium-233,234, and uranium-238.

Other surface water locations were sampled for tritium and plutonium. Additionally, both river and pond sediment samples were collected and analyzed for plutonium.

River water. The average incremental concentrations of tritium, plutonium-238, and plutonium-239 in water from the Great Miami River were 0.0006%, 0.0002%, and 0.001% of the DOE DCGs, respectively. Concentrations of uranium isotopes measured in the river were below environmental levels.

Sediment. Average concentrations of plutonium-238 in sediment samples collected from the Great Miami River suggest some accumulation of Pu-238 relative to other sampling locations. However, at such low concentrations, the error limits are quite large and the potential risk is quite small.

Radiological Monitoring of Foodstuffs and Vegetation

Locally-grown foodstuffs, vegetation, and fish samples were collected from the surrounding area. These samples were then analyzed for tritium and/or plutonium as appropriate. Concentrations of tritium in vegetation and tomatoes were at or below environmental levels in most cases. Similar results were observed for concentrations of plutonium-238 and plutonium-239 in vegetation, root crops, and fish.

Nonradiological Monitoring of Air

Particulate loadings are measured at all of the onsite and offsite air sampling locations. Particulate concentrations appeared to be independent of distance. This result suggests Mound exerts little or no influence on the levels of airborne particulates.

Nonradiological Monitoring of Water

Mound's nonradiological liquid discharges are regulated by a National Pollutant Discharge Elimination System (NPDES) permit. In 1992, 1128 samples were collected to demonstrate compliance with the NPDES permit. One exceedance did occur. On December 22, 1992, Mound exceeded the daily permit limit for copper. Mound recorded a copper concentration of 130 µg/L; the permit limit is 120 µg/L.

ES.6 Groundwater Monitoring Program

Mound maintains an extensive network of onsite and offsite monitoring wells. In addition, a number of onsite and offsite production wells and drinking water systems are routinely monitored. Drinking water from the Miamisburg area is analyzed for tritium, plutonium, and uranium. Other regional water supplied are sampled for tritium. Samples from monitoring and production wells are analyzed for various constituents including volatile organic compounds, polychlorinated biphenyls, metals, and inorganic cations and anions. Monitoring data collected in 1992 indicate that volatile organic compounds and tritium, respectively, are the primary nonradiological and radiological contaminants of concern.

ES.7 Environmental Restoration Program

Mound was designated a Superfund site, i.e., placed on the National Priorities List, in November of 1989. A Federal Facilities Agreement (FFA) between the DOE and the EPA followed in October of 1990. The FFA defined the responsibilities of each party for the completion of Superfund-related (CERCLA-related) activities.

Executive Summary

Preliminary CERCLA assessments of contamination at Mound have identified approximately 125 locations of known or suspected releases. In 1992, comprehensive evaluations of these areas continued.

ES.8 Quality Assurance for Environmental Data

To ensure the reliability of environmental data, Mound maintains an internal quality assurance (QA) program that consists of running blanks, internal standards, and duplicate samples. Mound also participates in comparison exercises with external laboratories to validate further Mound's environmental results. Comparisons of Mound's performance with that of other laboratories are shown in Chapter 7 of this report. The close agreement between Mound and the external labs demonstrates that Mound's Environmental Monitoring Program generates reliable data.

1.0 INTRODUCTION

1.1 Description of Mound Site and Operations

Location

The Mound Plant, named after the Miamisburg Indian Mound adjacent to the site, comprises 120 buildings on 124 hectares (306 acres) of land in Miamisburg, Ohio, approximately 16 km (10 mi) southwest of Dayton (Figure 1-1). The Great Miami River, which flows southwest through the

city of Miamisburg, dominates the geography of the five-county region surrounding Mound (Figure 1-2). The river valley is highly industrialized. The rest of the region is predominantly farmland, dotted with light industry and small communities.

Figure 1-1. Locations of the Mound Plant and surrounding communities

Figure 1-2. Location of Mound Plant

Population and Land Use

Figure 1-3 shows the population distribution within 50 miles (80 km) of Mound. The population information was extracted from 1990 Census data (PL94-171) by the Ohio Department of Development. The estimated number of individuals residing within the 50-mile radius is 3,034,679 (Table 1-1).

The primary agricultural activity in the area is raising field crops such as corn and soybeans. Approximately 10% of the agricultural land is devoted to pasturing livestock.

Table 1-1. Population Totals from the 1990 Census

Radius, miles	Total
0 - 10	322,876
0 - 20	887,114
0 - 30	1,477,621
0 - 40	2,541,609
0 - 50	3,034,679

Figure 1-3. Distribution of population within 50 mi (80 km) of Mound

Climate

The climate is moderate. Typically, the average annual precipitation of 91 cm (36 in) is evenly distributed throughout the year. However, in 1992, record amounts of rain fell in the month of July (Figure 1-4). Total precipitation measured at Mound in 1992 was 89 cm (35 in). Winds are predominantly out of the south southwest (Figure 1-5). The annual average wind speed measured at Mound for 1992 was 4.8 m/s (10.7 mi/hr) (Table 1-2).

Geology

The geologic record preserved in the rocks underlying Mound indicates that the area has been relatively stable since the beginning of the Paleozoic era more than 500 million years ago. No evidence indicates subsurface structural folding, significant stratigraphic thinning, or subsurface faulting. Limestone strata, which are interbedded with protective shale layers at the site, show no evidence of solution activity. No evidence of solution cavities or cavern development has been observed in any borings or outcrops in the Miamisburg area.

Figure 1-4. Monthly rainfall for 1992

Wind Rose for Mound January - December, 1992

Data set is 91.1% complete.

Figure 1-5. 1992 wind speeds and directions

Introduction

Table 1-2. Percent Frequency of Wind Direction and Wind Speed from the Mound Meteorological Tower, Miamisburg, Ohio, for 1992

Direction	Percent	Average Speed(m/s)
N	5.1	4.3
NNE	6.0	4.1
NE	5.4	4.2
ENE	5.1	4.0
E	4.5	3.8
ESE	3.3	3.6
SE	3.7	4.0
SSE	4.1	4.6
S	8.1	4.8
SSW	13.4	5.7
SW	13.4	5.9
WSW	6.1	4.9
W	5.2	4.7
WNW	6.1	5.2
NW	5.5	4.3
NNW	4.7	4.5
Average		4.8

Total relative frequency of calms distributed above is 0.3%.

Topography

The site topography is shown in Figure 1-6. Mound site elevations vary from 216 m to 268 m (710 ft to 880 ft) above sea level; most of the Plant is above 244 m (800 ft). No building in which radioactive material is processed is located below an elevation of 241 m (790 ft). The typical nonflood stage of the Great Miami River is 208 m (682 ft). The highest flood-water levels that can be reasonably postulated for the Great Miami River basin would result in flooding to 216 m (710 ft), which is approximately the lowest elevation at the site. No buildings at Mound are located on a floodplain or in areas considered as wetlands.

Mission and Operations

Mound is an integrated research, development, and production facility working to support DOE weapon and nonweapon programs, especially in the areas of chemical explosives and nuclear technology. The principal mission of the Mound Plant is to research, develop, and manufacture non-nuclear explosive components for nuclear weapons that are assembled at another DOE site. Other major operations at Mound include:

- Manufacture of stable (nonradioactive) nuclides for medical, industrial, and general research.
- Development and manufacture of small chemical heat sources for the national defense program.
- Recovery and purification of tritium from scrap materials generated by Mound and other DOE sites.
- Development and fabrication of radioisotopic heat sources fueled with plutonium-238 to provide power sources for such projects as lunar experiments, satellites, and spacecraft.
- Surveillance of explosive and radioactive weapons components received from other DOE sites.

Research and development operations at Mound include investigations involving chemical explosives and pyrotechnics; plastics, elastomers and adhesives for the nuclear weapons program; fuel systems for thermonuclear energy research programs; joining of exotic metals; instrumentation for the Nuclear Safeguards program; separation techniques and gas dynamics of stable nuclides; energy conversion systems; and management of radioactive wastes.

Figure 1-6. Mound site topography

Introduction

1.2 Perspective On Radiation

This section attempts to put into perspective the potential consequences of the radionuclide releases described in subsequent sections of this report.

Most consequences to humans from radionuclides released to the environment are caused by interactions between radiations emitted by the nuclides and human tissue. These interactions involve the transfer of energy from the radiations to the tissue, a process that may damage the tissue. The radiations may come from radionuclides located outside the body (i.e., in or on environmental media and man-made objects) and from radionuclides deposited inside the body via inhalation, ingestion, or absorption through the skin. Exposure to radiation from nuclides located outside the body is called external exposure and will last only as long as the exposed person is near the external source. Exposure to radiation from radionuclides deposited inside the body is called internal exposure and will last as long as the radionuclides remain in the body.

A number of specialized units are used to characterize exposures to ionizing radiations. Because the damage associated with such exposures is due primarily to the deposition of radiant energy in tissue, these units are described in terms of the amount of energy absorbed by the tissue and the biological consequences of the absorbed energy. Some of these units are defined below.

- **Absorbed dose** indicates the amount of energy absorbed by a material (e.g., human tissue), divided by the mass of the material. The unit of absorbed dose is the gray (Gy) or the rad (100 rads = 1 Gy).
- **Dose equivalent** indicates the biological effect of an absorbed dose on a particular organ or tissue. It equals the absorbed dose multiplied by factors that relate the absorbed dose to biological effects on that particular organ. The unit of dose equivalent is the sievert (Sv) or the rem (100 rem = 1 Sv).
- **Effective dose equivalent** indicates an individual's fatal cancer risk from an exposure to ionizing radiation. It is calculated from the weighted sum of the dose equivalents from the irradiated organs. It is also expressed in rems or Sieverts.
- **Committed effective dose equivalent** indicates the total dose over the individual's projected remaining lifetime (assumed to be 50 years) that results from an intake during 1 year. The committed effective dose equivalent (CEDE) expresses the dose of internal radiation received when an individual has ingested or inhaled a radionuclide that will remain inside the body for months or years. It is also expressed in rems, mrem (1000 mrem = 1 rem), or Sieverts.
- **Collective committed effective dose equivalent** indicates the sum of the committed effective dose equivalents to the individuals in a population. It gives an estimate of the expected health risk to the population from a dose of radiation. It can be used to calculate probable risks that might be too small to predict on the basis of a single individual. It is expressed in person-Sieverts or person-rems.

Sources of Radiation

Every day our bodies absorb ionizing radiation. Most of it comes from natural sources. Consumer products and medical procedures that use radiation are other common sources of ionizing radiation.

Natural Sources. Natural radiation comes from two sources—cosmic and terrestrial. Cosmic radiation results when energetic particles from outer space, traveling at nearly the speed of light, collide with nuclei in our atmosphere, creating showers of radioactive particles that fall to earth. The average annual dose equivalent received from cosmic radiation is 26 mrem (0.26 mSv) for an individual living at sea level. Because cosmic radiation dissipates as it travels through the

atmosphere, individuals living at lower altitudes receive less dose from this source than those living at higher altitudes.

Terrestrial radiation results when radionuclides that are a natural part of the earth's rocks and soils emit ionizing radiation. Because the concentrations of these radionuclides vary geographically, an individual's exposure depends on his location. The average annual dose equivalent from terrestrial radiation for an individual living in the U.S. is 28 mrem (0.28 mSv).

Besides absorbing radiation from external radionuclides, we can also absorb radiation internally when we ingest radionuclides along with the food, milk, and water we ingest or along with the air we inhale. Once in our bodies, radionuclides follow the same metabolic paths as nonradioactive forms of the same elements. The length of time a particular radionuclide remains and emits radiation depends on whether the body eliminates it quickly or stores it for a long period, and on how long it takes for the radionuclide to decay into a nonradioactive form.

The principal source of internal exposure in the U.S. is believed to be radon. Inhalation of radon contributes about 200 mrem (2.0 mSv) to the average annual dose equivalent from internal radiation. Other radionuclides present in the body contribute approximately 39 mrem (0.39 mSv).

Consumer Products. Many familiar consumer products emit ionizing radiation. Some must emit radiation to perform their functions, e.g., smoke detectors and airport x-ray baggage inspection systems. Other products, e.g., TV sets, emit radiation only incidentally to performing their functions. The average annual effective dose equivalent to an individual from consumer products ranges from 6 to 12 mrem (0.06 to 0.12 mSv).

Medical Uses. Radiation is a tool for diagnosing and treating disease. The average annual dose equivalent for an individual in the U.S. from diagnostic radiation is 53 mrem (0.53 mSv). Individuals undergoing radiation therapeutic procedures may receive much higher doses.

Summary. The contributions to an average individual's annual radiation dose are shown in Figure 1-7. Mound's maximum contribution for 1992, 0.22 mrem, is too small to include in the Figure.

Figure 1-7. Average annual radiation dose in the U.S. (NCRP, 1987)

Introduction

2.0 COMPLIANCE SUMMARY

The Mound Plant must operate in compliance with environmental requirements established by federal and state statutes and regulations. Additional requirements have been imposed by Executive Orders, U.S. Department of Energy (DOE) Orders, and a Federal Facilities Agreement (FFA). Mound's status with respect to each of those requirements is summarized below.

2.1 Major Environmental Statutes, Regulations, and Orders

Clean Air Act (CAA)

Radiological emissions. Ten stacks at Mound discharge radioactive effluents to the atmospheric environment. These releases are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for radionuclides. These "Radionuclide NESHAPs" regulations, 40 CFR 61, Subpart H, are components of the Clean Air Act (CAA) and are enforced by the U.S. Environmental Protection Agency (EPA).

The primary standard against which compliance with 40 CFR 61, Subpart H is measured is an annual effective dose equivalent (EDE). The regulations require that radionuclide emissions from a given site do not exceed those amounts that would cause a member of the public to receive an annual EDE of 10 mrem (0.10 mSv). The regulation also states that each facility must determine this "maximum offsite dose" using an approved approach; the preferred approach is to use a computer code such as CAP-88.

Based on CAP-88 calculations performed for Mound's emissions in 1992, the maximum EDE received by a member of the public was 0.06 mrem. This value represents 0.6 % of the dose limit and demonstrates that Mound releases for 1992 were well below allowable release levels.

NESHAPs for radionuclides also defines sampling and monitoring techniques which should be applied to stacks and vents that release radioactive materials. Mound is not in compliance with specific elements of those requirements. However, in November of 1991, Mound submitted to EPA, Region 5, a two-year plan to bring Mound's effluent sampling and monitoring practices into full compliance. In response, EPA conducted a fact-finding visit on May 5-7, 1992. Based on that visit, EPA agreed to work with Mound on formalizing a schedule for achieving compliance.

A formal response to Mound's 1991 plan was received from the EPA on December 28, 1992. The response was in the form of a draft Federal Facility Compliance Agreement (FFCA). The draft FFCA stipulates specific actions and deadlines that EPA feels are appropriate. DOE and EPA are currently negotiating the FFCA.

Nonradiological emissions. The Clean Air Act (CAA) of 1970, as amended in 1977, gave the EPA authority to regulate two groups of airborne pollutants: criteria pollutants and hazardous air pollutants. The CAA was again amended in 1990. The principal way in which those amendments affect operations at Mound relates to the phase-out of fully halogenated chlorofluorocarbons (CFCs). (The amendments of 1990 called for a phase-out of CFCs such as freon because these chemicals are believed to be major contributors to stratospheric ozone depletion.)

Compliance Summary

To evaluate Mound's compliance with the CAA and its amendments, a preliminary survey of all emission points at Mound was conducted in 1991. Based on that survey, it is believed that the amounts of criteria pollutants, hazardous air pollutants, and ozone-depleting substances discharged by the Plant are well below applicable regulatory thresholds. However, future permitting requirements and the CFC phase-out may generate new compliance issues in these areas. Mound staff members monitor federal and state CAA developments and will be prepared to respond to new requirements that may arise.

Mound is also subject to state and regional air pollution regulations. Compliance with State of Ohio regulations requires that all applicable Mound operations are permitted or otherwise registered. Mound has four air permits from the Ohio Environmental Protection Agency (OEPA). A number of other sources are registered with the Regional Air Pollution Control Agency (RAPCA). An additional 138 permit applications were submitted to RAPCA in the first quarter of 1992 as a result of the 1991 survey of Mound emission points. Further review resulted in the submission of three additional applications. RAPCA is reviewing all of the applications and has indicated that a number of the applications may be consolidated and placed on registration status.

More comprehensive chemical inventory data will be collected in 1993. This information will be carefully reviewed to ensure the adequacy of permit information previously submitted. Results of the inventory will also be used to meet the reporting requirements of other statutes such as the Emergency Planning and Community Right-to-Know Act (SARA Title III).

Non-radioactive air release data for 1992 have been compiled (Table 5-1). All emissions were within required limits and no enforcement citations were received.

Clean Water Act (CWA)

The Federal Water Pollution Control Act (FWPCA) of 1972 was established to limit the types and rates of liquid effluents that may be discharged to the nation's waters. These limits are set for a specific site by the U.S. and/or state EPA using a National Pollutant Discharge Elimination System (NPDES) permit. An NPDES permit is also used to maintain compliance with more recent legislation, the Clean Water Act (CWA) of 1987.

Mound's current NPDES permit went into effect on October 1, 1992; it is valid through April 1, 1997. The permit defines discharge limits and monitoring frequencies for the Plant's liquid effluents. The permit also specifies biomonitoring activities Mound must perform on the receiving body of water, the Great Miami River.

Additionally, the new permit significantly reduced the amount of chlorine that may be present in specific Plant effluents. Among the Plant effluents subject to this limitation are discharges composed primarily of potable water. Potable water discharges tend to be high in chlorine content because chlorine is intentionally added to drinking water systems to protect them from bacteria and to comply with the chlorination standards of the Safe Drinking Water Act (SDWA). Therefore, to achieve compliance with Mound's NPDES permit without violating the SDWA, it will be necessary for the Plant to continue to chlorinate drinking water before use and to begin to dechlorinate it before discharge. For this reason, Mound's NPDES permit mandates a 36-month compliance schedule for the construction and operation of a dechlorination plant. Mound anticipates meeting this schedule.

During calendar year 1992, Mound collected 1128 samples for analysis of NPDES parameters. One exceedance did occur. On December 22, 1992, Mound recorded a copper concentration of 130 ug/L in the effluent discharged to the River; the daily limit for copper at that location is 120 ug/L. The exceedance was reported to the Ohio EPA

within hours of discovery and Mound's Engineering Department has been tasked with identifying possible corrective actions that may be warranted to prevent reoccurrence.

Safe Drinking Water Act (SDWA)

The Safe Drinking Water Act (SDWA) of 1974 instructed the U.S. EPA to establish a program to protect drinking water sources. To meet this goal, the EPA has developed National Primary and Secondary Drinking Water Standards. These standards are applied to drinking water supplies "at the tap". Since Mound withdraws well water for use as drinking water, the Plant is subject to the requirements of the Act.

In Ohio, the SDWA is administered by the Ohio EPA. In accordance with Ohio EPA requirements, the Plant's drinking water system is routinely tested for bacteria and volatile organic compounds (VOCs). These analyses must be performed by a state-certified laboratory. For 1992, the analyses were performed by the National Environmental Testing Lab; no violations of bacteria or VOC standards were detected.

Under the Ohio EPA's SDWA authority, Mound is also required to maintain a minimum chlorination standard of 0.2 mg/L free chlorine. This standard applies at all sampling locations. Because the chlorine is injected fairly close to certain sampling points, yet rather far from others, it is possible to record both atypically high and low chlorine levels. Low chlorine levels would be a concern because they could foster bacteria growth. However, bacteriological testing of Mound's drinking water system indicates that low chlorine levels are observed infrequently and do not cause potability risks. High chlorine levels, on the other hand, do not present a safe drinking water concern, but rather are an NPDES compliance issue. (See NPDES discussion above.)

Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984, established a "cradle to grave" tracking system for hazardous wastes. The Acts led to the implementation of registration and/or permit requirements for all facilities that transport, generate, treat, store, and/or dispose of hazardous wastes. For the Mound Plant, the Ohio EPA administers this program.

Mound has "interim status" as a RCRA treatment and storage facility. "Interim status" provides for the continued use of these facilities while Mound awaits a formal permit from the Ohio EPA. Mound has been seeking a permit for a number of years; the first permit application, referred to as a Part B application, was submitted in October of 1986.

The operations at Mound subject to RCRA and HSWA are three hazardous waste storage units and three thermal treatment units. The storage units accommodate hazardous wastes, radioactive wastes that are also regulated by RCRA (i.e., mixed wastes), and energetic materials wastes. The thermal treatment units for which Mound is seeking a permit are associated with a glass melter, open burning of explosives, and explosives retorting.

Hazardous wastes. Hazardous wastes stored and/or treated onsite are managed pursuant to RCRA regulations on such issues as waste characterization, labeling, inspections for container integrity, facility performance criteria, and availability of protective and emergency response equipment. Those wastes not treated onsite are shipped offsite for RCRA-approved treatment and/or disposal. Mound has contracts in place with a RCRA-approved transporter and a RCRA-approved disposal facility. The facilities of both contractors were inspected by Mound personnel in 1992 to ensure that Mound Quality Assurance and RCRA procedures are followed.

Compliance Summary

Mixed wastes. Wastes regulated by RCRA, but that are also radioactive, are referred to as mixed wastes or RCRA mixed wastes. These wastes present a unique compliance issue because treatment or disposal options have not been available. For this reason, Mound has been forced to store mixed wastes in quantities, and for time periods, that exceed RCRA limits. However, extensive efforts in 1992 resulted in the selection of a vendor for treatment of Mound's primary mixed waste stream. Before issuing a contract to the vendor, Mound personnel made a number of visits to the facility to ensure that all appropriate RCRA and Mound QA procedures are followed.

Suspect wastes. It is the policy of DOE that RCRA hazardous wastes originating in Radioactive Material Management Areas (RMMAs) be treated as "suspect" wastes, i.e., suspected of being radioactive. This precaution is necessary to ensure that hazardous waste management facilities do not receive radioactive wastes unless they are equipped and licensed to do so. As a result of this policy, in place since May of 1991, Mound is required to store wastes from an RMMA in the mixed waste storage facility. However, Mound has developed elaborate waste certification and characterization procedures which have allowed the Plant to eliminate certain suspect wastes. The procedures have also helped minimize the volume of suspect wastes now generated.

Nonhazardous solid wastes. Nonhazardous solid wastes generated at Mound are disposed of in a nearby sanitary landfill that is licensed and permitted. The volume of materials requiring landfill disposal was significantly reduced in 1992 by Mound's recycling programs for paper, aluminum cans, and scrap metal.

Toxic Substances Control Act (TSCA)

The goal of the Toxic Substances Control Act (TSCA) of 1976 is to protect human health and the environment from unreasonable risks associated

with toxic chemical substances. The Act gave the U.S. EPA authority to govern the manufacture and use of chemicals deemed to present significant toxicity risks. Mound does not generate TSCA waste streams on a regular basis. However, efforts continue at Mound to remove TSCA wastes associated with past practices. The two primary areas comprising this category of Plant wastes are polychlorinated biphenyls (PCBs) and asbestos.

PCBs. PCB-contaminated materials that are not suspected of being radioactive are stored onsite pending their shipment to an EPA-approved facility for disposal. "Suspect" PCB wastes — those wastes originating in RMMAs — are retained onsite for waste characterization. Radioactively contaminated PCB wastes also retained onsite. Because no disposal options are currently available for TSCA mixed wastes, they have been stored onsite in excess of the time limitations imposed by the Act. The U.S. EPA is aware of Mound's mixed waste storage status.

Asbestos. The use of asbestos in pipes, panels, and as an additive to diallyl phthalate in parts production, has been discontinued at Mound. Residual asbestos is handled, packaged, and shipped offsite to an approved disposal facility in compliance with TSCA regulations.

Other asbestos removal projects continued in 1992 in connection with building renovation activities. All such projects are carefully monitored by the Industrial Hygiene Section to ensure compliance with TSCA and with Mound's Safety and Hygiene Manual.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) / Federal Facilities Agreement

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, also known as Superfund, is the federal government's primary environmental restoration legislation. Through CERCLA, the U.S. EPA

identifies sites where contamination by hazardous substances may present a risk to human health and/or the environment. These sites are then placed on the National Priorities List (NPL) and subjected to a four-stage remediation process.

Mound was added to the NPL in November of 1989. A Federal Facilities Agreement (FFA) between the DOE and the EPA followed in October of 1990. The FFA defines the responsibilities of each party for the completion of CERCLA-related activities. The DOE and the Ohio EPA have renegotiated the bipartite FFA to include the State of Ohio as a signatory. The revised Agreement has been approved by the three agencies and is ready for signature.

Preliminary CERCLA assessments of contamination at Mound identified approximately 125 locations of actual or suspected releases. These locations were grouped into "Operable Units" (OUs) based on waste type and/or geographical proximity. Originally, Mound established nine OUs. A brief description of each operable unit can be found in Section 3.7 of this report. As CERCLA activities at Mound have progressed, changes to the number and composition of the OUs have been warranted. One of the original OUs, Operable Unit 7, was eliminated from further consideration when testing found no evidence of contamination. Two other operable units, OUs 3 and 8, have been targeted for elimination; those sites previously grouped as OU 3 or 8 will be placed in other OUs. This approach will expedite the cleanup process and will provide considerable cost savings.

In 1992, comprehensive evaluations of environmental media on and near the Plant continued. Additionally, Mound continues to expand its onsite soil, surface water, and well waters sampling programs. Offsite characterization projects are also underway. Mound has designed an offsite testing program which involves six types of studies to be performed throughout a 20-

mile radius of the site. Those study areas are hydrogeology, seismic refraction, soil, wells and cisterns, surface water and sediment, and ecological assessments.

Also in 1992, the Agency for Toxic Substances and Disease Registry, ATSDR, began its evaluation of Mound. It is a requirement of CERCLA that the ATSDR evaluate each site listed on the NPL. The Agency examines health data to seek out abnormal rates or types of illnesses. If any such problems are suspected, the Agency attempts to determine if a correlation exists between the illness and the site. Initial ATSDR findings for the Mound Plant are expected to be published in 1993.

In addition to the CERCLA process described above, the Act established a list of CERCLA-regulated materials. Release of these materials to the environment is subject to certain reporting requirements. No releases of reportable quantities of CERCLA-regulated materials occurred at Mound in 1992.

Emergency Planning and Community Right-to-Know Act (SARA Title III)

The reauthorization of CERCLA came in 1986 in the form of the Superfund Amendments and Reauthorization Act (SARA). The Emergency Planning and Community Right-to-Know portion of that legislation is found in Title III of the Act. SARA Title III, Sections 311 and 312, requires that sites handling "extremely hazardous" and "hazardous" substances notify regional emergency planning agencies. In compliance with the Act, Mound annually reports hazardous chemical inventory data to the State Emergency Response Commission, the Miami Valley Regional Planning Commission, and the City of Miamisburg Fire Department. The inventory information is accompanied by maps showing the specific locations of the chemicals.

Compliance Summary

For 1992, Mound reported using and/or storing three "extremely hazardous" and 11 "hazardous" chemicals. A listing of those chemicals is presented in Section 5.3 of this report.

Federal Facilities Compliance Act (FFCA)

The Federal Facilities Compliance Act was signed into law on October 6, 1992. The Act requires that all DOE facilities prepare an inventory report of mixed wastes and mixed waste treatment capabilities. This report must be published within 180 days of the enactment of the FFCA. In addition, Conceptual Site Treatment Plans, Draft Site Treatment Plans, and Final Site Treatment Plans are due to the affected states in October, 1993, August, 1994, and February, 1995, respectively.

Mound has supplied the inventory and treatment capability information for the initial (180-day) report. Work is progressing on the Conceptual Site Treatment Plan.

National Environmental Policy Act (NEPA)

The National Environmental Policy Act (NEPA) of 1969 was established to ensure that consideration is given to the potential environmental impact of federal actions prior to the irretrievable commitment of resources. DOE has formalized its approach to NEPA by enacting regulations (10 CFR 1021). Mound has also formalized its approach by developing internal NEPA guidance documents.

In September of 1992, Mound Plant supervisors received training on the Plant's responsibilities for NEPA compliance. This training will help ensure that all applicable projects receive thorough NEPA reviews.

Numerous checklists and other NEPA-related documents were prepared for Mound in 1992. One process, thermal treatment of RCRA mixed

wastes, underwent a more formal NEPA review, an Environmental Assessment (EA). The EA for this unit was submitted to the Dayton Area Office of DOE in December of 1992. DOE is reviewing the document. Only when DOE concurs that the operation of the unit warrants a "Finding of No Significant Impact" can operation of this unit commence.

Endangered Species Act (ESA)

Provisions of the Endangered Species Act (ESA) of 1973, as amended, prohibit federal departments such as the DOE from carrying out projects that would destroy or modify a habitat critical to the survival of an endangered or threatened species.

Mound has performed a number of surveys for threatened and endangered species. Two potential ESA compliance issues have been noted. First, an endangered plant species, the Inland rush (*Juncus interior*), and an endangered bird species, the Dark-eyed junco (*Junco hyemalis*), have been observed onsite. It is not known at this time if the species are truly indigenous to the area. More detailed studies are underway. Secondly, it has been determined that certain portions of the Plant could serve as summer habitat areas for the Indiana bat (*Myotis sodalis*). At this point, no Indiana bats have been observed. Neither the solitary observations of the rush and the junco nor the potential habitat for the Indiana bat are expected to affect CERCLA operations onsite. However, planned ecological assessments call for biologists to determine animal populations in the area with specific emphasis on threatened and endangered species.

Executive Order 11988, "Floodplain Management"

The main plant site at Mound is not located in a floodplain. Recent investigations indicate that lower plant areas around the production wells may be in the 100-yr floodplain. This finding does not significantly affect operations at Mound.

Executive Order 11990, "Protection of Wetlands"

Ecological assessments conducted during CERCLA activities for the site will ensure compliance with this Order. Biologists will conduct surveys of sensitive environments including wetlands and floodplains.

2.2 Other Key Environmental Compliance Issues

Low Specific Activity (LSA) Waste Shipments

On May 29, 1992, Mound was notified that it had received approval to ship low-level radioactive soils to the Nevada Test Site. This approval ended a more than two year moratorium on offsite shipments of low specific activity soils. These soil-based wastes were generated during Decommissioning and Decontamination (D&D) projects at Mound. A total of 682 boxes had been stored onsite. Each box contained 100 ft³ (about 8000 lbs) of soil. After the May notification, Mound began the systematic elimination of the backlog. The last shipment was approved for transport in October of 1992; all shipments arrived at the Nevada Test Site without incident.

Tiger Team Action Plan

EG&G Mound continues to make improvements recommended by the 1989 DOE Tiger Team audit. These improvements are being implemented in accordance with a Corrective Action Plan developed for the Plant. As of December 31, 1992, corrective actions had been completed for 44 of the 76 findings assigned to EG&G Mound. For the Plant as of that date, 40 findings had been completed, 56 findings were scheduled for completion, and 16 findings were overdue.

Supplement #1 to the Corrective Action Plan was submitted to DOE on February 27, 1992. This Supplement requested revisions to the action plans

for 40 findings. On July 27, 1992, DOE granted approval on 21 of those revisions. Supplement #2 to the Corrective Action Plan was submitted to DOE on September 30, 1992. This Supplement included those findings not previously approved, as well as four additional revisions.

Emphasis in 1992 for the Tiger Team Action Plan centered on closure package status, independent verification, and finding completion.

DP/TSA

A Defense Programs Technical Safety Appraisal (DP/TSA) was conducted at Mound during August and September of 1992. Numerous plant "issues" were identified for corrective action. The formal report was received in November of 1992. EG&G Mound submitted a corrective action plan in February of 1993. Revisions to that Plan were submitted in March of 1993.

Major External Environmental Audits in 1992

U.S. EPA inspection. The annual multi-disciplinary inspection of Mound by the U.S. EPA was conducted September 22-24, 1992. Mound's nonradioactive air and water monitoring programs were evaluated. Additional areas covered by the inspection included: underground storage tanks, spill prevention measures, and management of PCBs. A formal report has not been received. During the inspection close-out meeting, however, the inspector indicated a overall positive impression of Mound's performance.

Ohio EPA inspection. An unannounced RCRA inspection by the Ohio EPA was conducted on July 7, 1992, with a follow-up visit on July 9, 1992. Two violations of the Ohio Administrative Code were cited. Both violations were minor and were resolved within the month of July.

Compliance Summary

PUCO inspection. An unannounced Public Utilities Commission of Ohio (PUCO) inspection was held in conjunction with the Ohio EPA inspection described above. The scope of the inspection was limited to compliance with Department of Transportation regulations for radioactive waste shipments. A formal report was issued which identified a number of minor deficiencies. No serious problems or findings were noted.

Pending Lawsuit

A class action lawsuit was filed against the Monsanto Research Corporation (MRC) and EG&G Mound (EG&G) on December 5, 1991. The lawsuit asserts that MRC and EG&G, Mound's former and current contractor, respectively, "engaged in a continuous course of negligent ... and unlawful conduct resulting in ... repeated discharges of both radioactive and nonradioactive hazardous substances ... into the environment surrounding the facility." The lawsuit further asserts that these actions were "concealed from the plaintiffs." Though 33 individuals are listed as plaintiffs, attorneys representing the plaintiffs are seeking class certification for all persons who were residents, property owners, or lessees of property within a 5-mile radius of the Plant.

EG&G strongly believes this suit is without merit. MRC and EG&G have filed extensive motions with the Court seeking dismissal of the claims. A decision on the motions is pending. Trial of the case is currently scheduled to commence September 27, 1993.

Environmental data for Mound have been published each year in publicly distributed documents such as this report. The data demonstrate the efforts taken by the Plant to operate within all applicable regulatory requirements and guidelines. Any individual who desires more information about operations at the Plant is encouraged to contact Mound's Public Relations Office.

2.3 Highlights for the First Quarter of 1993

- On January 5, 1993, the Ohio EPA conducted a routine inspection of Mound's drinking water system. A formal report was received in March. The inspector reported that the facilities appear to be in good condition.
- On January 26, 1993, Mound submitted its Revised Part B application to the Ohio EPA. The Part B application is a 13-volume set covering Mound's RCRA waste management program.
- A renewed Permit-to-Operate was received from the Ohio EPA on February 1, 1993. The permit allows continued operation of an open-top vapor degreaser that is essential to machining operations performed onsite.
- In February, the SARA Title III hazardous chemical inventory information for calendar year 1992 was submitted to the State Emergency Response Commission. This submission satisfied state and federal reporting requirements due each March 1.
- In March, Mound submitted a revised Corrective Action Plan for the DP/TSA.
- Also in March, the SARA Title III toxic chemical release data for calendar year 1992 were submitted to the state and federal EPAs.
- On March 23, 1993, an NPDES inspection was conducted by the Ohio EPA. Based on the close-out session with the inspector, no deficiencies were noted.

3.0 ENVIRONMENTAL PROGRAM INFORMATION

The principal objective of the environmental programs in place at Mound is to ensure that any threat to human health or the environment is promptly detected and mitigated. It is also Mound policy that meeting this goal be viewed as a minimum standard of practice; better performance should always be pursued. The philosophy is evident in the extent and scope of Mound's effluent and environmental monitoring programs. It is also supported by Mound's commitment to successful programs in the areas of:

- ALARA (As Low As Reasonably Achievable),
- Regulatory compliance,
- Waste minimization and pollution prevention,
- Environmental training, and
- Environmental restoration.

3.1 Effluent Monitoring

Air Emissions

All applicable stacks at Mound are sampled continuously for tritium and/or particulate radionuclides. These samples are collected to demonstrate Plant compliance with the NESHAPs for radionuclides regulations. An outline of the stack sampling program is shown in Table 3-1.

Liquid Releases

Mound's liquid discharges are also sampled continuously at their discharge points. With liquid releases, however, the key concern involves nonradiological parameters. Extensive sampling and analysis is required of the Plant to demonstrate compliance with Mound's NPDES permit. Mound also samples a number of locations prior to discharge to ensure that any unexpected constituents are quickly detected. An outline of the liquid effluent sampling program is also shown in Table 3-1.

Environmental Monitoring

Mound's environmental monitoring program involves sample collection from ambient air, regional water sources, sediments, onsite and offsite groundwater, vegetation, fish, and produce. An outline of the program is shown in Table 3-2.

Radionuclides of Concern

The principal radionuclides of concern at Mound are tritium and plutonium-238; no other radionuclides contribute significantly to the dose estimates made each year for the Plant (Appendix). Extremely small quantities of other radionuclides, however, are (or have been) used at Mound. In cases where there is a strong probability of detecting such radionuclides in the environment, they have been added to the appropriate sampling schedule. The primary example in this case is uranium. Because U-234 is a decay product of Pu-238, U-234 is a part of Mound's routine environmental monitoring program. Mound analyzes drinking water and river water samples to monitor the ingrowth of U-234. No significant concentrations have been encountered.

Table 3-1. Effluent Monitoring at Mound

	Parameter Measured ^a	No. of Sampling Locations	Collection Frequency
Air Emissions			
	HT, HTO	7	Daily
	²³⁸ Pu	7	Daily
	^{239,240} Pu	7	Daily
	^{233,234} U	2	Daily
	²³⁸ U	2	Daily
Liquid Effluents			
	Flow rate	6	Daily (4) 2/month (1) as pumped (1)
	HTO	3	Daily
	Pu	3	Daily
	U	3	Daily
	pH	6	Daily (1) Weekly (2) Bimonthly (2) Monthly (1)
	Chlorine	2	Daily(1) Weekly (1)
	Suspended solids	3	2/week (1) Weekly (2)
	COD	1	Weekly
	CBOD ₅	1	2/week
	Fecal coliform	1	Weekly
	E. coli	1	Monthly

^a HTO - Tritium oxide
HT - Elemental tritium
Pu - Plutonium

U - Uranium
CBOD₅ - Five-day carbonaceous biochemical oxygen demand
COD - Chemical oxygen demand

Table 3-1. Continued

Parameter Measured ^a	No. of Sampling Locations	Collection Frequency
Ammonia	1	2/month
Oil and Grease	2	Monthly (1) Quarterly (1)
Free cyanide	1	Monthly
Total cyanide	1	2/month
Cadmium	3	Weekly (1) 2/month (1) Monthly (1)
Chromium	3	Monthly (2) 2/month (1)
Copper	3	Weekly (1) 2/month (1) Monthly (1)
Lead	2	Monthly
Mercury	1	2/year
Nickel	3	Weekly (1) 2/month (1) Monthly (1)
Zinc	3	Weekly (1) 2/month (1) Monthly (1)
Total toxic organics	1	Quarterly
Pentachlorophenol	1	Monthly
Bis(2-ethylhexyl) phthalate	1	Monthly
Toxicity testing		
<i>Ceriodaphnia dubia</i>		
acute	1	Monthly
chronic	1	Quarterly
<i>Pimephales promelas</i>		
acute	1	Monthly
chronic	1	Quarterly

^a HTO - Tritium oxide
HT - Elemental tritium
Pu - Plutonium

U - Uranium
CBOD₅ - Five-day carbonaceous biochemical oxygen demand
COD - Chemical oxygen demand

Table 3-2. Environmental Surveillance at Mound

Environmental Medium	Parameter Measured ^a	No. of Sampling Locations ^b	Collection Frequency
Onsite			
Ambient air	HTO	7	Weekly
	²³⁸ Pu, ^{239,240} Pu	7	Weekly
	Particulates	7	Weekly
Drinking water	H-3	3	Weekly
	²³⁸ Pu, ^{239,240} Pu	3	Monthly
	^{233,234} U, ²³⁸ U	3	Monthly
	VOCs	3	Quarterly
Monitoring wells	H-3	c	Quarterly
	VOCs	c	Quarterly
Offsite			
Ambient air	HTO	15	Weekly
	²³⁸ Pu, ^{239,240} Pu	15	Weekly
	Particulates	15	Weekly
River water	Biotoxicity	3	Monthly (acute) Quarterly (chronic)
	H-3	6	Weekly
	²³⁸ Pu, ^{239,240} Pu	6	Monthly
	^{233,234} U, ²³⁸ U	6	Monthly
River silt	²³⁸ Pu, ^{239,240} Pu	6	Quarterly
Pond water	H-3	8	Quarterly
	²³⁸ Pu, ^{239,240} Pu	8	Quarterly
Pond silt	²³⁸ Pu, ^{239,240} Pu	8	Quarterly
Drinking water	H-3	c	Monthly
	²³⁸ Pu, ^{239,240} Pu	c	Monthly
	^{233,234} U, ²³⁸ U	c	Monthly
Monitoring wells	HTO	c	Quarterly
	VOCs	c	Quarterly

^a HTO - Tritium oxide

^b Includes background location when applicable.

^c Number of sampling locations varies. Locations for 1992 are specified in Chapter 6.

Table 3-2. Continued

Environmental Medium	Parameter Measured ^a	No. of Sampling Locations ^b	Collection Frequency
Vegetation	HTO	7	Quarterly
	²³⁸ Pu, ^{239,240} Pu	7	Quarterly
Produce	HTO	7	Quarterly
	²³⁸ Pu, ^{239,240} Pu	7	Quarterly
Fish	²³⁸ Pu, ^{239,240} Pu	2	Quarterly

^a HTO - Tritium oxide

^b Includes background location when applicable.

^c Number of sampling locations varies. Locations for 1992 are specified in Chapter 6.

Rationale

Environmental surveillance practices at Mound focus on those environmental media that are most likely to contain the radionuclide(s) of concern. For example, since Pu-238 in river water tends to accumulate in sediments, Mound evaluates Pu concentrations in sediment samples and in bottom-feeding fish such as carp.

The same rationale has been applied to the vegetation and produce sampling programs. Grass is sampled for Pu-238 and tritium because grass can take up these radionuclides from both air and soil. Root crops such as potatoes are analyzed since the roots may come into contact with subsurface plutonium. Tomato samples, conversely, are of use due to their high water content; the high water content makes them excellent indicators of tritium uptake.

Environmental Levels

To evaluate Mound's impact on the environment, it is necessary to establish background or baseline levels of contaminants in a variety of media. Mound accomplishes this task by collecting samples at points where discharges from the Plant are not observable. These locations are usually in a direction opposite prevailing winds and at a distance too great to be impacted by the Plant. Concentrations measured at these reference locations are referred to as "environmental levels" in this report.

3.3 Effluent Treatment and Waste Management

Effluent Treatment

Air. High efficiency particulate air (HEPA) filters remove particulate radionuclides from process air emissions. Air effluents are filtered first at their point of origin (e.g., a glove box), and again just before reaching the release point (i.e., the stack or vent). The filtering system in place at each stack is composed of two banks of HEPA filters connected in series. Each filter bank has a nominal collection efficiency of 99.95%.

Tritium is not trapped by HEPA filters. A chemical process is used to remove tritium from waste gas streams.

Liquids. An onsite sanitary waste treatment plant manages all domestic sewage generated at Mound. An activated sludge process operated in the extended aeration mode provides the necessary treatment. The installation of a continuous backwash sand filter in 1986 essentially upgraded the plant to tertiary treatment. The influent and effluent at the sewage treatment plant are monitored for radioactivity to ensure that radionuclides are not inadvertently discharged to the environment. All wastewater, after appropriate treatment and monitoring, is discharged from the Plant to the Great Miami River. Digested sludge from the sewage treatment plant is managed as Low Specific Activity (LSA) waste.

Waste Management

Hazardous wastes. Mound has "interim status" as a RCRA treatment and disposal facility. "Interim status" provides for the continued use of RCRA facilities while awaiting a formal permit. The operations at Mound subject to RCRA are three hazardous waste storage units and three hazardous waste treatment units. The storage units accommodate hazardous wastes, wastes that are

both hazardous and radioactive, and energetic materials wastes. The thermal treatment units for which Mound seeks the permit are associated with a glass melter, open burning of explosives, and explosives retorting. Hazardous wastes not treated onsite are shipped offsite by a waste disposal firm for treatment and/or disposal using EPA-approved procedures.

Radioactive wastes. In May of 1992, Mound received approval to ship low specific activity (LSA) wastes to the Nevada Test Site (NTS) for disposal. Mound received approval after demonstrating that the Plant had established elaborate waste characterization procedures and policies. This approval ended a more than two year moratorium on offsite shipments of LSA soils. During 1992 a total of 682 boxes, each containing about 8000 lbs. of soil, were shipped without incident to the NTS.

Nonhazardous, nonradioactive wastes. Solid wastes are disposed of according to a recycling and reclamation program whenever possible. White paper, scrap metal, and wood are sold for reclamation. General refuse is transported to a sanitary landfill approved by the county and the state.

3.4 Environmental Permits

Operations at Mound are routinely measured against the compliance requirements of four state air permits and one state NPDES permit. Additionally, Mound's hazardous waste program operates under interim status with the state's RCRA program. A current listing of the Plant's permits is shown in Table 3-3.

Table 3-3. Environmental Permits Issued to Mound

Operation	Permit No.	Valid Through	Issuing Agency
Paint spray booth	0857091196K001	11/26/95	Ohio EPA
Open-top vapor degreaser	0857091196L002	01/26/96	Ohio EPA
Open burning (explosives disposal)	N/A letter permit	09/28/93	Ohio EPA
Open burning (firefighter training)	N/A letter permit	Permanent authorization	Ohio EPA
Wastewater discharge (NPDES)	1T000005*DD	04/01/97	Ohio EPA
Hazardous waste operations (RCRA)	N/A	Interim status ^a	Ohio EPA

^a The Mound Plant is operating under interim status. The revised Part B application was submitted to the Ohio EPA on January 26, 1993.

3.5 Environmental Training

All Mound personnel received hazardous waste management training in 1992. Staff members with environment, safety, and health (ES&H) responsibilities received much more extensive training. Key ES&H training topics covered in 1992 included radioactive and hazardous materials handling; Department of Transportation regulations; updates on analytical techniques; Occupational Safety and Health regulations; and environmental law compliance.

3.6 Waste Minimization and Pollution Prevention (WM/PP)

Mound has established a Waste Minimization / Pollution Prevention Program to reduce the total volume and toxicity of Mound's hazardous, radioactive, and solid waste streams. These goals are accomplished at Mound by preventing waste generation, by recycling and reclamation, and by a variety of treatment techniques. The organizational structure of the Program is shown in Figure 3-1.

Figure 3-1. Organizational Structure of Mound's Waste Minimization Program

Specific activities underway in 1992 included high-grade paper and aluminum can recycling programs. Offsite reclamation projects were also pursued for halogenated solvents, waste oils, lead-acid batteries, and scrap metals. Through the efforts of the WM/PP Program, Mound significantly reduced the volumes of waste solvents and low specific activity wastes generated onsite. Long-term goals for the program are to continue to:

- reduce waste generation,
- expand recycling programs,
- encourage the use of non-ozone-depleting substances, and
- ensure employee awareness of these goals.

3.7 Environmental Restoration (ER)

Mound was added to the National Priorities List in 1989. A Federal Facilities Agreement between DOE and EPA followed in October of 1990. The FFA defines the responsibilities of each party for the completion of CERCLA-related activities. The DOE and the Ohio EPA have renegotiated the bipartite FFA to include the State of Ohio as a signatory. The revised Agreement has been approved by the three agencies and is ready for signature.

Preliminary CERCLA (Superfund) assessments of contamination at Mound identified approximately 125 locations of actual or suspected releases. These locations were grouped into nine "Operable Units", or OUs, based on waste type and/or geographical proximity. Three of these OUs are no longer necessary. Operable Unit 7 was eliminated when testing found no evidence of contamination. Operable Units 3 and 8 have been targeted for elimination; those sites previously grouped as OU 3 or 8 will be placed in other operable units. This approach will expedite ER activities and provide considerable cost savings.

The approximate boundaries of the remaining OUs are shown in Figure 3-2. A brief description of each operable unit and its status is presented in the paragraphs that follow.

Operable Unit 1. Operable Unit 1 represents sanitary landfill operational areas. The key concern for OU 1 is the potential migration of contaminated groundwater to the Great Miami River and the Buried Valley Aquifer. To evaluate migration of contaminants, 11 monitoring wells and nine piezometers (devices used to measure water levels) are being installed. Soil contamination is also a concern. In 1992, laboratory analysis of soil samples continued.

Operable Unit 2. Operable Unit 2 refers principally to the Main Hill seeps. Seeps occur when groundwater finds a path to the surface. Mound is developing a Work Plan for OU 2 which will investigate the migration of groundwater through cracks in the limestone cliffs comprising Mound's Main Hill.

Operable Unit 3. Operable Unit 3 includes a number of miscellaneous sites. A preliminary investigation of 32 potential release sites has been performed and a Limited Field Investigation Report has been submitted to the U.S. and Ohio EPAs. The Limited Field Investigation Report found no need for further CERCLA investigation at 23 of the sites. The report recommends that the remaining 9 sites be divided between OU 2, OU 5, and OU 6, as appropriate.

Operable Unit 4. Operable Unit 4 addresses an abandoned segment of the Miami-Erie Canal just west of the Plant site. The Canal contains plutonium and tritium contamination as a result of a 1969 break of a waste pipe line. Treatment options for removal of plutonium from the Canal are being investigated.

Figure 3-2. Mound Plant Operable Unit boundaries

Operable Unit 5. Operable Unit 5 includes soils with known or suspected radioactive contamination. A Work Plan is under development to determine the extent of contamination associated with this OU.

Operable Unit 6. Operable Unit 6 addresses Decommissioning and Decontamination (D&D) sites. These D&D sites are areas of soil contamination that are undergoing removal or are scheduled for removal. Therefore, the primary role of ER for OU 6 is to verify cleanup after the soils are removed.

Operable Unit 9. Operable Unit 9 is the so-called Site-wide OU. This Unit is necessary to ensure that all data from individual units are compiled into a comprehensive assessment of offsite migration of contaminants in groundwater, surface water, soil, and air. Extensive testing is planned for OU 9. Key study areas include onsite and offsite groundwater, soil, sediment, and an evaluation of area plant and animal life.

Though the operable units described in this section are on or near the Plant site, regional sampling activities are also planned. Mound's CERCLA program intends to investigate possible environmental impacts within a 20-mile radius of the site. Extensive groundwater, surface water, and surface and subsurface soil studies will be performed. Ecological assessments by qualified biologists will also be key components of the characterization efforts.

Environmental Program Information

4.0 RADIOLOGICAL ENVIRONMENTAL PROGRAM INFORMATION

Operations at Mound result in the discharge of radioactive effluents to the air and the Great Miami River. Release limits on these discharges have been established by the Department of Energy and the U.S. EPA. Mound monitors release levels using a network of stack and water sample collection devices. In addition, Mound operates an extensive environmental surveillance program. Data generated from those programs are presented in this Chapter. As demonstrated by the data, radioactive releases from Mound in 1992 did not significantly impact human health or the environment.

4.1 Radionuclide Releases from Mound

1992 Data

Table 4-1 lists the quantities of radionuclides released by Mound into the air and water during 1992. The unit used to report these quantities is the curie (Ci), a unit of radioactivity equal to 3.7×10^{10} disintegrations per second. The quantities, or activities, shown in Table 4-1 were measured at the point of release. Information on the effluent monitors used to estimate release levels appears in Section 4.2 of this Chapter.

Table 4-1. Radiological Effluent Data for 1992

Radionuclide	Released to	Activity, Ci
Tritium ^a	Air	825 ^a
	Water	3.2
Plutonium-238	Air	5.6×10^{-6}
	Water	4.6×10^{-4}
Plutonium-239,240	Air	3.8×10^{-8}
	Water	5.6×10^{-6}
Uranium-233,234	Air	2.1×10^{-8}
	Water	3.5×10^{-4}
Uranium-238	Air	1.4×10^{-8}

^aTritium in air consists of: Tritium oxide, 616 Ci
Elemental tritium, 209 Ci

5-Year Trends in Radionuclide Releases

It is Mound policy and philosophy that all releases of effluents from the Plant are ALARA, that is, As Low As Reasonably Achievable. To monitor Plant performance relative to ALARA goals, ALARA Investigation Levels (AILs) are established each year for principal radionuclides. AILs are set well below applicable regulatory standards to trigger internal investigations when exceeded.

Figures 4-1 through 4-8 illustrate 5-year trends in releases of tritium, plutonium, and uranium to the air and the Great Miami River. Mound's 1992 AILs have been included on the trend charts where applicable.

Tritium. Figure 4-1 shows releases of tritium to the atmosphere. The 1989 peak can be attributed to an accidental release. The 1992 value, 825 Ci,

represents a 5-year low in release rates. Figure 4-2 shows tritium releases to the Great Miami River. The 3.2 Ci value for 1992 also represents a 5-year low. In 1992, tritium releases to the atmosphere and the Great Miami River did not approach their respective AILs.

Plutonium-238. Figures 4-3 and 4-4 show plutonium-238 releases to the atmosphere and the Great Miami River, respectively. Atmospheric release levels were lower in 1992 when compared to 1991 and 1990 values; liquid release levels remained essentially unchanged from 1991 to 1992. No AILs were exceeded.

Plutonium-239,240. Figures 4-5 and 4-6 illustrate 5-year trends in Pu-239 and Pu-240 release rates. Releases of these plutonium isotopes continue to be in the μCi and sub- μCi ranges.

Figure 4-1. Tritium releases from Mound to the atmosphere

Figure 4-2. Tritium releases from Mound to the Great Miami River

Figure 4-3. Plutonium-238 releases from Mound to the atmosphere

Figure 4-4. Plutonium-238 releases from Mound to the Great Miami River

Figure 4-5. Plutonium-239,240 releases from Mound to the atmosphere

Figure 4-6. Plutonium-239,240 releases from Mound to the Great Miami River

Uranium. Figures 4-7 and 4-8 depict 5-year trends in uranium-233,234 and uranium-238 release rates. Atmospheric releases of uranium are also on the sub- μCi scale. Releases of uranium-233,234 to the Great Miami River are comparable to Pu-238 release levels for the River. As seen in Figure 4-8, uranium release rates have remained stable over the 5-year period and the 1992 AIL was not exceeded.

4.2 Effluent Monitoring Program

Air

Stacks through which radioactive materials are released are sampled continuously. Those areas in which a potential for unplanned releases exists are also monitored continuously.

Tritium. In operational areas where a release potential exists, room air and exhaust stacks are continuously monitored for tritium using strategically placed ionization chambers. These monitoring systems incorporate alarms and have been placed to help to locate the source if a release should occur. In most situations, an effluent removal and containment system can be relied upon to prevent or reduce the release of tritium to the atmosphere.

Plutonium. In operational areas where a release potential exists, ventilation air passes through a minimum of two HEPA filters before discharge to the atmosphere. Fixed continuous air samplers and continuous air monitors with alarm systems are used throughout the operational areas to detect airborne plutonium. These monitoring systems have been designed to ensure that prompt corrective action can be taken to prevent or reduce the release of plutonium to the atmosphere.

Figure 4-7. Uranium releases from Mound to the atmosphere

Figure 4-8. Uranium-233,234 releases from Mound to the Great Miami River

Water

Flow-proportional samples are collected from NPDES outfalls 5002, 5601, and 5602 (Figure 4-9). Samples are collected four times during Mound's four-day work week. Three 24-hour samples are collected on Tuesdays, Wednesdays, and Thursdays. One 96-hour sample is collected on Mondays. Samples are analyzed four times a week for tritium. Plutonium-238, plutonium-239,240, and uranium-233,234 samples are composited and analyzed on a weekly basis.

Results for 1992 are shown in Table 4-1. Trend data for the 5-year period 1988-1992 appear in Figures 4-1 through 4-8.

4.3 Environmental Surveillance

In the sections that follow, tables of environmental monitoring results are presented. The tables show the:

- number of samples analyzed during the year,
- minimum concentration measured,
- maximum concentration measured,
- average value with error limits, and, when appropriate, a
- comparison to a DOE or EPA standard.

Environmental Concentrations

In a number of the tables, results are presented as "incremental concentrations". This designation indicates that an average background concentration, or "environmental" concentration, has been subtracted from those values. Therefore, incremental concentrations represent estimates of Mound's contribution to the radionuclide content of an environmental sample.

Environmental or reference locations for Mound were positioned at sites where virtually no impact from Mound could be measured. The sites are in the least prevalent wind direction and/or are at substantial distances relative to Mound. Environmental levels for radionuclides in different environment media are shown in Table 4-2.

With decreasing releases rates of radioactivity, it has become increasingly difficult to observe Mound's contribution to radionuclide concentrations in the environment. For this reason, many of the tables in this Chapter report data as "below environmental levels". In those cases, it was not possible to observe an incremental concentration. In other words, the radionuclide concentration in that sample was equal to or less than the background sample.

Lower Detection Limit

All concentrations of radionuclides are determined by subtracting the instrument background and reagent blanks from the sample count. The lower detection limit (LDL) is shown for each set of data in this Chapter. The LDL is that value at which the presence of a contaminant, above that inherent in the detection method (including the reagent blank), can be inferred at the 95% confidence level. An LDL is calculated from the combined instrument and reagent blank backgrounds and their respective estimated standard deviations.

4.4 Air Sampling Program

Two types of air samples are collected at each sampling location. A particulate air sample is analyzed for plutonium-238 and plutonium-239,240. A second air sample, collected in a bubbler apparatus, is analyzed for tritium oxide. Mound operates a network of 22 stations: seven onsite and 15 offsite. The locations of the stations are shown in Figures 4-10 and 4-11, respectively.

Figure 4-9. Liquid effluent sampling locations for radionuclides

Table 4-2. Environmental Concentrations of Radionuclides in Sample Media in 1992

Radionuclide	Average Concentration ^{a,b}	Unit of Measure
Ambient air^c		
Tritium oxide	6.59 ± 2.97	10^{-12} $\mu\text{Ci/mL}$
Plutonium-238	N.D.	
Plutonium-239,240	0.05 ± 0.08	10^{-18} $\mu\text{Ci/mL}$
River water^d		
Tritium	N.D.	
Plutonium-238	0.24 ± 1.5	10^{-12} $\mu\text{Ci/mL}$
Plutonium-239,240	N.D.	
Uranium-233,234	0.87 ± 0.08	10^{-9} $\mu\text{Ci/mL}$
Uranium-238	0.81 ± 0.08	10^{-9} $\mu\text{Ci/mL}$
Pond water^e		
Tritium	N.D.	
Plutonium-238	N.D.	
Plutonium-239,240	0.09 ± 2.06	10^{-12} $\mu\text{Ci/mL}$
Sediment		
Plutonium-238 in river sediment ^d	1.26 ± 1.91	10^{-9} $\mu\text{Ci/g}$
Plutonium-238 in pond sediment ^e	0.51 ± 0.81	10^{-9} $\mu\text{Ci/g}$
Plutonium-239,240 in river sediment ^d	1.70 ± 2.04	10^{-9} $\mu\text{Ci/g}$
Plutonium-239,240 in pond sediment ^e	1.26 ± 1.18	10^{-9} $\mu\text{Ci/g}$
Vegetation^f		
Tritium in grass	N.D.	
Plutonium-238 in grass	0.31 ± 0.26	10^{-9} $\mu\text{Ci/g}$
Plutonium-239,240 in grass	0.05 ± 0.07	10^{-9} $\mu\text{Ci/g}$
Foodstuffs^f		
Tritium in tomatoes	0.15 ± 0.05	10^{-6} $\mu\text{Ci/g}$
Plutonium-238 in root crops	0.007 ± 0.01	10^{-9} $\mu\text{Ci/g}$
Plutonium-239,240 in root crops	0.01 ± 0.03	10^{-9} $\mu\text{Ci/g}$
Plutonium-238 in fish	0.04 ± 0.19	10^{-9} $\mu\text{Ci/g}$
Plutonium-239,240 in fish	0.002 ± 0.02	10^{-9} $\mu\text{Ci/g}$

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b N.D. indicates concentrations below the reagent blanks.

^c Measured 28 mi (45 km) northwest of Mound.

^d Measured 20 mi (32 km) upstream of Mound on the Great Miami River.

^e Measured 38 mi (61 km) southeast of Mound.

^f Measured 40 mi (64 km) west of Mound.

Figure 4-10. Onsite air sampling locations

Figure 4-11. Offsite air sampling locations

Tritium. The air sample for tritium analysis is collected on a continuous basis. Air is bubbled through 200 mL of ethylene glycol at a flow rate of approximately $1000 \text{ cm}^3/\text{min}$. Ethylene glycol is used as the trapping solution because it is not subject to loss by evaporation and will not freeze when exposed to winter sampling conditions (Sheehan et al., 1975). The glycol solutions are changed weekly and represent a sample volume of approximately 10 m^3 of air. An aliquot of each

glycol solution is then analyzed weekly in a liquid scintillation counter.

With this technique, tritium oxide rather than elemental tritium is collected. This approach is appropriate because tritium oxide is the more radiotoxic form of tritium. The dose that would result from a given release of tritium oxide would be 25,000 times greater than the dose from the same number of curies of elemental tritium.

Plutonium. The particulate sample for isotopic plutonium analysis is collected on a 200-mm diameter fiber glass disc by a continuously operating high-volume air sampler. The air is sampled at an average rate of $1.3 \times 10^6 \text{ cm}^3/\text{min}$ (45 ft³/min). The disc is changed weekly and represents a sample volume of approximately 1300 m³ of air. Each sampler is equipped with a flow meter so that location-specific flow rates can be calculated.

Plutonium analyses are performed on monthly composite samples for each onsite location and for the three offsite stations within 1000 m of Mound. The remaining samples are composited for quarterly analysis. The analytical protocol for plutonium incorporates the following basic steps: use of an internal tracer, chemical treatment, separation of plutonium with anion exchange resin, and alpha spectrometry.

Uranium. As seen in Table 4-1, Mound includes isotopes of uranium in the release data for air. However, because the stack emissions of uranium-233,234 and uranium-238 are so low and their contributions to dose are negligible, these radionuclides are not monitored at the environmental air sampling stations.

Applicable Standards

The guides for concentrations of radionuclides in air are given in DOE Order 5400.5 (DOE, 1990). These guides are based on recommendations in Publications 26 and 30 of the International Commission on Radiological Protection (ICRP 1977, 1979). The guides for radionuclide concentrations are referred to as Derived Concentration Guides, or DCGs. The DCG for a radionuclide is defined as the concentration of that radionuclide in air or water which will give a 50-year committed effective dose equivalent of 100 mrem (1 mSv) if taken into the body by inhalation or ingestion. DCGs for tritium, plutonium-238 in air, and plutonium-239,240 in air are listed in Tables 4-3, 4-4, and 4-5, respectively.

Results for 1992

Radionuclide concentrations measured at environmental air sampling stations in 1992 are shown in Tables 4-3, 4-4, and 4-5. The results are also presented in terms of the percentage DCG they represent. As seen from the tables, air concentrations of tritium and plutonium measured on and about Mound consistently averaged less than 0.03% of the DCGs established for those radionuclides.

The results for 1992 reflect a number of changes in the environmental surveillance network. Two onsite stations, Stations 213 and 214, were relocated in July of 1992. These moves were needed to eliminate obstructions and interferences with the collection of truly representative samples. After the relocations, the station designations were revised to reflect the change. Therefore, Tables 4-3, 4-4, and 4-5 include data from Stations 213 and 214 (before the move) and Stations 213R and 214R (after the move). Both the previous and current sampling locations for these two stations are shown on Figure 4-10.

Additional changes in 1992 included the expansion of the onsite sampling network. Two new stations, Stations 216 and 217, were added in July of 1992. Their locations are shown in Figure 4-10. Data from these new sampling stations now appears in Tables 4-3, 4-4, and 4-5.

4.5 Surface Water and Sediment Sampling Program

The Great Miami River and other regional surface waters are sampled routinely by Mound for tritium, isotopes of plutonium, and isotopes of uranium. Sediment samples are also collected from these locations and analyzed for plutonium isotopes. Sampling locations are shown in Figure 4-12. The analytical procedures followed for these sampling are consistent with the descriptions presented in Section 4.2 of this report.

Table 4-3. Incremental Concentrations^a of Tritium Oxide in Air in 1992

Location*	Number of Samples	Tritium Oxide 10 ⁻¹² μCi/mL			Average as a percent of DOE DCG ^d
		Minimum	Maximum	Average ^{b,c}	
Offsite					
101	52	e	43.97	6.57 ± 4.32	0.007
102	49	e	39.71	8.74 ± 4.27	0.009
103	50	e	35.53	4.32 ± 4.42	0.004
104	51	e	40.54	2.86 ± 4.45	0.003
105	52	e	33.89	3.84 ± 4.29	0.004
108	52	e	25.69	0.27 ± 4.34	0.0003
110	51	e	34.80	0.07 ± 4.64	0.00007
111	51	e	18.01	e	e
112	52	e	25.78	e	e
115	48	e	17.61	e	e
118	52	e	31.80	1.66 ± 4.40	0.002
122	51	e	27.83	3.31 ± 4.12	0.003
123	51	e	45.66	6.33 ± 4.61	0.006
124	50	e	59.39	5.65 ± 4.53	0.006
Onsite					
211	49	e	133.14	16.55 ± 8.56	0.02
212	51	e	39.62	7.43 ± 4.09	0.007
213	20	e	43.21	13.78 ± 5.80	0.01
213R	28	e	55.20	9.11 ± 6.57	0.009
214	20	e	20.24	4.28 ± 4.51	0.004
214R	31	e	55.24	8.09 ± 6.24	0.008
215	52	e	24.15	4.11 ± 3.90	0.004
216	31	e	36.21	5.14 ± 5.94	0.005
217	30	e	34.02	1.90 ± 6.28	0.002

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for tritium oxide in air is 20×10^{-12} μ Ci/mL.

^d DOE DCG for tritium oxide in air is $100,000 \times 10^{-12}$ μ Ci/mL.

^e Below environmental level.

* Offsite sampling locations shown on Figure 4-11.

Onsite sampling locations shown on Figure 4-10.

Radiological Environmental Program Information

Table 4-4. Concentrations^a of Plutonium-238 in Air in 1992

Location*	Number of Samples	Plutonium-238 10 ⁻¹⁸ μCi/mL			Average as a percent of DOE DCG ^d
		Minimum	Maximum	Average ^{b,c}	
Offsite					
101	4	e	0.70	0.32 ± 0.52	0.001
102	4	0.40	7.84	2.58 ± 5.61	0.009
103	4	1.05	2.62	1.77 ± 1.06	0.006
104	4	0.28	1.06	0.53 ± 0.57	0.002
105	4	e	0.58	0.27 ± 0.45	0.0009
108	4	e	1.92	0.41 ± 1.63	0.001
110	4	e	1.26	0.24 ± 1.13	0.0008
111	4	e	0.72	0.17 ± 0.65	0.0006
112	4	e	1.01	0.46 ± 0.99	0.002
115	4	0.04	0.24	0.12 ± 0.15	0.0004
118	4	0.11	1.67	0.68 ± 1.13	0.002
122	12	0.37	2.13	0.96 ± 0.33	0.003
123	12	1.09	4.81	2.55 ± 0.65	0.009
124	12	0.46	19.67	4.38 ± 3.42	0.01
Onsite					
211	12	3.07	14.99	6.42 ± 2.13	0.02
212	12	0.95	8.04	2.83 ± 1.27	0.009
213	5	12.94	31.78	22.33 ± 8.91	0.07
213R	7	3.28	15.76	10.52 ± 4.21	0.04
214	5	1.24	14.17	6.79 ± 5.92	0.02
214R	7	2.88	12.51	5.83 ± 3.07	0.02
215	12	0.94	11.34	3.58 ± 1.70	0.01
216	7	0.77	14.53	4.53 ± 4.19	0.02
217	7	0.31	2.73	1.26 ± 0.75	0.004

^a The environmental level was less than the reagent blank; therefore the data have not been labelled incremental concentrations.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for monthly values is 0.8×10^{-18} μ Ci/mL; for quarterly values the LDL is 0.5×10^{-18} μ Ci/mL.

^d DOE DCG for plutonium-238 in air is $30,000 \times 10^{-18}$ μ Ci/mL.

^e Below reagent blank.

* Offsite sampling locations shown on Figure 4-11.

Onsite sampling locations shown on Figure 4-10.

Table 4-5. Incremental Concentrations^a of Plutonium-239,240 in Air in 1992

Location*	Number of Samples	Plutonium-239,240 10 ⁻¹⁸ μCi/mL			Average as a percent of DOE DCG ^d
		Minimum	Maximum	Average ^{b,c}	
Offsite					
101	4	e	0.13	0.05 ± 0.12	0.0003
102	4	0.07	0.11	0.09 ± 0.09	0.0005
103	4	e	0.06	e	e
104	4	0.01	0.10	0.06 ± 0.10	0.0003
105	4	e	0.08	0.02 ± 0.11	0.0001
108	4	e	0.08	0.03 ± 0.10	0.0002
110	4	e	0.08	0.03 ± 0.10	0.0002
111	4	e	0.03	0.01 ± 0.08	0.00005
112	4	e	0.01	e	e
115	4	e	0.13	0.03 ± 0.14	0.0002
118	4	e	0.04	e	e
122	12	e	0.40	0.11 ± 0.24	0.0006
123	12	e	1.32	0.17 ± 0.34	0.0009
124	12	e	1.36	0.15 ± 0.39	0.0008
Onsite					
211	12	e	1.16	0.29 ± 0.30	0.001
212	12	e	0.67	0.16 ± 0.26	0.0008
213	5	0.09	0.78	0.35 ± 0.34	0.002
213R	7	e	1.34	0.37 ± 0.60	0.002
214	5	e	0.55	0.26 ± 0.34	0.001
214R	7	e	1.48	0.24 ± 0.72	0.001
215	12	e	0.64	0.19 ± 0.26	0.001
216	7	e	0.41	0.002 ± 0.38	0.00001
217	7	e	0.24	0.01 ± 0.25	0.00005

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for monthly values is 0.6×10^{-18} μ Ci/mL; for quarterly values the LDL is 0.04×10^{-18} μ Ci/mL.

^d DOE DCG for plutonium-239,240 in air is $20,000 \times 10^{-18}$ μ Ci/mL.

^e Below environmental level.

* Offsite sampling locations shown on Figure 4-11.

Onsite sampling locations shown on Figure 4-10.

Figure 4-12. Sampling locations for river water, surface water (ponds), and sediment

Great Miami River. River sampling locations have been selected according to guidelines published by the DOE (DOE 1991, 1992). These locations provide samples that are representative of river water after considerable mixing with Mound effluents has occurred. Tritium samples are collected and analyzed weekly; composite plutonium-238, plutonium-239,240, uranium-233,234, and uranium-238 samples are collected and analyzed monthly.

Regional surface waters. Seven ponds representing all compass directions relative to Mound are sampled quarterly. These samples are analyzed for tritium, plutonium-238, and plutonium-239,240.

River and pond sediments. Many plutonium solutions, including those in use at Mound, are relatively insoluble in water. For this reason, they are more likely to be found in sediment than in surface water. Additionally, because of the relatively long half-lives of plutonium isotopes, they may accumulate in sediments over a number of years. Therefore, Mound samples river and pond sediments on a quarterly basis. These samples are then analyzed for plutonium-238 and plutonium-239,240.

Applicable Standards

DOE Order 5400.5 established a radiation dose limit for the general public of 100 mrem/yr (1.0 mSv) effective dose equivalent (EDE) for all exposure pathways. To ensure that the dose standard would not be exceeded, the Order also established derived concentration guides (DCGs). DCGs are those concentrations, that under conditions of continuous exposure for one year, would result in an EDE of 100 mrem.

The primary use of DCGs for liquid releases is to control exposures received from drinking water supplies. Since neither the Great Miami River nor any of the regional ponds are sources of drinking

water, the DCGs do not apply to the environmental data reported in this section. DCGs are listed in the tables of results to help put the values in perspective. For the sediments samples, however, there are no DCGs or other applicable standards.

Results for 1992

River water. Radionuclide concentrations in the Great Miami River are shown in Tables 4-6 through 4-9. Many tritium, plutonium, and uranium measurements were below their respective reagent blanks or environmental levels. Averages for 1992 were on the order of one one-thousandth of a DCG or less.

Pond water. Radionuclide concentrations measured in pond water are shown in Tables 4-10 through 4-12. Average tritium and plutonium concentrations in pond water were slightly higher than those reported for the river. However, many of the pond samples were below environmental levels or reagent blanks.

Sediment. Results for river and pond sediment are listed in Tables 4-13 and 4-14 for plutonium-238 and plutonium-239,240, respectively. Maximum and average concentrations of plutonium for 1992 are comparable to concentrations observed in previous years. With one exception, slight increases and decreases were recorded with no evidence of an upward or downward trend. The exception involves location 4. Sediment results at that location continue to be elevated relative to the other sampling points. Since the location is downstream of Mound at a bend in the River, it is possible that some accumulation of plutonium-238 is occurring. The levels are still quite low and pose no significant risk, yet increased monitoring of this location may be warranted.

Table 4-6. Concentrations^a of Tritium in the Great Miami River in 1992

Location*	Number of Samples	Tritium 10 ⁻⁶ µCi/mL		Average ^{b,c}	Average as a percent of DOE DCG ^d
		Minimum	Maximum		
1	50	e	0.22	0.02 ± 0.02	0.001
2	51	e	0.18	e	e
3	51	e	0.26	0.002 ± 0.02	0.0001
4	51	e	0.25	0.009 ± 0.03	0.0005
5	51	e	0.38	0.03 ± 0.03	0.002

^a To eliminate a small negative bias, data from the background sampling location, Station 6, were used as the environmental blanks and as the reagent blanks.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for tritium in water is 0.2 x 10⁻⁶ µCi/mL.

^d DOE DCG for tritium in water is 2,000 x 10⁻⁶ µCi/mL.

^e Below reagent blank.

* Sampling locations shown on Figure 4-12.

Table 4-7. Incremental Concentrations^a of Plutonium-238 in the Great Miami River in 1992

Location*	Number of Samples	Plutonium-238 10 ⁻¹² µCi/mL		Average ^{b,c}	Average as a percent of DOE DCG ^d
		Minimum	Maximum		
1	12	e	3.95	e	e
2	12	e	5.91	0.01 ± 2.36	0.00003
3	12	e	12.09	0.34 ± 2.85	0.0009
4	12	e	1.36	e	e
5	12	e	3.61	e	e

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-238 in river water is 10.0 x 10⁻¹² µCi/mL.

^d DOE DCG for plutonium-238 in water is 40,000 x 10⁻¹² µCi/mL.

^e Below environmental level.

* Sampling locations shown on Figure 4-12.

**Table 4-8. Concentrations^a of Plutonium-239,240
in the Great Miami River in 1992**

Location*	Number of Samples	Plutonium-239,240 10 ⁻¹² μ Ci/mL		Average ^{b,c}	Average as a percent of DOE DCG ^d
		Minimum	Maximum		
1	12	e	3.43	0.28 $\pm$ 3.86	0.0009
2	12	e	1.88	0.31 $\pm$ 3.67	0.001
3	12	e	2.25	0.32 $\pm$ 3.69	0.001
4	12	e	1.75	0.16 $\pm$ 3.56	0.0005
5	12	e	1.58	e	e

^a The environmental level was less than the reagent blank; therefore, the data have not been labelled incremental concentrations.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-239 in river water is 5.0×10^{-12} μ Ci/mL.

^d DOE DCG for plutonium-239 in water is $30,000 \times 10^{-12}$ μ Ci/mL.

^e Below reagent blank.

* Sampling locations shown on Figure 4-16.

Table 4-9. Incremental Concentrations^a of Uranium-233,234 and Uranium-238 in the Great Miami River in 1992

Location*	Number of Samples	Uranium-233,234 10 ⁻⁹ µCi/mL			Average as a percent of DOE DCG ^d
		Minimum	Maximum	Average ^{b,c}	
1	12	e	0.15	e	e
2	12	e	0.01	e	e
3	12	e	0.02	e	e
4	12	e	0.10	e	e
5	11	e	0.06	e	e

Location*	Number of Samples	Uranium-238 10 ⁻⁹ µCi/mL			Average as a percent of DOE DCG ^d
		Minimum	Maximum	Average ^{b,c}	
1	12	e	0.09	e	e
2	12	e	0.01	e	e
3	12	e	0.03	e	e
4	12	e	0.09	e	e
5	11	e	e	e	e

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for uranium-233,234 is 0.03×10^{-9} µCi/mL. The LDL for uranium-238 is 0.04×10^{-9} µCi/mL.

^d DOE DCG for uranium-233,234 in water is 500×10^{-9} µCi/mL. The DOE DCG for uranium-238 in water is 600×10^{-9} µCi/mL.

^e Below environmental level.

* Sampling locations shown on Figure 4-12.

Table 4-10. Concentrations^a of Tritium in Pond Water in 1992

Location*	Number of Samples	Tritium 10 ⁻⁶ μ Ci/mL		Average ^{b,c}	Average as a percent of DOE DCG ^d
		Minimum	Maximum		
11	4	e	0.09	0.01 $\pm$ 0.13	0.0005
12	4	e	0.10	0.01 $\pm$ 0.15	0.0005
13	4	e	0.14	0.06 $\pm$ 0.17	0.003
14	4	e	0.19	0.07 $\pm$ 0.13	0.004
15	4	e	0.24	0.07 $\pm$ 0.20	0.004
16	4	e	0.10	e	e
17	4	0.02	0.17	0.09 $\pm$ 0.11	0.005

^a To eliminate a small negative bias, data from the background sampling location were used as the environmental blanks and as the reagent blanks.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for tritium in water is 0.4×10^{-6} μ Ci/mL.

^d DOE DCG for tritium in water is $2,000 \times 10^{-6}$ μ Ci/mL.

^e Below reagent blank.

* Sampling locations shown on Figure 4-12.

Table 4-11. Concentrations^a of Plutonium-238 in Pond Water in 1992

Location*	Number of Samples	Plutonium-238 10 ⁻¹² μ Ci/mL		Average ^{b,c}	Average as a percent of DOE DCG ^d
		Minimum	Maximum		
11	4	e	0.45	e	e
12	4	e	0.30	e	e
13	4	e	0.85	e	e
14	4	e	0.65	e	e
15	4	e	0.58	e	e
16	4	e	0.93	e	e
17	4	e	3.25	1.38 $\pm$ 2.73	0.003

^a The environmental level was less than the reagent blank; therefore, the data have not been labelled incremental concentrations.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-238 in water is 6.9×10^{-12} μ Ci/mL.

^d DOE DCG for plutonium-238 in water is $40,000 \times 10^{-12}$ μ Ci/mL.

^e Below reagent blank.

* Sampling locations shown on Figure 4-12.

**Table 4-12. Incremental Concentrations^a of Plutonium-239,240
in Pond Water in 1992**

Location*	Number of Samples	Plutonium-239,240 10 ⁻¹² µCi/mL			Average as a percent of DOE DCG ^d
		Minimum	Maximum	Average ^{b,c}	
11	4	e	0.46	0.18 ± 2.11	0.0006
12	4	e	1.66	e	e
13	4	e	0.31	e	e
14	4	e	1.23	0.24 ± 2.34	0.0008
15	4	e	1.53	0.39 ± 2.60	0.001
16	4	e	1.16	0.57 ± 2.39	0.002
17	4	e	1.58	0.68 ± 2.40	0.002

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-239 in pond water is 3.0×10^{-12} µCi/mL.

^d DOE DCG for plutonium-239 in water is $30,000 \times 10^{-12}$ µCi/mL.

^e Below environmental level.

* Sampling locations shown on Figure 4-16.

**Table 4-13. Incremental Concentrations^a of Plutonium-238
in River and Pond Sediments in 1992**

River Sediment Sampling Locations				
Location*	Number of Samples	Plutonium-238 10 ⁻⁹ µCi/g		
		Minimum	Maximum	Average ^{b,c}
1	4	d	d	d
2	4	4.01	24.49	14.10 ± 13.54
3	4	29.33	70.38	57.99 ± 30.81
4	4	20.56	1808	547 ± 1356
5	4	2.36	32.73	16.99 ± 26.16
Pond Sediment Sampling Locations				
Location*	Number of Samples	Plutonium-238 10 ⁻⁹ µCi/g		
		Minimum	Maximum	Average ^{b,c}
11	4	d	1.24	0.71 ± 1.34
12	4	d	1.82	0.56 ± 1.65
13	4	d	2.33	0.33 ± 2.29
14	4	d	1.36	0.32 ± 1.45
15	4	d	1.02	0.46 ± 1.22
16	4	d	7.81	2.96 ± 6.05
17	1	71.79	71.79	---

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-238 in river silt is 0.8×10^{-9} µCi/g. LDL for plutonium-238 in pond silt is 0.7×10^{-9} µCi/g.

^d Below environmental level.

* Sampling locations shown on Figure 4-12.

**Table 4-14. Incremental Concentrations^a of Plutonium-239,240
in River and Pond Sediments in 1992**

River Silt Sampling Locations				
Location*	Number of Samples	Plutonium-239,240 10 ⁻⁹ µCi/g		
		Minimum	Maximum	Average ^{b,c}
1	4	1.36	3.43	1.92 ± 2.60
2	4	d	5.80	1.47 ± 5.25
3	4	d	2.54	1.39 ± 2.71
4	4	d	8.90	2.92 ± 7.65
5	4	1.51	3.57	2.30 ± 2.50
Pond Silt Locations				
Location*	Number of Samples	Plutonium-239,240 10 ⁻⁹ µCi/g		
		Minimum	Maximum	Average ^{b,c}
11	4	d	2.59	1.03 ± 2.33
12	4	1.67	10.56	5.38 ± 6.24
13	4	d	1.42	0.33 ± 2.16
14	4	d	1.71	0.50 ± 1.97
15	4	d	1.05	d
16	4	0.53	5.72	3.51 ± 3.69
17	1	1.18	1.18	—

^a Average environmental level shown in Table 4-2 subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-239 in river silt is 1.6×10^{-9} µCi/g. LDL for plutonium-239 in pond silt is 0.8×10^{-9} µCi/g.

^d Below environmental level.

* Sampling locations shown on Figure 4-16.

4.6 Foodstuffs and Vegetation

Various locally grown foodstuffs and vegetation samples are collected during the growing season from the surrounding area. Additionally, fish are collected from the Great Miami River. The intent of this aspect of the Environmental Monitoring Program at Mound is to determine whether significant concentrations of radionuclides are present in plant and animal life.

In 1992, samples of grass, root crops, and tomatoes were collected from a number of regional cities. Fish were collected from the river downstream of Mound's discharge points.

Plutonium concentrations are determined by ashing the samples, then proceeding with the technique used for plutonium analyses of air samples (Section 4.4). Tritium concentrations are determined by removing and distilling the water from the sample, then analyzing the distillate using liquid scintillation spectrometry.

Results for 1992

The results for the foodstuff, vegetation, and fish analyses are shown in Tables 4-15 through 4-17. As seen in the tables, most of the samples were below their respective environmental levels or reagent blanks. Only those cities in proximity to Mound had average concentrations that were positive. The results demonstrate that exposure to Mound's effluents via food-related pathways is negligible.

Table 4-15. Concentrations^a of Tritium in Vegetation and Foodstuffs in 1992

Location*	Type of Sample	Number of Samples	Tritium 10 ⁻⁶ μCi/g		
			Minimum	Maximum	Average ^{b,c}
Bellbrook	Grass	4	d	d	d
	Tomatoes	4	e	e	e
Centerville	Grass	4	d	d	d
	Tomatoes	4	e	e	e
Franklin	Grass	4	0.1	0.15	0.12 ± 0.04
	Tomatoes	4	e	0.12	0.05 ± 0.10
Germantown	Grass	4	d	d	d
	Tomatoes	4	0.02	0.15	0.07 ± 0.11
Miamisburg	Grass	4	0.1	0.14	0.12 ± 0.04
	Tomatoes	4	e	e	e
Trotwood	Grass	4	d	d	d
	Tomatoes	4	e	e	e

^a The average environmental level was less than the reagent blank for the grass data. Therefore, those values have not been labelled "incremental" concentrations. For the tomato data, the average environmental level (Table 4-2) was subtracted from the data; therefore, those values are "incremental" concentrations.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for tritium in grass is 0.2×10^{-6} μCi/g. For tritium in tomatoes, the LDL is 0.3×10^{-6} μCi/g.

^d Below reagent blank.

^e Below environmental level.

* Sampling locations shown on Figure 4-12.

**Table 4-16. Incremental Concentrations^a of Plutonium-238
in Vegetation and Foodstuffs in 1992**

Location*	Type of Sample	Number of Samples	Plutonium-238 10 ⁻⁹ µCi/g		
			Minimum	Maximum	Average ^{b,c}
Bellbrook	Grass	4	d	d	d
	Root crops	4	d	0.003	d
Centerville	Grass	4	d	0.03	d
	Root crops	4	d	0.01	0.001 ± 0.02
Franklin	Grass	4	d	d	d
	Root crops	4	d	0.01	d
Germantown	Grass	4	d	d	d
	Root crops	4	0.001	0.03	0.01 ± 0.02
Miamisburg	Grass	4	0.06	0.66	0.4 ± 0.52
	Root crops	4	d	0.02	0.009 ± 0.02
Trotwood	Grass	4	d	d	d
	Root crops	4	d	0.006	d
Great Miami River	Fish	4	d	d	d

^a Average environmental level (Table 4-2) subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-238 in grass is 0.2×10^{-9} µCi/g. For plutonium-238 in root crops, the LDL is 0.6×10^{-9} µCi/g. For plutonium-238 in fish the LDL is 0.3×10^{-9} µCi/g.

^d Below environmental level.

* Sampling locations shown on Figure 4-12.

Table 4-17. Incremental Concentrations^a of Plutonium-239,240 in Vegetation and Foodstuffs in 1992

Location*	Type of Sample	Number of Samples	Plutonium-239,240 10 ⁻⁹ μCi/g		
			Minimum	Maximum	Average ^{b,c}
Bellbrook	Grass	4	d	0.08	0.02 ± 0.12
	Root crops	4	d	d	d
Centerville	Grass	4	0.04	0.10	0.06 ± 0.08
	Root crops	4	d	0.04	0.01 ± 0.04
Franklin	Grass	4	d	d	d
	Root crops	4	d	0.05	0.005 ± 0.06
Germantown	Grass	4	d	d	d
	Root crops	4	d	d	d
Miamisburg	Grass	4	d	0.14	0.06 ± 0.15
	Root crops	4	d	0.001	d
Trotwood	Grass	4	d	d	d
	Root crops	4	d	d	d
Great Miami River	Fish	4	d	0.005	0.002 ± 0.02

^a Average environmental level (Table 4-2) subtracted from the data.

^b Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^c LDL for plutonium-239 in grass is 0.3×10^{-9} μCi/g. For plutonium-239 in root crops, the LDL is 0.6×10^{-9} μCi/g. For plutonium-239 in fish, the LDL = 0.1×10^{-9} μCi/g.

^d Below environmental level.

* Sampling locations shown on Figure 4-16.

4.7 Offsite Dose Impacts

Dose Estimates Based on Measured Concentrations

Mound used the data presented in this report to estimate maximum doses to an offsite individual. The figure-of-merit used to calculate those doses was the committed effective dose equivalent (CEDE). CEDE calculations are required of DOE facilities according to DOE Order 5400.1. These calculations are also useful in evaluating the success of ALARA (As Low As Reasonably Achievable) policies. It is the philosophy of Mound, and of the DOE complex as a whole, to ensure that all doses from radiation exposures remain ALARA.

To provide an extra degree of conservatism, dose estimates are often calculated based on maximum exposure conditions. This "maximum individual", as defined for purposes of calculating CEDEs, is a hypothetical person who remained at the site boundary 24 hours per day throughout 1992. This individual was assumed to have:

- continually breathed air containing the maximum radionuclide concentrations found at an onsite air sampling station,
- drawn all of his drinking water from the offsite well with the maximum radionuclide concentrations, and
- used offsite foods exhibiting the maximum radionuclide concentrations as components of his diet.

The radionuclides and the exposure pathways which contribute to the maximum individual's CEDEs are shown in Figure 4-13. Values for the CEDEs are shown in Table 4-18. More detailed information on the CEDE calculations, including the concentration values used, is presented in the Appendix.

Figure 4-13. Exposure pathways for dose calculations based on measured data for 1992

Table 4-18. Maximum Committed Effective Dose Equivalents to a Hypothetical Individual in 1992

Radionuclide	Pathway	mrem	mSv
Tritium	Air	0.01	0.0001
	Water	0.04	0.0004
	Vegetation/Foodstuffs	0.001	0.00001
	Total	0.05	0.0005
Plutonium-238	Air	0.05	0.0005
	Water	0.001	0.00001
	Vegetation/Foodstuffs	0.10	0.001
	Total	0.15	0.0015
Plutonium-239	Air	0.001	0.00001
	Vegetation/Foodstuffs	0.02	0.0002
	Total	0.02	0.0002
Total		0.22	0.0022

Dose Estimates for NESHAPs Compliance

The National Emission Standards for Hazardous Air Pollutants; Radionuclides regulations (NESHAPs; Radionuclides; 40 CFR 61, Subpart H) limit offsite doses from airborne releases to 10 mrem effective dose equivalent (EDE) per year. As specified by the EPA in 40 CFR 61, Subpart H, the preferred technique for demonstrating compliance with this dose standard is a modelled approach.

Maximum individual. Mound uses the EPA's computer code CAP-88 to evaluate doses for NESHAPs compliance. The 1992 input data for the CAP-88 calculations are listed in the Appendix. Based on the CAP-88 output, the maximum EDE from all airborne releases was 0.06 mrem. This estimate represents 0.6% of the dose standard.

Population doses. CAP-88 also has the capability of estimating population doses from airborne releases. The population, approximately 3,035,000 persons, within a radius of 80 km (50 mi) of

Mound received an estimated 2.6 person-rem from Plant operations in 1992. CAP-88 determined this number by calculating average doses to individuals in areas defined by their distance and compass sector relative to the release point. The dose for each area was then multiplied by the number of people living there. For example, an average dose of 0.001 rem x 10,000 persons in the area yields a 10 person-rem collective dose for that region.

Mound's dose contribution of 2.6 person-rem can be put in perspective by comparison with background doses. The average dose from background sources is 355 mrem (0.355 rem) per individual per year. A background collective dose can be estimated for the 80-km population by multiplying 0.355 rem x 3.035 million persons. The result, 1.08 million person-rem, represents an estimate of the collective dose from all background sources of ionizing radiation. Mound's contribution, 2.6 person-rem, is about 0.00028% of that value.

5.0 NONRADIOLOGICAL ENVIRONMENTAL PROGRAM INFORMATION

The Mound Plant releases minor quantities of nonradiological constituents to the atmosphere. These releases are governed by State of Ohio permits. Mound monitors the impact of the Plant's nonradiological airborne releases by measuring airborne particulates at seven onsite and 15 offsite locations. Nonradiological liquid releases, however, are subject to much more extensive sampling protocols. Each year Mound collects over 1000 water samples to demonstrate compliance with the Site's National Pollutant Discharge Elimination System (NPDES) permit.

5.1 Air Monitoring Program

The primary source of nonradiological airborne emissions at Mound is the steam power plant. The plant is normally fueled with natural gas but under certain circumstances fuel oil is used. Fuel oil with a 1% sulfur content is burned during unusually cold weather or if the natural gas supply to Mound is interrupted. Approximately 10,447 liters (2780 gallons) of fuel oil were burned during 1992.

Mound has four air permits from the Ohio EPA. A number of other sources, such as the powerhouse, are registered with the Regional Air Pollution Control Agency (RAPCA). The permitted

operations are described in this paragraph. First, a paint spray booth is operated intermittently in the Mound paint shop. Second, wastes from operations involving explosives are disposed of by open burning. Third, fire fighter training exercises are held at an outdoor facility under a burning permit issued by RAPCA. The fourth RAPCA-permitted facility is an open-top vapor degreaser. This unit was not used in 1992. However, in past years, degreaser operations have released volatile organic compounds to the atmosphere.

Nonradiological airborne emissions for 1992 are summarized in Table 5-1.

Table 5-1. Nonradiological Airborne Effluent Data for 1992

Emission Source	Pollutant	Emission Rate	Emission Standard	% of Standard
Powerhouse	Particulates	0.005 lbs/10 ⁶	0.02 lbs/10 ⁶	25
	(natural gas)	BTU input	BTU input ^a	
	Particulates	0.01 lbs/10 ⁶	0.04 lbs/10 ⁶	25
	(No. 2 fuel oil)	BTU input	BTU input ^a	
	Sulfur oxides	0.001 lbs/10 ⁶	1.6 lbs/10 ⁶	0.06
		BTU input	BTU input ^b	
Paint shop	Organics	323 lbs	5000 lbs/yr ^c	6.5
Explosives disposal	Particulates	8 lbs	d	d
Fire fighter training	Particulates	0 lbs	d	d

^a Ohio EPA Regulation 3745-17-10.

^b Ohio EPA Regulation 3745-18-06.

^c Condition of Mound's permit.

^d Not applicable.

Nonradiological Environmental Program Information

Mound evaluates particulate concentrations at 7 onsite and 15 offsite locations. High-volume particulate air samples are collected weekly by flowing air through a 200-mm diameter fiber glass filter. The system operates at about 1.3×10^6 cm³/min which represents a sample volume of

13,000 m³ of air per week. By weighing the filter paper before and after use, it is possible to determine the mass of particulates retained by the filter. The mass loading and known air volume can then be used to generate concentration values (Table 5-2).

Table 5-2. 1992 Particulate Concentrations

Sampling Location ^a	Number of Samples	Particulate Concentration ^b ($\mu\text{g}/\text{m}^3$)		Arithmetic Average ^c ($\mu\text{g}/\text{m}^3$)
		Minimum	Maximum	
Offsite				
101	51	22	79	41 ± 4
102	52	5	46	27 ± 2
103	52	14	80	25 ± 3
104	52	19	48	32 ± 2
105	52	16	176	32 ± 6
108	52	24	65	37 ± 2
110	52	12	50	25 ± 2
111	51		73	34 ± 3
112	51		40	26 ± 2
115	49		144	36 ± 6
118	52		95	23 ± 3
119 ^d	52	14	47	26 ± 2
122	52	13	38	24 ± 2
123	52	20	54	32 ± 2
124	51	16	43	28 ± 2
Onsite				
211	51	15	70	31 ± 3
212	51	7	99	28 ± 5
213	19	17	73	38 ± 7
213R ^e	29	12	74	31 ± 4
214	20	11	33	22 ± 3
214R ^e	31	12	53	29 ± 3
215	52	9	40	23 ± 2
216	32	14	56	31 ± 3
217	31	11	57	32 ± 3

^a Sampling locations shown in Figures 4-10 and 4-11 for onsite and offsite sampling stations, respectively.

^b Ohio Ambient Air Quality Standard is $60 \mu\text{g}/\text{m}^3$ (annual geometric average).

^c Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^d Background location (approx. 28 mi. NW of Mound).

^e Stations 213 and 214 were relocated during 1992 to improve and re-align onsite sampling positions.

As the data in Tables 5-1 and 5-2 demonstrate, nonradioactive air emissions from Mound in 1992 did not significantly affect ambient air quality. All regulated releases were below permit limits, and comparisons of particulate concentrations measured onsite versus offsite suggest little or no influence by Mound. Particulate measurements for a few sampling locations exhibited periodic increases due to construction activities. These elevated air loadings were of short duration and did not significantly affect average values for 1992.

5.2 Water Monitoring Program

Mound releases wastewater to offsite surface waters via three discharge systems. In 1992, Mound discharged an average of 2.68 million liters (0.71 million gallons) of water per day to the Great Miami River. U.S. Geological Survey data indicate that the 1992 flow rate in the River averaged 1547 million gallons per day (MGD), with a minimum and maximum flow rate of 112 MGD and 18,088 MGD, respectively. The average magnitude of the river flow rate is significantly greater than that of Mound's effluents. Therefore, releases from Mound can be expected to have minimal impact on river water quality.

Mound's discharges are regulated by a National Pollutant Discharge Elimination System (NPDES) permit. Mound's permit was renewed on October of 1992; it will remain valid through March of 1997.

NPDES Monitoring Requirements

Mound's NPDES permit requires scheduled collection and analysis of Plant effluents at four onsite locations (Outfalls 5601, 5602, 5603, and 5002). Flow-weighted effluent limitations are further imposed for the combined discharges from Outfalls 5601 and 5602 (calculated Outfall 5001). Additional sampling requirements are required for one offsite outfall (5604) and three Great Miami River locations (5801, 5901, and 5902).

These locations are shown in Figure 5-1. The sampling requirements established for each outfall are listed in Table 5-3.

Outfall 5601. Outfall 5601 contains the effluent from Mound's sanitary sewage treatment plant. Flow-proportional, 24-hour composite samples and periodic grab samples are collected at this outfall. NPDES permit requirements for this location focus on bacteria and heavy metals. Though not a condition of the permit, Mound also analyzes the effluent quarterly for total toxic organics (TTOs).

Outfall 5602. Outfall 5602 includes storm water runoff, single-pass cooling water, cooling tower blowdown, zeolite softener backwash, and effluent from the radioactive waste disposal facility. Flow-proportional, 24-hour composite samples and periodic grab samples are collected at this outfall. NPDES permit requirements for this location are more limited: chemical oxygen demand, suspended solids, and oil and grease content are of concern. Though not a condition of the permit, Mound also analyzes the effluent quarterly for total toxic organics (TTOs).

Outfall 5603. Outfall 5603 is associated with an electroplating facility operated onsite. Time-proportional composite samples and periodic grab samples are collected at this outfall. Because the effluent is associated with a plating shop, the parameters of concern are heavy metals and cyanide. The NPDES permit also requires quarterly TTO sampling.

Outfall 5002. Discharge 5002 contains softener backwash and most of the Plant's storm water runoff. Flow-proportional, 24-hour composite samples and periodic grab samples are collected at this outfall. NPDES permit requirements for this location focus on bacteria and heavy metals. Though not a condition of the permit, Mound also analyzes the effluent quarterly for total toxic organics (TTOs).

Figure 5-1. NPDES sampling locations

Table 5-3. National Pollutant Discharge Elimination System Data for 1992

	No. of Samples	Minimum	Maximum	Annual Average	Maximum Monthly Average	NPDES Permit Limits		
						Daily	Weekly Average	Monthly Average
Outfall 5601 Parameters								
Flow rate, MGD	a	0.03	0.18	0.08	0.10	n/a	n/a	n/a
pH, s.u.	201	7.4	8.1	7.8	7.8	6.5-9.0	n/a	n/a
Chlorine, total ^b , mg/L	103	0.08	0.35	0.16	0.27	n/a	0.5	n/a
Suspended solids, mg/L	102	0.2	8.6	2.5	4.7	n/a	30.0	15.0
Fecal coliform ^b , n/100mL	28	1	1600	46	90	n/a	2000	1000
E. coliform ^b , n/100mL	6	<2	1933	346	1933	n/a	n/a	n/a
Ammonia, mg/L as N	24	0.04	10.28	1.38	8.97	n/a	n/a	n/a
BOD ^c , mg/L	102	0.1	5.4	1.5	2.8	n/a	15.0	10.0
Oil & Grease, mg/L	4	<1	1.4	1.0	1.4	n/a	n/a	n/a
Cadmium, µg/L	4	<10	<10	<10	<10	n/a	n/a	n/a
Chromium, µg/L	4	<50	<50	<50	<50	n/a	n/a	n/a
Copper, µg/L	4	58	123	98	123	n/a	n/a	n/a
Nickel, µg/L	4	<50	<50	<50	<50	n/a	n/a	n/a
Lead, µg/L	4	<50	<50	<50	<50	n/a	n/a	n/a
Zinc, µg/L	4	<50	132	60	132	n/a	n/a	n/a
Mercury, µg/L	2	<0.2	<0.2	<0.2	<0.2	n/a	n/a	n/a
Outfall 5602 Parameters								
Flow rate, MGD	a	0.04	0.36	0.13	0.17	n/a	n/a	n/a
pH, s.u.	51	7.4	8.6	8.3	8.5	6.5-9.0	n/a	n/a
Suspended solids ^d , mg/L	51	1.8	41.6	9.9	16.1	45.0	n/a	30.0
COD ^e , mg/L	51	3	461	217	308	n/a	n/a	n/a
Oil & Grease, mg/L	12	<1	9.6	2	9.6	10	n/a	n/a
Outfall 5603 Parameters								
Flow rate, MGD	6	7300	7300	7300	7300	n/a	n/a	n/a
pH, s.u.	24	7.4	7.8	7.6	7.7	6.5-9.0	n/a	n/a
Cyanide, mg/L	24	<0.1	<0.1	<0.1	<0.1	1.0	n/a	0.65
Cadmium, µg/L	24	<10	<10	<10	<10	100	n/a	n/a
Chromium, µg/L	24	<50	<50	<50	<50	500	n/a	n/a
Copper, µg/L	24	122	426	270	374	500	n/a	n/a
Nickel, µg/L	24	<50	<50	<50	<50	500	n/a	n/a
Zinc, µg/L	6	<50	<50	<50	<50	n/a	n/a	n/a
Total Toxic Organics, mg/L	4	<0.05	<0.05	<0.05	<0.05	2.13	n/a	n/a
Outfall 5002 Parameters								
Flow rate, MGD	a	0	2.5	0.51	0.89	n/a	n/a	n/a
pH, s.u.	51	7.7	8.9	8.3	8.5	6.5-9.0	n/a	n/a
Suspended solids, mg/L	51	4.1	35	14.3	26.8	45	n/a	30

^a Continuous.

^b Summer months only (May 1 through October 31).

^c BOD = Biochemical oxygen demand.

^d Limits n/a when 0.25 inches of rain occurs three days during the week.

^e COD = Chemical oxygen demand.

Nonradiological Environmental Program Information

Table 5-3 (continued)

	No. of Samples	Minimum	Maximum	Annual Average	Maximum Monthly Average	NPDES Permit Limits	
						Daily	Monthly Average
Outfall 5001 Parameters							
Flow rate, MGD	a	0.08	0.27	0.15	0.18	n/a	n/a
pH, s.u.	6	8.0	8.3	8.2	8.3	6.5-9.0	n/a
Chlorine, residual ^b , mg/L	4	0.02	0.12	0.05	0.05	0.038 ^f	n/a
Cyanide, mg/L	3	<0.01	<0.01	<0.01	<0.01	0.083	0.023
Pentachlorophenol, µg/L	3	<4	<4	<4	<4	n/a	n/a
Bis(2-ethylhexyl) phthalate, µg/L	3	<4	<4	<4	<4	n/a	n/a
Cadmium, µg/L	12	<10	15	<10	<10	43	n/a
Chromium, µg/L	12	<50	<50	<50	<50	878	546
Copper, µg/L	12	<50	130	70	80	120	n/a
Nickel, µg/L	12	<50	<50	<50	<50	1261	760
Lead, µg/L	12	<50	91	<50	54	305	191
Zinc, µg/L	12	<50	115	<50	55	n/a	na
<i>Ceriodaphnia dubia</i>							
acute, t.u.	2	0	1.0	0.5	1.0	n/a	n/a
chronic, t.u.	1	1.3	1.3	1.3	1.3	n/a	n/a
<i>Pimephales promelas</i>							
acute, t.u.	2	0	0	0	0	n/a	n/a
chronic, t.u.	1	0	0	0	0	n/a	n/a
Outfall 5604 Parameters							
Flow rate, MGD						Outfall not used during 1992.	
pH, s.u.							
Station 5801 Parameters							
% affected:							
<i>Ceriodaphnia dubia</i>							
48-hr acute toxicity	1	0	0	0	0	n/a	n/a
<i>Pimephales promelas</i>							
96-hr acute toxicity	1	17.5	17.5	17.5	17.5	n/a	n/a
Station 5901 Parameters							
% affected:							
<i>Ceriodaphnia dubia</i>							
48-hr acute toxicity	2	0	0	0	0	n/a	n/a
<i>Pimephales promelas</i>							
96-hr acute toxicity	2	0	0	0	0	n/a	n/a
Station 5902 Parameters							
% affected:							
<i>Ceriodaphnia dubia</i>							
7-day chronic toxicity	1	10	10	10	10	n/a	n/a
<i>Pimephales promelas</i>							
7-day chronic toxicity	1	15	15	15	15	n/a	n/a

^a Continuous.

^b Summer months only (May 1 through October 31).

^c BOD = Biochemical oxygen demand.

^d Limits n/a when 0.25 inches of rain occurs three days during the week.

^e COD = Chemical oxygen demand.

^f Limit not imposed until October 1, 1995.

Calculated Outfall 5001. Outfall 5001 represents the combined effluents of 5601 and 5602. These discharges are combined and released to the Great Miami River via a closed pipe. Since sampling the pipe is not practical, Mound's NPDES permit imposes additional limits for this outfall based on flow-weighted calculations. The concentrations of materials present in Outfalls 5601 and 5602 are used, along with their respective flow rates, to estimate concentrations in the effluent discharged through the pipe. The limits associated with Outfall 5001 are also listed in Table 5-3.

Outfall 5604. Outfall 5604 is an abandoned well located west of the Plant site. In the past Mound has purged the well, known as Miamisburg Abandoned Well No. 2, to lower tritium concentrations. The purged water was then directed through a closed pipe to the Great Miami River. When this activity is performed, Mound's NPDES permit requires that the flow rate and pH be recorded. The well was most recently pumped in 1991. It was pumped for six days; a total volume of 3.51 million gallons was discharged at an average pH of 7.2.

Outfalls 5801, 5901, and 5902. A new requirement of Mound's NPDES permit involves toxicity testing of water samples taken from the Great Miami River. The permit specifies that monthly (for acute toxicity testing) and quarterly (for chronic toxicity testing) samples be collected from specific river locations and plant effluents

(Table 5-3 and Figure 5-1). The water samples are then evaluated using water fleas (*Ceriodaphnia dubia*) and fathead minnows (*Pimephales promelas*).

Results

A total of 1128 samples were analyzed for NPDES parameters in 1992. Key results are summarized in Tables 5-3 and 5-4. Analytical procedures were consistent with the methods specified in regulations of the Clean Water Act, 40 CFR 136. Sampling and analytical services were provided by Mound's Environmental Monitoring and Bioassay Labs and by outside contractors. All such procedures were required to meet Mound standards for quality assurance and quality control.

One NPDES exceedance did occur in 1992. On December 22, 1992, Mound recorded a copper concentration of 130 µg/L for Outfall 5001; the daily limit for copper at that location is 120 µg/L. The exceedance was reported to the Ohio EPA within hours of discovery. Mound's Engineering Department is investigating potential corrective actions to avoid reoccurrence.

A review of Mound's NPDES performance over the past five years is shown in Figure 5-2. As seen in the Figure, Mound has recorded a total of nine exceedances. During that time period, 4402 NPDES samples were collected.

Figure 5-2. NPDES exceptions for the five-year period 1988 - 1992

Nonradiological Environmental Program Information

Table 5-4. Summary of Organic Compounds Detected in Mound Effluents in 1992

Outfall*	Parameter	Concentration, µg/L				MDL ^a
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	
5601	Dichlorobromomethane	ND ^b	ND	1.1	ND	1
	Chloroform	ND	ND	1.9	ND	1
	Bis(2-ethylhexyl)phthalate	ND	ND	31 ^c	ND	4
5602	Chloroform	ND	43.5	ND	ND	1.6
	Methylene chloride	ND	5.17	ND	ND	2.8
	Dichlorobromomethane	ND	9.11	ND	ND	2.2
	Bis(2-ethylhexyl)phthalate	ND	ND	30 ^c	ND	4
5603	Tetrachloroethylene	ND	9.76	ND	ND	4.1
	Bromoform	ND	ND	1.1	2.8	1
	Dibromochloromethane	ND	ND	1.7	3.5	1
	Bis(2-ethylhexyl)phthalate	ND	ND	27 ^c	ND	4
	Dichlorobromomethane	ND	ND	ND	1.6	1
5002	Acetone	ND	13.7	ND	ND	10
	Bis(2-ethylhexyl)phthalate	ND	ND	24 ^c	ND	4
	Dibromochloromethane	ND	ND	ND	1.1	1

* Outfall locations shown on Figure 5-1.

^a MDL = Method detection limit.

^b ND = None detected.

^c This compound was present in the extraction blank at a concentration of 24 µg/L; therefore, to obtain an accurate concentration, subtract 24 µg/L from the value shown.

5.3 Submissions Under SARA Title III

Title III of the Superfund Amendments and Reauthorization Act (SARA) addresses the emergency planning and community right-to-know responsibilities of facilities handling hazardous substances. Sections 311 and 312 of Title III specify reporting requirements for the use and/or storage of "extremely hazardous" and "hazardous" substances. For facilities subject to Sections 311 and 312, chemical usage, storage, and location information must be submitted to regional emergency response agencies by March

1 of each year. For 1992, Mound reported using and/or storing three extremely hazardous substances and 11 hazardous substances. This information, along with site maps showing usage and storage locations, was submitted to the State Emergency Response Commission, the Miami Valley Regional Planning Commission, and the City of Miamisburg Fire Department. The 14 substances handled by Mound are listed in Table 5-5.

Table 5-5. 1992 Emergency and Hazardous Chemical Data for Mound

Hazardous Substances		
Diesel fuel	Nitrogen, liquid	Ethylene glycol
No. 2 fuel oil	Helium, liquid	Calcium chloride
Gasoline, unleaded	Argon, liquid	Ferric chloride
Sodium hydroxide	Ethyl alcohol	
Extremely Hazardous Substances		
Chlorine	Sulfuric acid	Nitric acid

Section 313 of Title III specifies reporting requirements associated with the release of toxic chemicals. Each year Mound files a Section 313 report, Form R, for methylene chloride. (Methylene chloride usage in recent years has declined; however, the reporting requirements use 1988 as a baseline.) Based on a review of chemical release data for 1992, no additional chemicals in use at Mound warrant Section 313 submissions.

5.4 Environmental Occurrences

Under CERCLA and the Clean Water Act, reportable quantity (RQ) levels have been established for designated hazardous substances. If a spill or other inadvertent release to the environment exceeds the RQ, immediate notification of the appropriate federal agencies (e.g., National Response Center, EPA, or Coast Guard) is required. No such releases occurred at Mound during 1992.

6.0 GROUNDWATER MONITORING PROGRAM

The Mound Plant site lies atop the largest of Ohio's sole-source aquifers, the Buried Valley Aquifer (BVA). The City of Miamisburg, and a number of other communities in the area, draw drinking water from the BVA. Mound also relies on the BVA for drinking and process water.

Mound has more than 60 active groundwater monitoring wells and water depth indicators (piezometers) in place onsite and offsite to characterize any impact Plant operations may have on the BVA. As part of Mound's CERCLA Program, an additional 43 monitoring wells and 42 piezometers will be installed.

6.1 Regional Geohydrology

Beneath the Miami Valley region of southwest Ohio lies the Buried Valley Aquifer (BVA). The BVA was designated a sole-source aquifer by the EPA in 1989. This distinction indicates that the aquifer supplies all of the drinking water to the communities above it. The approximate areal extent of the BVA is shown in Figure 6-1.

The aquifer has a north-south orientation and reaches a maximum thickness of about 46 m (150

ft) near the Great Miami River channel. Groundwater in the area generally flows south, following the downstream course of the River. Recharge by induced stream infiltration occurs, although in this region the aquifer contains extensive layers of clayish till which impede infiltration. The BVA west of the Plant site is estimated to have a production capability of 35 to 47 million liters per day per kilometer (15 to 20 million gallons of groundwater per day per mile) of valley.

Figure 6-1. Location and extent of the Buried Valley Aquifer

Groundwater Monitoring Program

The BVA is somewhat overdrawn between the cities of West Carrollton and Dayton. Practices involving relocation of well fields and artificial recharge via infiltration lagoons are in use to reduce the magnitude of the reversal. Currently, there is no evidence that the gradient reversal affects regions south of West Carrollton such as Miamisburg. At Miamisburg, pumping does not influence the natural groundwater gradient except in the immediate vicinity of individual well fields.

Uses of Groundwater in the Vicinity

There are six major public water supplies and numerous industrial users within an 8-km (5-mi) radius of the Mound Plant. The locations of public and private water supply wells are shown in Figure 6-2 (overleaf, pages 6-4 and 6-5). The only industrial user within 8 km (5 mi) downgradient is the O.H. Hutchings Power Generation Station. Industrial groundwater users located north (upgradient) of the site are isolated from Mound by hydraulic barriers.

The City of Miamisburg owns ten wells in the BVA, but only those on the west side of the Great Miami River are in use. All City wells currently in service are separated from the Plant by a minimum straight-line distance of 0.8 km (0.5 mi).

In 1992 a residential well and cistern study (DOE, 1993) was conducted. A total of 216 residential wells and 14 cisterns were identified within a 2-mile radius of the Mound Plant. A representative subset of these wells will be used by Mound's ER Program to assess potential groundwater impacts of plant operations on these water sources.

6.2 Hydrology at Mound

As seen in Figure 6-1, the "tongue" of the BVA extends onto the Mound Plant site. Within the limits of the property, the maximum known thickness of the aquifer is about 21 m (70 ft) at the extreme southwest corner of the site. Present

usage of BVA water by Mound ranges from 19 to 32 liters/second (300 to 500 gallons per minute). Recharge to the portion of the BVA underlying Mound primarily arises from direct infiltration of river water, precipitation, and leakage from valley walls. These sources of recharge provide sufficient volumes of water to balance Mound's withdrawals.

Groundwater elevations are shown on Figure 6-3. Groundwater levels vary from elevations near 700 ft to approximately 800 ft. Onsite groundwater levels increase with increasing ground surface elevations. (Ground surface elevations are shown on Figure 1-6.) The maximum groundwater level beneath the site is 800 feet. This elevation occurs under the main hill which has a maximum ground surface elevation of approximately 880 ft.

Bedrock permeability. As a result of the dramatic changes in elevations associated with the Plant's topography, the Site has a variety of groundwater regimes. Virtually impermeable bedrock underlies all but the first few feet of the hilltop and hillside areas at Mound. Although the rock itself is impermeable, small quantities of groundwater seep through joints and cracks. The upper 6 m (20 ft) of bedrock, where chemical weathering leads to enlargement of the cracks, is the most permeable. Permeability of the upper 6 m (20 ft) of bedrock is estimated to range from 40 to 400 L/day/m² (1 to 10 gal/day/ft²). Below this depth, bedrock permeability generally ranges from 0 to 8 L/day/m² (0 to 0.2 gal/day/ft²).

Glacial till and outwash permeability. Hydraulic properties of the glacial tills that form a veneer over the site vary depending on the proportions of fine- and coarse-grained material at a given location. Values of permeability normally range from 0.0041 to 0.041 L/day/m² (0.0001 to 0.001 gal/day/ft²), although values up to 2.8 L/day/m² (0.007 gal/day/ft²) have been measured in upper weathered zones. Below the glacial till in the lower valley is a zone of glacial outwash composed of sand and gravel. The permeability of this zone is estimated to range from 40,700 to 81,000 L/day/m² (1,000 to 2,000 gal/day/ft²).

Figure 6-3. Mound Plant groundwater level elevations

Figure 6-2. Production and monitoring well locations (Plate 1 of 2)

Seeps

A key issue for groundwater protection at Mound is the seepage of contaminated water to the surface of the Main Hill. At points along the Plant's north hillside, bedrock is exposed and seep lines exist. A generalized cutaway depicting this phenomenon is shown in Figure 6-4. Numerous samples have been collected from the seeps and analyzed for tritium and volatile organic compounds. Results for 1992 are discussed below (Section 6.4).

Surface Water Features

There are no perennial streams on the Plant site. A natural drainage area exists in the deep valley separating the two main hills, but water in this area generally has a short residence time. The basin is relatively small and the slopes are relatively steep. Therefore, runoff through site drainage features is rapid.

The Buried Valley Aquifer Geologic Cutaway

Figure 6-4. Geologic cutaway of the Mound Plant

6.3 Offsite Groundwater Monitoring Program

The offsite groundwater monitoring program at Mound consists of routine collection of samples from production wells, private wells, regional drinking water supplies, and BVA monitoring wells. Samples are collected and analyzed primarily for radionuclides and volatile organic compounds (VOCs). Data from the groundwater analyses performed in 1992 are presented below. Sampling and analytical procedures used to generate these results are documented in Mound's Environmental Monitoring Plan (1992) and Mound's Groundwater Protection Management Program Plan (DOE 1993).

Tritium in Production and Private Wells

Private wells immediately downgradient of the Plant have tritium concentrations that are above background. "Background" is established each year by collecting well water from a location unaffected by Plant operations. Those samples are collected from a well 38 km (22 mi) southeast of Mound. In 1992, tritium concentrations measured at that location were less than or equal to the reagent blanks.

Because tritium is known to have migrated from the Site, downgradient wells are closely monitored for tritium. Sampling results for 1992 are shown in Table 6-1. As seen in the table, the maximum tritium concentration observed was approximately 8 nCi/L. This value represents 40% of the EPA's drinking water standard of 20 nCi/L. Average tritium concentrations, however, ranged from 0.14 nCi/L to 3.7 nCi/L, or 0.7% and 18.5% of the drinking water standard, respectively.

Table 6-1. Tritium Concentrations in Offsite Production and Private Wells in 1992

Well I.D.*	Historic Designation	Number of Samples	Tritium nCi/L		Average ^{a,b}	Average as a % of the EPA Standard ^c
			Minimum	Maximum		
0904	J-1	12	0.57	1.31	0.92 ± 0.16	4.6
0905	Tr-1	12	d	0.42	0.14 ± 0.10	0.7
0906	B-R	9	1.70	3.97	3.17 ± 0.50	15.9
0907	B-H	9	2.10	3.07	2.39 ± 0.23	12.0
0909	MCD	11	d	0.33	0.18 ± 0.07	0.9
0912	MSBG2	45	1.89	7.66	3.70 ± 0.44	18.5
0913	MSBG3	12	0.71	1.88	1.15 ± 0.20	5.8

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for tritium in private well waters is 0.7 nCi/L.

^c The EPA standard for tritium in drinking water is 20 nCi/L.

^d Below reagent blank.

* Well locations are shown on Figure 6-2.

Groundwater Monitoring Program

Tritium in Community Drinking Water Supplies

Tritium is the most mobile of the radionuclides released from the Plant. For this reason, Mound also monitors tritium concentrations in a number of regional groundwater supplies. The results for 1992 are presented in Table 6-2. The table shows that all of the values were near or below the lower limit of detection. However, the results, reflect the pattern of tritium concentrations one would expect: highest averages near the site (Miamisburg, Franklin) and lowest averages at greater distances (e.g., Bellbrook, Middletown).

Tritium in Offsite Monitoring Wells

To provide additional information on the extent of offsite tritium migration, Mound also collects quarterly groundwater samples from a number of offsite monitoring wells. The results for 1992 are shown in Table 6-3. (The data in Table 6-3 have not been presented as percentages of the EPA drinking water standard because these wells are used exclusively for monitoring purposes.) The 1992 data confirm that the tritium contamination is minor.

Table 6-2. Tritium Concentrations in Community Drinking Water Supplies in 1992

Location*	Number of Samples	Tritium nCi/L		Average ^{a,b}	Average as a percent of the EPA Standard ^c
		Minimum	Maximum		
Bellbrook	11	d	0.07	d	d
Centerville	11	d	0.11	0.02 ± 0.03	0.1
Dayton	11	d	0.12	0.02 ± 0.03	0.1
Franklin	11	0.01	0.20	0.10 ± 0.04	0.5
Germantown	11	d	0.23	0.06 ± 0.05	0.3
Kettering	11	d	0.10	0.02 ± 0.03	0.1
Miamisburg	11	0.25	0.60	0.39 ± 0.08	2.0
Middletown	11	d	0.15	0.01 ± 0.04	0.05
Moraine	11	d	0.10	d	d
Springboro	11	0.002	0.22	0.08 ± 0.05	0.4
Waynesville	11	d	0.04	d	d
W. Carrollton	11	d	0.11	0.03 ± 0.03	0.2

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for tritium in community drinking water is 0.3 nCi/L.

^c EPA drinking water standard for tritium is 20 nCi/L; this standard is applied to total, not incremental, concentrations of tritium.

^d Below reagent blanks. To eliminate a small negative bias, data from the background sampling location were used as the reagent blanks.

* Sampling locations shown on Figure 4-11.

Table 6-3. Tritium Concentrations in Offsite Monitoring Wells in 1992

Well I.D.*	Tritium Concentration nCi/L			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
0118	0.4	0.8	0.8	0.9
0123	—	N.D.	—	N.D.
0124	—	2.0	—	—
0126	3.0	2.7	3.2	—
0129	1.3	1.7	2.0	2.0
0138	1.8	3.4	3.2	—
0156	—	N.D.	—	—
0159	0.1	0.3	N.D.	—
0160	N.D.	0.14	N.D.	N.D.
0303	—	9.1	—	—
0304	—	1.8	—	—
0311	—	0.86	—	—

— = not sampled.

N.D. = none detected.

* Well locations shown on Figure 6-2.

EPA drinking water standard for tritium is 20 nCi/L.

Groundwater Monitoring Program

Offsite Monitoring Activities for other Radionuclides

Private well waters in the immediate vicinity of the Plant are also analyzed for plutonium-238, plutonium-239,240, uranium-233,234, and uranium-238. Results for 1992 are shown in Tables 6-4 and 6-5 for plutonium and uranium,

respectively. Averages reported in both tables demonstrate that concentrations measured in 1992 were comparable to background levels for these radionuclides. (Background levels for 1992 are also listed in the tables.)

Table 6-4. Plutonium Concentrations in Offsite Drinking Water and an Offsite Private Well in 1992

Well I.D.*	Historic Designation	Number of Samples	Plutonium-238 10 ⁻¹² µCi/mL			Average as a % of 0.04 x the DOE DCG ^d
			Minimum	Maximum	Average ^{a,b,c}	
Miamisburg water supply 0904	J-1	12	e	7.98	2.26 ± 1.87	0.14
		11	e	2.85	0.49 ± 1.26	0.03

Well I.D.*	Historic Designation	Number of Samples	Plutonium-239,240 10 ⁻¹² µCi/mL			Average as a % of 0.04 x the DOE DCG ^d
			Minimum	Maximum	Average ^{a,b,c}	
Miamisburg water supply 0904	J-1	12	e	0.42	e	e
		11	e	2.18	e	e

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for plutonium-238 in well water is 9.7×10^{-12} µCi/mL. LDL for plutonium-239 in well water is 5.0×10^{-12} µCi/mL.

^c Background concentration of plutonium-238 in 1992 averaged $1.27 \pm 1.29 \times 10^{-12}$ µCi/mL. Background concentrations of plutonium-239 in 1992 averaged below the reagent blanks.

^d The DOE DCG for plutonium-238 in water is $40,000 \times 10^{-12}$ µCi/mL. This value corresponds to an EDE of 100 mrem/yr. Since the EPA dose standard is 4 mrem/yr, the averages have been reported as percentages of 0.04 x the DCG ($0.04 \times 40,000 \times 10^{-12}$ µCi/mL = 1600×10^{-12} µCi/mL). 0.04 x the DOE DCG for Pu-239 = 1200×10^{-12} µCi/mL.

^e Below reagent blank.

* Well locations are shown on Figure 6-2.

Table 6-5. Uranium Concentrations in Offsite Drinking Water and an Offsite Private Well in 1992

Well I.D.*	Historic Designation	Number of Samples	Uranium-233,234 10 ⁻⁹ µCi/mL			Average as a % of 0.04 x the DOE DCG ^d
			Minimum	Maximum	Average ^{a,b,c}	
Miamisburg water supply 0904	J-1	12	0.18	0.55	0.42 ± 0.06	2.1
		11	0.15	0.23	0.19 ± 0.02	1.0

Well I.D.*	Historic Designation	Number of Samples	Uranium-238 10 ⁻⁹ µCi/mL			Average as a % of 0.04 x the DOE DCG ^d
			Minimum	Maximum	Average ^{a,b,c}	
Miamisburg water supply 0904	J-1	12	0.12	0.46	0.37 ± 0.06	1.5
		11	0.14	0.23	0.17 ± 0.02	1.0

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for uranium-233,234 is 0.05 x 10⁻⁹ µCi/mL; the LDL for uranium-238 is 0.05 x 10⁻⁹ µCi/mL.

^c Background concentration for uranium-233,234 and uranium-238 in 1992 averaged 0.3 ± 0.02 x 10⁻⁹ µCi/mL and 0.21 ± 0.01 x 10⁻⁹ µCi/mL, respectively.

^d DOE DCGs correspond to doses of 100 mrem/yr. Since the EPA dose standard is 4 mrem/yr, the averages have been reported as percentages of 0.04 x the DCGs. 0.04 x the DCG for uranium-233,234 and 0.04 x the DOE DCG for uranium-238 are 20 x 10⁻⁹ µCi/mL and 24 x 10⁻⁹ µCi/mL, respectively.

* Well locations are shown on Figure 6-2.

Groundwater Monitoring Program

VOCs in Offsite Monitoring Wells

The offsite monitoring wells are also used to evaluate concentrations of volatile organic compounds (VOCs). VOCs of concern at industrial sites are typically halogenated solvents such as 1,1,1-trichloroethane, trichloroethene, and tetrachloroethene. Concentrations of these compounds measured in offsite monitoring wells in 1992 are presented in Table 6-6. The table also lists the Maximum Contaminant Level (MCL) for

each VOC. However, the MCLs are not truly applicable to these samples. MCLs are used by the EPA to ensure compliance with the Primary Drinking Water Standards. Since the samples do not represent drinking water, the MCLs should only be used to help put the observed concentrations in perspective.

Table 6-6. VOC Concentrations in Offsite Monitoring Wells in 1992

Well I.D.*	Compound	$\mu\text{g/L}$			
		1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
0118	1,1,1-trichloroethane ^a chloroform ^b	N.D. N.D.	N.D. 3.5	N.D. 0.61	N.D. N.D.
0123		—	N.D.	—	N.D.
0124	1,1,1-trichloroethane	—	0.78	—	—
	1,2-dichloroethene ^c (total)	—	1.8	—	—
	trichloroethene ^d	—	2.4	—	—
0126	tetrachloroethene ^e	0.4	N.D.	N.D.	—
	1,1,1-trichloroethane	N.D.	1.7	N.D.	—
0129	1,1,1-trichloroethane	1.7	3.0	1.7	2.0
0138		N.D.	N.D.	N.D.	—
0156	1,1,1-trichloroethane	—	N.D.	—	—
0159	trichloroethene	N.D.	N.D.	N.D.	—
0160		N.D.	N.D.	N.D.	N.D.
0303		—	N.D.	—	—
0304	trichloroethene	—	N.D.	—	—
0311	chloroform	—	N.D.	—	—

^a MCL (Maximum Contaminant Level) for 1,1,1-trichloroethane is 200 $\mu\text{g/L}$.

^b MCL for total halomethanes is 100 $\mu\text{g/L}$.

^c MCL for 1,2-dichloroethene is 70 $\mu\text{g/L}$ (cis), 100 $\mu\text{g/L}$ (trans).

^d MCL for trichloroethene is 5 $\mu\text{g/L}$.

^e MCL for tetrachloroethene is 5 $\mu\text{g/L}$.

— = not sampled.

N.D. = none detected.

* Well locations shown on Figure 6-2.

6.4 Onsite Groundwater Monitoring Program

The onsite groundwater monitoring program at Mound consists of routine collection of samples from production wells and BVA monitoring wells. Samples are collected and analyzed primarily for radionuclides and volatile organic compounds (VOCs). Data from the groundwater analyses performed in 1992 are presented below. Sampling and analytical procedures used to generate these results are documented in Mound's Environmental Monitoring Plan (1992) and Mound's Groundwater Protection Management Program Plan (DOE 1993).

Tritium in Mound's Production Wells

There are three deep wells onsite which provide drinking water and process water for the Mound Plant. Tritium concentrations in those wells are evaluated on a monthly basis. The results for 1992 are summarized in Table 6-7. As seen in the table, elevated levels of tritium are associated with the wells. However, the maximum concentration observed, 2.5 nCi of tritium per liter of water, represents only 11.5% of the drinking water standard.

Table 6-7. Tritium Concentrations in Onsite Production Wells in 1992

Well I.D.*	Historic Designation	Number of Samples	Tritium nCi/L		Average as a % of the EPA Standard ^c
			Minimum	Maximum	
0071	No. 1	44	0.7	2.5	1.6 ± 0.1
0271	No. 2	31	1.0	2.3	1.9 ± 0.1
0076	No. 3	41	0.5	1.6	1.2 ± 0.1

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for tritium in onsite well water is 0.6 nCi/L.

^c The EPA standard for tritium in drinking water is 20 nCi/L.

* Well locations are shown on Figure 6-2.

Tritium in the BVA

Mound maintains an extensive network of onsite Buried Valley Aquifer (BVA) monitoring wells (Figure 6-2). Samples from a number of these wells are collected and analyzed for tritium. The results for 1992 are listed in Table 6-8. Data from Table 6-8 and from previous years demonstrate that some degree of tritium contamination is present in the aquifer.

The maximum concentration observed in 1992 was 31.5 nCi/L (Well 0115, located on top of the Main Hill). This value would be considered unacceptable from the perspective of the drinking water standard for tritium. However, the value was encountered in a monitoring well. Therefore, the drinking water standard does not apply and higher values (relative to production wells) are to be expected.

Groundwater Monitoring Program

Table 6-8. Tritium Concentrations in Onsite Monitoring Wells in 1992

Well I.D.*	Tritium Concentration nCi/L			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
0046	8.7	7.7	6.9	—
0063	6.9	6.7	7.6	6.2
0115	10.1	31.5	25.4	—
0119	—	3.3	—	—
0122	5.0	—	—	—
0125	—	0.76	—	—
0152	11.6	10.7	10.6	—
0153	—	8.2	—	—
0154	2.1	3.8	2.9	—
0155	2.3	2.3	2.2	2.2
0158	—	0.6	—	—
0305	6.6	7.1	7.3	5.9
0306	6.6	7.6	7.3	6.7
0307	7.9	7.9	7.0	7.9
0309	0.3	0.7	N.D.	—
0310	—	12.5	—	—
0312	11.1	11.0	11.7	—
0313	7.3	7.3	7.4	6.6
0314	—	4.3	—	—
0315	4.5	5.4	6.2	4.1
0317	—	3.0	—	—
0318	—	—	—	3.1
0319	—	1.0	—	—
0320	—	1.4	—	—

— = not sampled.

N.D. = none detected.

* Well locations shown on Figure 6-2.

EPA drinking water standard for tritium is 20 nCi/L.

Tritium in the Seeps

Tritium has been recognized as a persistent contaminant in the Main Hill seeps since 1986 (DOE 1987). Since then, tritium has been the focus of extensive sampling activities in that area. Table 6-9 shows concentrations of tritium in seep samples for 1992. (Seep locations are shown on Figure 6-5.) The highest tritium concentrations are clearly associated with Seep 601. This result is consistent with observations in previous years. However, the 1992 average tritium concentration for Seep 601 is approximately twice the average observed in 1991.

Remediation of the seeps is being addressed through Mound's CERCLA Program. The seeps are included in Operable Unit 2 of the environmental restoration (ER) program established for Mound. An overview of the status of the ER Program appears in Section 3.7 of this report.

Tritium in the Capture Pits

A number of groundwater collection devices, or "capture pits", are used on the Main Hill to isolate and monitor contamination in perched groundwater. These areas of contamination resulted from contact between pockets of shallow groundwater and contamination from past disposal practices. The locations of the sampling points for the capture pits are shown on Figure 6-5.

In June of 1992, the pits were sampled for tritium. Results of the sampling exercise are shown on Figure 6-6. As seen in Figure 6-6, significant concentrations of tritium are present in Pits 0714 and 0727. However, contamination in the pits is contained and does not present a significant threat to human health or the environment.

Table 6-9. Tritium Concentrations in Seeps in 1992

Seep I.D.*	Historic Designation	Number of Samples	Tritium nCi/L		
			Minimum	Maximum	Average
0601	S001	344	37.4	1460.6	207.3
0602	S002	25	1.6	30.3	9.8
0605	S005	44	28.0	96.0	46.1
0606	S006	22	4.9	34.6	23.6
0607	S007	310	8.0	41.7	21.6

* Seep locations are shown on Figure 6-5.

Groundwater Monitoring Program

Figure 6-5. Seep and capture pit sampling locations

Figure 6-6. Tritium concentrations in capture pits, June 1992 samples

Onsite Monitoring Activities for Other Radionuclides

Samples collected from the Plant's three production wells are also analyzed for plutonium-238, plutonium-239,240, uranium-233,234, and uranium-238. Results for 1992 are shown in

Tables 6-10 and 6-11 for plutonium and uranium, respectively. Averages reported in both tables demonstrate that average concentrations measured in 1992 were comparable to background levels for these radionuclides. (Background levels for 1992 are also listed in the tables.)

Table 6-10. Plutonium Concentrations in Onsite Production Wells in 1992

Well I.D.*	Historic Designation	Number of Samples	Plutonium-238 10 ⁻¹² µCi/mL		Average ^{a,b,c}	Average as a % of 0.04 x the DOE DCG ^d
			Minimum	Maximum		
0071	No. 1	11	e	5.95	1.05 ± 1.85	0.07
0271	No. 2	9	e	5.10	1.52 ± 1.83	0.10
0076	No. 3	11	e	6.85	1.49 ± 1.51	0.09

Well I.D.*	Historic Designation	Number of Samples	Plutonium-239,240 10 ⁻¹² µCi/mL		Average ^{a,b,c}	Average as a % of 0.04 x the DOE DCG ^d
			Minimum	Maximum		
0071	No. 1	11	e	2.33	0.40 ± 0.76	0.03
0271	No. 2	9	e	0.95	e	e
0076	No. 3	11	e	2.43	0.38 ± 0.84	0.03

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for plutonium-238 in drinking water is 9.7×10^{-12} µCi/mL. LDL for plutonium-239 in drinking water is 5.0×10^{-12} µCi/mL.

^c Background concentration of plutonium-238 in 1992 averaged $1.27 \pm 1.29 \times 10^{-12}$ µCi/mL. Background concentrations of plutonium-239 in 1992 averaged below the reagent blanks.

^d The DOE DCG for plutonium-238 in water is $40,000 \times 10^{-12}$ µCi/mL. This value corresponds to an EDE of 100 mrem/yr. Since the EPA dose standard is 4 mrem/yr, the averages have been reported as percentages of 0.04 x the DCG ($0.04 \times 40,000 \times 10^{-12}$ µCi/mL = 1600×10^{-12} µCi/mL). 0.04 x the DOE DCG for plutonium-239 is 1200×10^{-12} µCi/mL.

^e Below reagent blank.

* Well locations are shown on Figure 6-2.

Table 6-11. Uranium Concentrations in Onsite Production Wells in 1992

Well I.D.*	Historic Designation	Number of Samples	Uranium-233,234 10 ⁻⁹ μ Ci/mL			Average as a % of 0.04 x the DOE DCG ^c
			Minimum	Maximum	Average ^{a,b}	
0071	No. 1	11	0.19	0.28	0.22 $\pm$ 0.02	1.1
0271	No. 2	9	0.18	0.24	0.21 $\pm$ 0.01	1.1
0076	No. 3	11	0.19	0.25	0.22 $\pm$ 0.01	1.1

Well I.D.*	Historic Designation	Number of Samples	Uranium-238 10 ⁻⁹ μ Ci/mL			Average as a % of 0.04 x the DOE DCG ^c
			Minimum	Maximum	Average ^{a,b}	
0071	No. 1	11	0.15	0.24	0.19 $\pm$ 0.02	0.8
0271	No. 2	9	0.14	0.23	0.19 $\pm$ 0.02	0.8
0076	No. 3	11	0.16	0.22	0.19 $\pm$ 0.01	0.8

^a Error limits are estimates of the standard error of the estimated means at the 95% confidence level.

^b LDL for uranium in drinking water is 0.05×10^{-9} μ Ci/mL.

^c DOE DCGs correspond to doses of 100 mrem/yr. Since the EPA dose standard is 4 mrem/yr, the averages have been reported as percentages of 0.04 x the DCGs. 0.04 x the DCG for uranium-233,234 and 0.04 x the DOE DCG for uranium-238 are 20×10^{-9} μ Ci/mL and 24×10^{-9} μ Ci/mL, respectively.

* Well locations are shown on Figure 6-2.

Groundwater Monitoring Program

VOC Monitoring Activities

Production wells. The Plant's production wells exhibit VOC contamination, principally trichloroethene. Other halogenated solvents are present in trace concentrations. Results for 1992 are shown in Table 6-12. Table 6-12 confirms that the Plant continues to record trichloroethene concentrations in excess of the drinking water standard at Well 0071. Since the wells do provide drinking water for Mound, this issue is carefully monitored. Well 0071 has been used sparingly over the past several years because of these results and the proximity of the well to the suspected source of VOC contamination.

BVA. Within the Mound Plant, numerous monitoring wells in the upper and lower units of the Buried Valley aquifer have been sampled quarterly since 1988. Results confirm the presence of VOC contamination in the aquifer. Based on routine sampling of the BVA monitoring network, the contamination appears to be greatest along the western Plant boundary, immediately southwest of the Main Hill. Generally, within the boundaries of the plant, the contamination tends to decrease from west to east and from north to south.

Table 6-12. VOC Concentrations in Onsite Production Wells in 1992

Well I.D.*	Compound	No. of Samples	$\mu\text{g/L}$			MCL ^a
			Minimum	Maximum	Average	
0071	1,2-dichloroethene (total)	18	N.D.	7.60	3.38	70 ^b
	trichloroethene	18	1.70	2.80	2.28	5
	chloroform	18	N.D.	6.30	0.35	100 ^c
	tetrachloroethene	18	N.D.	0.90	0.62	5
0271	1,2-dichloroethene (total)	14	0.90	3.50	1.83	70 ^b
	trichloroethene	14	0.80	3.90	2.28	5
	chloroform	14	N.D.	N.D.	---	100 ^c
	tetrachloroethene	14	N.D.	1.60	0.86	5
0076	1,2-dichloroethene (total)	14	N.D.	1.40	0.77	70 ^b
	trichloroethene	14	0.70	1.70	1.27	5
	chloroform	14	N.D.	N.D.	---	100 ^c
	tetrachloroethene	14	N.D.	N.D.	---	5

^a MCL = Maximum Contaminant Level (based on EPA Primary Drinking Water Standards).

^b MCL for cis = 70 $\mu\text{g/L}$; MCL for trans = 100 $\mu\text{g/L}$.

^c MCL for total halomethanes = 100 $\mu\text{g/L}$.

N.D. = None detected.

* Well locations shown on Figure 6-2.

The result for 1992 are shown in Table 6-13. From north to south (see Figure 6-2), 10 monitoring wells exhibit VOC concentrations that exceed EPA drinking water standards: 0312, 0315, 0313, 0307, 0153, 0306, 0063, 0305, and 0154.

Trichloroethene and tetrachloroethene are the principal contaminants of concern. Other constituents present in elevated concentrations include 1,2-dichloroethene and tetrachloromethane.

Table 6-13. VOC Concentrations in Onsite Monitoring Wells in 1992

Well I.D.*	Compound	$\mu\text{g/L}$				MCL ^b
		1st Quarter	2nd Quarter ^a	3rd Quarter ^a	4th Quarter ^a	
0046	trichloroethene	3.3	1.7	N.A.	—	5
	tetrachloroethene	4.0	1.7	0.8	—	5
	1,2-dichloroethene (total)	1.2	2.9	1.6	—	70 ^c
0063	trichloroethene	21	47	N.D.	—	5
	tetrachloroethene	20	23	N.D.	—	5
	1,2-dichloroethene (total)	6.6	13	N.D.	—	70 ^c
	chloroform	5.1	7.9	5.7	—	100 ^d
	tetrachloromethane	2.3	3.1	N.D.	—	5
0115	trichloroethene	4.0	3.9	2.8	—	5
	tetrachloroethene	N.D.	1.9	1.7	—	5
	1,2-dichloroethene (total)	1.8	2.1	N.D.	—	70 ^c
0152	trichloroethene	7.2	8.2	8.3	—	5
	tetrachloroethene	4.0	4.5	5.6	—	5
	tetrachloromethane	N.D.	1.3	N.D.	—	5
0153	trichloroethene	—	12	—	—	5
	tetrachloroethene	—	6.0	—	—	5
	chloroform	—	N.D.	—	—	100 ^d
	1,1,1-trichloroethane	—	1.4	—	—	200
0154	trichloroethene	2.8	8.1	5.1	—	5
	tetrachloroethene	0.7	1.4	0.9	—	5
	1,2-dichloroethene (total)	5.6	16	24	—	70 ^c
	chloroform	N.D.	N.D.	N.D.	—	100 ^d
	1,1,1-trichloroethane	N.D.	0.7	N.D.	—	200

^a 2nd, 3rd, and 4th Quarter data for 1992 not yet validated; minor revisions may follow.

^b MCL = Maximum Contaminant Level (based on EPA Primary Drinking Water Standards).

^c MCL for cis isomer = 70 $\mu\text{g/L}$. MCL for trans isomer = 100 $\mu\text{g/L}$.

^d MCL for total halomethanes = 100 $\mu\text{g/L}$.

— = not sampled.

N.A. = not available at time of publication.

N.D. = none detected.

* Well locations shown on Figure 6-2.

Groundwater Monitoring Program

Table 6-13 (continued)

Well I.D.*	Compound	$\mu\text{g/L}$				MCL ^b
		1st Quarter	2nd Quarter ^a	3rd Quarter ^a	4th Quarter ^a	
0155	trichloroethene	4.6	4.4	3.5	—	5
	tetrachloroethene	0.9	0.7	0.4	—	5
	1,2-dichloroethene (total)	9.7	6.0	14	—	70 ^c
	chloroform	N.D.	0.35	N.D.	—	100 ^d
	1,1,1-trichloroethane	N.D.	N.D.	N.D.	—	200
0305	trichloroethene	23	35	37	32	5
	tetrachloroethene	23	21	21	32	5
	tetrachloromethane	2.9	2.8	2.6	3	5
	1,2-dichloroethene (total)	15	18	20	11	70 ^c
	chloroform	4.0	6.6	8.0	6	100 ^d
	1,1,1-trichloroethane	N.D.	N.D.	N.D.	N.D.	200
0306	trichloroethene	4.6	8.5	16	13	5
	tetrachloroethene	3.4	4.5	8.4	9	5
	tetrachloromethane	N.D.	1.0	N.D.	1.0	5
	1,1,1-trichloroethane	N.D.	N.D.	N.D.	N.D.	200
0307	trichloroethene	8.2	8.8	7.6	10	5
	tetrachloroethene	10	11	11	16	5
	tetrachloromethane	1.4	2.0	1.9	2	5
	chloroform	1.0	0.8	0.5	N.D.	100 ^d
0312	trichloroethene	27	21	20	—	5
	1,2-dichloroethene (total)	18	14	7.8	—	70 ^c
	chloroform	N.D.	N.D.	N.D.	—	100 ^d
	1,1,1-trichloroethane	N.D.	N.D.	N.D.	—	200
0313	trichloroethene	8.7	6.2	6.1	6	5
	tetrachloroethene	15	11	12	16	5
	tetrachloromethane	1.9	2.1	2.2	2	5
	chloroform	N.D.	0.8	0.5	N.D.	100 ^d
	benzene	N.D.	N.D.	3.2	N.D.	5
0315	trichloroethene	5.3	5.3	6.8	9	5
	tetrachloroethene	0.3	0.3	N.D.	N.D.	5
	tetrachloromethane	4.4	4.7	4.0	5.0	5
	1,2-dichloroethene (total)	N.D.	N.D.	N.D.	N.D.	70 ^c
	chloroform	0.6	0.5	N.D.	N.D.	100 ^d

^a 2nd, 3rd, and 4th Quarter data for 1992 not yet validated; minor revisions may follow.

^b MCL = Maximum Contaminant Level (based on EPA Primary Drinking Water Standards).

^c MCL for cis isomer = 70 $\mu\text{g/L}$. MCL for trans isomer = 100 $\mu\text{g/L}$.

^d MCL for total halomethanes = 100 $\mu\text{g/L}$.

— = not sampled.

N.A. = not available at time of publication.

N.D. = none detected.

* Well locations shown on Figure 6-2.

Seeps. Samples collected from the Main Hill in 1988 first confirmed the presence of VOCs in Seeps 0601, 0602, 0605, and 0607 (DOE, 1991). Seep locations are shown on Figure 6-5. Sample results for these seeps in 1992 are shown in Table 6-14.

In 1992, trichloroethene levels were near or above the 5- $\mu\text{g/L}$ drinking water standard at all seep

sampling locations. Additionally, the tetrachloroethene concentration measured at Seep 0601 was above the 5- $\mu\text{g/L}$ drinking water standard. However, it is important to note that seep water is unlikely to serve as a drinking water source. Therefore, a relatively low degree of risk is associated with the VOC contamination present in the seeps.

Table 6-14. VOC Concentrations in Seeps, June 1992 Samples

Seep I.D.*	Compound	$\mu\text{g/L}$	
		Sample Result ^a	MCL ^b
0601	dichloromethane	N.D.	5 ^c
	1,1,1-trichloroethane	N.D.	200
	trichloroethene	4.7	5
	tetrachloroethene	16	5
0602	chloroform	3.2	100 ^d
	1,2-dichloroethene (total)	2.6	70 ^e
	bromodichloromethane	3.8	100
	trichloroethene	7.6	5
	1,1,1-trichloroethane	0.6	200
	dibromochloromethane	3.7	f
	tetrachloroethene	0.4	5
0605	1,1,1-trichloroethane	N.D.	200
	1,2-dichloroethylene (total)	17.0	70 ^e
	chloroform	N.D.	100 ^d
	trichloroethene	8.3	5
0607	1,1,1-trichloroethane	0.7	200
	dichloromethane	N.D.	5 ^c
	acetone	N.D.	f
	1,2-dichloroethene (total)	4.5	70 ^e
	chloroform	N.D.	100 ^d
	toluene	N.D.	2000 ^c
	tetrachloroethene	N.D.	5
	trichloroethene	4.1	5

^a Analytical data not yet validated; minor revisions may follow.

^b MCL = Maximum Contaminant Level (based on EPA Primary Drinking Water Standards).

^c Proposed limit.

^d MCL for total halomethanes = 100 $\mu\text{g/L}$.

^e MCL for cis isomer = 70 $\mu\text{g/L}$. MCL for trans isomer = 100 $\mu\text{g/L}$.

^f N/A = MCL not established.

N.D. = none detected.

* Seep locations shown on Figure 6-5.

Groundwater Monitoring Program

Capture pits. VOC samples were also collected from the capture pits in June of 1992. The sampling locations are shown on Figure 6-5. The 1992 results are shown in Table 6-15. The principal VOC of concern for the capture pits is

trichloroethene. Elevated levels were recorded for Pits 0725 and 0726. However, as described above for the seep results, these levels present a low degree of risk because they do not involve drinking water sources.

Table 6-15. VOC Concentrations in Capture Pits, June 1992 Samples

Pit I.D.*	Compound	$\mu\text{g/L}$	
		Sample Result ^a	MCL ^b
0712	1,1-dichloroethene	6.1	7
	cis 1,2-dichloroethene	2.6	70
	trichloroethene	3.8	5
0714	1,1,2-trichloroethane	0.6	5
	trichloroethene	3.4	5
	tetrachloroethene	2.2	5
0721		N.D.	
0722		N.D.	
0723		N.D.	
0724		N.D.	
0725	trichloroethene	6.5	5
0726	1,2-dichloroethene (total)	30	70 ^c
	tetrachloroethene	0.67	5
	trichloroethene	60	5
	1,1,1-trichloroethane	3.2	200
0727	cis 1,2-dichloroethene	1.9	70
	tetrachloroethene	2.7	5
	trichloroethene	3.7	5

^a Analytical data not yet validated; minor revisions may follow.

^b MCL = Maximum Contaminant Level (based on EPA Primary Drinking Water Standards).

^c MCL for cis isomer = 70 $\mu\text{g/L}$. MCL for trans isomer = 100 $\mu\text{g/L}$.

^d N/A = MCL not established.

N.D. = none detected.

* Pit locations shown on Figure 6-5.

6.5 Five-Year Trends for Wells of Interest

As seen in Sections 6.1 through 6.4 of this chapter, a large volume of groundwater monitoring data are generated each year for the Mound Plant. It is important that the data be reviewed for evidence of long-term trends, especially in cases where there is some history of elevated concentrations of contaminants. In this section, five-year trends are presented for certain indicator parameters measured in wells of interest.

Trend Data for Offsite Drinking Water

A primary environmental consideration for the Mound Plant is to ensure that area drinking water supplies are not adversely affected by Plant operations. The most mobile of the constituents released to groundwater by Mound is tritium. For this reason, tritium is an excellent indicator of offsite migration. Detailed information regarding tritium levels in offsite wells was presented in Section 6.3.

Among the wells listed in those sections, two drinking water sources can be considered key receptor wells. First, the drinking water supply of the City of Miamisburg is of interest due to the proximity of the City's well fields to the Plant. And second, Well 0904, a private well, is useful as an indicator because it reflects potential impact to small drinking water systems.

Five-year trends for tritium concentrations in the two wells described above are shown in Figure 6-7. Also shown on the figure are background data for each year. As seen in the figure, tritium levels in the wells have exhibited little change during the period 1988 through 1992. Some evidence of a downward trend in tritium concentrations is evident for the private well, but the magnitude of change is small. All of the values shown on the graph are significantly below the drinking water standard for tritium, 20 nCi/L.

Figure 6-7. Tritium trend data for offsite drinking water

Trend Data for Onsite Production Wells and Seeps

As previously described in this chapter, tritium and certain volatile organic compounds (VOCs) have been observed in the groundwater system underlying the Plant site. As discussed in Section 6.4, VOCs of concern include trichloroethene, tetrachloroethene, and 1,2-dichloroethene. An appropriate onsite indicator well is Production Well No. 3 (also referred to as Well 0076) because it serves as a source of drinking water for the Plant. Another important monitoring point for the evaluation of groundwater conditions is associated with the seep sites. Data collected to-date suggest Seep 0601 is an appropriate location for the observation of long-term trends.

Five-year trend data for Mound Production Well No. 3 are shown in Figures 6-8 and 6-9 for tritium and VOCs, respectively. Similarly, Figures 6-10 and 6-11 present five-year-trend data for tritium and VOCs at Seep 0601.

Figure 6-8 indicates that tritium levels in Mound Well No. 3 are well below the applicable drinking water standard (20 nCi/L) and are not significantly different from the values reported for offsite drinking water systems. Some evidence of a downward trend is suggested by the data. For the VOCs in Well No. 3 (Figure 6-9), slightly elevated concentrations have been observed. However, as documented by the footnote to the figure, observed VOC concentrations have remained below the applicable MCLs.

Figure 6-8. Tritium trend data for onsite drinking water

Figure 6-9. VOC trend data for onsite drinking water

Figure 6-10 presents tritium concentration data for Seep 0601. Data for the period 1988-1992 show tritium concentrations ranging from approximately 100 nCi/L to just over 300 nCi/L. From the figure, it can be noted that three years of decreasing concentration were followed by a year in which tritium concentrations increased by a factor of two. Additional data will be required to evaluate the presence or absence of a clear trend. As seen in Figure 6-11, Seep 0601 is also characterized by elevated levels of VOCs. Over the past few years, tetrachloroethene has emerged as a key contributor to VOC contamination in the seep.

Because Mound seep sites are not sources of drinking water, tritium levels above the drinking water standard, or VOC values in excess of a maximum contaminant level, should not be interpreted as indicative of a human health or environmental threat. Mound's Environmental Restoration (ER) Program will evaluate the risks associated with contamination in the seeps and will identify remediation actions which may be appropriate.

Figure 6-10. Tritium trend data for Seep 0601

Figure 6-11. VOC trend data for Seep 0601

7.0 QUALITY ASSURANCE PROGRAMS FOR ENVIRONMENTAL DATA

Mound participates in quality assurance (QA) exercises sponsored by the DOE and the EPA. Such exercises provide objective evaluations of the validity of the environmental data generated by Mound. In this Chapter, QA programs involving radiological and nonradiological analyses of a variety of environmental media are described. In addition to these external QA programs, Mound performs internal QA studies that make use of field and reagent blanks, internal standards, and duplicate samples.

EML QA Program

Twice each year, DOE's Environmental Measurements Laboratory (EML) conducts blind environmental sampling exercises for DOE sites. Each participating lab is given a number of samples to analyze for radiological constituents. The radionuclides are present as contaminants on air filters, or in soil, vegetation, or water. A laboratory's performance is evaluated by comparing their results with EML's reference values.

The concentrations reported by Mound for the March and September 1992 studies are shown in Table 7-1. The reference values established by EML are also shown in the Table. A useful method of evaluating Mound's performance is to examine the ratio of Mound's result to the EML reference concentration for each environmental medium. This information is shown in Figure 7-1.

As seen in Figure 7-1, all data reported by Mound fell within a range of 59% to 133% of the EML reference concentrations. Most of the samples were within $\pm 20\%$ of the reference values. Since the concentrations were in many cases near the detection limit of the analytical method in use, the results are encouraging.

NPDES QA Program

National Pollutant Discharge Elimination System (NPDES) permits are used by the EPA to regulate discharges of liquid effluents. The permits limit the concentrations of certain wastewater

constituents to protect the receiving body of water. To ensure that a facility does not exceed those limits, the NPDES permit imposes strict requirements for effluent characterization. The EPA requires that labs performing analyses for NPDES parameters participate in QA exercises. These exercises assure EPA that the labs are producing reliable and accurate data.

In 1992, as in previous years, Mound participated in the NPDES QA exercise. In this program, a contractor lab, Bionetics, prepares water samples for blind analysis. Labs, including Mound, analyze these samples and then submit the results to the contractor. The contractor evaluates the data based on limits for acceptability.

Mound's performance for 1992 is shown in Table 7-2. Of the 15 parameters analyzed, Mound was rated "acceptable" on 13. One "not acceptable" rating and one "check for error" message were noted. The not acceptable evaluation was associated with a chromium sample. The sample was composed of a 15-metal matrix. Interference due to a matrix effect resulted in a low chemical yield. This phenomenon is unlikely to be encountered in an actual environmental sample. Nevertheless, Mound's Environmental Monitoring Lab has taken steps to ensure that future samples could be more accurately analyzed if the need arose. The "check for error" message was associated with a mercury sample that was analyzed by a contractor lab. In response to that evaluation, Mound required that the lab analyze additional samples to verify the accuracy of their analytical protocol. Based on those samples, no discrepancies were noted.

**Table 7-1. Mound DOE Quality Assessment Program Results for 1992:
Radionuclides in Environmental Samples**

Sample Type	Radionuclide	Mound Result ^a	EML Reference Concentration
Air filters			
March	Pu-238	5.02 ± 3.0%	7.29 pCi
		4.41 ± 3.1%	7.29 pCi
	Pu-239	5.27 ± 2.9%	7.70 pCi
		4.54 ± 3.0%	7.70 pCi
September	Pu-238	0.91 ± 5.1%	1.13 pCi
		0.95 ± 5.5%	1.13 pCi
	Pu-239	1.09 ± 4.7%	1.22 pCi
		1.10 ± 5.1%	1.22 pCi
	U-234	0.41 ± 10.8%	0.45 pCi
		0.42 ± 7.9%	0.45 pCi
	U-238	0.39 ± 11.1%	0.43 pCi
		0.44 ± 7.8%	0.43 pCi
Vegetation			
March	Pu-238	28.30 ± 12.0%	29.16 pCi/kg
		33.14 ± 10.3%	29.16 pCi/kg
	Pu-239	7.28 ± 23.6%	8.40 pCi/kg
		9.24 ± 19.4 %	8.40 pCi/kg
September	Pu-238	35.30 ± 9.0%	33.75 pCi/kg
	Pu-239	10.85 ± 16.3 %	10.23 pCi/kg
Soil			
March	Pu-238	0.90 ± 155.9%	1.35 pCi/kg
		1.80 ± 88.9 %	1.35 pCi/kg
	Pu-239	787 ± 5.5%	689 pCi/kg
		656 ± 4.7 %	689 pCi/kg
	U-234	687 ± 3.5 %	802 pCi/kg
	U-238	696 ± 3.4 %	799 pCi/kg
September	Pu-238	571 ± 4.4 %	591 pCi/kg
		582 ± 7.7 %	591 pCi/kg
		540 ± 5.2 %	591 pCi/kg
	Pu-239	197 ± 7.5 %	210 pCi/kg
		188 ± 13.4 %	210 pCi/kg
		212 ± 8.2 %	210 pCi/kg
	U-234	669 ± 2.3 %	788 pCi/kg
		653 ± 4.7%	788 pCi/kg
	U-238	649 ± 2.4 %	799 pCi/kg
		628 ± 4.8 %	799 pCi/kg

^a The Mound error is the two-sigma error based on counting statistics or replicate analysis.

Table 7-1. Continued.

Sample Type	Radionuclide	Mound Result ^a	EML Reference Concentration
Water	March	H-3	6750 $\pm$ 8.4 %
		Pu-238	8.79 $\pm$ 2.9 %
		Pu-239	20.75 $\pm$ 1.4%
		U-234	11.33 $\pm$ 3.4 %
		U-238	11.21 $\pm$ 3.4 %
	September	H-3	3294 $\pm$ 9.8 %
		Pu-238	50.21 $\pm$ 2.3 %
		Pu-239	6.43 $\pm$ 6.5 %
		U-234	2.86 $\pm$ 12.8 %
		U-238	2.80 $\pm$ 12.9 %

^a The Mound error is the two-sigma error based on counting statistics or replicate analysis.

Figure 7-1. Mound's Performance in the DOE Quality Assessment Program in 1992

Table 7-2. Mound's Performance in the NPDES Quality Assurance Program for 1992

Parameter	Mound Value	EPA Value	Performance Evaluation
Trace Metals, µg/L			
Cadmium	258	250	Acceptable
Chromium	629	800	Not acceptable ^a
Copper	800	790	Acceptable
Lead	564	550	Acceptable
Mercury	6.33	5.30	Check for error ^b
Nickel	728	740	Acceptable
Zinc	376	360	Acceptable
pH, standard units	9.31	9.40	Acceptable
Misc. Analytes, mg/L			
Total suspended solids	25.0	25.0	Acceptable
Oil and grease	17.8	19.0	Acceptable
Total cyanide	0.56	0.61	Acceptable
Total residual chlorine	0.43	0.44	Acceptable
Ammonia-Nitrogen	2.45	2.50	Acceptable
Carbonaceous biological oxygen demand	37.0	30.7	Acceptable
Chemical oxygen demand	56.0	56.3	Acceptable

^a The sample in question was a 15-metal matrix. Interference by the metal complex led to the low chemical yield. The problem has been isolated and corrected and has not affected routine environmental analyses performed by the Environmental Monitoring Lab.

^b The mercury analysis was performed by a contractor lab. The lab was asked to analyze additional blind samples; no discrepancies were encountered.

APG QA Program

As a companion to the EPA program described above, Mound also participates in another QA exercise for NPDES parameters. In this study, water samples prepared by Analytical Products Group, Inc. (APG) are analyzed in a round-robin fashion by participating labs. The studies are conducted two times per year. For each parameter of interest, APG determines the average value reported by all participants. The figure-of-merit used to evaluate a lab is the standard deviation of a result from the average for that parameter. In this fashion, a lab's performance is rated relative to the performance of all other labs.

Limits of acceptability are associated with the APG studies. There are "warning" and "not acceptable limits" for performance. Those limits have been set at 1.96 and 2.58 standard deviations from the average, respectively.

Mound participated in both APG studies for 1992. The results are shown in Figures 7-2a and 7-2b for trace metals and miscellaneous parameters, respectively.

Figure 7-2a demonstrates that Mound's performance for trace metal analysis in 1992 was exceptional. All standard deviations from the averages were small and no performance limits were exceeded. Mound's performance for the miscellaneous analytes, Figure 7-2b, was generally satisfactory. Two data points, however, do lie outside the desirable range. Both points involve the NH₃-N analysis. It was subsequently determined that an incorrect dilution factor had been applied. This error was not readily detectable at the time the report was submitted. It was, however, corrected, and is unlikely to occur again.

Mound QA Program

In addition to the external programs described above, Mound performs a number of internal QA operations. Blank samples are analyzed to verify the absence of excessive instrument contamination or background. The standard deviation of the blank is then used to calculate the lower limit of detection limit. Quality data from this step is imperative because many of the environmental samples analyzed at Mound have contaminant concentrations at or below the lower detection limit.

Mound also routinely uses duplicate sample analysis and internal standard techniques to evaluate analytical precision. Deviation from an expected value results in a comprehensive review of the analytical protocol.

Figure 7-2a. Mound's Performance in the APG Proficiency Environmental Testing Program for 1992: Trace Metal Analysis

Figure 7-2b. Mound's Performance in the APG Proficiency Environmental Testing Program for 1992: Miscellaneous Parameters

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References

APPENDIX

A.1 Exposure Routes

Members of the public receive radiation doses via various exposure pathways. For radionuclides discharged to the atmosphere, a person may inhale or be immersed in airborne radionuclides. Other routes of airborne exposure include ground deposition of radionuclides and consumption of food products that were contaminated by airborne releases. For radionuclides released to water, a person may consume contaminated water or fish. The other potential water-based exposure pathways (e.g., swimming and boating) generally do not add significantly to the dose.

A.2 Dose Calculations Based on Measured Data

For DOE reporting requirements, doses are presented as 50-year committed effective dose

equivalents (CEDEs). The CEDE is the total dose equivalent that will be received by an individual over a 50-year time period as a result of one year of exposure to ionizing radiation. The total CEDE reported is the sum of the CEDEs from the air, water, and foodstuffs pathways.

Each year, Mound personnel calculate CEDEs for tritium, plutonium-238, plutonium-239. (Other radionuclides released by Mound were present in concentrations that were below environmental levels or were too small to affect the overall dose.) The CEDEs for tritium and plutonium are evaluated using environmental monitoring data measured on and near the plant site. A CEDE for a given radionuclide is calculated as shown below. Specific input values for 1992 are shown in Table A-1.

$$CEDE = \sum C_r \cdot I_a \cdot DCF \cdot CF$$

where CEDE = total committed effective dose equivalent, mrem

$\sum_1^p$ = summation over the exposure pathways 1 through p

C_r = maximum average concentration of the radionuclide

I_a = annual intake of the environmental medium

DCF = dose conversion factor for the radionuclide and intake type

CF = conversion factor to accommodate dose conversion factor units

The CEDE for all radionuclides are then summed to provide a single value for reporting purposes.

Table A-1. Factors Used to Calculate 1992 CEDEs

Radionuclide	Concentration	Location	Dose Factor, mrem/ μ Ci (a)
Tritium			
Air	$16.55 \times 10^{-12} \mu\text{Ci/mL}$	211	6.3×10^{-8} (b)
Well water	$0.92 \times 10^{-6} \mu\text{Ci/mL}$	0904	6.3×10^{-8}
Vegetation	$0.06 \times 10^{-6} \mu\text{Ci/g}$	Miamisburg	6.3×10^{-8}
Plutonium-238			
Air	$15.44 \times 10^{-18} \mu\text{Ci/mL}$	213/213R	0.38
Well water	$0.99 \times 10^{-12} \mu\text{Ci/mL}$	Miamisburg	0.0019
Vegetation	$0.2 \times 10^{-9} \mu\text{Ci/g}$	Miamisburg	0.0019
Fish	environmental level	Great Miami River	N/A - no dose
Plutonium-239			
Air	$0.36 \times 10^{-18} \mu\text{Ci/mL}$	213/213R	0.42
Well water	environmental level	Miamisburg	N/A - no dose
Vegetation	$0.03 \times 10^{-9} \mu\text{Ci/g}$	Miamisburg	0.0022
Fish	$0.002 \times 10^{-9} \mu\text{Ci/g}$	Great Miami River	0.0022

Annual Consumption Factors

Air	8400 m ³	Vegetation	260 kg
Well water	730 L	Fish	21 kg

(a) Plutonium releases from Mound are believed to be insoluble (Class Y). However, to provide a reasonable degree of conservatism in the dose estimates, the Pu-238 and Pu-239 doses factors used are averages of Class W and Class Y values.

(b) The dose factor is multiplied by a factor of 1.5 to include absorption of tritium through the skin.

A-3. Dose Calculations for NESHAPs Compliance

To demonstrate compliance with the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs, 40 CFR 61, Subpart H), Mound performs additional dose calculations each year for all airborne releases. As preferred by the EPA in 40 CFR 61, Subpart H, Mound uses the computer code CAP-88 to calculate those doses.

Whenever available, Mound uses site-specific data as input to the code. Meteorological data measured onsite are used to evaluate transport and dispersion. Stack-specific release rates are used in an aggregated form as shown below (Table A-2). This approach makes it possible to combine stacks with similar physical attributes. Table A-2 lists all the relevant stack information for a CAP-88 run.

Table A-2. 1992 CAP-88 Input Data

Stack IDs	Assumed Stack Height (meters)	Assumed Stack Diameter (meters)	Exit Velocity (meters/sec)	Radionuclide(s)	1992 Release (Ci/yr)
HH	23	0.9	5.2	H-3	2.08×10^1
NCPDF/ SWIC	40	0.8	14	H-3	6.41×10^{-1}
				Pu-238	1.88×10^{-9}
				Pu-239	4.02×10^{-10}
				U-234	2.16×10^{-9}
				U-238	1.24×10^{-9}
HEFS	45	2.0	11.9	H-3	7.26×10^2
				Pu-238	1.57×10^{-8}
				Pu-239	1.67×10^{-9}
SMPP/ T WEST/ T EAST	61	2.0	10.3	H-3	1.42×10^1
				Pu-238	5.37×10^{-6}
				Pu-239	3.31×10^{-8}
				U-234	1.89×10^{-8}
				U-238	1.27×10^{-8}
WDALR/ WDAHR/ WDSS	15	0.7	5.3	H-3	7.00×10^{-2}
				Pu-238	1.67×10^{-7}
				Pu-239	2.79×10^{-9}

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