DOE/NV--897-REV 1

Nevada Environmental Restoration Project



Closure Report for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada

Controlled Copy No.:_____

Revision: 1

July 2003

Environmental Restoration Division

> U.S. Department of Energy National Nuclear Security Administration Nevada Site Office

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DOE/NV--897-REV 1

CLOSURE REPORT FOR CORRECTIVE ACTION UNIT 262: AREA 25 SEPTIC SYSTEMS AND UNDERGROUND DISCHARGE POINT, NEVADA TEST SITE, NEVADA

Prepared for: U.S. Department of Energy National Nuclear Security Administration Nevada Site Office Work Performed Under Contract No. DE-AC08-96NV11718

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CLOSURE REPORT FOR CORRECTIVE ACTION UNIT 262: AREA 25 SEPTIC SYSTEMS AND UNDERGROUND DISCHARGE POINT, NEVADA TEST SITE, NEVADA

Approved by: <u>SIGNATURE APPROVED</u> Janet Appenzeller-Wing, Project Manager Industrial Sites Project Date: <u>7/3/2003</u>

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ACRONYMS AND ABBREVIATIONS

BN	Bechtel Nevada
CADD	Corrective Action Decision Document
CAIP	Corrective Action Investigation Plan
CAP	Corrective Action Plan
CAS(s)	Corrective Action Site(s)
CAU	Corrective Action Unit
COC	Contaminant(s) of Concern
CR	Closure Report
DOE/NV	U.S. Department of Energy, Nevada Operations Office
DQO	Data Quality Objective
E-MAD	Engine Maintenance, Assembly, and Disassembly
EPA	U.S. Environmental Protection Agency
ft	foot(feet)
FFACO	Federal Facility Agreement and Consent Order
in	inch(es)
kgs	kilograms
lbs	pounds
m	meter(s)
m ³	cubic meter
MDA	Minimum Detectable Activity
MDC	Minimum Detectable Concentration
mg/kg	milligram(s) per kilogram
mg/L	milligrams(s) per liter
MTL	Materials Testing Laboratory
NAC	Nevada Administrative Code
NDEP	Nevada Division of Environmental Protection
NNSA/NSO	U.S. Department of Energy, National Nuclear Security Administration Nevada
	Site Office
NNSA/NV	U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office
NTS	Nevada Test Site
PCBs	Polychlorinated biphenyls
pCi/g	picoCuries per gram
pCi/L	picoCuries per liter
QA/QC	quality assurance/quality control

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ACRONYMS AND ABBREVIATIONS (continued)

R-MAD	Reactor Maintenance,	Assembly, and Disassembly	,
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- SWO Solid Waste Operations
- TCLP VOC Toxicity Characteristic Leaching Procedure Volatile Organic Compounds
- TPH Total Petroleum Hydrocarbons
- μg/L micrograms per liter
- yd³ cubic yard(s)

CLOSURE RE PORT - CAU 262 Section: Executive Summary Revision: 1 Date: July 2003

EXECUTIVE SUMMARY

Corrective Action Unit (CAU) 262 consists of nine Corrective Action Sites (CAS) located in Area 25 of the Nevada Test Site (NTS). The NTS is located approximately 105 kilometers (65 miles) northwest of Las Vegas, Nevada. CAU 262 is listed in the Federal Facility Agreement and Consent Order (FFACO, 1996) and consists of the following CASs:

CAS 25-02-06, Underground Storage tank CAS 25-04-06, Septic Systems A and B CAS 25-04-07, Septic System CAS 25-05-03, Leachfield CAS 25-05-05, Leachfield CAS 25-05-06, Leachfield CAS 25-05-08, Radioactive Leachfield CAS 25-05-12, Leachfield CAS 25-51-01, Dry Well

CAU 262 was closed in accordance with the FFACO and the Nevada Division of Environmental Protection-approved Corrective Action Plan for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada (U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office, 2002a). CAU 262 was closed by implementing the following corrective actions:

Four CASs were closed in place with administrative controls.

CAS 25-02-06 is a septic tank which contains Total Petroleum Hydrocarbons (TPH), polychlorinated biphenyls (PCBs), and sanitary waste. This site was closed in place by solidifying the tank contents and backfilling the tank with grout. A use restriction was implemented to control inadvertent intrusion or exposure to the tank contents.

CAS 25-05-03 is a leachfield which contains underground radiological constituents. This site was closed in place by constructing a 0.6 meter (m) (2 feet [ft]) thick soil cap over the leachfield footprint. Leachfield monitoring tubes were cut off at ground level and filled with grout. The distribution box and a diversion drum were filled with grout. The subsurface vaults and valve boxes were backfilled with clean fill. The existing chain link fence was repaired and a use restriction was implemented. Permanent warning signs were installed on the fence listing use restriction and point of contact information. As a best management practice, the two washes that transect the leachfield were graded and backfilled with rip rap to limit erosion potential. The upgradient portion of the wash was modified by construction of a diversion channel of native soil and rip rap to redirect flow away from the leachfield cap.

CAS 25-05-06 is a leachfield which contains underground radiological constituents. The site was closed in place. The existing wire fence was replaced by a 2.1 m (7 ft) high chain link security fence to restrict site access. The distribution box was filled with grout. Leachfield monitoring tubes were cut off at ground level and filled with grout. Permanent warning signs were installed on the fence listing use restriction and point of contact information.

CAS 25-05-08 is a leachfield which contains underground radiological constituents and was closed in place by constructing a 0.6-1.2 m (2-4 ft) thick soil cap over the leachfield footprint. Leachfield monitoring tubes were cut off at ground level and filled with grout. The leachfield distribution box was also filled with grout. Erosion protection was installed on the downgradient face of the soil cap. A 2.1 m (7 ft) chain link security fence was installed around the leachfield perimeter to restrict site access. Permanent warning signs were installed on the fence listing use restriction and point of contact information.

Four CASs were clean closed.

CAS 25-04-06 Systems A and B are septic systems that contained only sanitary waste. System A was closed by filling the empty septic tank, distribution box, and access points (manholes) with grout. System B was closed by pumping, solidifying, and disposing the tank contents. The septic tank, distribution box, and access points were filled with grout.

CAS 25-04-07 is a septic system in which the septic tank contained only sanitary waste. This site was clean closed by filling the dry, empty septic tank and distribution box with grout.

CAS 25-05 05 is a septic tank that contained TPH-impacted liquid and sludge. The site was clean closed by removing and disposing the tank contents. The tank was steam cleaned and verification samples of the rinseate were collected. The tank, distribution box, and all access points were filled with grout.

CAS 25-05-12 is a septic tank that contained TPH-impacted liquid and sludge. The site was clean closed by removing and disposing the tank contents. The tank was steam cleaned and verification samples of the rinseate were collected. The tank, distribution box, and all access points were filled with grout.

One CAS was closed by taking no further action

CAS 25-51-01 is an underground discharge point designed to receive sanitary waste. Characterization activities determined no contaminants of concern above action levels present; therefore, this site was closed by taking no further action.

1.0 INTRODUCTION

This Closure Report (CR) documents the activities undertaken to close Corrective Action Unit (CAU) 262: Area 25 Septic Systems and Underground Discharge Point, in accordance with the Federal Facility Agreement and Consent Order (FFACO) of 1996. Site closure was performed in accordance with the Nevada Division of Environmental Protection (NDEP)-approved Corrective Action Plan (CAP) for CAU 262 (U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office [NNSA/NV, 2002a]). CAU 262 is located at the Nevada Test Site (NTS) approximately 105 kilometers (65 miles) northwest of Las Vegas, Nevada (see Figure 1). CAU 262 consists of the following nine Corrective Action Sites (CASs) located in Area 25 of the NTS (see Figures 2 through 4):

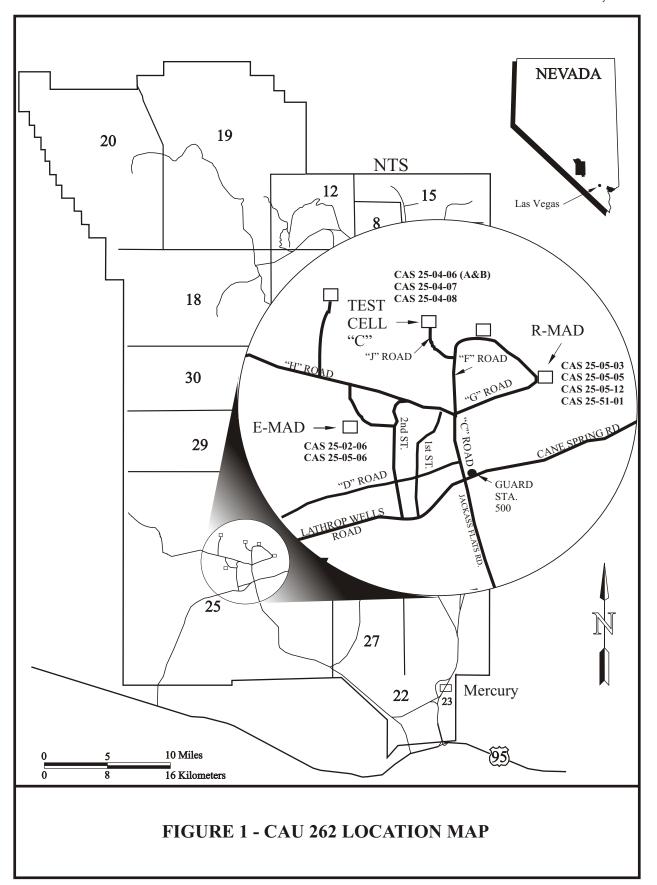
CAS 25-02-06, Underground Storage tank CAS 25-04-06, Septic Systems A and B CAS 25-04-07, Septic System CAS 25-05-03, Leachfield CAS 25-05-05, Leachfield CAS 25-05-06, Leachfield CAS 25-05-08, Radioactive Leachfield CAS 25-05-12, Leachfield CAS 25-51-01, Dry Well

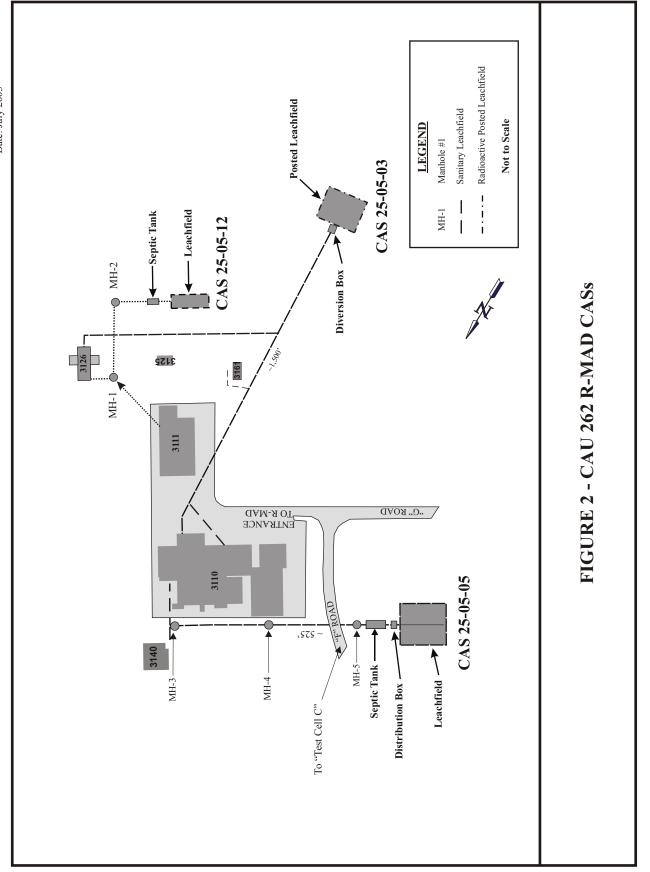
Copies of the analytical results for the site verification samples are included in Appendix B. Copies of the CAU Use Restriction Information forms are included in Appendix G.

1.1 PURPOSE

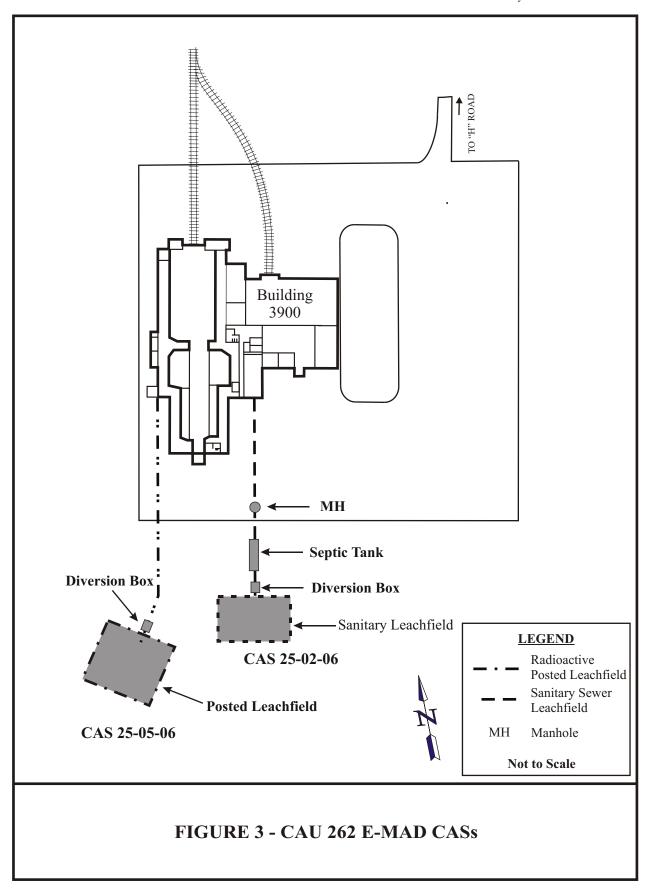
The purpose of this CR is to document that the closure of CAU 262 complied with all of the closure requirements detailed in the NDEP-approved CAP (NNSA/NV, 2002a) and to provide data confirming the clean closure. CAU 262 was investigated and closed using the FFACO complex process. Details of the investigation activities are documented in the CAU 262 Corrective Action Investigation Plan (CAIP) (U.S. Department of Energy, Nevada Operations Office)[DOE/NV, 2000]). Results of the investigation activities are presented in the Corrective Action Document (CADD) for CAU 262 (NNSA/NV, 2001).

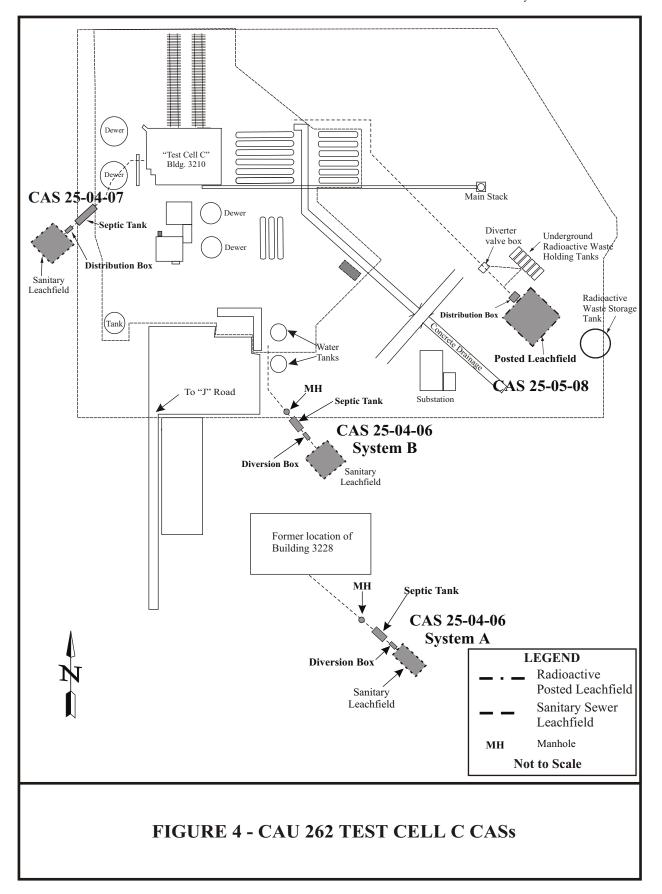
CAS 25-02-06 is a septic system that received sanitary effluent from Building 3900 at the Engine Maintenance, Assembly, and Disassembly (E-MAD) facility. The leachfield contains no contaminants of concern (COC) above action levels. The septic tank contains sanitary waste, Total Petroleum Hydrocarbons (TPH), and polychlorinated biphenyls (PCBs) above action levels. This site was closed in place by solidifying the septic tank contents and filling the remaining void space with grout. Access points were also filled with grout. Use restrictions were implemented to restrict access into the tank.





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CAS 25-04-06 consists of two septic systems (A and B) which received sanitary effluent from Buildings 3228 and 3220, respectively at the Test Cell C facility. Results of characterization activities presented in the CADD for CAU 262 indicated the septic tanks and leachfields contained no COC, only sanitary waste (NNSA/NV, 2001). System A septic tank contained no liquid or sludge and was clean closed by filling the septic tank, distribution box, and upstream manhole with grout. System B was clean closed by removing and disposing the septic tank contents and filling the tank, distribution box, and upstream manhole with grout.

CAS 25-04-07 is a septic system which received sanitary effluent from Building 3210 at the Test Cell C facility. Characterization results indicated the septic tank and leachfield contained only sanitary waste (NNSA/NV, 2001). However, during closure activities the septic tank and distribution box were found to contain no liquid or sludge and was clean closed by filling with grout.

CAS 25-05-03 is a leachfield that received radioactive effluent from the Reactor-Maintenance, Assembly, and Disassembly (R-MAD) facility. The leachfield contains underground radiological COC (NNSA/NV, 2001). The leachfield was closed in place by installing a 0.6 meter (m) (2 feet [ft]) thick cap over the leachfield. The cap was constructed of clean native soil in three 0.2 m (8 inch [in.]) thick lifts. Each lift was compacted to 90 percent of maximum density. Prior to installing the cap, all monitoring tubes were cut off at ground level and filled with grout. The distribution box and a diversion drum were filled with grout. Two valve boxes located within the leachfield were backfilled with clean fill. As a best management practice to control potential erosion, existing surface washes were graded and backfilled with rip-rap. A rip-rap lined channel was constructed along the upgradient side of the leachfield to divert overland flow away from the leachfield cap. The existing chain link security fence was repaired and permanent warning signs were affixed to the fence. A Use Restriction was implemented to restrict intrusive activity into or beneath the site.

CAS 25-05-05 is a septic tank that received sanitary effluent from Buildings 3110 and 3140 at the R-MAD facility. The tank contained TPH above the Nevada state action level of 100 milligrams per kilogram (mg/kg) [Nevada Administrative Code (NAC), 2002a], and sanitary waste (NNSA/NV, 2001). The tank was clean closed by removing, solidifying, and disposing the tank contents. The tank was pressure washed/steam cleaned and the rinseate was sampled to verify that no COC remained in the tank. The tank, distribution box and access points were filled with grout.

CAS 25-05-06 is a leachfield that received radioactive effluent from the E-MAD facility and contains underground radiological COC (NNSA/NV, 2001). The leachfield was closed in place by installing a 2.1 m (7 ft) high chain link security fence around the perimeter of the leachfield. Monitoring tubes within the leachfield were cut off at ground level and filled with grout. The existing fence was removed and disposed. Permanent warning signs were affixed to the new fence and a Use Restriction was implemented to restrict intrusive activity into the leachfield.

CAS 25-05-08 is a leachfield that received radioactive effluent from Building 3210 at the Test Cell C facility. The site was closed in place by installing a 0.6-1.2 m (2-4 ft) thick cap over the leachfield. The cap was constructed of clean native soil in six 0.2 m (8 in.) thick lifts. Each lift was compacted to 90 percent of maximum density. Prior to installing the cap, all monitoring tubes were cut off at the surface and filled with grout. The buried distribution box was exposed and filled with grout. The existing fence was removed and disposed and a new 2.1 m (7 ft) high chain link security fence was installed around the perimeter of the leachfield. As a best management practice to control potential erosion, a cellular confinement system filled with aggregate was installed on the downgradient south face of the cap. Permanent warning signs were affixed to the new fence and a Use Restriction was implemented to restrict intrusive activity into or beneath the site.

CAS 25-05-12 is a septic tank that received sanitary effluent from Buildings 3111 and 3126 at the R-MAD facility. The tank contained TPH above the state action level of 100 mg/kg (NAC, 2002a), and sanitary waste (NNSA/NV, 2001). The tank was clean closed by removing, solidifying, and disposing the tank contents. The tank was pressure washed/steam cleaned and the rinseate was sampled to verify that no COC remained in the tank. The tank, distribution box, and access points were filled with grout.

CAS 25-51-01 is an underground discharge point that received sanitary waste from Building 3125 at the R-MAD facility. Characterization indicated this CAS contained no COC (NNSA/NV, 2001) and was therefore closed by taking no further action.

1.2 SCOPE

The closure strategy for CAU 262 was specified in the NDEP-approved CAP for CAU 262 (NNSA/NV, 2002a). The nine CASs in CAU 262 were closed as follows:

CAS 25-02-06, Underground Storage tank - Closed in place with administrative controls CAS 25-04-06, Septic Systems A and B - Clean closed CAS 25-04-07, Septic System - Clean closed CAS 25-05-03, Leachfield - Closed in place with administrative controls CAS 25-05-05, Leachfield - Clean closed CAS 25-05-06, Leachfield - Closed in place with administrative controls CAS 25-05-08, Radioactive Leachfield - Closed in place with administrative controls CAS 25-05-12, Leachfield - Clean closed CAS 25-05-12, Leachfield - Clean closed CAS 25-05-12, Leachfield - Clean closed CAS 25-05-12, Leachfield - Clean closed

CASs 25-05-05 and 25-05-12 were the only CASs requiring verification data. The tank contents were removed, the tanks were rinsed, and the rinseate sampled to verify that all waste above the TPH action level was removed. The tanks were then filled with grout. CASs 25-04-06 and 25-04-07 did not contain COC above action levels and were closed by removing the sanitary waste as applicable and filling the tanks with grout. CAS 25-51-01 was closed by taking no further action. All other CASs were closed in place.

1.3 CLOSURE REPORT CONTENTS

This CR is divided into the following sections:

Section 1.0 - Introduction

Section 2.0 - Closure Activities

Section 3.0 - Waste Disposition

Section 4.0 - Closure Verification Results

Section 5.0 - Conclusions and Recommendations

Section 6.0 - References

Appendix A - Data Quality Objectives

Appendix B - Sample Analytical Results

Appendix C - Soil Compaction Test Results

Appendix D - Radiological Survey Reports

Appendix E - Waste Disposition Documentation

Appendix F - "As-Built Drawings

Appendix G - Use Restriction Documentation

Appendix H - Site Closure Photographs

Appendix I - Approved Records of Technical Change

Appendix J - "A Through K Evaluation

Distribution List

The following standard FFACO CR appendices are not included in this CR because they do not apply to closure of CAU 262.

Closure Certification - Not applicable.

Modifications to the Post-Closure Plan - Not applicable.

This report was developed using information and guidance from the following documents:

Corrective Action Plan for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada (NNSA/NV, 2002a).

Field Management Plan for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada. (Bechtel Nevada [BN], 2001a).

Site-Specific Health and Safety Plan for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada (BN, 2001b).

Nevada Environmental Restoration Project, Industrial Sites Quality Assurance Project Plan, Nevada Test Site, Nevada, Revision 3 (NNSA/NV, 2002b).

1.3.1 Data Quality Objectives

The data quality objectives (DQOs) used for closure of CAU 262 were presented in Appendix A of the CAIP (DOE/NV, 2000), and are included as Appendix A of this report.

The general conceptual model as presented in the CAIP (DOE/NV, 2000) was applied to all the CASs in CAU 262 and assumed that any subsurface contamination was the result of both designed and accidental releases. The potential contamination would be restricted to those areas immediately beneath and adjacent to the system components. The extent of the potential contamination was dependent upon such variables as release volume, system design, geologic conditions, and nature of contaminants.

CAU 262 characterization activities determined that actual site conditions were in agreement with the conceptual model. This information is presented in the CADD (NNSA/NV, 2001). Closure activities also indicated the conceptual model was accurate.

Details of the DQO assessment are included in Section 4.1 of this report.

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2.0 CLOSURE ACTIVITIES

This section details the specific corrective action activities completed during the closure of CAU 262: Area 25 Septic Systems and Underground Discharge Point. Copies of the analytical data reports for all verification samples are included in Appendix B.

2.1 DESCRIPTION OF CORRECTIVE ACTION ACTIVITIES

2.1.1 Preplanning and Site Preparation

Closure of CAU 262 was completed using the NDEP-approved CAP (NNSA/NV, 2002a). Prior to beginning site closure activities, the following pre-field activities were completed:

Preparation of National Environmental Policy Act documentation (checklist).

Preparation of the <u>Field Management Plan for Corrective Action Unit 262</u>: Area 25 <u>Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada,</u> (BN, 2001a).

Preparation of the <u>Site-Specific Health and Safety Plan for Closure Activities at</u> <u>Corrective Action Unit 262: Nevada Test Site, Nevada, (BN, 2001b).</u>

Preparation of a U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) Real Estate/Operations Permit.

Preparation of required BN work permits.

Preparation of BN work control packages

Preparation of engineering design specifications

The following is the scope of the closure actions implemented for CAU 262. Closure activities occurred from December 2002-April 2003.

2.1.2 CAS 25-02-06, Underground Storage Tank

This CAS was closed by closure in place with administrative controls. The tank contents were solidified by mixing with dry Portland Type II cement. Approximately 14 cubic meters (m³) (18.5 cubic yards [yd³]) of cement were used to solidify the tank contents. The remaining void spaces were filled with concrete. Approximately 42 m³ (55 yd³) of concrete were used to fill the tank, distribution box, and one upstream access point (manhole). A Use Restriction was implemented and signs were posted on "T posts to restrict access to the tank.

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2.1.3 CAS 25-04-06, Septic Systems A and B

This CAS was closed by clean closure. The Septic System A tank was exposed using a backhoe. The tank was metal and extremely rusted. The top of the tank was removed with the backhoe. Visual observation showed the tank to be dry. Excavating to the tank bottom also showed the tank to be dry with no evidence of sludge. The distribution box and manhole were also found to be dry. The septic tank, distribution box, and manhole were completely filled with approximately 6 m³ (8 yd³) of grout. The excavation was then backfilled with clean soil.

Septic System B was closed by removing the sanitary liquid from the tank. The liquid was pumped from the tank using a vacuum truck. The tank was rinsed and the rinseate was also removed using a vacuum truck. The liquid was then pumped into a lined basin and solidified with clean soil. The septic tank, distribution box, and manhole were then filled with grout. Approximately 7 m³ (9 yd³) of grout was required to fill these structures. The solidified tank contents were disposed of in the NTS Area 23 Sanitary Landfill. Approximately 37 m³ (48 yd³) of waste was disposed. Per the request of BN Solid Waste Operations (SWO), the waste was sampled prior to disposal. The samples were analyzed for gross alpha/beta and gamma spectroscopy. The results indicated that the waste met landfill requirements for radiological constituents. The sample results are presented in Table 1 and the analytical data is included in Appendix B.

2.1.4 CAS 25-04-07, Septic System

This CAS was closed by clean closure. Access to the septic tank was achieved by removing part of a concrete slab that covered most of the tank. The tank was visually inspected and found to be empty and dry. Characterization results indicated that the tank contained only sanitary liquid. Since no liquid was present in the tank, closure was achieved by filling the septic tank and distribution box with grout. Approximately 5 m^3 (7 yd³) of grout was used to completely fill the tank and distribution box. Clean soil was used to backfill the area to surface grade.

2.1.5 CAS 25-05-03, Leachfield

This CAS was closed by closure in place with administrative controls. A minimum 0.6 m (2 ft) thick soil cap was constructed over the leachfield footprint. The cap was constructed of three 0.2 m (8 in) lifts of clean, native soil. Each lift was compacted to at least 90 percent of the maximum density of the fill material. A minimum of four compaction tests were done per complete lift. Supplemental lifts (additional lifts required to compensate for variations in the leachfield topography) required a minimum of one compaction test. The compaction tests were conducted in the field by BN Material Testing Laboratory (MTL) personnel. The test results are included in Appendix C. The existing chain link security fence was retained and repaired where necessary.

Prior to installing the soil cover, all the leachfield monitoring tubes were cut off at ground level and filled with grout. The cut tubes were found not to be radiologically impacted and were disposed in the NTS Area 9 Construction Landfill. The radiological survey reports are included in Appendix D and Waste Disposition Records are presented in Appendix E.

PARAMETER	SAMPLE ID	RESULT (mg/kg) ^a	REPORTING LIMIT (mg/kg)ª	
	CA	CAS 25-05-05		
TPH ^b Diesel	250505-Waste-1	<60	60	
TPH Gasoline	250505-Waste-1	100	60	
TPH Oil	250505-Waste-1	390	150	
TPH Total	250505-Waste-1	490	60	
TPH Diesel	250512-Waste-1	1100	60	
TPH Gasoline	250512-Waste-1	83	60	
TPH Oil	250512-Waste-1	<150	150	
TPH Total	250512-Waste-1	1200	60	
PARAMETER (TCLP VOC) ^c	SAMPLE ID	RESULT (mg/L) ^d	REPORTING LIMIT (mg/L) ^d	
Benzene	250505-Waste-1	<0.10	0.10	
Carbon Tetrachloride	250505-Waste-1	<0.10	0.10	
Chlorobenzene	250505-Waste-1	<0.10	0.10	
Chloroform	250505-Waste-1	<0.10	0.10	
1,4-Dichlorobenzene	250505-Waste-1	<0.10	0.10	
1,1-Dicholroethene	250505-Waste-1	<0.10	0.10	
1,2-Dichloroethane	250505-Waste-1	<0.10	0.10	
Methyl ethyl ketone	250505-Waste-1	<0.50	0.50	
Tetrachloroethene	250505-Waste-1	<0.10	0.10	
Trichloroethene	250505-Waste-1	<0.10	0.10	
Vinyl chloride	250505-Waste-1	<0.10	0.10	
1,1,1-Trichloroethane	250505-Waste-1	<0.10	0.10	
Toluene	250505-Waste-1	<0.10	0.10	
Ethylbenzene	250505-Waste-1	<0.10	0.10	
Total Xylenes	250505-Waste-1	<0.20	0.20	

TABLE 1 - WASTE CHARACTERIZATION SAMPLE RESULTS

PARAMETER	SAMPLE ID	RESULT(pCi/L) ^e	MDC ^f (pCi/L) ^e
Gross Alpha	250505-Waste-1	1.12E+03	2.98E+02
Gross Beta	250505-Waste-1	2.87E+03	3.65E+02
PARAMETER	SAMPLE ID	RESULT(pCi/g) ^g	MDC ^f (pCi/g) ^g
Gross Alpha	250505-Waste-2	3.60E+00	6.47E-01
Gross Beta	250505-Waste-2	3.96E+00	9.46E-01
	CAS	S 25-04-06	
Gross Alpha	250406B-Waste-1	4.59E+00	3.53E-01
Gross Beta	250406B-Waste-1	4.55E+00	6.73E-01
	CAS	S 25-05-12	
Gross Alpha	250512-Waste-1	1.22E+00	3.18E-01
Gross Beta	250512-Waste-1	1.72E+00	4.70E-01
Gross Alpha	250512-Waste-2	4.79E+00	1.12E+00
Gross Beta	250512-Waste-2	3.73E+00	1.77E+00
PARAMETER (GAMMA	SAMPLE ID	RESULT (pCi/L) ^e	MDC ^f (pCi/L) ^e
SPECTROSCOPY)			
N N	CAS	\$ 25-05-05	
N N	CAS 250505-Waste-1	5 25-05-05 3.05E+01	3.35E+01
SPECTROSCOPY)			3.35E+01 9.84E+00
SPECTROSCOPY) Actinium-228	250505-Waste-1	3.05E+01	
SPECTROSCOPY) Actinium-228 Americium- 241	250505-Waste-1 250505-Waste-1	3.05E+01 -2.92E+00	9.84E+00
SPECTROSCOPY) Actinium-228 Americium- 241 Cerium-144	250505-Waste-1 250505-Waste-1 250505-Waste-1	3.05E+01 -2.92E+00 -1.88E+01	9.84E+00 3.38E+01
SPECTROSCOPY) Actinium-228 Americium- 241 Cerium-144 Cobalt-60	250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1	3.05E+01 -2.92E+00 -1.88E+01 -1.40E+00	9.84E+00 3.38E+01 1.02E+01
SPECTROSCOPY) Actinium-228 Americium- 241 Cerium-144 Cobalt-60 Cesium-134	250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1	3.05E+01 -2.92E+00 -1.88E+01 -1.40E+00 6.36E-01	9.84E+00 3.38E+01 1.02E+01 8.77E+00
SPECTROSCOPY) Actinium-228 Americium- 241 Cerium-144 Cobalt-60 Cesium-134 Cesium-137	250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1	3.05E+01 -2.92E+00 -1.88E+01 -1.40E+00 6.36E-01 1.12E+02	9.84E+00 3.38E+01 1.02E+01 8.77E+00 8.52E+00
SPECTROSCOPY) Actinium-228 Americium- 241 Cerium-144 Cobalt-60 Cesium-134 Cesium-137 Europium-152	250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1 250505-Waste-1	3.05E+01 -2.92E+00 -1.88E+01 -1.40E+00 6.36E-01 1.12E+02 -8.09E+00	9.84E+00 3.38E+01 1.02E+01 8.77E+00 8.52E+00 5.26E+01

TABLE 1 - WASTE CHARACTERIZATION SAMPLE RESULTS (Con	tinued)
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PARAMETER (GAMMA SPECTROSCOPY)	SAMPLE ID	RESULT (pCi/L) ^e	MDC ^f (pCi/L) ^e
Lead-212	250505-Waste-1	3.12E+01	1.47E+01
Promethium-144	250505-Waste-1	3.97E+00	8.45E+00
Promethium-146	250505-Waste-1	-2.23E+00	1.08E+01
Ruthenium-106	250505-Waste-1	-1.97E+01	8.14E+01
Antimony-125	250505-Waste-1	2.64E+00	2.21E+01
Thorium-234	250505-Waste-1	8.65E+01	1.09E+02
Uranium-235	250505-Waste-1	3.16E+00	4.23E+01
Yttrium-88	250505-Waste-1	4.37E+00	8.59E+00
PARAMETER (GAMMA SPECTROSCOPY)	SAMPLE ID	RESULT (pCi/g) ^g	MDC ^f (pCi/g) ^g
Actinium-228	250505-Waste-2	1.05E+00	7.58E-01
Americium- 241	250505-Waste-2	3.28E-01	1.13E+00
Cerium-144	250505-Waste-2	-2.02E-02	6.64E-01
Cobalt-60	250505-Waste-2	-7.97E-02	2.57E-01
Cesium-134	250505-Waste-2	6.85E-03	1.68E-01
Cesium-137	250505-Waste-2	3.36E-02	1.64E-01
Europium-152	250505-Waste-2	5.22E-01	5.68E-01
Europium-154	250505-Waste-2	-1.13E-01	9.39E-01
Europium-155	250505-Waste-2	2.32E-01	3.97E-01
Potassium-40	250505-Waste-2	2.19E+01	1.97E+00
Lead-212	250505-Waste-2	1.19E+00	3.12E-01
Promethium-144	250505-Waste-2	-7.66E-03	1.80E-01
Promethium-146	250505-Waste-2	7.53E-02	1.91E-01
Ruthenium-106	250505-Waste-2	-2.81E-01	1.65E+00

TABLE 1 - WASTE CHARACTERIZATION SAMPLE RESULTS (Continued)

PARAMETER (GAMMA SPECTROSCOPY)	SAMPLE ID	RESULT (pCi/g) ^g	MDC ^f (pCi/g) ^g		
Antimony-125	250505-Waste-2	3.06E-02	4.26E-01		
Thorium-234	250505-Waste-2	2.31E+00	2.79E+00		
Uranium-235	250505-Waste-2	2.36E-01	6.59E-01		
Yttrium-88	250505-Waste-2	3.90E-02	1.71E-01		
CAS 25-04-06					
Actinium-228	250406B-Waste-1	1.96E+00	1.11E+00		
Americium-241	250406B-Waste-1	5.01E-01	1.17E+00		
Cerium-144	250406B-Waste-1	1.12E-01	9.43E-01		
Cobalt-60	250406B-Waste-1	-8.34E-02	3.08E-01		
Cesium-134	250406B-Waste-1	1.10E-02	2.09E-01		
Cesium-137	250406B-Waste-1	-5.63E-02	2.65E-01		
Europium-152	250406B-Waste-1	-3.50E-01	1.36E+00		
Europium-154	250406B-Waste-1	6.87E-01	1.21E+00		
Europium-155	250406B-Waste-1	3.90E-01	5.10E-01		
Potassium-40	250406B-Waste-1	3.23E+01	3.36E+00		
Lead-212	250406B-Waste-1	1.81E+00	3.26E-01		
Promethium-144	250406B-Waste-1	1.13E-01	2.25E-01		
Promethium-146	250406B-Waste-1	1.34E-02	2.84E-01		
Ruthenium-106	250406B-Waste-1	-7.52E-01	2.53E+00		
Antimony-125	250406B-Waste-1	0.00E+00	4.96E-01		
Thorium-234	250406B-Waste-1	-1.56E-01	3.63E+00		
Uranium-235	250406B-Waste-1	1.04E-04	1.02E+00		
Yttrium-88	250406B-Waste-1	-1.83E-02	2.92E-01		

TABLE 1 - WASTE CHARACTERIZATION SAMPLE RESULTS (Continued)

PARAMETER (GAMMA SPECTROSCOPY)	SAMPLE ID	RESULT (pCi/g) ^g	MDC ^f (pCi/g) ^g			
CAS 25-05-12						
Actinium-228	250512-Waste-1	8.09E-02	4.26E-01			
Americium- 241	250512-Waste-1	5.20E-02	1.34E-01			
Cerium-144	250512-Waste-1	1.19E-01	3.38E-01			
Cobalt-60	250512-Waste-1	3.42E-02	9.57E-02			
Cesium-134	250512-Waste-1	-1.12E-02	1.13E-01			
Cesium-137	250512-Waste-1	1.13E+00	1.24E-01			
Europium-152	250512-Waste-1	1.08E-01	5.00E-01			
Europium-154	250512-Waste-1	-4.68E-02	7.03E-01			
Europium-155	250512-Waste-1	7.05E-02	1.96E-01			
Potassium-40	250512-Waste-1	7.02E-01	1.65E+00			
Lead-212	250512-Waste-1	8.39E-02	1.70E-01			
Promethium-144	250512-Waste-1	-3.77E-02	1.26E-01			
Promethium-146	250512-Waste-1	4.92E-02	1.51E-01			
Ruthenium-106	250512-Waste-1	3.45E-01	9.59E-01			
Antimony-125	250512-Waste-1	9.27E-02	2.92E-01			
Thorium-234	250512-Waste-1	1.98E-01	9.87E-01			
Uranium-235	250512-Waste-1	1.38E-01	4.48E-01			
Yttrium-88	250512-Waste-1	-1.21E-02	1.14E-01			
Actinium-228	250512-Waste-2	1.31E+00	6.64E-01			
Americium- 241	250512-Waste-2	-3.34E-01	5.44E-01			
Cerium-144	250512-Waste-2	2.07E-01	5.89E-01			
Cobalt-60	250512-Waste-2	-3.35E-02	1.53E-01			
Cesium-134	250512-Waste-2	-1.01E-01	2.19E-01			
Cesium-137	250512-Waste-2	2.13E-01	1.42E-01			

TABLE 1 - WASTE CHARACTERIZATION SAMPLE RESULTS (Continued)

PARAMETER (GAMMA SPECTROSCOPY)	SAMPLE ID	RESULT (pCi/g) ^g	MDC ^f (pCi/g) ^g
Europium-152	250512-Waste-2	-1.91E-01	8.11E-01
Europium-154	250512-Waste-2	-8.14E-02	8.62E-01
Europium-155	250512-Waste-2	9.49E-02	3.57E-01
Potassium-40	250512-Waste-2	2.61E+01	2.42E+00
Lead-212	250512-Waste-2	1.26E+00	2.51E-01
Promethium-144	250512-Waste-2	1.07E-02	1.44E-01
Promethium-146	250512-Waste-2	6.35E-02	1.40E-01
Ruthenium-106	250512-Waste-2	-4.97E-01	1.35E+00
Antimony-125	250512-Waste-2	-8.62E-02	3.23E-01
Thorium-234	250512-Waste-2	6.17E-01	1.67E+00
Uranium-235	250512-Waste-2	4.69E-02	6.39E-01
Yttrium-88	250512-Waste-2	-7.28E-02	1.81E-01

^a mg/kg - milligrams per kilogram

^b TPH - Total Petroleum Hydrocarbons

[°] TCLP VOC - Toxicity Characteristic Leaching Procedure Volatile Organic Compounds (EPA, 1996)

^d mg/L - milligrams per liter

^e pCi/L - picoCuries per liter

^f MDC - Minimum Detectable Concentration

^g pCi/g - picoCuries per gram

The distribution box and a diversion drum were also filled with approximately 4.5 m^3 (6 yd³) of grout. Two valve boxes and three subsurface vaults within the leachfield were backfilled with clean fill.

To limit erosion of the surface cap, existing surface washes on the southwest and northeast sides of the leachfield were graded and backfilled with geotextile fabric, graded sand, and a minimum of 0.3 m (1 ft) of rip rap. A rip-rap lined channel was constructed along the north upgradient side of the leachfield to divert overland flow away from the leachfield cap. As-built drawings of the site are presented in Appendix F. A Use Restriction was implemented to restrict intrusive activity into or beneath the site and warning signs were posted on all four sides of the fence. Use Restriction information is presented in Appendix G.

2.1.6 CAS 25-05-05, Leachfield

This site consists of a septic tank and was closed by clean closure. Prior to closure activities, waste characterization samples of the tank contents were collected to verify the COC present. The samples were analyzed for TPH full scan, Toxicity Characteristic Leaching Procedure volatile organic compounds (U.S. Environmental Protection Agency [EPA], 1996), gross alpha/beta, and gamma emitting radionuclides. The results indicated that the waste contained TPH above the action level (NAC, 2002a) (see Table 1). Analytical data is presented in Appendix B.

The tank was clean closed by removing, solidifying, and disposing of the tank contents. The contents were pumped out of the tank into a lined basin and solidified with clean soil. When pumping became ineffective due to the viscosity of the sludge, the top of the tank was exposed and opened and the sludge was solidified in place with clean soil. The solidified waste was removed from the tank using appropriate heavy equipment and placed in the lined basin. The tank was pressure washed/steam cleaned to remove any remaining residue in the tank. The final rinseate was sampled to verify that no COC remained in the tank. The rinseate was analyzed for TPH full scan and gross alpha/beta. The results indicated that no COC above action levels remained in the tank (see Table 2). Rinseate remaining in the tank was solidified in place with clean soil and the remaining void space was filled with grout. The excavation was then backfilled with clean fill. In addition, the distribution box and three manholes were also filled with grout. Approximately 25 m³ (33 yd³) of grout was used to fill these structures.

The solidified tank contents were disposed in the NTS Area 6 Hydrocarbon Landfill. Approximately 122 m³ (160 yd³) of waste was disposed. Per the request of BN SWO, the waste was sampled prior to disposal. The samples were analyzed for gross alpha/beta and gamma emitting radionuclides. The results indicated that the waste met landfill requirements for radiological constituents. The sample results are presented in Table 1 and the analytical data is included in Appendix B.

PARAMETER	SAMPLE ID	RESULT (µg/L) ^a	REPORTING LIMIT (µg/L) ^a			
CAS 25-05-05						
TPH ^b Diesel	250505-V1	340	300			
TPH Gasoline	250505-V1	<30	30			
TPH Oil	250505-V1	590	300			
CAS 25-05-12						
TPH Diesel	250512-V1	300	300			
TPH Gasoline	250512-V1	<30	30			
TPH Oil	250512-V1	340	300			
TPH Diesel	250512-V2 ^c	300	300			
TPH Gasoline	250512-V2	<30	30			
TPH Oil	250512-V2	300	300			
PARAMETER	SAMPLE ID	RESULT (pCi/L) ^d	MDA ^e (pCi/L) ^d			
CAS 25-05-05						
Gross alpha	250505-V1	3.30	3.78			
Gross beta	250505-V1	5.42	1.50			

TABLE 2 - VERIFICATION SAMPLE RESULTS

^a μg/L - micrograms per liter
 ^b TPH - Total Petroleum Hydrocarbons
 ^c duplicate of 250512-V1
 ^d pCi/L - picoCuries per liter
 ^e MDA - Minimum Detectable Activity

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2.1.7 CAS 25-05-06, Leachfield

This CAS is comprised of a leachfield that contains underground radiological COC (NNSA/NV, 2001). The leachfield was closed by closure in place with administrative controls. Closure activities began with filling the distribution box with approximately 7.5 m³ (10 yd³) of grout. The leachfield monitoring tubes were cut off at ground level and filled with grout.

The cut tubes were found not to be radiologically impacted and were disposed in the NTS Area 9 Construction Landfill. The radiological survey reports are included in Appendix D and Waste Disposition Records are presented in Appendix E. After the tubes were cut and filled a 2.1 m (7 ft) high chain link security fence was installed around the perimeter of the leachfield. The existing fence was removed and disposed in the NTS Area 9 Construction Landfill. A Use Restriction was implemented to restrict intrusive activity into or beneath the leachfield site and warning signs posted on all four sides of the fence. Use Restriction information is presented in Appendix G.

2.1.8 CAS 25-05-08, Radioactive Leachfield

This CAS was closed by closure in place with administrative controls. A 0.6-1.2 m (2-4 ft) thick soil cap was constructed over the leachfield footprint. The cap was constructed of six 0.2 m (8 in.) lifts of clean, native soil. Each lift was compacted to at least 90 percent of the maximum density of the fill material. A minimum of four compaction tests were done per lift. Supplemental lifts required a minimum of one compaction test. The compaction tests were conducted in the field by BN MTL personnel and the results are included in Appendix C.

Prior to installing the soil cap, all the leachfield monitoring tubes were cut off at ground level and filled with grout. The cut tubes were found to be radiologically impacted and were co-packaged with the CAU 113 waste stream for disposal as low level waste. This was done with the approval of BN Waste Generator Services. The radiological survey reports are presented in Appendix D and Waste Disposition Records are presented in Appendix E.

The buried distribution box was exposed and filled with approximately 4 m^3 (5 yd³) of grout. The distribution box excavation was backfilled prior to installing the leachfield cap.

To protect the downgradient southern face of the cap from erosion, a cellular confinement system was installed along the downgradient face of the cap. The cells were anchored to the cap with "J hooks and then filled with graded aggregate. After the soil cap was completed, a 2.1 m (7 ft) high chain link security fence was installed around the perimeter of the leachfield. The existing rope fence was removed and disposed in the NTS Area 9 Construction Landfill. As-built drawings for the cover and fence are presented in Appendix F. A Use Restriction was implemented to restrict intrusive activity into or beneath the site and warning signs were posted on all four sides of the fence. Use restriction information is presented in Appendix G.

2.1.9 CAS 25-05-12, Leachfield

This site consists of a septic tank and was closed by clean closure. Prior to closure activities,

waste characterization samples of the tank contents were collected to verify the COC present. The samples were analyzed for TPH full scan, gross alpha/beta, and gamma emitting radionuclides. The results indicated that the waste contained TPH above the action level (NAC, 2002a) (see Table 1). Analytical data is presented in Appendix B.

The tank was clean closed by removing, solidifying, and disposing of the tank contents. The contents were pumped out of the tank into a lined basin and solidified with clean soil. When pumping became ineffective due to the viscosity of the sludge, the top of the tank was exposed and opened, and the sludge was solidified in place with clean soil. The solidified waste was removed from the tank and placed in the lined basin using appropriate heavy equipment. The tank was pressure washed/steam cleaned to remove any remaining residue in the tank. The final rinseate was sampled to verify that no COC remained in the tank. The rinseate was analyzed for TPH full scan. The results indicated no COC above action levels remained in the tank (see Table 2). Rinseate remaining in the tank was solidified in place with clean soil and the remaining void space was filled with grout. The excavation was then backfilled with clean fill. In addition, two system manholes were also filled with grout. Approximately 20 m³ (26 yd³) of grout was used to fill the septic tank and two manholes.

The solidified tank contents were disposed in the NTS Area 6 Hydrocarbon Landfill. Approximately 111 m³ (145 yd³) of waste was disposed. Per the request of BN SWO, the waste was sampled prior to disposal. The samples were analyzed for gross alpha/beta and gamma emitting radionuclides. The results indicated that the waste met landfill requirements for radiological constituents. The sample results are presented in Table 1 and the analytical data is included in Appendix B.

2.1.10 CAS 25-51-01, Dry Well

No COC were identified for this CAS (NNSA/NV, 2001); therefore, this CAS was closed by taking no further action.

2.2 DEVIATIONS FROM CORRECTIVE ACTION PLAN AS APPROVED

The NDEP-approved CAP (NNSA/NV, 2002a) was modified before and during field activities to adjust to unexpected conditions and simplify activities. The following deviations occurred from the approved scope of work as presented in the NDEP-approved CAP (NNSA/NV, 2002a). Approved Records of Technical Change are included in Appendix I.

CAS 25-02-06, Underground Storage Tank:

The CAP calls for the removal of the tank lid to allow access. It was determined in the field that the tank was constructed in place and no removable lid was present. Access to the tank interior was sufficient through the existing four manholes. Because no lid was removed, there was no need to construct a reinforced concrete pad over the tank footprint.

CAS 25-04-06, Septic System B

The tank contents were to be pumped out of the tank and into the NTS Area 23 Sewage Treatment Facility. Because of BN SWO concerns of depositing excess liquid/sediment into the sewage lagoon, the tank contents were pumped into a lined basin and solidified with clean soil. The solidified material was then disposed in the NTS Area 23 Sanitary Landfill.

CAS 25-04-06, Septic System A and CAS 25-04-07, Septic System

The contents of these septic tanks were to be removed and disposed. It was determined in the field that no liquid or sludge were present in either tank; therefore, the tanks were closed by filling with concrete.

CAS 25-05-03, Leachfield

The CAP indicated that the existing security fence around the leachfield was to be replaced. A pre-field inspection determined that the fence was in good condition and replacement was not necessary. Only minor repairs were required for the fence to meet specifications.

CAS 25-05-05, Leachfield and CAS 25-05-12, Leachfield

Because of the configuration of the septic tanks, it was not possible to mix and remove the tank contents by pumping as specified in the CAP. Therefore the tank tops were opened and the contents were solidified in place with clean fill and then removed using appropriate equipment. The tanks were then pressure washed/steam cleaned. The final rinse water was sampled from the tank rather than pumped out into drums for sampling. When sample results indicated that no COC above action levels remained in the tanks, the remaining rinse water was solidified in place with clean fill material. The remaining void spaces were then filled with concrete.

2.3 CORRECTIVE ACTION SCHEDULE AS COMPLETED

The corrective action field activities began in December 2002 and were completed in April 2003. Details of the closure field activities schedule are provided in Table 3.

2.4 SITE PLAN/SURVEY PLAT

CAS 25-02-06, 25-05-03, 25-05-06, and 25-05-08 were closed in place with administrative controls (i.e., Use Restrictions). Figures listing the site coordinates for the Use Restrictions are provided in Appendix G. Engineered construction was required for CAS 25-05-03 and 25-05-08. As-built drawings of these CASs are provided in Appendix F.

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TABLE 3 - CORRECTIVE ACTION SCHEDULE AS COMPLETED

CAU 262 Field Work Schedule	Oct 2002	Nov 2002	Dec 2002	Jan 2003	Feb 2003	Mar 2003	Apr 2003
	1 7 14 21 28	4 11 18 25	2 9 16 23 30	6 13 20 27	3 10 17 24	3 10 17 24 31	7 14 21 28
Pre Field Planning							
Readiness Review							
Field work (As Completed)							
Mobilization							
25-02-06							
(EMAD Septic Tank)							
25-04-06							
(TCC Septic Systems A & B)							
25-04-07							
(TCC Bldg 3210 Septic System)							
25-05-03							
(RMAD Rad Leachfield)							
25-05-05							
(RMAD Sanitary Septic Tank)							
25-05-06							
(EMAD Rad Leachfield)							
25-05-08							
(TCC Rad Leachfield)							
25-05-12							
(RMAD Bldg 3126 Septic Tank)							
Demobilization							

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3.0 WASTE DISPOSITION

The following types of waste were produced at CAU 262 during closure activities: hydrocarbonimpacted soil and debris, radiologically-impacted pipe, sanitary waste, and construction debris. All waste was managed in accordance with state and federal regulations, DOE orders, and BN procedures.

During closure activities at CAS 25-05-05, approximately 145 m³ (190 yd³) of TPH-impacted soil and debris was removed from the site. This is equivalent to approximately 207,541 kilograms (kgs) (457,550 pounds [lbs]) of waste. All of the waste removed from the site was transported and disposed of at the NTS Area 6 Hydrocarbon Landfill and included the solidified septic tank contents, debris, and the solidification basin liner. Waste documentation is provided in Appendix E.

During closure activities at CAS 25-05-12, approximately 111 m³ (145 yd³) of TPH-impacted soil and debris was removed from the site. This is equivalent to approximately 143,589 kgs (316,560 lbs) of waste. All of the waste removed from the site was transported and disposed of at the NTS Area 6 Hydrocarbon Landfill and included the solidified septic tank contents, debris, and the solidification basin liner. Waste documentation is provided in Appendix E.

CAS 25-04-06 closure generated approximately 37 m³ (48 yd³) of sanitary waste. This is equivalent to approximately 48,367 kgs (106,630 lbs) of waste. The waste was disposed in the NTS Area 23 Sanitary Landfill and included solidified septic tank contents and the solidification basin liner. Waste documentation is provided in Appendix E.

Closure of CAS 25-05-08 generated radiologically-impacted waste. The waste was the leachfield monitoring tubes that were cut off at ground level prior to installing the soil cover. Six 0.6 m (2 ft) sections of pipe were disposed of. Waste also included hot line trash. Approximately 0.11 m³ (0.15 yd³) of waste was generated. This is equivalent to approximately 22.5 kgs (50 lbs) of waste. The cut tubes and hot line trash was co-packaged with the CAU 113 waste stream for disposal as low level radioactive waste. This was done with the approval of BN Waste Generator Services. Waste documentation is provided in Appendix E.

Closure activities at all the CASs generated various miscellaneous construction debris including existing leachfield fence, scrap wood, metal debris, and vegetation. All debris was radiologically surveyed prior to disposal. All debris was found to be free of radiological contamination and was disposed in the NTS Area 9 Construction landfill. Salvageable material such as T-posts were saved for reuse.

A description of the type and quantity of waste generated during CAU 262 closure activities is provided in Table 4. Waste disposition records are included in Appendix E.

WASTE TYPE	APPROX. WASTE QUANTITY (mass)	APPROX. WASTE QUANTITY (volume)		
CAS 25-05-05				
Petroleum Hydrocarbon	207,541 kgs ^a (457,550 lbs ^b)	145 m ^{3c} (190 yd ³) ^d		
CAS 25-05-12				
Petroleum Hydrocarbon	143,589 kgs (316,560 lbs)	111 m ³ (145 yd ³)		
CAS 25-04-06				
Sanitary	48,367 kgs (106,630 lbs)	37 m ³ (48 yd ³)		
CAS 25-05-08				
Low-level Radioactive	22.5 kgs (50 lbs)	0.11 m ³ (0.15 yd ³)		
All CASs				
Construction Debris	31,470 kgs (69,380 lbs)	37 m ³ (48 yd ³)		

^a kgs - kilograms
^b lbs - pounds
^c m³ - cubic meters
^d yd³ - cubic yards

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4.0 CLOSURE VERIFICATION RESULTS

CAU 262 closure was verified by:

CAS 25-02-06: Closure was accomplished by filling the septic tank, distribution box, and manhole with grout. Because this CAS was closed by closure in place with administrative controls, no verification samples were required.

CAS 25-05-06: Closure in place with administrative controls was completed by installing a 2.1 m (7 ft) chain link security fence around the leachfield. The distribution box and monitoring tubes were filled with grout.

CAS 25-05-05: A verification sample of the final rinse water was collected from the septic tank. The sample was analyzed for TPH full scan and gross alpha/beta emitting radionuclides. Verification sample results showed no COC present in the tank above regulatory limits. Sample results are shown in Table 2 and the laboratory data packages are presented in Appendix B. Closure was completed by filling the septic tank, distribution box, and three manholes with grout.

CAS 25-05-12: A verification sample of the final rinse water was collected from the septic tank. The sample was analyzed for TPH full scan. Verification sample results showed no COC present in the tank above regulatory limits. Sample results are shown in Table 2 and the laboratory data packages are presented in Appendix B. Closure was completed by filling the septic tank and two manholes with grout.

CAS 25-04-06 System B: Closure was accomplished by removing and disposing the tank contents. Because the contents were sanitary waste only, no verification samples were required. The septic tank, distribution box, and manhole were filled with grout.

CAS 25-04-06 System A: Because no contents were present in the tank, closure was achieved by filling the septic tank, distribution box, and manhole with grout.

CAS 25-04-07: Because no contents were present in the tank, closure was achieved by filling the septic tank, distribution box, and manhole with grout.

CAS 25-05-03 and 25-05-08: Construction of the soil covers and erosion control structures as designed were verified by As-built drawings. (Appendix F).

CAS 25-51-01: No COC were identified for this CAS (NNSA/NV, 2001); therefore, this CAS was closed by taking no further action.

All verification samples were collected with disposable polyethylene dippers and placed in appropriately labeled sample containers secured with custody seals. All samples were labeled with a unique sample number, placed on ice in coolers, and transported under chain-of-custody to an off-site laboratory. All samples were analyzed for TPH full scan.

During collection of all verification samples, standard quality assurance/quality control (QA/QC) samples were also collected; e.g., one field duplicate per 20 samples submitted blind to the analytical laboratory for analysis. Also, the analytical laboratory followed standard QA/QC procedures during sample analysis. This included matrix spike/matrix spike duplicate and spiked surrogate percent recovery analysis (Appendix B).

4.1 DATA QUALITY ASSESSMENT

CAU 262 closure activities were performed to the criteria specified in the NDEP-approved CAP (NNSA/NV, 2002a) and CADD (NNSA/NV, 2001). The approved correction action alternatives as implemented did not result in any deviations with the conceptual model as presented in the CAIP (DOE/NV, 2000) and included in Appendix A of this report.

The closure in place with administrative controls alternative included constructing engineered soil covers and filling septic tanks with grout. No verification data were required, therefore, agreement with the conceptual model was determined by the results of characterization activities (NNSA/NV, 2001).

Clean closure of the septic tanks at CAS 25-05-05 and 25-05-12 required removal of the tank contents. Verification samples were required at these CASs because the septic tanks contained COC above action levels. Verification samples were limited to the tank interiors and not the surrounding soil. However, during removal of the tank contents, visual inspections did not indicate any cracks, holes, or other structural defects. This qualitative data coincides with data gathered during characterization, which indicated no contamination in the soil caused by a septic tank breach.

4.2 USE RESTRICTIONS

Use restrictions have been implemented at the following four CASs: 25-02-06, 25-05-03, 25-05-06, and 25-05-08. CASs 25-04-06, 25-04-07, 25-05-05, and 25-05-12 have been cleanclosed; use of the areas associated with these sites is unrestricted. CAS 25-51-01 was closed by taking no further action; future use of this area is unrestricted. Use Restriction information is provided in Appendix G.

A risk assessment for the following four CASs was made based on the "A through K evaluation as presented in NAC Section 445A.227 (NAC, 2002b). The results of the "A through K evaluation are found in the CADD (NNSA/NV, 2001) and are included in Appendix J of this report.

4.2.1 CAS 25-02-06, Underground Storage Tank Use Restriction

COC associated with this CAS are confined within the septic tank; therefore, the use restriction was implemented as the boundaries of the tank itself. Two Use Restriction warning signs were erected in the area as specified in the CAP (NNSA/NV, 2002a).

The Use Restriction Information form and a figure showing the location of the corner points for the area at CAS 25-02-06 are contained in Appendix G.

4.2.2 CAS 25-05-03, Leachfield Use Restriction

This site contains underground radioactive material. Closure activities included the installation of a 2.1 m (7 ft) security fence; therefore, the Use Restriction area is delineated by the security fence. Survey located the four corner fence posts bounding the leachfield. The Use Restriction Information form and figure showing the location of the corner points for CAS 25-05-03 is contained in Appendix G.

4.2.3 CAS 25-05-06, Leachfield Use Restriction

This site contains underground radioactive material. Closure activities included the installation of a 2.1 m (7 ft) security fence; therefore, the Use Restriction area is delineated by the security fence. Survey located the four corner fence posts bounding the leachfield. The Use Restriction Information form and figure showing the location of the corner points for CAS 25-05-06 is contained in Appendix G.

4.2.4 CAS 25-05-08, Radioactive Leachfield

This site contains underground radioactive material. Closure activities included the installation of a 2.1 m (7 ft) security fence; therefore, the Use Restriction area is delineated by the security fence. Survey located the corner fence posts bounding the leachfield. The Use Restriction Information form and figure showing the location of the corner points for CAS 25-05-08 is contained in Appendix G.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 CONCLUSIONS

The following site closure activities were performed at CAU 262 and are documented in this CR.

CAS 25-02-06 was closed in place by solidifying the septic tank contents and filling the remaining void space with grout. Access points were also filled with grout. A use restriction was implemented to restrict access into the tank.

CAS 25-04-06 consists of two septic systems (A and B). System A septic tank contained no liquid or sludge and was clean closed by filling the septic tank, distribution box, and upstream manhole with grout. System B was clean closed by removing and disposing the septic tank contents, and the tank, distribution box, and upstream manhole were filled with grout.

CAS 25-04-07 septic tank and distribution box contained no liquid or sludge and was clean closed by filling with grout.

CAS 25-05-03 is a leachfield which was closed in place with administrative controls by installing a 0.6 m (2ft) thick soil cap over the leachfield. As a best management practice to control potential erosion, existing surface washes were graded and backfilled with rip rap. A riprap lined channel was constructed along the upgradient side of the leachfield to divert overland flow away from the leachfield cap. The existing chain link fence was repaired and permanent warning signs were affixed to the fence. A use restriction was implemented to restrict intrusive activity into or beneath the site.

CAS 25-05-05 septic tank was clean closed by removing, solidifying, and disposing the tank contents. The tank was pressure washed/steam cleaned and the rinseate was sampled to verify that no COC remained in the tank. The tank, distribution box, and access points were filled with grout and the excavation was backfilled with clean fill material.

CAS 25-05-06 is a leachfield that was closed in place with administrative controls by installing a 2.1 m (7 ft) high chain link security fence around the perimeter of the leachfield. Permanent warning signs were affixed to the fence and a Use Restriction was implemented to restrict intrusive activity into the leachfield.

CAS 25-05-08 is a leachfield that was closed in place with administrative controls installing a 1.2 m (4 ft) thick soil cap over the leachfield. The existing fence was removed and disposed and a new 2.1 m (7 ft) high chain link security fence was installed around the perimeter of the leachfield. As a best management practice to control potential erosion, a cellular confinement system filled with aggregate was installed on the downgradient face of the cap. Permanent warning signs were affixed to the new fence and a use restriction was implemented to restrict intrusive activity into or beneath the site.

CAS 25-05-12 septic tank was clean closed by removing, solidifying, and disposing the tank contents. The tank was pressure washed/steam cleaned and the rinseate was sampled to verify that no COC remained in the tank. The tank, distribution box and access points were filled with grout and the excavation was backfilled with clean fill material.

CAS 25-51-01 is an underground discharge point that was closed by taking no further action.

5.2 POST-CLOSURE MONITORING REQUIREMENTS

Details of the CAU 262 post-closure monitoring plan are provided below:

5.2.1 Inspections

5.2.1.1 CAS 25-02-06

The inspection will be performed on an annual basis and will consist of visual observations to verify that the proper signs are in place and readable, and that the use restriction is maintained. If any maintenance and repair requirements are identified, funding will be requested and the repairs scheduled. Any repairs will be documented in writing at the time of repair.

5.2.1.2 CAS 25-05-03

The inspection will be performed on an annual basis and will consist of visual observations to verify that the fence is in good condition, proper signs are in place and readable, the soil cover is intact, and the use restriction is maintained. If any maintenance and repair requirements are identified, funding will be requested and the repairs scheduled. Any repairs will be documented in writing at the time of repair.

5.2.1.3 CAS 25-05-06

The inspection will be performed on an annual basis and will consist of visual observations to verify that the fence is in good condition, proper signs are in place and readable, and the use restriction is maintained. If any maintenance and repair requirements are identified, funding will be requested and the repairs scheduled. Any repairs will be documented in writing at the time of repair.

5.2.1.4 CAS 25-05-08

The inspection will be performed on an annual basis and will consist of visual observations to verify that the fence is in good condition, proper signs are in place and readable, the soil cover is intact, and the use restriction is maintained. If any maintenance and repair requirements are identified, funding will be requested and the repairs scheduled. Any repairs will be documented in writing at the time of repair.

The post-closure inspections will consist of detailed inspections of the fence, soil covers as applicable, and postings. Inspection results will be documented in a single annual letter report. The letter report will include a discussion of observations and provide a record of maintenance activities. A copy of each annual letter report will be submitted to the NDEP.

The proposed date for the first post-closure inspection is May 2004 and the proposed due date for the post-closure monitoring report is approximately one year after the NDEP approves the final CAU 262 CR.

5.3 **RECOMMENDATIONS**

Based on completion of site closure activities as documented by this CR, it is requested that a Notice of Completion be provided by the NDEP for CAU 262. Upon closure approval, CAU 262 will be promoted from Appendix III to Appendix IV of the FFACO (1996), "Closed Corrective Action Units.

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6.0 **REFERENCES**

BN, see Bechtel Nevada.

- Bechtel Nevada, 2001a. <u>Field Management Plan for Corrective Action Unit 262: Area 25 Septic</u> <u>Systems and Underground Discharge Point, Nevada Test Site, Nevada</u>, Las Vegas, NV.
- Bechtel Nevada, 2001b. <u>Site-Specific Health and Safety Plan for Corrective Action Unit 262:</u> <u>Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada,</u> Las Vegas, NV.
- DOE/NV, see U.S. Department of Energy, Nevada Operations Office.
- EPA, see U.S. Environmental Protection Agency
- FFACO, see Federal Facility Agreement and Consent Order.
- Federal Facility Agreement and Consent Order of 1996 (as amended). Agreed to by the State of Nevada, U.S. Department of Energy, and U.S. Department of Defense.
- NAC, see Nevada Administrative Code.
- Nevada Administrative Code. 2002a. Section 445A.2272, "Contamination of Soil: Establishment of Action Levels. Carson City, NV.
- Nevada Administrative Code. 2002b. Section 445A.227, "Contamination of Soil: Order by Director for Corrective Action; Factors to be Considered in Determining Whether Corrective Action is Required. Carson City, NV.
- NNSA/NV, see U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office
- U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office, 2002a. <u>Corrective Action Plan for Corrective Action Unit 262</u>: <u>Area 25 Septic</u> <u>Systems and Underground Discharge Point, Nevada Test Site, Nevada</u>; Revision 0, DOE/NV--824, Las Vegas, NV.
- U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office Nevada Operations Office, 2002b. <u>Nevada Environmental Restoration Project</u>, <u>Industrial Sites Quality Assurance Project Plan, Nevada Test Site, Nevada</u>, DOE/NV--372-Rev. 3, Las Vegas, NV.
- U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office Nevada Operations Office, 2001. <u>Corrective Action Decision Document for</u> <u>Corrective Action Unit 262</u>: <u>Area 25 Septic Systems and Underground Discharge Point</u>, <u>Nevada Test Site, Nevada</u>; Revision 1, DOE/NV--744, Las Vegas, NV.

- U.S. Department of Energy, Nevada Operations Office, 2000. <u>Corrective Action Investigation</u> <u>Plan for Corrective Action Unit 262: Area 25 Septic Systems and Underground</u> <u>Discharge Point, Nevada Test Site, Nevada;</u> Revision 0, DOE/NV 629, Las Vegas, NV.
- U.S. Environmental Protection Agency. 1996. <u>Test Methods for Evaluating Solid Waste</u>, <u>Physical/Chemical Methods</u>, EPA Publication SW-846, Third Edition. Washington, D.C.

APPENDIX A

DATA QUALITY OBJECTIVES FOR CAU 262*

* As presented and published in the approved Corrective Action Investigation Plan for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada, July 2000, DOE/NV--629, Rev. 0. Las Vegas, NV.

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ACRONYMS AND ABBREVIATIONS

non	
bgs	Below ground surface
BMEC	Burns & McDonnell Engineering Company
BN	Bechtel Nevada
CADD	Corrective Action Decision Document
CAIP	Corrective Action Investigation Plan
CAS	Corrective Action Site(s)
CAU	Corrective Action Unit(s)
COPC	Contaminant(s) of potential concern
CR	Closure Report
CV	Coefficient of variation
DoD	U.S. Department of Defense
DOE	U.S. Department of Energy
DOE/NV	U.S. Department of Energy, Nevada Operation Office
DQO	Data Quality Objective(s)
E-MAD	Engine-Maintenance Assembly and Disassembly
EPA	U.S. Environmental Protection Agency
e _r	percent error
FFACO	Federal Facility Agreement and Consent Order
FSL	Field-screening levels
ft	Foot (feet)
FMBF	Flatow, More, Bryan and Fairburn
in.	Inch(es)
IT	International Technology Corporation
LASL	Los Alamos Scientific Laboratory
NAC	Nevada Administrative Code
NDEP	Nevada Division of Environmental Protection
NRDS	Nuclear Rocket Development Station
NTS	Nevada Test Site
PAL	Preliminary action level(s)
PCB	Polychlorinated biphenyl(s)
ppm	parts per million
PRG	Preliminary Remediation Goal(s)
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
REECo	Reynolds Electrical & Engineering Co., Inc.
R-MAD	Reactor-Maintenance Assembly and Disassembly
SAIC	Science Application International Corporation
SVOC	Semivolatile organic compound(s)
TCC	Test Cell C
TPH	Total petroleum hydrocarbons
UDP	Underground Discharge Point
VEC	Vitro Engineering Company
VOC	Volatile organic compound(s)

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A.1.0 Introduction

A.1.1 Problem Statement

Potentially hazardous and radioactive wastes were discharged to several leachfields and an UDP in Area 25 addressed as CAU 262, Area 25 Septic Systems and UDP. Corrective Action Sites at the R-MAD, TCC, and E-MAD facilities are included. The four CASs associated with the R-MAD facility are 25-05-03 (Radioactive Leachfield), 25-05-05 (Leachfield), 25-05-12 (Leachfield), and 25-51-01 (Dry Well). The three CASs associated with the Test Cell C facility are 25-04-06 (Septic Systems A and B), 25-04-07 (Septic System), and 25-05-08 (Radioactive Leachfield). The two CASs associated with the E-MAD facility are 25-02-06 (Underground Storage Tank) and 25-05-06 (Leachfield). Existing information about the nature and extent of contamination is insufficient to evaluate and select preferred corrective actions for these sites.

These leachfield systems will be investigated based on DQOs developed by representatives of NDEP and DOE/NV. This investigation will determine if COPCs are present and if concentrations in soils underlying the leachfields and surrounding the leachfield system components exceed regulatory levels. If COPCs are detected, the lateral and vertical extent of contamination will be determined. This investigation will focus on collection of data adequate to close the site under NDEP, RCRA, and DOE requirements.

A.1.2 DQO Kickoff Meeting

Table A.1-1 lists the participants present at the FFACO-required DQO Kickoff Meeting and any subsequent meetings. The goal of the DQO process is to establish the quantity and quality of environmental data required to support corrective action decisions for the CAU. The process ensures that the information collected will provide sufficient and reliable information to identify, evaluate, and technically defend the chosen corrective action. Unless otherwise required by the results of this DQO and stated in the CAIP, this investigation will adhere to the *Industrial Sites Quality Assurance Project Plan* (DOE/NV, 1996) and the *Work Plan for Leachfield Corrective Action Units: Nevada Test Site and Tonopah Test Range, Nevada* (DOE/NV, 1998b), hereafter referred to as the Leachfield Work Plan.

		Мес	eting Date
Proposed Participants	Affiliation	Kickoff Meeting 2/1/00	Pipe Characterization Meeting ^a 3/28/00
Lydia Coleman	SAIC		
Sabine Curtis	DOE/NV	\checkmark	
Bruce Dionne	IT		
Cindy Dutro	IT		
Thomas Fitzmaurice	BN	\checkmark	
Dennis Gustafson	BN		
Juliana Herrington	SAIC		
Syl Hersh	IT	\checkmark	
Mark Holmes	IT		
Mike McKinnon	NDEP	\checkmark	
Jason Moore	SAIC	\checkmark	
Charles Orchard	SAIC	\checkmark	
Barbara Quinn	BN	\checkmark	
Greg Rabb	NDEP		
Milinka Watson-Garrett	IT		
Jeanne Wightman	MACTEC	\checkmark	
Dustin Wilson	SAIC	\checkmark	\checkmark
John Wong	NDEP		

Table A.1-1DQO Kickoff Meeting Participants

^aThe pipe characterization meeting was conducted to establish Data Quality Objectives for the limited characterization of collection system piping. The results of this meeting have been integrated into this document.

BN - Bechtel Nevada

DOE/NV - U.S. Department of Energy, Nevada Operations Office

IT - IT Corporation

NDEP - Nevada Division of Environmental Protection

SAIC - Science Applications International Corporation

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A.2.0 Conceptual Model

The CAU 262 Leachfields and UDP received various combinations of sanitary effluent, process effluent and radioactive effluent primarily from operations conducted within associated Area 25 facilities. Dates of leachfield activity are variable and poorly constrained, but the Area 25 facilities were most active between 1959 and 1973. All of the leachfields addressed by CAU 262 are currently inactive or abandoned but some leachfields may still receive effluent from passive generation (i.e., open pad drains, floor drains, and equipment drains).

Within this document, "effluent" is generally applied to all liquid waste disposed of in leachfield systems without regard to toxic, hazardous, or radioactive properties. Effluent discharged to the CAU 262 leachfields is considered potentially contaminated with various constituents but the probabilities of actual contamination are highly variable. "Sanitary effluent" is considered equivalent to domestic sewage and potentially toxic, "process effluent" is considered potentially hazardous and "radioactive effluent" is considered potentially radioactive and hazardous. The three leachfields in CASs 25-05-03, 25-05-06, and 25-05-08 are posted as underground radiological materials areas. "Posted Leachfields" are considered radioactively contaminated.

For each leachfield system, effluent was discharged from source buildings and routed through the collection system to a septic tank and/or distribution box. Subsequent discharge to the leachfield via distribution lines allowed effluent to percolate into the underlying soil for disposal. Effluent contaminants were transported by relatively large volumes of water. This conceptual model is consistent with the general conceptual model for leachfield CAUs provided in Section 3.1 of the Leachfield Work Plan.

An outline of CAU-specific and CAS-specific elements of the conceptual model for CAU 262 is provided in Table A.2-1 and Table A.2-2.

Table A.2-1 General CAU 262 Conceptual Model (Page 1 of 2)

Conceptual Model Element	Assumptions	Source
System dynamics, waste inventories, release information	Infiltration and concentration of contaminants in the form of liquid waste into the soil directly below the distribution pipes and within the leachfields may have occurred.	Knowledge of similar sites, Leachfield Work Plan (DOE/NV, 1998b)
	Groundwater contamination is unlikely due to environmental conditions at the sites, such as an arid climate, low permeabilities, and depth to groundwater	Knowledge of similar sites, Leachfield Work Plan (DOE/NV, 1998b)
	Driving forces restricted to infiltration of limited precipitation subsequent to cessation of facility operations and redirection of generated effluent to alternative disposal systems.	Knowledge of similar sites, Leachfield Work Plan (DOE/NV, 1998b)
Lateral extent of potential contaminants	Subsurface effects limited by low mobility of constituents.	Process knowledge and similar site investigations (i.e., CAUs 261/266/500 [DOE/NV, 1999; 2000a, 2000b])
	The potential lateral migration of contaminants is unknown, but if migration has occurred, it will likely be confined within the boundaries of the leachfield.	Process knowledge and similar site investigations (i.e., CAUs 261/266/500 [DOE/NV, 1999; 2000a; 2000b])
Vertical extent of potential contaminants	The vertical extent of potential contamination is unknown, but if present, will be primarily adjacent to and below the distribution lines. Potential contamination is probably concentrated at the native soil/leachfield material interface. Vertical extent should be limited by low mobility of COPCs and limited driving force.	Process knowledge and similar site investigations (i.e., CAUs 261/266/500 [DOE/NV, 1999; 2000a, 2000b])
Physical and practical constraints	Radiological control access requirements to posted areas surrounding posted leachfields (CASs 25-05-03, -08, and -06). Current posting of these leachfields is "Underground Radioactive Materials Area." Additional constraints include Yucca Mountain Project activities; activities of other Area 25 users (i.e., DoD) nearby utilities; facility constrains including fencing, buildings, and concrete pads; adverse weather conditions; restricted access; heavy equipment and resource availability; health and safety concerns; approval of the CAIP.	Site knowledge; site visits

Table A.2-1General CAU 262 Conceptual Model(Page 2 of 2)

Conceptual Model Element	Assumptions	Source
Future use	Leachfield systems are contained within restricted use zones classified as either "Research Test and Experiment Zone" or "Yucca Mountain Site Characterization Zone". The Research Test and Experiment Zone is designated for small-scale research and development projects and demonstrations; pilot projects; outdoor tests; and experiments for development, quality assurance, or reliability of material and equipment under controlled conditions. This includes compatible nondefense research, development and testing projects and activities. CASs 25-02-06 and 25-05-06 are contained within the zone designated for Yucca Mountain Site Characterization.	Record of Decision Land Use Zones as defined in NTS Resource Management Plan, (DOE/NV, 1998a)
Potential exposures	Ingestion, inhalation, external exposure to radiation, or dermal contact (absorption) of COPCs in the soil due to exposure during investigation.	Process knowledge
Waste management	Waste will be evaluated against characteristic criteria unless contrary information is discovered during the investigation. The following constituents will be considered listed if identified in samples associated with CAS 25-05-03: Carbon tetrachloride, Trichloroethylene, 1,1,1- Trichloroethane, 1,1,2-Tricloro-1,2,2-triflouroethane, and Tetrachloroethylene.	Process knowledge

Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 1 of 9)

Conceptual Model Element	Assumptions	Source		
	CAS Facility Association: R-MAD			
	CAS 25-05-03			
System dynamics, waste inventories, release information	Radioactive effluent generated within Buildings 3110, 3126, 3161, and a radiochemistry trailer was discharged to this leachfield. The leachfield is located south of the R-MAD facility and is composed of two distribution manifolds supplied by a diversion box. Twenty-five 100-ft long distribution lines are connected to each distribution manifold on 8-ft centers. The distribution lines are 6-in. diameter open joint tiles installed in an 18-in. wide by 18-in. high gravel-filled trench and are approximately 1 ft bgs.	Engineering drawings including 25-R-MAD-C1 (REECo, 1983b), and 3102-SW-6.1 Sheet 8 (BMEC, 1959)		
Source location	Sources within Building 3110: Darkroom sink, drain trench, hatch frame drain line, laboratory sink, open drains, floor drains, and showers.			
	Sources within Building 3126: Acid drains, service sinks, floor sink, and decontamination sink with filter hood and exhaust fan.	Engineering drawings		
	Sources within Building 3161: Chemistry sink, floor drain, safety shower, and sink.			
	Sources within radiochemistry trailer: Unknown.			
	Process and radioactive effluent associated with assembly, maintenance, and disassembly of nuclear reactors tested at the NRDS. Additional work after termination of NRDS program may also have contributed effluent to this leachfield.			
Contaminants of Potential Concern	Building 3110 potentially hazardous COPCs identified during preliminary assessment include: Ethyl alcohol, ethanol, Freon, PCBs, trichloroethene, and trichloroethylene. Radiological COPCs include: Barium-137 m, cesium-137, cobalt-60, europium-152, niobium-94, plutonium-239/240, radium-226, strontium-90, uranium-234, uranium-235, and uranium-238.	Process knowledge		

Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 2 of 9)

Conceptual Model Element	Assumptions	Source
Contaminants of Potential Concern	Building 3126 potentially hazardous COPCs identified during preliminary assessment include: Carbon tetrachloride, dilute acid, powdered citric acid in water, trichloroethene, TPH and unidentified RCRA metals, VOCs, and SVOCs. Radiological COPCs include: Barium-137 m, cesium-137, plutonium isotopes, strontium-90, depleted uranium, uranium-234, and yttrium-90.	
	Building 3161 potentially hazardous COPCs identified during preliminary assessment include: Fuming nitric acid, perchloric acid, sulfuric acid, and mercury. Radiological COPCs include: Barium-137m, cesium-137, cobalt-60, niobium-94, plutonium-239/240, uranium-234, uranium 238, and yttrium-90.	Process knowledge
	COPCs associated with the radiochemistry trailer are unknown, but potentially hazardous and radioactive.	
	CAS 25-05-05	
System dynamics, waste inventories, release information	Sanitary and process effluent generated within Buildings 3110 and 3140 was discharged to this leachfield. The leachfield is located west of the R-MAD facility and is composed of two distribution manifolds supplied by a septic tank and diversion box. Fifteen 100-ft long distribution lines are connected to each distribution manifold on 8-ft centers. The distribution lines are 6-in. diameter open joint tiles installed in an 18-in. wide by 12- to 18-in. high gravel-filled trench and are approximately 1 ft bgs.	Engineering drawings including 25-R-MAD-C1 (REECo, 1983b), 3102-SW- 7.1 (BMEC, 1957a), and 3102-SW-8.1 (BMEC, 1957b)
Source location	Sources within Building 3110: Emergency showers, equipment drains, floor drains, hoist well drain, laboratory sinks, service sinks, sinks, toilets, and urinal.	Engineering drawings
	Sources within Building 3140: Floor drains, toilet, sink, and service sink.	

Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 3 of 9)

Conceptual Model Element	Assumptions	Source
	Contaminants associated with sanitary effluent produced by activities conducted within Buildings 3110 and 3140. Potential contamination was most likely produced by use of floor drains within the source buildings.	
Contaminants of Potential Concern	Building 3110 potentially hazardous COPCs identified during preliminary assessment include: chemicals and degreasers. No specific radiological COPCs were identified. Significant contribution of radiological contaminants unlikely, but possible.	Process knowledge
	Building 3140 potentially hazardous COPCs identified during preliminary assessment include material related to paint shop activities (i.e., paints, solvents, and lubricants). No specific radiological COPCs were identified. Significant contribution of radiological contaminants unlikely, but possible.	
	CAS 25-05-12	
System dynamics, waste inventories, release information	Sanitary effluent generated within Buildings 3111 and 3126 was discharged to this leachfield. The leachfield is located in the south-southeast area of the R-MAD facility and is composed of two distribution manifolds supplied by a septic tank. Three, 80-ft long distribution lines are connected to each distribution manifold on 6-ft centers. The distribution lines are 4-in. diameter perforated VCP installed in a 5-ft wide by 2-ft high gravel-filled trench and are approximately 1.7 ft bgs.	Engineering drawings including 25-R-MAD-C1 (REECo, 1983b) and FMBF-2 (FMBF, 1962)
Source location	Sources within Building 3111: Deluge shower, drinking fountain, floor sinks, sinks, service sink, toilets, and urinal.	Engineering drawings
	Sources within Building 3126: Floor sinks, service sinks, shower, sink, toilet, and urinal.	

Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 4 of 9)

Conceptual Model Element	Assumptions	Source
Contaminants of Potential Concern	Contaminants associated with sanitary effluent produced by activities conducted within Buildings 3111 and 3126. Potential contamination was most likely produced by use of floor drains/sinks within the source buildings.	
	Building 3111 potentially hazardous COPCs identified during preliminary assessment include: solvents and degreasers. No specific radiological COPCs were identified. Significant contribution of radiological contaminants unlikely, but possible.	Process knowledge
	Building 3126 potentially hazardous COPCs identified during preliminary assessment include: Freon, dilute acid, Tide washing soap, Turco cleaner, powdered citric acid in water, alcohol, and trichloroethene. Radiological COPCs include: Barium-137m, cesium-137, plutonium, strontium-90, depleted uranium, uranium-234, uranium, and yttrium-90. Based on sources, it is unlikely that potentially hazardous or radioactive COPCs were discharged to this leachfield.	
System dynamics, waste inventories, release information	Sanitary effluent generated within Building 3125 was discharged to this UDP. The UDP is located in the southeast area of the R-MAD facility and is composed of a gravel sump supplied by a discharge line. The UDP is a 5-ft diameter by 5-ft deep gravel dry well.	Engineering drawings including 25-R-MAD-C1 (REECo, 1983b)
	In addition to the UDP, this CAS includes a potential leachfield identified only by surface expression (grading with small berms to prevent run-on) and inconclusive geophysics.	Site visits, (IT 1999a), Geophysics (IT, 1999b)
Source location	Sources within Building 3125: Floor drains. A service sink may have been added to the system.	Engineering drawings
Source location	No sources have been identified for the potential leachfield.	

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Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 5 of 9)

Conceptual Model Element	Assumptions	Source
Contaminants of Potential Concern	Contribution of potentially hazardous effluent from Building 3125 unlikely, but possible. Fluids associated with maintenance of the Beetle vehicle may have been discharged to the floor drains. No specific radiological COPCs were identified. Significant contribution of radiological contaminants unlikely, but possible. Beetle vehicle was exposed to radioactive source but is assumed not to have been contaminated or to have been decontaminated prior to its return to Building 3125.	Process knowledge
	No specific potentially hazardous COPCs were identified for the potential leachfield as no source has been determined. Significant contribution of radiological contaminants unlikely, but possible. No specific radiological COPCs were identified. Significant contribution of radiological contaminants unlikely, but possible.	
	CAS Facility Association: Test Cell C	
	CAS 25-05-08	
System dynamics, waste inventories, release information	Radioactive effluent generated within Building 3210 was discharged to this leachfield. The leachfield is located south of the Test Cell C facility and is composed of two distribution manifolds supplied by a diversion box. Fifteen, 60-ft long distribution lines are connected to each distribution manifold on 2-ft centers. The distribution lines are 6-in. diameter perforated VCP installed in an 2-ft wide by 2-ft high gravel-filled trench and are approximately 5 ft bgs.	Engineering drawings including 25-TC-C-C1 (REECo, 1984), 3222-PD- 201 (LASL, 1969a), and 3222-PD-202 (LASL, 1969b)
	The leachfield was apparently installed to receive radioactive effluent generated by decontamination activities at Test Cell C.	Engineering drawing 3222-PD-201 (LASL, 1969a)
Source location	The collection system was modified to incorporate the leachfield into the Nuclear Furnace exhaust scrubbing system. Radioactive material produced by reactor tests was removed from associated exhaust using a water and filter system. The water was disposed of in this leachfield.	Engineering drawing 25-TC-C-C1 (REECo, 1984), LASL, 1973

Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 6 of 9)

Conceptual Model Element	Assumptions	Source
	Potentially hazardous and radioactive effluent associated with Test Cell C decontamination and Nuclear Furnace exhaust scrubbing was discharged to this leachfield.	
Contaminants of Potential Concern	No potentially hazardous COPCs were identified during preliminary assessment. Potentially hazardous COPCs may be present based on process knowledge of Test Cell C activities. Radiological COPCs include: Antimony-125, cadmium- 109, cesium-137, europium-155, potassium-40, radium- 226, thorium-228, and thorium-232.	Process knowledge
	CAS 25-04-06	
System dynamics,	Sanitary effluent generated within Building 3228 was discharged to Leachfield A. The leachfield is located south of the Test Cell C facility. The leachfield design is poorly constrained, but a septic tank and distribution box are present. Approximately six distribution lines within a 270 square ft area are shown on facility drawings.	Engineering drawing
waste inventories, release information	Sanitary effluent generated within Building 3220 was discharged to Leachfield B. The leachfield is located south of the Test Cell C facility. The leachfield design is poorly constrained, but a septic tank and distribution box are present. Approximately 6 distribution lines within a 2,115 square ft area are shown on facility drawings.	25-TC-C-C1 (REECo, 1984)
	Sources within Building 3228: Water closets, urinals, floor drains, clean-out drain, and wash fountain.	
Source location	Sources within Building 3220: Equipment drains, floor drain, sink with peg board, acid sink with fume hood, sink drain.	Engineering drawings

Table A.2-2CAS-Specific CAU 262 Conceptual Model(Page 7 of 9)

Conceptual Model Element	Assumptions	Source
	Contaminants associated with effluent produced by activities conducted within Buildings 3228 and 3220. Potential contamination was most likely produced by use of floor drains within the source buildings or the acid sink in Building 3220.	
Contaminants of Potential Concern	Building 3228 potentially hazardous COPCs identified during preliminary assessment include: 1,2-dichlorethene, trichloroethene, 1,4-dichlorobenzene, 4-methylphenol, tetrachloroethylene, oil. Radiological COPCs include: Actinium-228, bismuth-212, bismuth-214, cesium-137, europium-152, lead-212, potassium-40, plutonium-238, plutonium-239, radium-226, strontium-90, thallium-208, thorium-228, thorium-232, and tritium.	Process knowledge
	No potentially hazardous COPCs for Building 3220 were identified during preliminary assessment. Potentially hazardous COPCs may be present based on process knowledge. Radiological COPCs include: Potassium-40, plutonium- 238, plutonium-239, radium-226, thorium-228, thorium- 232, and tritium.	
	CAS 25-04-07	
System dynamics, waste inventories, release information	Sanitary effluent generated within Building 3210 was discharged to this leachfield. The leachfield is located west of the Test Cell C facility. The leachfield design is poorly constrained, but a septic tank and distribution box are present. Approximately 8 distribution lines within an 1,800 square ft area are shown on facility drawings.	Engineering drawings including 25-TC-C-C1 (REECo, 1984)
Source location	Sources within Building 3210: Water closet, urinal, hand sink, and floor drain.	Engineering drawings
	Contaminants associated with sanitary effluent produced by activities conducted within Building 3210. Potential contamination may have been produced by use of floor drains within the source building.	
Contaminants of Potential Concern	Building 3210 potentially hazardous COPCs identified during preliminary assessment include tetrachloroethylene. Radiological COPCs include europium-152 detected in a background soil sample associated with leachfield sampling.	Process knowledge

Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 8 of 9)

Conceptual Model Element	Assumptions	Source
	CAS Facility Association: E-MAD	
	CAS 25-05-06	-
System dynamics, waste inventories, release information	Radioactive effluent generated within Building 3900, a metallurgical trailer, and at the train decontamination area and Building 3900 process effluent was discharged to this leachfield. The leachfield is located south of the E-MAD facility and is composed of two distribution manifolds supplied by a diversion box. Twenty-four approximately 70-ft long distribution lines are connected to each distribution manifold on 8-ft centers. The distribution lines are 6-in. diameter open joint tiles installed in an 24-in. wide by 18-in. high gravel-filled trench and are approximately 6 ft bgs.	Engineering drawings including 25-E-MAD-C1.1 (REECo, 1983a) and 1425-C-403 (VEC, 1963)
	Sources of radioactive effluent within Building 3900: All shielded area floors including hot bay and hot cells.	
	Sources of process effluent within Building 3900: Operating gallery floor, maintenance and machine shop, instrument shop, "cold" change room, boiler room, and cold bay.	
Source location	The heating, ventilation, and air conditioning stacks are an additional radioactive effluent source.	Engineering drawings
	The Metallurgical Trailer is an additional process and radioactive effluent source.	
	The Train Decontamination Area is an additional process and radioactive effluent source.	
	Potentially hazardous and radioactive effluent associated with assembly, maintenance, and disassembly of nuclear reactors and rocket engines tested at the NRDS. Additional work after termination of NRDS program may also have contributed effluent to this leachfield.	
Contaminants of Potential Concern	E-MAD facility potentially hazardous COPCs identified during preliminary assessment include: Solvents and degreasers, metallurgical process waste, and process water stabilization additives (i.e., ethylene glycol). Radiological COPCs include: Cesium-137, cobalt-60, plutonium-239/240, strontium-90, uranium-235, uranium-238.	Process knowledge
	COPCs associated with the metallurgical trailer are unknown, but potentially hazardous and radioactive.	

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Table A.2-2 CAS-Specific CAU 262 Conceptual Model (Page 9 of 9)

Conceptual Model Element	Assumptions	Source
	CAS 25-02-06	
System dynamics, waste inventories, release information	Sanitary effluent generated within Buildings 3900 was discharged to this leachfield. The leachfield is located south of the E-MAD facility and is composed of two distribution manifolds supplied by a septic tank and diversion box. Fifteen, 100-ft long distribution lines are connected to each distribution manifold on 8-ft centers. The distribution lines are 6-in. diameter open joint tiles installed in an 18-in. wide by 12- to 18-in. high gravel- filled trench and are approximately 1 ft bgs.	Engineering drawings including 25-E-MAD-C1.1 (REECo, 1983a) and 1425-C-8 (VEC, 1965)
Source location	Sources within Building 3900: Restrooms, janitor rooms, water closets, sinks, showers, drinking fountains, and floor drains.	Engineering drawings
	Note that the hot change room restrooms drained to this leachfield.	
Contaminants of	No previous sampling results have been identified for this leachfield system.	Process knowledge
Potential Concern	Significant contribution of radiological or potentially hazardous contaminants unlikely, but possible.	Tocess knowledge

A.3.0 Potential Contaminants

Additional information on the COPCs for CAU 262, including PALs and quality assurance/ quality control (QA/QC) requirements are provided in Section 3.0 of either the Leachfield Work Plan or the CAIP.

Previous sampling efforts and process knowledge identify the following potential contaminants:

- Radioactive and Chemical COPCs These leachfields serviced buildings that were used for a variety of reactor testing and support activities. Activities within these buildings that likely contributed chemical effluents to one or more of the leachfields include film processing, decontamination/degreasing, radiochemistry, and reactor assembly and disassembly. In general, the contaminants that may be present are associated with organic solvents, hydrocarbons, paint, film processing agents, and activation and fission products.
- Previous sampling activities at the R-MAD posted leachfield identified significant concentrations of cesium-137 and cobalt-60. High beta/gamma activity was identified at the "pit/sump/drum."
- Previous sampling activities at the Test Cell C leachfields identified significant concentrations of cesium-137 at the posted leachfield; low concentrations of hydrocarbons and PCBs at CAS 25-04-07; a low concentration of gasoline-range TPH at Septic System B; and a high concentration of oil-range TPH and low concentrations of VOCs, SVOCs, and PCBs at Septic System A.
- Previous sampling activities associated with the E-MAD posted leachfield identified SVOCs, diesel-range TPH, RCRA metals, PCBs, gamma-emitting radionuclides, plutonium, uranium, and strontium at CAU 135. Previous sampling activities at the E-MAD posted leachfield identified gamma emitting radionuclides within the typical range of background.

Samples submitted for laboratory analysis will be analyzed for the following chemical COPCs to determine if potentially hazardous or hydrocarbon materials are present:

- VOCs
- SVOCs
- RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver)
- TPH (diesel-range organics)
- PCBs (CASs 25-04-07 and 25-05-06)

At least 25 percent (100 percent for CASs 25-05-03, 25-05-06, and 25-05-08) of samples submitted for laboratory analysis will be analyzed for the following COPCs to determine if radioactive materials are present:

- Gamma-emitting radionuclides
- Isotopic uranium
- Isotopic plutonium
- Strontium-90

All laboratory analyses will be conducted according to Table 3-1 of the Leachfield Work Plan or as specified in the CAIP.

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A.4.0 Decisions and Inputs

A.4.1 Decisions

Decisions to be resolved by the investigation include:

- Determine if COPCs are present at the sites.
- Determine if COPC concentrations exceed FSLs.
- Determine if COPC concentrations exceed PALs.
- Determine the nature and extent of contamination with enough certainty to develop and evaluate a range of potential corrective actions, including closure in place and clean closure.

A.4.2 Inputs and Strategy

Inputs to the decisions include those elements of information used to support the decisions in addressing the identified problem. A list of information inputs, existing data, identified data gaps, and brief strategies are discussed in Table A.4-1.

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Table A.4-1Decisions, Inputs, and General Strategies(Page 1 of 3)

Decision	Input	Existing Data	Data Gap	Strategy
	Potential contaminant identification	Previous sampling efforts (See Table A.2-1 for COPCs generated by CAS-specific sampling efforts when applicable)	Exact COPCs Not all leachfield systems sampled	Collect laboratory samples; analyze for COPCs
Are COPCs present	Potential contaminant concentration	Previous sampling efforts (See Table A.2-1 for COPCs generated by CAS-specific sampling efforts when applicable)	Unsampled components and leachfield systems; do concentrations exceed PALs?	Collect samples from unsampled components and soil; perform field screening; submit samples for laboratory analysis from biased or biased and random locations that represent worst case for contamination and confirmatory clean locations; compare results to FSLs or to PALs
above PALs at site?	Potential contaminant distribution	Locations of leachfield systems components are known with some degree of certainty; vertical and lateral extent limited by removal of source and limited driving force, mobility of COPCs	Vertical and lateral extent of COPCs	Excavation to investigate collection system, septic tank, and distribution box piping as needed; collect samples at and from inside septic tanks and distribution boxes; collect samples from leachfields. Use excavation or drilling to establish worst case depth of COPCs; collect additional samples from excavations or drill step-out borings as required to determine lateral extent if COPCs are detected near leachfield boundaries; collect laboratory samples to confirm extent

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Table A.4-1Decisions, Inputs, and General Strategies(Page 2 of 3)

Decision	Input	Existing Data	Data Gap	Strategy
	Meteorologic data	Data on annual precipitation, evapotranspiration, and weather	None identified	No specific meteorological data collection anticipated; general weather and wind speed and direction noted on daily field logs
	Geologic/hydrologic data	General geologic/hydrologic characteristics of site; specific geologic conditions of nearby sites (i.e., CAUs 261/266/500)	Existence and characteristics of differing permeability zones	Field log representative soil by qualified geologist; collect and analyze geotechnical sample for each leachfield
Are potential	Biological degradation factors	Potential hydrocarbons release	Presence of biomass; biological parameters to evaluate natural biological process	No specific data collection anticipated; bioassessment samples may be collected based on site conditions
contaminants migrating?	Radioactive decay	Radionuclides were intentionally discharged to the CAS 25-05-03, -06, and -08 leachfields. Previous sampling efforts and deactivation and decontamination operations identified radioactive COPCs for these leachfields. Partial record of radioactivity discharged to CAS 25-03 leachfield located. Significant radioactive decay of short- lived radionuclides has occurred.	Presence and type of radionuclides	Establish background; field screen for radiation using alpha/beta scintillometer (i.e., Electra) to guide collection of samples for radiological COPCs analysis based on field-screening results; additional measurement techniques may be employed as feasible

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Table A.4-1Decisions, Inputs, and General Strategies(Page 3 of 3)

Decision	Input	Existing Data	Data Gap	Strategy
	No further action	Historical evidence that COPCs were released to the environment at several CASs; assume no actions	Presence, concentration, and extent of COPCs	Insufficient evidence to proceed without investigation; collect field and laboratory samples; compare results to PALs; if no COPCs above PALs, prepare CADD/Closure Report
Data sufficient to support closure	Closure in place	Potential for radiological, RCRA, and/or TPH constituents; PALs are isotope specific maximum background radioactivity levels, Industrial PRGs, 100 parts per million (ppm) TPH per NAC 445A (NAC, 1998); assume use restrictions	Presence, concentration, and extent of COPCs	Collect field and laboratory samples; compare results to PALs; if no COPCs above PALs, prepare CADD/Closure Report; otherwise prepare CADD
	In situ bioremediation	Potential for radiological, RCRA, and TPH constituents; PALs are isotope-specific maximum background radioactivity levels, Industrial PRGs and 100 ppm TPH per NAC 445A (NAC, 1998)	Presence, concentration, and extent of COPCs; biodegradation parameters	Collect field and laboratory samples; compare results to PALs; if no COPCs above PALs, prepare CADD/Closure Report; otherwise prepare CADD
	Clean closure by contaminant removal	Potential for radiological, RCRA, and TPH constituents; PALs are isotope-specific maximum background radioactivity levels, Industrial PRGs and 100 ppm TPH per NAC 445A (NAC, 1998)	Presence, concentration, and extent of COPCs; volume of contaminated material above PALs	Collect field and laboratory samples; compare results to PALs; if no COPCs above PALs, prepare CADD/Closure Report; otherwise prepare CADD

A.5.0 Investigation Strategy

The CAU 262 Leachfields will be investigated using the basic technical approach provided in the Leachfield Work Plan with site-specific modifications as required.

All soil and sediment/sludge samples will be field screened for VOCs and radioactivity. Samples will be analyzed according to Section A.3.0. Samples will be collected from septic tanks and distribution structures (if appropriate, accessible, and adequate material is present) and from soil underlying the leachrock/native soil interface. Contents of previously sampled septic tanks will not be collected if previous sample results are adequate for waste management requirements. Contrary to the leachfield work plan, integrity samples will be collected from proximal and distal end soil at the base of septic tanks and from the distal end soil at the base of distribution structures.

The CAS-specific investigation strategy is dependent on the COPCs and the leachfield design. Complex leachfields with a high likelihood of radiological contamination will be investigated using an initial phase of *in situ* radiation measurement followed by biased and random sample collection using drilling. Complex leachfields that are not expected to contain significant radiological contamination will be investigated by biased and random sampling using excavation. Simple leachfields will be investigated by biased sampling using excavation. Drilling may be used to augment excavation throughout the investigation if required to determine the maximum vertical extent of potential contamination. This sampling strategy will ensure that contamination in the soil has been adequately located, identified, and quantified.

A.5.1 Sampling at Radiologically Posted Leachfields

Based on preliminary assessment, the leachfields addressed by CASs 25-05-03, 25-05-06, and 25-05-08 may contain significant radiological contamination. The radioactivity of soil to be sampled may be determined using *in situ* radiation measurements if feasible. Sample collection from these leachfields is contingent upon the radioactivity of the soil to be sampled. Samples that are too radioactive to practically handle, transport, or submit for analysis may not be collected.

The total number of samples submitted for off-site quantitative analysis may be significantly reduced based on these considerations.

Drilling will be the primary sampling method. Biased and random sampling will be conducted during the field investigation to assess the extent of COPCs and determine if COPC concentrations exceed PALs for the site.

Boreholes will be located based on system dynamics and statistical analysis. Biased boreholes will be drilled at the initial discharge points in the two proximal distribution lines, the area between the distribution manifold ends, the four corners, and center of each leachfield. Additional boreholes will be located at the center of each half of the leachfields. Due to the extreme slope of the CAS 25-05-06 leachfield, four of the biased borehole locations will be at different locations. For this leachfield, boreholes will be drilled at the initial discharge points in the two distribution lines approximately at the proximal end of the distal one-third of the leachfield and the center of the distal two-thirds of each half of the leachfield. Additional locations will be selected randomly within the area of the leachfield to ensure adequate sampling locations have been considered. The number of random locations are addressed in Section A.7.0.

A.5.2 Sampling at R-MAD and E-MAD Complex Sanitary Leachfields

Excavation will be the primary sampling method for leachfields in CASs 25-05-05 and 25-05-06. Biased and random sampling will be conducted during the field investigation to assess the extent of COPCs and determine if COPC concentrations exceed PALs for the site. Drilling will be conducted if excavation sampling fails to determine the maximum vertical extent of potential contamination.

Excavations will be located based on system dynamics and statistical analysis. Biased excavations will be located at the initial discharge points in the two proximal distribution lines, the area between the distribution manifold ends, the four corners and center of each leachfield. Additional excavations will be located at the center of each half of the leachfields. Additional locations will be selected randomly within the area of the leachfield to ensure adequate sampling locations have been considered. The number of random locations are addressed in Section A.7.0.

A.5.3 Sampling at Remaining Leachfields and UDP

Samples will be collected from the leachfields addressed by CASs 25-04-06, 25-04-07, 25-05-12, and 25-51-01 according to the Leachfield Work Plan using excavation. A biased and random sampling approach, as described in Section A.5.2, may be required if more distribution lines than expected are located (see Section A.6.0). Drilling will be conducted if excavation sampling fails to determine the maximum vertical extent of potential contamination.

A leachfield and UDP are addressed by CAS 25-51-01. It is unlikely that the leachfield addressed by CAS 25-51-01 exists. This potential leachfield will be investigated by excavating a single trench across a graded area with small berms and perpendicular to the lineations identified by an inconclusive geophysical survey. If distribution lines are located, samples will be collected using continued excavation or drilling depending on field-screening results. The UDP will be investigated by drilling a borehole at the center of the feature and collecting soil samples beginning at the native soil/leachrock interface. Three stepout borings will be drilled in a roughly triangular pattern approximately 15 ft from the UDP if FSLs are exceeded.

A.5.4 Limited Collection System Pipe Inspections

The collection systems will be inspected using one of four CAS-specific strategies:

- Portions of the posted leachfield collection systems will be inspected using a video survey and *in situ* radiation measurements as described in Section 4.1.1.4 of the Leachfield Work Plan. The *in situ* radiation measurements are designed to determine if the pipes meet free-release criteria.
- A portion of the CAS 25-04-07 collection system will be inspected using a video survey. Access to most of the collection system piping is limited by extensive concrete cover and no attempt will be made to collect sediment samples from the pipes. Contamination associated with the sampled leachfield system components will be attributed to the sediment within the collection system if significant sediment is present in the piping.
- The CAS 25-04-06 collection systems will be excavated at a point between the source buildings and the leachfields. System A will be inspected at the nominal midpoint of the collection system piping and System B will be inspected adjacent to (outside) the Test Cell C security fence. If sediment is present at the inspection locations, it will be sampled and analyzed for the chemical and radiological parameters provided in Section A.3.0.

• The remaining collection systems will be inspected via manholes. If manholes cannot be located, the investigation strategy will be consistent with that used for CAS 25-04-06. If sediment is present at the inspection locations, it will be sampled and analyzed for the chemical and radiological parameters provided in Section A.3.0.

A.5.5 Additional Sampling

Bioassessment samples may be collected according to the Leachfield Work Plan at the Site Supervisor's discretion. Need for bioassessment samples will be based on the nature of contamination established during the field investigation (i.e., extensive VOC contamination).

At least one geotechnical sample will be collected from soil underlying the leachfields according to Section 3.2.1 of the Leachfield Work Plan. Additional samples may be collected at the discretion of the Site Supervisor. Geotechnical samples will be analyzed using the methods in Table 3-2 of the Leachfield Work Plan to measure the following parameters:

- Initial moisture content
- Dry bulk density
- Calculated porosity
- Moisture retention characteristics
- Particle size distribution
- Saturated and unsaturated hydraulic conductivity

A.6.0 Decision Rules

The following decision rules will be used to guide the investigation and subsequent data evaluation for CAU 262:

- If, in the course of the investigation, either of the following occur, then the investigation will be halted and rescoped as necessary:
 - The conceptual model fails to such a degree that rescoping is required.
 - Sufficient data are collected to support evaluation of corrective actions.
- If field screening indicates no COPCs above FSLs, then a sample at the next prescribed subsurface location will be field screened. If no COPCs are indicated, a confirmatory laboratory sample will be submitted.
- If field screening indicates the presence of COPCs above FSLs, then the investigation will continue to determine extent of COPCs a sample with field-screening results below FSLs is obtained for laboratory submittal. Sample depth may be limited by maximum practicable excavation or drilling depth. A sample will also be submitted for laboratory analysis from the subsurface interval that represents the worst-case, field-screening result and at the discretion of the Site Supervisor. Some worst-case samples may not be submitted due to transportation or laboratory limitations. Additional samples may be required for waste management purposes.
- If laboratory results indicate the presence of contaminants of concern above PALs, then a CADD will be prepared. Potential corrective actions may be CAS-specific.
- If no COPCs are identified above PALs, then a CADD/Closure Report will be prepared according to the outline agreed upon by NDEP and DOE/NV. This type of CADD incorporates the elements of the regular CADD and the corrective action plan and serves as the closure report for the site. Recommendations of no further action may be CAS-specific.

Table A.6-1 provides additional decision points and rules.

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Table A.6-1 Activity-Specific Decision Points and Rules (Page 1 of 2)

Investigation	Decision Point	Decision	Decision Rule
ACTIVITY		Result	
	Are caps at CAS	Yes	No additional exploration required.
survey and Exploration	25-05-06 distribution box and CAS 25-02-06 Manhole #3 in place?	No	Attempt to determine outlet of unexpected pipe. Conduct exploratory excavation if required. NDEP notification and rescoping will be required.
	Can required samples be	Yes	Collect samples as required.
	recovered?	No	Justification omissions will be provided in the CADD.
	Are field data above FSLs?	Yes	Submit samples with highest field-screening values for laboratory analysis. Submit samples from each sampling location (highest FSL and confirmatory clean sample) to laboratory for confirmation as required. Collect additional samples from greater depths or using stepouts as required.
Sampling		No	Submit at least one sample from each sampling location to laboratory for confirmation as required.
	Is sample too radioactive for feasible transportation	Yes	Collect similar sample that can be feasibly transported and analyzed. Note field- screening measurements.
	or analysis?	No	Submit sample to laboratory as planned.
	Do COPCs exceed	Yes	Prepare CADD. Additional sampling may be required. Potential corrective actions may be CAS-specific.
		No	Prepare CADD/CR. Recommendations of no further action may be CAS-specific.

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Table A.6-1Activity-Specific Decision Points and Rules(Page 2 of 2)

Investigation Activity	Decision Point	Decision Result	Decision Rule
		Yes	Sample soil underlying leachfield via excavation (drilling for CASs 25-05-03, -06, -08). Modifications to the Leachfield Work Plan generic strategy include reducing the number of sampling locations due to the large number of closely spaced distribution pipes except at CASs 25-04-06, 25-04-07, and 25-05-12.
Leachfield Investigation	Can the leachfield be located?	In Part	Configuration or dimensions are not as anticipated. Sample soil underlying known leachfield. Also, conduct intrusive investigation (excavation or drilling as required) at known or assumed leachfield perimeter to visually confirm absence/presence of installed leachfield material.
		No	Leachfield may never have existed. Resume intrusive investigation, as required, if existence of leachfield is confirmed and configuration and dimensions are established.
	Do posted leachfield	Yes	Discuss rationale for free-release determination in CADD.
	collection system pipes meet free-release criteria?	No	Continued free-release determination unnecessary for portions of collection system known to exceed free-release criteria. Disposition of pipes will be addressed in CADD.
Collection System Pine Investigation	Is significant sediment	Yes	Collect sediment samples for non-posted leachfield collection systems. Posted leachfield collection systems will be characterized using <i>in situ</i> radiation measurements.
		No	Do not collect sediment samples.
	le nino sodimont samo	Yes	Collect sediment samples.
	collection practical?	No	COPCs detected in the septic tank, distribution structure, or leachfield will be attributed to the piping.

A.7.0 Decision Error

As described in Section A.5.0, biased or a combination of random and biased sampling strategy will be employed for CAU 262 leachfields. Biased sampling is appropriate because the system component locations are known, will be located through exploratory surveys, or can be reasonably assumed. Random sampling will also be conducted for leachfields with large numbers of distribution lines to reduce redundant sampling results while maximizing confidence that the leachfields have been adequately investigated.

Table A.6-1 describes actions if specific component locations cannot be identified.

A.7.1 Biased Sampling Strategies

The biased sampling strategies either require samples associated with all distribution lines or target the worst-case contamination by concentrating leachfield system sampling at points with highest potential for contamination. Biased sampling ensures that the extent of the contamination has been adequately located and identified. At least one sample with field-screening results below FSLs will be obtained from the predetermined sampling locations to define the lower limit of the impact (if any) on soils produced by effluent disposal. Field-screening results will be confirmed by off-site laboratory analysis of these samples.

A.7.2 Random Sampling Strategy

Systematic random sampling will be employed for investigation of the several leachfields addressed by CAU 262 (see Section A.5.0). This approach will ensure coverage of the potentially contaminated areas at leachfields where soil samples are not directly associated with each distribution pipe. The number of samples required to characterize the sites to a predetermined level of confidence will be calculated using Equation 8 from Chapter 9 of SW-846 (EPA, 1996), with a confidence level and acceptable sampling error agreed to by the DOE/NV and the NDEP.

Equation 8 from Chapter 9 of SW-846 gives the number of samples required to determine the mean value of a given parameter to within a specified percent error, e_r , with a confidence limit of 90 percent, using an analytical method with a specified coefficient of variation (CV), as:

$$\mathbf{n} = \left(\mathbf{t}_{0.90, \text{ n-1}} \frac{\mathrm{CV}}{\mathrm{e}_{\mathrm{r}}}\right)^2$$

where "t" is the one-tailed 90 percent Student's "t" value for the appropriate number of degrees of freedom (n-1).

The CV in the above equation refers to the variability of the specific parameter in the medium being sampled. Its value cannot be determined until sufficient samples from the site have been analyzed. However, in the absence of data regarding the soil variability of the COPCs at CAU 262, some assumptions must be made:

- The variability of the analytical method may be used as a first approximation of the variability of the contaminant distribution in the soil. This is probably a reasonable assumption for chemical contaminants, which are likely to have been deposited from a solution, thus leading to a somewhat uniform distribution.
- Table A.7-1 shows the average CVs for several chemical methods, as determined from the individual procedures in SW-846. Pesticides and PCBs are included, although neither of these are COPCs at CAU262.
- For radiological contaminants, higher average CVs should be considered. Radiological contaminants are typically particulate in nature and are thus likely to be less uniformly distributed in the medium under investigation, leading to high variability.

For CAU 262, a CV of 50 percent will be assumed. This figure represents a compromise between the very high CVs of the pesticides and the extremely low CVs of the VOCs and SVOCs. It is an acceptable starting point for the purposes of Equation 8.

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SW-846 Method	Parameter Measured	% CV
6010B	Metals	21.3
7470A/7471A	Mercury	69.5
8260B	VOCs	7.5
8270C	SVOCs	9.1
8081A	Pesticides	70.1
8082	PCBs	29.7

Table A.7-1Average Coefficients of Variation

A relative error of 10 to 20 percent from the true mean at a confidence limit of 90 percent is considered acceptable for planned removal and remedial response studies (EPA, 1989). A relative error of 15 percent will be specified for this site. Substituting the appropriate values for "t" (Taylor, 1990), CV (50 percent) and e_r (15 percent) into this equation and iterating the equation several times gives n = 20. Twenty random sample locations will be sampled in addition to nine biased sample locations.

A.8.0 References

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CLOSURE RE PORT - CAU 262 Section: Appendix B Revision: 1 Date: July 2003

APPENDIX B

SAMPLE ANALYTICAL RESULTS

CLOSURE RE PORT - CAU 262 Section: Appendix B Revision: 1 Date: July 2003

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Corporate Headquarters / Reno Laboratory 4750 Longley Lane, Suite 106 Reno, NV 89502 Phone: 775.348.2522

Fax: 775.348.2546

Las Vegas Laboratory

4208 Arcata Way, Suite A Las Vegas, NV 89030 Phone: 702.657.1010 Fax: 702.657.1577

Ted Redding Bechtel Nevada P.O. Box 98521, M/S NTS273 Las Vegas, NV 89193-8521

TEL: 702-295-7220

RE Project: CAU 262

Order No.: L0210354

Dear Ted Redding:

NEL Laboratories, Las Vegas received 3 samples on 10/22/02 for the analyses presented in the following report.

There were no problems with the analyses and all data for associated QC met EPA or laboratory specifications unless noted in the Case Narrative.

If you have any questions regarding these tests results, please feel free to call.

mill

Rod T. Miller Laboratory Director

Certifications: Arizona California Idaho Montana Nevada New Mexico

AZ0518 2002 Certified Certified NV052 Certified 11/14/02 (Reissone) Date

Albuquerque 866.360.5726

Boise 800.200.2952

Las Vegas 888.368.3282

Phoenix 888.238.2514

Reno 800 368 5221

Sacramento 000.000

CLOSURE RE PORT - CAU 262 Section: Appendix B Revision: 1 Date: July 2003

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NEL Laboratories, Las Vegas

CLIENT: Bechtel Nevada Project: CAU 262 Lab Order: L0210354

Date: 14-Nov-02

CASE NARRATIVE

Attached are the analytical results for samples in support of the above referenced project.

The samples submitted for this project were not sampled by NEL. Should you have any questions or comments, please feel free to contact our Client Services Department.

Analytical Comments:

TPH Analysis:

F1: Hydrocarbon pattern atypical of gasoline.

F3: Hydrocarbon pattern atypical of diesel.

S6: Surrogate recovery was below laboratory and method limits. Reextraction and reanalysis confirm low recovery caused by matrix effects.

At the request of the client, samples 250505-waste-1 and 250512-waste-1 were reextracted and reanalyzed for TPH analysis in order to achieve a lower reporting limit.

CLOSURE RE PORT - CAU 262 Section: Appendix B Revision: 1 Date: July 2003

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Bechtel Nevada

DATA VALIDATION COVER SHEET

all all all		Section I
Contract Laboratory: <u>NFL (store for ies</u>) Organization: <u>DN FR</u> Validation Procedure/Instruction, including revision number: <u>OI-2(IF(.30)</u> <u>Kee. 1</u> Analysis Requested (check all that apply): Uvolatile Organics Semi Volatile Organics Organochlorine Pesticides/Polychlorinated Biphenals (PCBs) Radiochemistry Section II Chain-of-Custody Form Case Narrative Sample Results Forms Guality Control Forms Uduality Control Forms Uduality Control Forms Identify any samples that are missing: Comments/Problems: (include information about requests for further information submitted to the contract aboratory and agreed upon date of resolution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the data for the solution and contract laboratory point of contact); If the solution is the solution and contract laboratory point of contact); If the solution is the solution and contract laboratory and agreed upon date of resolution and contract laboratory point of contact); If the solution is the solution and contract laboratory point of contact); If the solution is the solution and contract laboratory point of contact); If the solution is the solution and contract aboratory point of contact); If the solution is the solution and contract aboratory point of contact); If the solution is the solutio	MEF Number:	(CAU 262) (V1796) Sample Request Number:
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lidator Signature: 1000 Kong Kong Date: 4/08/03	ilidator Name: Krgig K	19pp
	ilidator Signature: Harry Korg	Date: 4/08/03

Bechtel Nevada

DATA VALIDATION CHECKLIST

Analyses Reviewed: TPH	/	Date: 4//	8/03		
DATA REVIEW			Yes	No	N/A
1. Requested analyses were	performed on all samples.		10		
2. Samples were extracted, p	prepared, and analyzed within holding tir	mes.	6		
3. Cooler temperature was re	ecorded upon receipt.		1		
4. Proper preservation / pH w	as used for each matrix and analysis.		E		
5. The laboratory sample iden	ntification corresponds to the client samp	ole identification.	D		
6. Background checks were p	erformed at the proper frequency and w	vere acceptable.			D
	formed at the proper frequency and were		. 0		D
8. Method blanks were analyz			E		
9. All MDAs were less than the	e RDLs.				b
10. LCSs were analyzed at the	proper frequency and recoveries were a	acceptable.	9		
11. MS were analyzed at the pr	roper frequency and recoveries were ac	ceptable.	ष		
12. Lab duplicates were analyze	ed the proper frequency and RPDs were	e acceptable.			P
13. QC batches correspond clea	arly with analytical batches.		6		
14. Sample activity/concentration	on units are reported accurately.		D		
15. Dilutions were properly note	ed and calculated.				M
16. Sample detection limits were	e properly adjusted for dilutions.				F
17. Detection limits meet project	t requirements.		P		

QUALIFIERS

QC Result	Qualifier	Associated San	nple Results
Preparation Blank:	ч.	250505-w=stel	250512-Waste
Lab Control Sample:	ADAR	11	13
Matrix Spike:	none	4	"
Duplicate Sample:	mone	"	"
Validator Name:K	raig Knapp		
Signature: Kray	Knepp	Date:/	18/03

Signature:

Date: 4/8/03

BN-1086 (11/00)

Bechtel Nevada

DATA VALIDATION CHECKLIST

A	analyses Reviewed: VOC Date: 4	18/03		
D	ATA REVIEW			
1.	Requested analyses were performed on all samples.	Yes	No	N/A
2.		M	-	0
3.		M	-	
4.		A	-	
5,	The laboratory sample identification corresponds to the client sample identification	E / D		0
6.	Background checks were performed at the proper frequency and were acceptable.) E		
7.	efficiency checks were performed at the proper frequency and were acceptable.		-	5
8.	Method blanks were analyzed and were acceptable.	10		EINT
9.	All MDAs were less than the RDLs.		-	Dur
10	LCSs were analyzed at the proper frequency and recoveries were acceptable.	1		
11.	MS were analyzed at the proper frequency and recoveries were acceptable.	N		
12.	Lab duplicates were analyzed the proper frequency and RPDs were acceptable.	N	-	
13.	QC batches correspond clearly with analytical batches.	1		
	Sample activity/concentration units are reported accurately.	A		
	Dilutions were properly noted and calculated.		-	
	Sample detection limits were properly adjusted for dilutions.		2	D D
	Detection limits meet project requirements.	D		
			-	

QUALIFIERS

QC Result	Qualifier	Associated Sample Res	ulte
Preparation Blank:	И	250505-weste-1,	(A420- TRA
Lab Control Sample:	more	"	1
Matrix Spike:	none	1)	
Duplicate Sample:	none	n	"
Validator Name:	rais Knopp		
Signature: Kang	. Hayp	Date: 4/8/03	2

Bechtel Nevada

DATA CONFIDENCE STATEMENT

MEF Number: CRUZEL SDE VI746 Analyses: VOC, TPH Field and QA/QC sample data have been generated in accordance with method requirements and within quality control. Requirements of the SOW have been met. X Comments: VOC analysis QA/QC problems were encountered during analysis of the samples. Usability is not affected, data are acceptable. Comments: Sefficilty & matrix effects for TPH andges Significant QA/QC problems were encountered during analysis of the samples. Data for the following samples is rejected: Summary: King Knapp Validator Name: Validator Signature: _____ Date: ___

TIER I REVIEW

GENERAL INFORMATION

1. Project Name and/or Sample Delivery Group (SDG): V1746

2. Date Samples taken: 10/21/02

SAMPLE NUMBER	DATE RECEIVED	DATE ANALYZED	
CAU262 TB-1	10/22/02		100
50505-Worte-1		TPH 11/04, 11/06	ORI
250505-Waste-1 250512-Waste-1	l	VOC 10/26 TPH 11/04, 11/06 VOC 10/24 10/25 TPH 11/04, 11/06	ORO
			_
			_
			_
	Constant State		

TCLP VOLATILE ORGANIC COMPOUNDS (VOCs)

EXTRACTION HOLD TIME	ANALYSIS HOLD TIME	DAYS HELD	PASS Y/N	SAMPLES NOT PASSING
Liquids - 7 days	NA	5	Y	
NA	Liquids - 40 days			
	HOLD TIME Liquids - 7 days	HOLD TIME HOLD TIME Liquids - 7 days NA Liquids - 40 days	HOLD TIME HOLD TIME HELD Liquids - 7 days NA 5	HOLD TIME HOLD TIME HELD Y/N Liquids - 7 days NA J //

Were extractions done within the hold time limit? Yes No

Were analyses run within the hold time limit? Yes No

A. TCLP VOCs reported as: mg/L or ug/L (liquids) Other:

B. Hits above detection level found in laboratory blank (LB), reagent blank surrogate (RBS), field blank (FB), rinse blank (RB), or other QA samples? Yes Yo No If yes, explain:

C. Did laboratory report indicate any problems? Yes INO If 'yes,' explain: Only for TPH, Not VOC.

D. Were other VOC results reported besides TCLP VOC target compounds? TYes No

TOTAL PETROLEUM HYDROCARBONS (TPH)

ASSING

Was TPH digestion done within the hold time limit? Yes No

Were analyses run within the hold time limit? Q Yes D No

A. TPH reported as: mg/Kg or ug/Kg Other:

B. Hits above detection level found in LB, RBS, FB, RB, or other QA samples? TYes You No If 'yes,' explain:

C. Did laboratory report indicate any problems? X Yes D No

If yes, explain: Hydrocarbon pottons were atypiced for all analytes. Surroyste recovery was your Reaftraction and reanalysis obtained the same results, indicating a matrix. client requested lower reporting limit for 250505-work- and 2505 R-work- 1 so the angels were restructed and reardycar

CLIENT: Bechtel Nevada PROJECT ID: CAU 262 PROJECT #: B502 MATRIX: AQUEOUS

CLIENT ID: CAU 262 TB-1 DATE SAMPLED: 10/21/02 NEL SAMPLE ID: L0210354-001A

Parameter	Read	Units	Reporting	DE		-	1.11	
1,1,1,2-Tetrachloroethane	Contraction of the		Limit	DF	Method	Prep Date	Analyzed	Analyst
1.1.1-Trichloroethane	ND	µg/L	5.0	1	SW82608		10/26/02	DRM-LV
1.1.2.2-Tetrachloroethane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1,1,2-Trichloroethane	ND	μg/L.	5.0	1	SW8260B		10/26/02	DRM-LV
1,1-Dichloroethane	ND	μg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1,1-Dichloroethene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1.1-Dichlaropropene	ND	µg/L	5.0	1	SW8260B	10	10/26/02	DRM-LV
1.2.3-Trichlorobenzene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1,2,3-Trichloropropane	ND	µg/1.	5.0	1	SW8260B		10/26/02	DRM-LV
1,2,4-Trichlorobenzene	ND	µg/L	5.0	1	5W8260B		10/26/02	DRM-LV
1.2.4-Trimethylbenzene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1,2-Dibromo-3-chloropropane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1,2-Dibromoethane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1.2-Dichlorobenzene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1.2-Dichloroethane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1.2-Dichloropropane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1.3.5-Trimethylbenzene	ND	μg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1_3-Dichlorobenzene	ND	µg/1_	5.0	1	SW8260B		10/26/02	DRM-LV
1.3-Dichloropropane	ND	µgq.	5.0	1	SW8260B		10/26/02	DRM-LV
1,4-Dichlorobenzene	ND	HB/L	5.0	1	SW8260B		10/26/02	DRM-LV
2,2-Dichloropropane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
2-Butanone		µg/L	25	1	5W8260B		10/26/02	DRM-LV
2-Chloroethyl vinyl ether		µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
2-Chlorotoluene		µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
2-Hexanone		µg/l.	25	1	SW8260B		10/26/02	DRM-LV
4-Chlorotoluene	ND	μg/L	5.0	1	SW8260B		10/26/02	DRM-LV
4-Methyl-2-pentanone	ND	µg/L	25	1	SW8260B		10/26/02	DRM-LV
Acetone	ND	µg/L	25	1	SW8260B		10/26/02	DRM-LV
Benzene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Bromobenzene	ND	µµ/L	5.0	1	SW8260B		10/26/02	DRM-LV
Bromochloromethane	ND	µg/L	5.0	1	SW8260B ·		10/26/02	DRM-LV
Bromodichloromethane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Bromotorm	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Bromomethane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Carbon disulfide	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV
Carbon tetrachloride	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV DRM-LV
Chlorobenzene	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV
Chloroethane	ND j	igʻL	5.0	1	SW8260B		10/26/02	
Thioroform	ND j	ig/L	5.0	1	SW8260B		10/26/02	DRM-LV
Thioromethane		ag/L	5.0	1	SW8260B		10/26/02	DRM-LV
is-1,2-Dichloroethene		1giL	5.0	1	SW8260B		10/26/02	DRM-LV
is-1,3-Dichloropropene		ig/L	5.0		SW8260B			DRM-LV
Cyclohexane		g/L	5.0		SW8260B		10/26/02	DRM-LV
Dibromochloromethane		g/L	5.0		SW8260B		10/26/02	DRM-LV DRM-LV

ND - Not Detected at the Reporting Limit

DF - Dilution Factor

Date: 14-Nov-02

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

CLIENT: Bechtel Nevada PROJECT ID: CAU 262 PROJECT #: B502 MATRIX: AQUEOUS

CLIENT ID: CAU 262 TB-1 DATE SAMPLED: 10/21/02 NEL SAMPLE ID: L0210354-001A

Parameter	Result	Units	Reporting Limit	DF	Method	Prep Date	Analyzed	Analyst
Dibromomethane	ND	ug/L	5.0	-	SW8260B		10/26/02	and the second se
Dichlorodifluoromethane	ND	µg/L	5.0	1	SW8260B			DRM-LV
Diisopropyl ether (DIPE)	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Ethyl t-butyl ether (ETBE)	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Ethylbenzene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Hexachlorobutadiene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Hexane	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
lodomethane	ND	µg/L	5.0		SW8260B		10/26/02	DRM-LV
Isopropylbenzene	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV
m,p-Xylene	ND	µg/L	10		SW8260B		10/26/02	DRM-LV
Methyl t-butyl ether (MTBE)	ND	ug'L	5.0	1	SW8260B		10/26/02	DRM-LV
Methylene chloride	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV
n-Butylbenzene	ND	ag/L	5.0	1			10/26/02	DRM-LV
n-Propylbenzene	ND	Hg/L	5.0		SW8260B		10/26/02	DRM-LV
Naphthalene	ND	µg/L	10	1	SW8260B		10/26/02	DRM-LV
o-Xylene	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV
p-lsopropyholuene	ND	ug/L	5.0	1	SW8260B		10/26/02	DRM-LV
sec-Butylbenzene	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Styrene	ND	Hg/L	5.0		SW8260B		10/26/02	DRM-LV
I-Amyl methyl ether (TAME)	ND	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
1-Butyl alcohol (TBA)	ND	HBL.	50	1	SW8260B		10/26/02	DRM-LV
tert-Butylbenzene	ND	µg/L	5.0	-	SW8260B		10/26/02	DRM-LV
Tetrachloroethene	1000	µg/L	5.0		SW8260B		10/26/02	DRM-LV
Toluene	100 A	µg/L	5.0	12.1	SW8260B		10/26/02	DRM-LV
Total THM		ag/L	5.0	1	5W8260B		10/26/02	DRM-LV
trans-1,2-Dichloroethene		Hg/L	5.0	1	SW8260B		10/26/02	DRM-LV
trans-1,3-Dichloropropene		ugi	5.0	1	SW8260B		10/26/02	DRM-LV
Trichloroethene	112.00	µg/L	5.0	1	SW8260B		10/26/02	DRM-LV
Trichlorofluoromethane		այց։ է. այց/է	1212	1.1	SW8260B		10/26/02	DRM-LV
Vinyl acetate	200.0	μg/L.	5.0	1	SW8260B		10/26/02	DRM-LV
Vinyt chloride	20.67	0.000	5.0	1	SW8260B		10/26/02	DRM-LV
Surr: 4-Bromofluorobenzene		µg/l. %REC	5.0	1	SW8260B		10/26/02	DRM-LV
Surr: Dibromofiuoromethane		%REC	71.7-120	1	SW8260B		10/26/02	DRM-LV
Surr: Toluene-d8	1000		80.2-106	1	SW8260B		10/26/02	DRM-LV
and a second the	11.5	%REC	75.5-105	1	SW8260B		10/26/02	DRM-LV

ND - Not Detected at the Reporting Limit

DF - Dilution Factor

Date: 14-Nov-02

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

CLIENT:	Bechtel Nevada
PROJECT ID:	CAU 262
PROJECT #:	B502
MATRIX:	SLUDGE

CLIENT ID: 250505-Waste-1 DATE SAMPLED: 10/21/02 NEL SAMPLE ID: L0210354-002A

Parameter	Result	Units		Reporting Limit	DF	Method	Prep Date	Analyzed	Analyst
Diesel Range Organics (C12-C22)	ND	mg/Kg		60	1	SW8015Ext	11/04/02	11/06/02	COP-LV
Gasoline Range Organics (C8-C12)	100	mg/Kg		60	1	SW8015Ext	11/04/02	11/06/02	COP-LV COP-LV
Oil Range Organics (C22-C34)	390	mg/Kg		150	1	SW8015Ext	11/04/02	11/06/02	COP-LV COP-LV
Total Petroleum Hydrocarbons	490	mg/Kg		60	1	SW8015Ext	11/04/02	11/06/02	COP-LV
Surr: n-Octacosane	34.0	%REC	56	55-130	1	SW8015Ext	11/04/02	11/06/02	COP-LV

ND - Not Detected at the Reporting Limit DF - Dilution Factor

Date: 14-Nov-02

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

CLIENT: Bechtel Nevada PROJECT ID: CAU 262 PROJECT #: B502 MATRIX: SLUDGE

CLIENT ID: 250505-Waste-1 DATE SAMPLED: 10/21/02 NEL SAMPLE ID: L0210354-002B

Parameter	Result	Units	Reporting Limit	DF	Method	Prep Date	Analyzed	Analyst
Benzene	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	The second s
Carbon tetrachloride	ND	mg/L	0.10	20	TCLP 8260	10/24/02		DRM-LV
Chlorobenzene	ND	mp/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Chloroform	ND	mg/L	0.10	20	TCLP 8260	10/24/02	100 100 100	DRM-LV
1,4-Dichlorobenzene	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
1,1-Dichloroethene	ND	mg/L	0.10	20	TCLP 8260		10/25/02	DRM-LV
1,2-Dichloroethane	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Methyl ethyl ketone	ND	mg/L	0.50	20		10/24/02	10/25/02	DRM-LV
Tetrachloroethene	ND	mg/L	0.10	100	TCLP 8260	10/24/02	10/25/02	DRM-LV
Trichloroethene	ND			20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Vinyl chloride	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
1,1,1-Trichloroethane		mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Toluene	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Ethylbenzene	ND	mg/L	0.10	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Total Xylenes	ND	mg/L	0.20	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Surr: Dibromofluoromethane	87.6	%REC	74.3-132	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Surr: Toluene-d8	99.6	%REC	81.3-138	20	TCLP 8260	10/24/02	10/25/02	DRM-LV
Surr: 4-Bromofluorobenzene	82.0	%REC	58.4-154	20	TCLP 8260	10/24/02	10/25/02	DRM-LV

ND - Not Detected at the Reporting Limit DF - Dilution Factor

Date: 14-Nov-02

B - Analyte detected in the associated Method Blank

5 - Spike Recovery outside accepted recovery limits

CLIENT:	Bechtel Nevada
PROJECT ID:	CAU 262
PROJECT #:	B502
MATRIX:	SLUDGE

CLIENT ID: 250512-Waste-1 DATE SAMPLED: 10/21/02 NEL SAMPLE ID: L0210354-003A

Parameter	Result	Units		Reporting Limit	DF	Method	Prep Date	Analyzed	Analyst
Diesel Range Organics (C12-C22)	1100	mg/Kg	F3	60	1	SW8015Ext	11/04/02	11/06/02	COP-LV
Gasoline Range Organics (C8-C12)	83	mg/Kg	FI	60	1	SW8015Ext	11/04/02	11/06/02	COP-LV
Oil Range Organics (C22-C34)	ND	mg/Kg		150	1	SW801 SExt	11/04/02	11/06/02	COP-LV
Total Petroleum Hydrocarbons	1200	mg/Kg		60	1	SW8015Ext	11/04/02	11/06/02	COP-LV
Surr: n-Octacosane	62.1	%REC		55-130	1	SW8015Ext	11/04/02	11/06/02	COP-LV

ND - Not Detected at the Reporting Limit

DF - Dilution Factor

Date: 14-Nov-02

B - Analyte detected in the associated Method Blank

S - Spike Recovery outside accepted recovery limits

CLOSURE RE PORT - CAU 262 Section: Appendix B Revision: 1 Date: July 2003

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PARAGON ANALYTICS, INC. 225 Commerce Drive + Fort Collins, CO 80524 + (800) 443-1511 + (970) 490-1511 + FAX (970) 490-1522

November 15, 2002

Mr. Ted Redding Bechtel Nevada US DOE Zone 1, Bldg. 652 Rm. 2, M/S NTS273 Mercury, NV 89023

RE: Paragon Workorder: 02-10-144 Client Project Name: CAU 262 Client Project Number: V1747

Dear Mr. Redding:

One liquid and sludge sample was received from Bechtel Nevada on October 25, 2002. The sample was scheduled for the following analyses:

Gross Alpha/Beta	pages 1-243
Gamma Spectroscopy-liquid	pages 1-104
Gamma Spectroscopy-sludge	pages 1-96

The results for these analyses are contained in the enclosed reports.

Thank you for your confidence in Paragon Analytics, Inc. Should you have any questions, please call.

Sincerely,

Paragon Analytics, Inc. Ken Campbell Project Manager

KDC/hc Enclosure: Report

An Employee Owned Small Business

Bechtel Nevada		SI	ANALYTICAL LABORATORY SERVICES REQUEST & CHAIN OF CUSTODY RECORD	EQUI	ANAL YTICAL LABORATORY UEST & CHAIN OF CUS	AL LA	N OF	CUSI	ODY RE	COR			Pa	Page / of	1
Project. C/Put. 2.6.2 BN Or Charge Number: 578039910	BN OR # 3 5D 2	205		NOR ES	PLACE A TURNAROUND INFORMATION	TOGIASONIDA	SON)	MMATHO	gor sur		Samping S The sample	Samping Sile CAL 25.01.024	CPE, Zr (thack);	Z(2012	
Project Manager. S-0131 S-7401 Phone:	Nas	900 STN		Rush P	d - 14 days I refiminary by	H. 28 day	s Non-rad	Em, 45	Turmaround: Standard - 14 days IH. 28 days Non-rad Env. 46 Days Rad Env. (IH) 2 1 2 1 14 (non-Rad Env) 1 1 7 2 14 (non-Rad Env)	-	Classical Radios	Radioactive (192) - Unknown contamination, If brown, identify contaminants. This mometion will ensure organice with applicable regulations and must be the sub-hordino of the summer relevant.	ce with applica	die regulations a	pu
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ID/DESCRIPTION	SAM	NG	MATRIX	# 00	CONTAINER # Est. Vol	QW	OC MS M	MSD en	Pres - Analysis eg. HCI - VOCs	363	Seres 3				
250505-47ASTE-1	Hailer 1220	20	CIQUID	N	TI			-	Jak	×	×		-		
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Paragon Analytics, Inc. Radiochemistry Case Narrative Gross Alpha/Beta

Bechtel Nevada CAU 262 / V1747 PAI WO 0210144

- This report consists of one liquid sample and sludge sample received by Paragon on 10/25/02.
- Sample 250505-WASTE-1 (PAI ID 0210144-1) was received with a pH of 7. Due to the high levels of suspended solids, acidification was not attempted prior to analyses. Please refer to QASS 246103.
- These samples were prepared according to Paragon Analytics, Inc. procedure PAI SOP702R15.
- The samples were analyzed for gross alpha and beta activity by gas flow proportional counting according to Paragon Analytics, Inc. procedure PAI SOP724R7. The analyses were completed on 11/08/02. Gross alpha results are referenced to ²⁴¹Am. Gross beta results are referenced to ⁹⁰Sr/Y.
- The analysis results for the sludge sample are reported on a dry weight basis in units of pCi/gram.
- The analysis results for the liquid sample are reported in units of pCi/L. The sample was not filtered prior to analysis.
- The sludge sample was flamed, as prescribed in EPA Methods 900.0 and 9310 for samples which demonstrate hygroscopicity. This could reduce the beta activity if the samples contained ¹³⁷Cs, or other beta emitters, that may be volatile under the conditions associated with flaming.
- 8. Following an extended count the requested MDC for gross alpha/beta for sample 250505-WASTE-1 and its duplicate (PAI ID 0210144-1 and -1-D1) were not achieved due to the presence of elevated levels of dissolved / suspended solids native to the sample. The requested method limits the amount of sample solids residue taken for analysis to 5 mg/cm². These samples are identified with an "M" flag on the Gross AlphaBeta Raw Data Report, which can be found in Section 4, "Raw Data" of this report. The reported gross alpha/beta activity for theses samples exceeds the achieved MDC.

PARAGON ANALYTICS, INC.

- 9. Due to current software limitations, the DER determinations in this report were calculated using the 2 sigma TPU. The SOW indicates that the 1 sigma TPU be used in the DER determination. However, the requested DER limit of less than 3 at the 1 sigma level (which is equivalent to 1.5 at the 2 sigma level) was achieved. Data quality is not affected.
- 10. No further anomalous situations were noted during the preparation and analysis of these samples. All remaining quality control criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

« Ellingson Julie Ellingson

Radiochemistry Instrument Technician

Radiochemistry Final Data Review

Date

Client Name: Bechtel Nevada Client Project Name: CAU 262 Client Project Number: V1747

Sample Results Summary

Laboratory Name: Paragon Analytics, Inc. PAI Work Order: 0210144

Reported on: Friday, November 08, 2002 13:34:06 Page: 1 of 1

Lab Sample ID	Client Sample ID	Test	Nuclide	Result +/- 2 s TPU	MDC	Units	Matrix	Prep Batch	Date Analyzed	Flags
0210144-1	250505-WASTE-1	RD_GAB	GrAiphe	1.12E+03 +/- 2.80E+02	2.98E+02	PCIAL	Liquid	AB00667	11/8/02	
0210144-1	250505-WASTE-1	RD_GAB	GrBeta	2.87E+03 +/- 4.70E+02	3.65E+02	pOIL	Liquid	AB00667	11/8/02	
0210144-2	250512-WASTE-1	RD_GAB	GrAlpha	1.22E+00 +/- 3.80E-01	3,18E-01	pOlig	Sludge	AB00668	11/5/02	LT
0210144-2	250512-WASTE-1	RD_GAB	GrBeta	1.72E+00 +/- 4.27E-01	4.70E-01	pOlig	Sludge	AB00668	11/5/02	Ы

Comments:

Data Package ID: AB0210144-1

Cualifiers/Flags:

— - Result is less than the sample specific MDC.
CDP-Result is less than Requested MDC, gname than sample specific MDC.

CR- Chemics Yield is in control at 100-110%. Quantitative Yield is assumed Common Yield outside default innia. Partagion Amalytics Inc.

MDC - Minimum Detectable Concernation (see PAI SOP 709)

TPU - Total Propagated Uncertainty (see PAI SOP 743).

Abbreviations:



Paragon Analytics, Inc.

Radiochemistry Case Narrative Gamma Spectroscopy

Bechtel Nevada CAU 262 / V1747

Paragon Work Order 0210144

- This report consists of analysis results for one sludge sample received by Paragon on 10/25/02. The analysis results for this sample are reported on an 'as received' basis in units of pCi/gram.
- This sample was prepared according to Paragon Analytics, Inc. procedure PAI SOP739R5.
- The sample was analyzed for the presence of gamma emitting radionuclides according to Paragon Analytics, Inc. procedure PAI SOP713R7. The analyses were completed on 10/29/02.
- The sample was analyzed using Seeker Version 2.2, which is a product of Vertechs Software Solutions, Inc.
- Sample volumes were insufficient to allow preparation of a duplicate. A duplicate analysis
 of sample 250512-WASTE-1 (PAI ID 0210144-2) was performed in lieu of a preparation
 duplicate.
- 6. Due to current software limitations, the DER determinations in this report were calculated using the 2 sigma TPU. The SOW indicates that the 1 sigma TPU be used in the DER determination. However, the requested DER limit of less than 3 at the 1 sigma level (which is equivalent to 1.5 at the 2 sigma level) was achieved. Data quality is not affected.
- 7. The efficiencies used in the activity calculations for these samples were obtained using a NIST traceable mixed gamma source spiked into 500g of sand. Due to differences between the calibration standard and the samples, the analytical results may be biased.
- 8. There are cases where the magnitude of the negative activity is greater than the 2 sigma TPU. The analyst's review of the data does not indicate a problem with the instrument data or the subsequent reporting systems. The data quality is not believed to be affected and the results are submitted without qualification. Under typical conditions, where background level sample data is normally distributed and analyzed by paired observations, this event is likely to occur at least 2.5% of the time.
- No problems were encountered with either the client samples or the associated quality control samples. All quality control criteria were met.

PARAGON ANALYTICS, INC.

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The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

Kein File

Radiochemistry Instrument Technician

Radiochemistry Final Data Review

<u>11-8-02</u> Date

Method PAI 713R7

Sample Results

Client Name: Bechtel nt Project Name: CAU 26 Project Number: V1747		Laborato	Page: 1 of 2 ported on: Thursda 15:42:40 pry Name: Paragor prk Order: 0210144	Analytics, Inc.
D:250505-WASTE-1 D:0210144-1	Sample Matrix: Liquid Date Prepared: 29-Oct-02 Prep SOP: PAI 739R5 Prep Batch: GS01753	Date Collected: 21-0 Date Analyzed: 30-0 Analytical SOP: PAI Spectrum Code: 0211	713R7 Count	Final Aliquot: 1.000 L Report Basis: As Receiv t Time (min.): 300 Library: GAM-A-001
Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Ac-228	3.05E+01 +/- 2.21E+01	3.35E+01	pCi/L	U
Am-241	-2.92E+00 +/- 5.64E+00	9.84E+00	pCi/L	U
Ce-144	-1.88E+01 +/- 1.92E+01	3.38E+01	pCi/L	U
Co-60	-1.40E+00 +/- 5.53E+00	1.02E+01	pCi/L	U
Cs-134	6.36E-01 +/- 5.11E+00	8.77E+00	pCi/L	U
Cs-137	1.12E+02 +/- 2.13E+01	8.52E+00	pCi/L	
Eu-152	-8.09E+00 +/- 2.84E+01	5.26E+01	pCi/L	U
Eu-154	5.50E+00 +/- 2.83E+01	4.94E+01	pCi/L	U
Eu-155	-2.84E+00 +/- 9.23E+00	1.60E+01	pCi/L	U
K-40	2.96E+02 +/- 1.21E+02	1.61E+02	pCi/L	
Pb-212	3.12E+01 +/- 1.10E+01	1.47E+01	pCi/L	
Pm-144	3.97E+00 +/- 5.17E+00	8.45E+00	pCi/L	U
Pm-146	-2.23E+00 +/- 6.12E+00	1.08E+01	pei/L	U
Ru-106	-1.97E+01 +/- 4.55E+01	8.14E+01	pCi/L	U
Sb-125	2.64E+00 +/- 1.30E+01	2.21E+01	pCi/L	U
Th-234	8.65E+01 +/- 6.84E+01	1.09E+02	pCi/L	U
U-235	3.16E+00 +/- 2.51E+01	4.23E+01	pCi/L	U
Y-88	4.37E+00 +/- 5.30E+00	8.59E+00	pCi/L	U

Data Package ID: GSW0210144-1

Paragon Analytics Inc.

Method PAI 713R7

Sample Results

Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Field ID: 250505-WASTE-1	Sample Matrix: Liquid Date Prepared: 29-Oct-02 Prep SOP: PAI 739R5 Prep Batch: GS01753	Date Collected: 21-Oct-0 Date Analyzed: 30-Oct-0 Analytical SOP: PAI 713 Spectrum Code: 0211460	R7 Count	Final Aliquot: 1.000 L Report Basis: As Receive Time (min.): 300 Library: GAM-A-001.
Lab ID:0210144-1 Date Prepared: 29-Oct-0 Prep SOP: PAI 739P Prep Batch: GS01753			15:42:40 Name: Paragor Order: 0210144	Analytics, Inc.
			Page: 2 of 2 ed on: Thursda	y. November 07, 2002

Qualifiers/Flags:

- U Result is less than the sample specific MDC or less than the associated TPU.
- Y1 Chemical Yield is in control at 100-110%. Quantitative Yield is assumed.
- Y2 Chemical Yield outside default invits.
- LT Result is less than Requested MDC, greater than sample specific MDC.
- SQ Spectral quality prevents accurate quantitation.
- 51 Nuclide identification and/or quantitation is tentative.
- TI Nuclide identification is tentative.
- R Nuclide has exceeded 8 haffives.

Abbreviations

TPU - Total Propagated Uncertainty (see PAI SCP 743)

MDC - Minimum Detectable Concentration (see PAI SOP 709)

Data Package ID: GSW0210144-1

Method PAI 713R7

Sample Results

Client Name: Bechtel nt Project Name: CAU 26 Project Number: V1747		Laborator	Page: 1 of 2 orted on: Friday, N 09:11:21 y Name: Paragor k Order: 0210144	Analytics, Inc.
D:250512-WASTE-1 D:0210144-2	Sample Matrix: Sludge Date Prepared: 29-Oct-02 Prep SOP: PAI 739R5 Prep Batch: GS01754	Date Collected: 21-Oc Date Analyzed: 29-Oc Analytical SOP: PAI 7 Spectrum Code: 02114	t-02 R 13R7 Count	Final Aliquot: 347.1 g teport Basis: As Receive Time (min.): 30 Library: GAM-A-001.
Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Ac-228	8.90E-02 +/- 2.34E-01	4.26E-01	pCi/g	U
Am-241	5.20E-02 +/- 8.04E-02	1.34E-01	pCi/g	U
Ce-144	1.19E-01 +/- 2.00E-01	3.38E-01	pCl/g	U
Co-60	3.42E-02 +/- 5.61E-02	9.57E-02	pCi/g	U
Cs-134	-1.12E-02 +/- 5.71E-02	1.13E-01	pCi/g	U
Cs-137	1.13E+00 +/- 2.65E-01	1.24E-01	pCi/g	
Eu-152	1.08E-01 +/- 2.64E-01	5.00E-01	pCi/g	U
Eu-154	-4.68E-02 +/- 3.38E-01	7.03E-01	pCi/g	U
Eu-155	7.05E-02 +/- 1.17E-01	1.96E-01	pCi/g	U
K-40	7.02E-01 +/- 9.98E-01	1.65E+00	pCi/g	U
Pb-212	8.39E-02 +/- 1.05E-01	1.70E-01	pCl/g	U
Pm-144	-3.77E-02 +/- 5.93E-02	1.26E-01	pCl/g	U
Pm-146	4.92E-02 */- 8.88E-02	1.51E-01	pCi/g	U
Ru-106	3.45E-01 +/- 5.66E-01	9.59E-01	pCi/g	U
Sb-125	9.27E-02 +/- 1.72E-01	2.92E-01	pCVg	U
Th-234	1.98E-01 +/- 5.69E-01	9.87E-01	pCi/g	U
U-235	1.38E-01 +/- 2.64E-01	4.48E-01	pCi/g	U
Y-88	+1.21E-02 +/- 5.13E-02	1.14E-01	pCi/g	U

Data Package ID: GSS0210144-1

Method PAI 713R7

Sample Results

Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Field ID:250512-WASTE-1 Lab ID:0210144-2	Sample Matrix: Sludge Date Prepared: 29-Oct-02 Prep SOP: PAI 739R5 Prep Batch: GS01754	Date Collected: 21-0 Date Analyzed: 29-0 Analytical SOP: PAI 7 Spectrum Code: 0211	cl-02 F 13R7 Count	Final Aliquot: 347.1 g Report Basis: As Receive t Time (min.): 30 Library: GAM-A-001.
Client Name: Bechtel Client Project Name: CAU 26 Client Project Number: V1747		Laborato	orted on: Friday, f 09:11:21 ry Name: Paragor rk Order: 0210144	n Analytics, Inc.
			Page: 2 of 2	

Comments:

Qualifiers/Flags:

- U Result is less than the sample specific MDC or less than the associated TPU.
- Y1 Chemical Yield is in control at 100-110%. Quantitative Yield is assumed.

Y2 - Chemical Yield outside default limits.

LT - Result is less than Requested MDC, greater than sample specific MDC.

SQ - Spectral quality prevents accurate quantitation.

SI - Nuclide identification and/or quantitation is tentative.

T) - Nuclide identification is tentative.

R - Nuclide has exceeded 8 haffives.

Abbreviations:

TPU - Total Propagated Uncertainty (see PAI SOP 743)

MDC - Minimum Detectable Concentration (see PAJ SOP 709)



Analytical Report

Client: BECHTEL-NEVADA V1898 LVL #: 0302L786

W.O. #: 60052-001-001-0001-00 Date Received: 02-20-2003

DIESEL RANGE ORGANICS

Three (3) water samples were collected on 02-18-2003.

The samples and their associated QC samples were extracted on 02-21-2003 and analyzed according to Lionville Laboratory OPs on 02-25-2003. The extraction procedure was based on method 3520 and the extracts were analyzed based on method 8015B for Diesel Range Petroleum Hydrocarbons.

- All results presented in this report are derived from samples that met LvLI's sample acceptance policy.
- The required holding time for extraction and analysis has been met.
- The method blank was below the reporting limits for all target compounds.
- All surrogate recoveries were within acceptance criteria.
- The blank spike recovery was within acceptance criteria.
- 6. The matrix spike recoveries were within EPA QC limits.
- All initial calibrations associated with this data set were within acceptance criteria.
- All continuing calibration standards analyzed prior to sample extracts were within acceptance criteria.

Jain Daniels

Laboratory Manager Lionville Laboratory Incorporated

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The results presented in this report relate only to the analytical testing and conditions of the samples at receipt and during storage. All pages of this report are integral parts of the analytical data. Therefore, this report should only be reproduced in its entirety of 5.2 pages.



GLOSSARY OF DIESEL RANGE ORGANICS DATA

DATA QUALIFIERS

- U = Indicates that the compound was analyzed for but not detected. The minimum detection limit for the sample (not the method detection limit) is reported with the U (e.g., 10U).
- J = Indicates an estimated value. This flag is used in cases where a target analyte is detected at a level less than the lower quantification level. If the limit of quantification is 10 ug/L and a concentration of 3 ug/L is calculated, it is reported as 3J.
- B = This flag is used when the analyte is found in the associated blank as well as in the sample. It indicates possible/probable blank contamination.
- E = Indicates that the compound was detected beyond the calibration range and was subsequently analyzed at a dilution.

I = Interference.

ABBREVIATIONS

- BS = Indicates blank spike in which reagent grade water is spiked with the CLP matrix spiking solutions and carried through all the steps in the method. Spike recoveries are reported.
- BSD = Indicates blank spike duplicate.
- MS = Indicates matrix spike.
- MSD = Indicates matrix spike duplicate.
- DL = Indicates that recoveries were not obtained because the extract had to be diluted for analysis.
- NA = Not Applicable.

DF = Dilution Factor.

- NR = Not Required.
- SP = · Indicates Spiked Compound.



GLOSSARY OF DIESEL RANGE ORGANICS DATA

D	=	This flag identifies all compounds identified in an analysis at a secondary
		dilution factor.

C = This flag applies to a compound that has been confirmed by GC/MS.

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Bechtel Nevada

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DATA VALIDATION COVER SHEET

Section I

	ille Lab Inc. Organization: BN ER	
alidation Procedure/Instruction	n, including revision number:	
nalysis Requested (check all t	that apply):	-
Volatile Organics	D TPH full	,
Semi Volatile Organics		
Inorganics		
Organochlorine Pesticid	des/Polychlorinated Biphenals (PCBs)	
Radiochemistry	(PODS)	
	0 - <i>u</i> n	
Chain-of-Custody Form	Section II	
Case Narrative		
Sample Results Forms		
Field Forms		
Contraction of the second seco		
-		
Quality Control Forms	*	
Quality Control Forms	nissing:	
Quality Control Forms	nissing:	
Quality Control Forms	nissing:	
Quality Control Forms entify any samples that are m		
Quality Control Forms entify any samples that are m mments/Problems: (include in		act
Quality Control Forms entify any samples that are m mments/Problems: (include in	nissing:	act
Quality Control Forms entify any samples that are m mments/Problems: (include in		act
Quality Control Forms entify any samples that are m mments/Problems: (include in		act
Quality Control Forms entify any samples that are m mments/Problems: (include in		act
Quality Control Forms lentify any samples that are m mments/Problems: (include in		act

Retention Code: ENV 6.5

BN-1087 (03/02)

Bechtel	Nevada
Contraction of the second	A44.444

DATA VALIDATION CHECKLIST

Analyses Reviewed:	TPH (GRO)	Da	te: 4/	9/03		
DATA REVIEW		-			Yes	No	N/A
1. Requested analyses	s were performed o	on all samples.			D		
2. Samples were extra	cted, prepared, an	nd analyzed within	holding times.		6		
3. Cooler temperature	was recorded upo	n receipt.			6		
4. Proper preservation	/ pH was used for	each matrix and a	analysis.				0
5. The laboratory samp	le identification co	rresponds to the	client sample ider	ntification.	6		
6. Background checks	were performed at	the proper freque	ency and were ac	ceptable.	D		
7. efficiency checks we	re performed at the	e proper frequend	cy and were acce	ptable.	,		6
3. Method blanks were	analyzed and were	e acceptable.			2		
. All MDAs were less	than the RDLs.						D
10. LCSs were analyzed	at the proper freq	uency and recove	eries were accept	able.			6
11. MS were analyzed a	t the proper freque	ency and recoveri	es were acceptab	ole.		0	
2. Lab duplicates were	analyzed the prop	er frequency and	RPDs were acce	ptable.			6
13. QC batches correspo	ond clearly with an	alytical batches.			D		
14. Sample activity/conc	entration units are	reported accurat	ely.		D		
15. Dilutions were prope	rly noted and calcu	ulated.					V
16. Sample detection lim	nits were properly a	adjusted for dilutio	ons.				D
17. Detection limits mee	t project requireme	ents.			V		
		QUALIFIE	RS				
QC Result	Qualifier		Associat	ted Sample	Results		
Preparation Blank:	И	erosos-ul,	250512-11,	50512-6	12, 250	512-	nm
Leb Control Sample		11	Л	11		11	,

11

11

Matrix Spike:

Duplicate Sample:-

Validator Name: <u>Kreig</u> Knapp Signature: <u>Kreig</u> Knapp

nona

Date: 4/9/07

η

1

1



DATA VALIDATION CHECKLIST

Analyses Reviewed:	TPH (DRO)			Date: 4/	9/03		
DATA REVIEW					Yes	No	N/A
1. Requested analyse	s were performed o	on all samples.			D		
2. Samples were extra	acted, prepared, an	d analyzed within	holding times.		, b		
3. Cooler temperature	was recorded upor	n receipt.			D		
4. Proper preservation	/ pH was used for	each matrix and a	nalysis.				Þ
5. The laboratory samp	ole identification co	rresponds to the o	lient sample id	dentification.	E		
6. Background checks	were performed at	the proper freque	ncy and were	acceptable.			D
7. efficiency checks we	ere performed at the	e proper frequenc	y and were ac	ceptable.			D
8. Method blanks were	analyzed and were	e acceptable.			D		
9. All MDAs were less	than the RDLs.						Ð
10. LCSs were analyzed	at the proper frequencies	uency and recove	ries were acce	eptable.			1
11. MS were analyzed a	t the proper freque	ncy and recoverie	s were accept	table.	D		
12. Lab duplicates were	analyzed the prope	ar frequency and l	RPDs were ac	ceptable.			6
13. QC batches corresp	ond clearly with an	alytical batches.			N		
14. Sample activity/cond	entration units are	reported accurate	ly.		D		
15. Dilutions were prope	rly noted and calcu	lated.					E
16. Sample detection lim	nits were properly a	djusted for dilutio	ns.				A
17. Detection limits mee	t project requireme	nts.			D		
		QUALIFIE	RS				
QC Result	Qualifier		Assoc	iated Sample	e Results		
Preparation Blank:	Ч	250505-1	, 150512 V	1, 250512-10	2,25051	2-1	e ms/m
Lab Control-Sample:							
Matrix Spike:	time	"		~		•	k
Duplicate Sample:							

Validator Name: King Rouge

Signature:

Date: 4/5/07

BN-1086 (11/00)

Bechtel Nevada

DATA CONFIDENCE STATEMENT

Analyses:

Field and QA/QC sample data have been generated in accordance with method requirements and within quality control. Requirements of the SOW have been met.

Comments: ORO

P

QA/QC problems were encountered during analysis of the samples. Usability is not affected, data are acceptable.

Comments: GRO

Significant QA/QC problems were encountered during analysis of the samples.

Data for the following samples is rejected:

Summary:

Kraig Knapp Knapp Validator Name: Validator Signature:

Date:

TIER I REVIEW

GENERAL INFORMATION

1. Project Name and/or Sample Delivery Group (SDG): 1898

2. Date Samples taken: 2/18/03

SAMPLE NUMBER	DATE RECEIVED	DATE ANALYZED
250505-11	2/20/03	2/21/08 2/25/03
250512-V1		
250512-12		
250512-V2 250512-V2 MS/MSO	V	

3. Date of Review: 4/9/03

 Chain of Custody (COC): Completed? Yes No

Legible? Yes No

5. Is a cover letter/case narrative attached? ☑ Yes □ No If 'yes,' has it been reviewed for significant problems? ☑ Yes □ No □ NA

Comments: GRO: 148 arryste recorris mes la

6. Analyses requested (Attach COC, Sample Request Form, and lab data packet to this review):

Total VOCs	Total B
TCLP VOCs	TCLP I
D PCBs	Other:

- tal BNA Total Metals Radionuclides CLP BNA TCLP Metals TPH ther:
- 7. Were all requested analyses performed on all samples? X Yes INO

8. Temperature on cooler: $4^{\circ}C$ (parameters: $4^{\circ}C \pm 2^{\circ}$) or \Box NA

10. Refer to Table 1. Was the proper preservation used? Yes No NA If 'no,' then explain:

TOTAL PETROLEUM HYDROCARBONS (TPH)

Was TPH digestion done within the hold time limit? Yes No

Were analyses run within the hold time limit? Ves No

- A. TPH reported as: mg/Kg or ug/Kg Other: Mg/L
- B. Hits above detection level found in LB, RBS, FB, RB, or other QA samples? Yes No If 'yes,' explain:
- C. Did laboratory report indicate any problems? Yes No If 'yes,' explain:

GRO: 18 8 ennight recovering and for. GRO: 182 recoveries for MS was low.

Bechtel Nevada		SERVICES F	REQUE	ANALYTICAL LABORATORY UEST & CHAIN OF CUS	HAIN	OF CU	ANALYTICAL LABORATORY SERVICES REQUEST & CHAIN OF CUSTODY RECORD	ORD	Page of /
PROJECTICLENT INFORMATION Project: CAN 26 2 1800	MATION BN COD # D.CD 2		11	REPORT & TURNAROUND INFORMATION	NAROUN	D INFORM	ADON	Sample INFORMATION	DRWATION LOT. 47 OF PL
Charge Number: SBOM 9050			4	Sim	5-726		JOL 27U	The samples submitted contain (check); Mazardous (NSC) -	n (check);
Project Manager, Brad Jackson			Standard -	14 days IH. Iminary by:	28 days ?	ton-rad Em	Turnaround: Standard - 14 days IH, 28 days Non-rad Ern, 45 Days Rad Ern, (HI)	SUnknown contamination.	
5-0331 5-7361 Phone: Fax:	Jar FUN			őő	õõ		28 (Radiological Env)	If known, identify contaminants. This information will ensure compliance with apple allow for the safe handling of the service metanolo	If Anowe, identify contaminants. This information will ensure complexice with applicable regulations and allow for the safe handling of the sorrola materials.
	SAMPLE MAN	SAMPLE MANAGEMENT INFORMATION	NON					Pay Item, Analysis, Method	ysis, Method
SDG: (IH)	V1898	(Non	Rad Env)			(Rad	(Rad Env)	c.m	
0 9	with a signed P he SOW			OND OND	×.			2 (HU)5	
If not, identify the variation: Subcontract Lab(s) used for this work:	rk:	LION	MULLE			1			
ID/DESCRIPTION	SAMPLING DATE TIME	IE MATRI	# CONT	AINER Est. Vol	MD M	ac MS MSD	Pres - Analysis eg. HCI - VOCs	SOR	
250505-11	0001 50/81/2	10 water	η	Inwell			204	×-	
250512 -111	Och sale its	(where	2	100 ml	-	_	205	-X-	
	2412/02 1120	1	2	Jugar	-		204	X	
USH/SH Z A-21505Z	0(11 Sala1/2		7	Yrodi	×	×	204	×.	
	/				-				
	4	-							
		5+3	Y	4	+	_			
			1		+	-			
			1	1	+	-			
CUSTODY TRANSFER Sampled/Relinquished (print)		Signature	Dat	Date/Time	Rece	Received by (print)	orint	Signature	Data/Time
DANIEL 5 - TOO, ASAN	NA	SPI	2/19/03	3 /129	_	CLANS	J. DU645	3	827/60/8/10 20
N	COCAS	ASTANEDA	Habe	7/4/23 @ 1300	M	1 80	*	ariappointerer	2/19/0301300
160 CA	aller	- AT	3.20%	2.20.03/09.2					
				Retention Code: ENV 5.c[1]	IN EDV 5	(L)=			Bit-oraz (p400

ORGANICS	S ANALYSIS SHEET		Cartan orange No.
Lab Name: <u>Lionville</u>	Labs, Inc. Work Ord	er: <u>60052001001</u>	250505-V1
Client: BECHTEL NE	EVADA V1898		
Matrix:	WATER	Lab Sample ID:	03021786-001
Sample wt/vol:	<u>1000</u> (g/mL) <u>ML</u>	Lab File ID:	BLKLACHJ
Level: (low/med)	LOW	Date Received:	02/20/03
Moisture: not dec.		Date Analyzed:	02/25/03
Column: (pack/cap) g	CAP_	Dilution Facto	r: <u>1.00</u>
CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) ug/L	
68334-30-5	Diesel Range Org	anics 340	

12/88 Rev.

CLIENT SAMPLE NO.

ORGANIC	S ANALYSIS SHEET		CLIENT SAMPLE NO.	
Lab Name: Lionville	Labs, Inc. Work Order	: 60052001001	250512-V1	
Client: BECHTEL N	EVADA V1898			
Matrix:	WATER	Lab Sample ID:	03021786-002	
Sample wt/vol:	<u>1000</u> (g/mL) ML	Lab File ID:	BLKLACHJ	
Level: (low/med)	TOM	Date Received:	02/20/03	
<pre>% Moisture: not dec</pre>		Date Analyzed:	02/25/03	
Column: (pack/cap) ;	CAP	Dilution Facto	r: <u>1.00</u>	
CAS NO.		CONCENTRATION UNITS: (ug/L or ug/Kg) <u>ug/L</u>		
68334-30-5 00-00-0000	Diesel Range Organi Motor Oil	ics 300 340	σ	

12/88 Rev.

Т.

ORGANIC	S ANALYSIS SHEET		CLIENT SAMPLE NO.
Chonne		2	50512-V2
Lab Name: Lionville	Labs, Inc. Work Ord	er: 60052001001	
Client: <u>BECHTEL N</u>	EVADA V1898		
Matrix:	WATER	Lab Sample ID:	03021786-003
Sample wt/vol:	<u>1000</u> (g/mL) ML	Lab File ID:	BLKLACHJ
Level: (low/med)	LOW	Date Received:	02/20/03
<pre>% Moisture: not dec</pre>		Date Analyzed:	02/25/03
Column: (pack/cap)	CAP	Dilution Pactor	: <u>1.00</u>
CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) <u>ug/L</u>	_
	Diesel Range Org	anics 300	UU

12/88 Rev.



Analytical Report

Client: BECHTEL-NEVADA V1898 LVL #: 0302L786 W.O. #: 60052-001-001-0001-00 Date Received: 02-20-2003

GRO

Three (3) water samples were collected on 02-18-2003.

The samples and their associated QC samples were analyzed according to Lionville Laboratory OPs based on SW-846 method 8015 for Gasoline range organics (GRO) on 02-25-2003.

The following is a summary of the QC results accompanying these sample results and a description of any problems encountered during their analyses:

- All results presented in this report are derived from samples that met LVLI's sample acceptance policy.
- Samples were analyzed within required holding time.
- The method blank was below the reporting limits for all target compounds.
- One (1) of eight (8) surrogate recoveries was outside acceptance criteria. A copy of the Sample Discrepancy Report (SDR) has been enclosed.
- The blank spike recoveries were within acceptance criteria.
- One (1) of two (2) matrix spike recoveries was outside acceptance criteria. A copy of the Sample Discrepancy Report (SDR) has been enclosed.
- All initial calibrations associated with this data set were within acceptance criteria.
- All continuing calibration standards analyzed prior to sample extracts were within acceptance criteria.

Iaip Daniels

Laboratory Manager Lionville Laboratory Incorporated

The results presented in this report relate only to the analytical testing and conditions of the samples at receipt and during storage. All pages of this report are integral parts of the analytical data. Therefore, this report should only be reproduced in its entirety of 5.6 pages.

Lion	ville Laboratory	Sample Discre	bancy Rep	oort (SDR) SI	DR #: 0366047
nitiator:	John Luch.	Batch: 03020	-786	Parameter:	DERO
Date:	2/24/01	Samples: m		Matrix:	wate
Client:	Beckfel	Method: SW846/		Prep Batch	COLUTELT
a. COC D	Discrepancy Tech I		Request Test Code	Sampler Error on C Other	-o-c
	al Discrepancy	Ountrings Darkers	14.6-0	na Cample Dullad	Label ID's Illegible
	ng Sample/Extract	Container Broken		ng Sample Pulled servation Wrong	Label ID's Illegible Received Past Hold
	oper Bottle Type	Not Amenable to Analy			
	rified by [Log-In] or [Prep Grou				
c. Proble	em (Include all relevant s	specific results; attach dat	a if necessary)		
mso	no reconcerts.				
2. Known	or Probable Causes(s)			
	ed Posetule				
3 Discus	sion and Proposed Ac	tion Other De	escription:		
Re-la	og		7.	ms in control	
	ntire Batch ollowing Samples:			sho- by BS 4	
Re-k	each	the second	freeision	show y as a	e 21:
the second se	extract				
	ligest se EDD				
	nge Test Code to				
	e On/Take Off Hold (circ	de)			
	t Manager Instructions		2/210/	03	
	ocur with Proposed Actio agree with Proposed Act				
	ude in Case Narrative	ion, see insudcoon g			
Clie	int Contacted:				
	e/Person				
Add Car	ncel				
	Actionsignature/date:	Norma	Other	Explanation:	
Veri	fied re-flogilleachilextrac	t][digest][analysis] (circle)		Explanation.	
/ Inclu	uded in Case Narrative				
	d Copy COC Revised				
the second se	tronic COC Revised Corrections Completed				
Cold Contraction of Cold State		, corded, forward origina	I to QA Specia	alist for distribution an	d filing.
	Distribution of Completed			istribution of Completed	
1.1.1	X Initiator	- wards - read		Metals: Beegle	
	X Lab General Manager			Inorganic: Perrone	
	X Project Mgr: Stone/Jo X Technical Mgr: Wesso			_ GC/LC: Kiger _ MS: Rychlak/Layman	
	X QA (file)			Log-in: Melnic	
	Data Management: F			Admin: Soos	
16.6	Sample Prep: Beegle	Kider		Other	



GLOSSARY OF GASOLINE RANGE ORGANICS DATA

DATA QUALIFIERS

- U = Indicates that the compound was analyzed for but not detected. The minimum detection limit for the sample (not the method detection limit) is reported with the U (e.g., 10U).
- J = Indicates an estimated value. This flag is used in cases where a target analyte is detected at a level less than the lower quantification level. If the limit of quantification is 10 ug/L and a concentration of 3 ug/L is calculated, it is reported as 3J.
- B = This flag is used when the analyte is found in the associated blank as well as in the sample. It indicates possible/probable blank contamination.
- E = Indicates that the compound was detected beyond the calibration range and was subsequently analyzed at a dilution.
- I = Interference.

ABBREVIATIONS

- BS = Indicates blank spike in which reagent grade water is spiked with the CLP matrix spiking solutions and carried through all the steps in the method. Spike recoveries are reported.
- BSD = Indicates blank spike duplicate.
- MS = Indicates matrix spike.
- MSD = Indicates matrix spike duplicate.
- DL = Indicates that recoveries were not obtained because the extract had to be diluted for analysis.
- NA = Not Applicable.
- DF = Dilution Factor.
- NR = Not Required.
- SP = Indicates Spiked Compound.



GLOSSARY OF GASOLINE RANGE ORGANICS DATA

1. 10 V.

LEADER FRANK I.

- D = This flag identifies all compounds identified in an analysis at a secondary dilution factor.
- C = This flag applies to a compound that has been confirmed by GC/MS.

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tophalicate.

GC VO	LATILES SHEET		CLIENT SAMPLE NO.
Lab Name: <u>Lionville</u>	Labs, Inc. Work Ord		250505-V1
Client: BECHTEL N	EVADA V1898		
Matrix:	MATER	Lab Sample ID:	0302L786-001
Sample wt/vol:	<u>5.00</u> (g/mL) <u>ML</u>	Lab File ID:	BLKLACHJ
Level: (low/med)	LOW	Date Received:	02/20/03
Moisture: not dec	•	Date Analyzed:	02/25/03
Column: (pack/cap)	CAP	Dilution Factor	: 1.00
CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) <u>UG/L</u>	_
86290-81-5	Gasoline Range O	rganics (GRO) 30	
			v

12/88 Rev.

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CLI	ENT	SAMP	LE	NO.
A	THE A	OWNER	4460	44.04

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250512-V1

Lab Name: Lionville Labs, Inc. Work Order: 60052001001

Client: BECHTEL NEVADA V1898

Matrix:	WATER	Lab Sample ID:	0302L786-002
Sample wt/vol:	_5.00 (g/mL) ML	Lab File ID:	BLKLACHJ
Level: (low/med)	LOW	Date Received:	02/20/03
% Moisture: not dec.		Date Analyzed:	02/25/03
Column: (pack/cap) <u>C</u>	AP_	Dilution Factor	: 1.00
CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) <u>UG/L</u>	_

86290-81-5Gasoline Range	Organica (GPO	30	111
86230-81-5Gaborine Range	organics (GRO		

12/88 Rev.

00 100	ATILES SHEET		
ab Name: <u>Lionville</u>	Labs, Inc. Work Ord		50512-V2
lient: <u>BECHTEL NE</u>	VADA V1898		
atrix:	WATER	Lab Sample ID:	03021786-003
ample wt/vol:	<u>5.00</u> (g/mL) <u>ML</u>	Lab File ID:	BLKLACHJ
evel: (low/med)	LOW	Date Received:	02/20/03
Moisture: not dec.		Date Analyzed:	02/25/03
olumn: (pack/cap) 🖸	AP	Dilution Pactor	: 1.00
CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) <u>UG/L</u>	_
86290-81-5	Gasoline Range O	rganics (GRO) 30	U

12/88 Rev.

CLIENT SAMPLE NO.

SCEA S. COHEN & ASSOCIATES AN EMPLOYEE OWNED COMPANY

February 27, 2003

Mr. Ted Redding USDOE Zone 1 Bldg. 652, Room 2 M/S NTS 273 Mercury, NV 89023

Dear Mr. Redding:

On February 20, 2003, one water sample (SDG V1899) was received for analysis at the Sanford Cohen and Associates (SC&A) Southeastern Environmental Laboratory. The chain-of-custody accompanying the sample requested that the sample results be reported within seven days of receipt. The samples were assigned Laboratory Report Identification Code 4024. Enclosed the Sample Data Package containing the results of the analyses for the sample.

If you have any questions please do not hesitate to call.

Sincerely,

thisan

Charles Phillips Vice President

COVER PAGE

Sanford Cohen & Associates Southeastern Environmental Laboratory 1000 Monticello Court Montgomery, Alabama 36117

Laboratory Code: SCA

Contract Number: 30025

Laboratory Report Identification Code: 4024 SDG: V1899

Sample Matrix: Water

Site Sample Numbers	Laboratory Sample Number	
the second s	Gross Alpha/Beta	
250505-V1	NTS03-4024-01	
Laboratory Control Sample (LC)	SCAQC-4024-LC1	
Duplicate (LD)	SCAQC-4024-LC1	
Preparation Blank (PB)	SCAQC-4024-PB	

Comments: There were no problems encountered during sample receiving.

"I certify that this sample data package is in compliance with SOW requirements, both technically and for completeness, other than the conditions detailed above. Release of the data contained in this hard-copy sample data package and the computer-readable EDD, as applicable, submitted on diskette or by modern, has been authorized by the laboratory Manager or the Manager's designee, as verified by the following signature."

tu Sa Signabere

Joe Stinsor Name

Laboratory Manager Title

2/27/03 Date

Bechtel Nevada		SERVICES R	ANALYTICA EQUEST & C	ANALYTICAL LABORATORY UEST & CHAIN OF CUS	ANALYTICAL LABORATORY REQUEST & CHAIN OF CUSTODY RECORD	ORD	Page / of)
Project C. A. M. 2. 6. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	DEMATION	Parent Descent Low	12	REPORT & TURNAROUND INFORMATION	BMATION	SAMPLE INFORMATION	MUDIN
Charge Number, SBD 474 57		Phone 5-6/61	4	Vorado	MS.	Sampling Sile: C.d. J. 2.F.D.F.P.J. The samples submitted contain (check):	hack):
Project Manager & Rol Jackson	rary	Turmaround:	Standard - 14 days Il- Rush Profemary by	26 days Non-rad	Env. 45 Days Rad Env.	Reditactive (kt) -	
	ADC TEM 13		66	200 80 80	14 (non-Rad En	If known, identify contaminants, This information will amone compliance	with application regulations and
	SAMPLE MANAGEMENT INFORMATION	ENT INFORMATI	NO			Pav Item. Analysis. Method	s. Mathod
SDG: (IH)	-	T-u	1 Emv) V1893		(Rad Env)	GR-A-	
Samples submitted are associated with a signed Project SOW Analyses entered here agree with the SOW	d with a signed Project the SOW		DYPES DNO DNIA	MA.		24-	
Subcontract Lab(s) used for this work:		SCAA		-		18/	
NTTS 03-4024	SAMPLING DATE TIME	MATRIX	CONTAINER # Est. Vol 1	MD MS MSD	Pres - Analysis eg. HCI - VOCs	100 PT	
250505-41	2/12/12/200 6	Luter	1-00 1		705	X	
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CUSTODY TRANSFER Sampled/Relinquished (print)	Signature	are	Date/Time	Received/by (print)	(print) A	Simotree	Detertion
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			Retortion Cas	te: ENVS.c(1)			84-0732 (04-02)

0 -

CASE NARRATIVE SDG V1899 Laboratory Report Identification Number: 4024

February 27, 2003

I. Introduction

On February 20, 2003, one water sample was received for analysis at the Sanford Cohen and Associates (SC&A) Southeastern Environmental Laboratory, located in Montgomery, Alabama. The chain-of-custody accompanying the sample requested that it be reported within seven days. The samples were analyzed in accordance with the Bechtel Nevada Services Subcontract Task Order Agreement Form, Exhibit B, Statement of Work and Specifications, Rev 1, 1/23/01.

II. Analytical Methodology

The radioanalytical results reported for the sample include the site and laboratory sample identification numbers, collection date, method of analysis, and the quality control samples that were analyzed concurrently. The Samples were analyzed in accordance with the following methods.

Radionuclide	Method Number	Method Name	Counting Method
Gross Alpha	EPA 900.0	Gross Alpha Radioactivity	Gas Proportional Counting
Gross Beta	EPA 900.0	Gross Beta Radioactivity	Gas Proportional Counting

III. Analytical Results

Deficiencies

None.

Matrix Interferences

There were no indications of matrix interference.

Dilutions

No dilutions were required.

Detection Limits

The required detection limits (RDL) were met for all analyses.

Reanalysis

There were no reanalyses.

Deviations from Protocols

There were no deviations from the written protocols and analytical methods.

Contacts with the CTR

There were no contacts with the contract technical representative (CTR) regarding these samples.

IV. Quality Control

Site Samples Used for Quality Control Samples: Gross Alpha, Gross Beta

Site Sample Number	Laboratory Sample Number	Type of Quality Control Analysis Sample
Laboratory Type II Water	SCAQC-4024-LC1	Laboratory Control Sample
250505-V1	SCAQC-4024-LD1	Laboratory Duplicate Sample
Preparation Blank	SCAOC-4024-PB	Preparation Blank

The analytical results of all quality control samples met the acceptance criteria specified in the SOW.

Sincerely,

alsa

Joe Stinson Laboratory Manager

2/27/03 Date

Sanford Cohen & Associates Southeastern Environmental Laboratory

Radioanalytical Results

Report Identification Number: V1899

Project Name: Site Sample ID:	Bechtel Nevada 250505-V1	Chain-of-C	Custody Number:	NONE	Matric:	Water
Other Sample ID:			Collection Date: Batch Number:	2/18/2003 10:00:00 A 4024	Date Received: Laboratory Code:	2/20/2003 SCA
Method Number	Radionuclide	Laboratory Sample ID	Activity (pC/L)		Total Error (pCi/L)	MDA (pCi/L)
EPA 900.0 EPA 900.0	ALPHA BETA	NTS03-4024-01 NTS03-4024-01		2.71 1.45	3.17 2.18	3.78

		Quality Control Sa	mples	
Alpha	Laboratory Control (LC) SCAQC-4024-LC1 SCAQC-4024-LC1	Laboratory Duplicate (LD) SCAQC-4024-LD1 SCAQC-4024-LD1	Matrix Spike (MS)	Preparation Blank (PB) SCAQC-4024-PB SCAQC-4024-PB

1000 Monticello Court * Montgomery, Alabama * 36117 * 334.272.2234 * FAX 334.213.0407



225 Commerce Drive + Fort Collins, CO 80524 + (800) 443-1511 + (970) 490-1511 + FAX (970) 490-1522

February 10, 2003

Mr. Ted Redding Bechtel Nevada US DOE Zone 1, Bldg 652, Rm 2, M/S NTS273 Mercury NV 89023

RE: Paragon Workorder: 03-01-130 Client Project Name: CAU 262 Client Project Number: V1860

Dear Mr. Redding:

Two solid samples were received from Bechtel Nevada on January 28, 2003. The samples were scheduled for Gross Alpha/Beta (pages 1-147) and Gamma Spectroscopy (pages 1-122) analyses. The results for these analyses are contained in the enclosed reports.

Thank you for your confidence in Paragon Analytics, Inc. Should you have any questions, please call.

Sincerely,

Paragon Analytics, Inc. Ken Campbell Project Manager

KDC/hc Enclosure: Report

An 'Employee Owned Small Business

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Bechtel Nevada		SE	SERVICES RI	AN	ANAL YTICAL LABORATORY UEST & CHAIN OF CUS	ALLA	V OF	ORY	ANALYTICAL LABORATORY S REQUEST & CHAIN OF CUSTODY RECORD	CORL	~			Page	of 1
PROJECTION INFORMATION	MATION SWATION	8502		A	5	TODIO	IND INFO	RMA IIO				SAMP	SAMPLE INFORMATION	NOUN	
lumber:	10.53		+	6169	Fax	Fix S- 7241	171	WS: NY	10714	Τ	mes off	stimutur seit	ed contain (ct	04-10-07-000	ò
Project Manager BRAD JACKSON	(vos		Turnaround:	Standard Rush Pm	- 14 days Il liminary by	L'alda	S Non-rad	Em. 45	Bays Rad Erv.	Γ	C Radio	wactive (list)	ination	Radioactive (Nt) - Unknown contamination	
1964 -2 1 CEO-2 HOUND		NTS 306	01 02 07 014 (non-Rad Env)		00	Dia		14 10	14 128 (Roched Env)		If known, The inform	If known, identify contaminants. This information will ensure compliance	aminants.	If known, identify contaminants. $\leq E n T Q \in E$ This information will amone compliance with applicable regulat	n an
	SAMPLE	MANAGE	SAMPLE MANAGEMENT INFORMATION	N						1		av Item.	Pav Item. Analysis.	Pav Item. Analysis. Method	
SDG: (IH)			(Non-Rad Env)	Env)	VIS	2 co	(P O (Rad Env)	ad Emv)		N65-	64-4		-		
Samples submitted are associated with a signed Project SOW Analyses entered here sume with the SOW	with a sign	ed Proje		RIVes [NO NO	Non D					611		-		
If not, identify the variation:			X			4				v	05/		_		
Subcontract Lab(s) used for this work:	rk:	P	PARAGON				1			EC WW	550	-	-		
ID/DESCRIPTION	SAMPLING DATE TIN	TIME	MATRIX	NOO #	CONTAINER # Est. Vol	QW	0C MS M	MSD eg.	Pres - Analysis eg. HCI - VOCs	109	1000		-		
250505-4416-2	1/22/03 0945		304.10	1	Tras		-	2	20%	×	×		+		
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Paragon Analytics, Inc. Radiochemistry Case Narrative Gross Alpha/Beta

Bechtel Nevada CAU 262 / V1860 PAI WO 0301130

- 1. This report consists of two solid samples received by Paragon on 01/28/03.
- 2. These samples were prepared according to Paragon Analytics, Inc. procedure PAI SOP702R15.
- The samples were analyzed for gross alpha and beta activity by gas flow proportional counting according to Paragon Analytics, Inc. procedure PAI SOP724R7. The analyses were completed on 02/03/03. Gross alpha results are referenced to ²⁴¹Am. Gross beta results are referenced to ⁹⁰Sr/Y.
- 4. The analysis results for these samples are reported on a dry weight basis in units of pCi/gram.
- 5. Due to current software limitations, the DER determinations in this report were calculated using the 2 sigma TPU. The SOW indicates that the 1 sigma TPU be used in the DER determination. However, the requested DER limit of less than 3 at the 1 sigma level (which is equivalent to 1.5 at the 2 sigma level) was achieved. Data quality is not affected.
- All of the solid samples associated with this work order were flamed, as prescribed in EPA Methods 900.0 and 9310 for samples which demonstrate hygroscopicity. This could reduce the beta activity if the samples contained ¹³⁷Cs, or other beta emitters, that may be volatile under the conditions associated with flaming.
- No anomalous situations were encountered during the preparation or analysis of these samples. All quality control criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

John Petrovic Radiochemistry Instrument Technician

Radiochemistry Final Data Review

2603 Date

Date

PARAGON ANALYTICS, INC.

000001

Sample Results Summary

Client Name: Bechtel Nevada Client Project Name: CAU 262 Client Project Number: V1860

Laboratory Name: Paragon Analytics, inc. PAI Work Order: 0301130

Reported on: Tuesday, February 04, 2003 12:53:26 Page: 1 of 1

Lab Sample ID	Client Sample ID	Test	Nuclide	Result +/- 2 s TPU	MDC	Units	Matrix	Prep Batch	Date Analyzed	Flags
0301130-1	250505-WASTE-2	RD_GAB	GrAlpha	3.60E+00 +/- 9.66E-01	6.47E-01	pCi/g	Solid	AB00725	2/3/03	11
0301130-1	250505-WASTE-2	RD_GAB	GrBeta	3.96E+00 +/- 9.26E-01	9.46E-01	pCi/g	Solid	AB00725	2/3/03	15
0301130-2	2504068-WASTE-1	RD_GAB	GrAlpha	4.59E+00 +/- 9.46E-01	3.53E-01	pillig	Solid	AB00725	2/3/03	5
0301130-2	2504068-WASTE-1	RD_GAB	GrBeta	4.55E+00 +/- 8.61E-01	6.73E-01	pCilg	Solid	AB00725	2/3/03	11

Comments:

Data Package ID: ABS0301130-1

Qualifiers/Flags:

U - Result is leas than the sample specific MDC.

U.T. Bound is less then Requested MDC, greater than sample specific MDC. VT 255mical Vield is in control of 100-110%. Quantitative Vield is assumed. V2 (255mical Vield outside default limit).

Peragon Analytics Inc.

TPU - Total Propegated Uncertainty (see PAI SOP 743) Abbreviations:

MDC - Minimum Detectable Concentration (see PAI SOP 709)



Paragon Analytics, Inc.

Radiochemistry Case Narrative Gamma Spectroscopy

Bechtel Nevada CAU 262 / V1860

Paragon Work Order 0301130

- 1. This report consists of analysis results for two solid samples received by Paragon on 1/28/03. The analysis results for these samples are reported on a 'dry weight' basis in units of pCi/gram.
- 2. These samples were prepared according to Paragon Analytics, Inc. procedure PAI SOP739R5.
- The samples were analyzed for the presence of gamma emitting radionuclides according to 3. Paragon Analytics, Inc. procedure PAI SOP713R7. The analyses were completed on 1/31/03.
- The samples were analyzed using Seeker Version 2.2, which is a product of Vertechs 4. Software Solutions, Inc.
- Due to current software limitations, the DER determinations in this report were calculated 5. using the 2 sigma TPU. The SOW indicates that the 1 sigma TPU be used in the DER determination. However, the requested DER limit of less than 3 at the 1 sigma level (which is equivalent to 1.5 at the 2 sigma level) was achieved. Data quality is not affected.
- No problems were encountered with either the client samples or the associated quality 6. control samples. All quality control criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

1e- 20

Radiochemistry Instrument Technician

Radiochemistry Final Data Review

1-3-03 Date

PARAGON ANALYTICS, INC.

. 000001

Method PAI 713R7

Sample Results

	Client Name: Bechtel nt Project Name: CAU 26 Project Number: V1860		Laborato	Page: 1 of 4 borted on: Monday, 18:08:56 bry Name: Paragor brk Order: 0301130	Analytics, Inc.
0.000	D:250505-WASTE-2 D:0301130-1	Sample Matrix: Solid Date Prepared: 30-Jan-03 Prep SOP: PAI 739R5 Prep Batch: GS01875	Date Collected: 23-J Date Analyzed: 31-J Analytical SOP: PAI Spectrum Code: 030	an-03 F 713R7 Count	final Aliquot: 101.5 g Report Basis: Dry Weigh t Time (min.): 30 Library: GAM-A-001
	Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
	Ac-228	1.05E+00 +/- 3.91E-01	7.58E-01	pCi/g	
	Am-241	3.28E-01 +/- 6.64E-01	1.13E+00	pCi/g	U
	Ce-144	-2.02E-02 +/- 3.65E-01	6.64E-01	pCi/g	U
	Co-60	-7.97E-02 +/- 1.20E-01	2.57E-01	pCi/g	U
	Cs-134	6.85E-03 +/- 9.19E-02	1.68E-01	pCi/g	U
	Cs-137	3.36E-02 +/- 9.23E-02	1.64E-01	pCi/g	U
	Eu-152	5.22E-01 +/- 4.48E-01	5.68E-01	pCi/g	U
	Eu-154	-1.13E-01 +/- 4.51E-01	9.39E-01	pCi/g	U
	Eu-155	2.32E-01 +/- 2.49E-01	3.97E-01	pCi/g	U
	K-40	2.19E+01 +/- 5.00E+00	1.97E+00	pCi/g	
	Pb-212	1.19E+00 +/+ 3.24E-01	3.12E-01	pCi/g	
	Pm-144	-7.66E-03 +/- 9.57E-02	1.80E-01	pCi/g	U
	Pm-146	7.53E-02 +/- 1.15E-01	1.91E-01	pCi/g	U
	Ru-106	-2.81E-01 +/- 8.45E-01	1.65E+00	pCi/g	U
	Sb-125	3.06E-02 +/- 2.36E-01	4.26E-01	pCi/g	U
	Th-234	2.31E+00 +/- 1.80E+00	2.79E+00	pCi/g	U
	U-235	2.36E-01 */- 3.94E-01	6.59E-01	pCl/g	U
	Y-88	3.90E-02 +/- 9.58E-02	1.71E-01	pCi/g	U

Method PAI 713R7

Sample Results

	Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
120121	D:250505-WASTE-2 D:0301130-1	Sample Matrix: Solid Date Prepared: 30-Jan-03 Prep SOP: PAI 739R5 Prep Batch: GS01875	Date Collected: 23-Ja Date Analyzed: 31-Ja Analytical SOP: PAI Spectrum Code: 0301	an-03 F 713R7 Coun	Final Aliquot: 101.5 g Report Basis: Dry Weight t Time (min.): 30 Library: GAM-A-001.
	Client Name: Bechtel It Project Name: CAU 26 Project Number: V1860		Laborato	orted on: Monday 18:08:50 ory Name: Parago ork Order: 0301130	n Analytics, Inc.

Comments:

Qualifiers/Flags:

U - Result is less than the sample specific MDC or less than the associated TPU.

Y1 - Chemical Yield is in control at 100-110%. Quantitative Yield is assumed.

Y2 - Chemical Yield outside default limits.

LT - Result is less than Requested MDC, greater than sample specific MDC.

SQ - Spectral quality prevents accurate quantitation.

SI - Nuclide identification and/or quantitation is tentative.

TI - Nuclide identification is tentative.

R - Nuclide has exceeded 8 halflives.

Abbreviations:

TPU - Total Propagated Uncertainty (sea PAJ SOP 743)

MDC - Minimum Dielectable Concentration (see PAI SOP 709)

Method PAI 713R7

Sample Results

Client Name: Bechtel ent Project Name: CAU 26 Project Number: V1860		Laborate	Page: 3 of 4 ported on: Monday 18:08:50 pry Name: Paragon prk Order: 0301130	n Analytics, Inc.
ID:250406B-WASTE-1 ID:0301130-2	Sample Matrix: Solid Date Prepared: 30-Jan-03 Prep SOP: PAI 739R5 Prep Batch: GS01875	Date Collected: 23-J Date Analyzed: 31-J Analytical SOP: PAI Spectrum Code: 030	an-03 F 713R7 Count	Final Aliquot: 88.70 g Report Basis: Dry Weigh t Time (min.): 30 Library: GAM-A-001.
Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Ac-228	1.96E+00 +/- 6.98E-01	1.11E+00	pCl/g	
Am-241	5.01E-01 +/- 7.08E-01	1.17E+00	pCi/g	U
Ce-144	1.12E-01 +/- 5.39E-01	9.43E-01	pCi/g	U
Co-60	-8.34E-02 +/- 1.39E-01	3.08E-01	pCl/g	U
Cs-134	1.10E-02 +/- 1.14E-01	2.09E-01	pCi/g	U
Cs-137	-5.63E-02 +/- 1.34E-01	2.65E-01	pCi/g	U
Eu-152	-3.50E-01 +/- 5.88E-01	1.36E+00	pCl/g	U
Eu-154	6.87E-01 +/- 7.72E-01	1.21E+00	pCi/g	U
Eu-155	3.90E-01 +/- 3.31E-01	5.10E-01	pCi/g	U
K-40	3.23E+01 +/- 7.33E+00	3.36E+00	pCi/g	
Pb-212	1.81E+00 +/- 4.36E-01	3.26E-01	pCi/g	
Pm-144	1.13E-01 +/- 1.39E-01	2.25E-01	pCi/g	U
Pm-146	1.34E-02 +/- 1.57E-01	2.84E-01	pCi/g	U
Ru-106	-7.52E-01 +/- 1.28E+00	2.53E+00	pCi/g	U
Sb-125	0.00E+00 +/- 2.65E-01	4.96E-01	pCi/g	U
Th-234	-1.56E-01 +/- 2.08E+00	3.63E+00	pCi/g	U
U-235	1.04E-04 +/- 5.75E-01	1.02E+00	pCi/g	U
Y-88	-1.83E-02 +/- 1.51E-01	2.92E-01	pCi/g	U

Data Package ID: GSS0301130-1

Method PAI 713R7

Sample Results

Target Nucli	le Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Field ID:250406B-WASTE	1 Sample Matrix: Solid Date Prepared: 30-Jan-03 Prep SOP: PAI 739R5 Prep Batch: GS01875	Date Collected: 23-Ja Date Analyzed: 31-Ja Analytical SOP: PAI 3 Spectrum Code: 0301	in-03 F 713R7 Count	Final Aliquot: 88.70 g Report Basis: Dry Weight t Time (min.): 30 Library: GAM-A-001.0
Client Name: B Client Project Name: C Client Project Number: V	AU 262		18:08:56 ry Name: Paragor rk Order: 0301130	Analytics, Inc.
Clinet Name - D		Rep	100 C 100	February 03, 2003

Comments:

Qualifiers/Flags:

U - Result is less than the sample specific MDC or less than the associated TPU.

V1 - Chemical Yield is in control at 100-110%. Quantitative Yield is assumed.

Y2 - Chemical Yield outside default limits.

LT - Result is less than Requested MDC, graster than sample specific MDC.

SQ - Spectral quality prevents accurate quantitation.

SI - Nuclide identification and/or quantitation is tentative.

TI - Nuclide identification is tentative.

R - Nuclide has exceeded 8 haffives.

Abbreviations:

TPU - Total Propagated Uncertainty (see PAI SOP 743)

MDC - Minimum Delectable Concentration (see PAI SOP 709)



PARAGON ANALYTICS, INC.

225 Commerce Drive + Fort Collins, CO 80524 + (800) 443-1511 + (970) 490-1511 + FAX (970) 490-1522

February 20, 2003

Mr. Ted Redding Bechtel Nevada US DOE Zone 1, Bldg 652, Rm 2.M/S NTS273 Mercury, NV, 89023

RE: Paragon Workorder: 03-02-018 Client Project Name: CAU 262 Client Project Number: V1885

Dear Mr. Redding:

One soil sample was received from Bechtel Nevada on February 7, 2003. The samples were scheduled for Gross Alpha/Beta (pages 1-147) and Gamma Spectroscopy (pages 1-108) analyses. The results for these analyses are contained in the enclosed reports.

Thank you for your confidence in Paragon Analytics, Inc. Should you have any questions, please call.

Sincerely,

Paragon Analytics, Inc. Ken Campbell Project Manager

KDC/hc Enclosure: Report

An 'Employee Owned Small 'Business

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0302018



Paragon Analytics, Inc. Radiochemistry Case Narrative Gross Alpha/Beta

Bechtel Nevada CAU 262 / V1885 PAI WO 0302018

- 1. This report consists of one soil sample received by Paragon on 2/7/03.
- This sample was prepared according to Paragon Analytics, Inc. procedure PAI SOP702R15.
- The sample was analyzed for gross alpha and beta activity by gas flow proportional counting according to Paragon Analytics, Inc. procedure PAI SOP724R7. The analyses were completed on 2/13/03. Gross alpha results are referenced to ²⁴¹Am. Gross beta results are referenced to ⁹⁰Sr/Y.
- 4. The analysis results for this sample are reported on a dry weight basis in units of pCi/gram.
- This sample was flamed, as prescribed in EPA Methods 900.0 and 9310 for samples which demonstrate hygroscopicity. This could reduce the beta activity if the sample contained ¹³⁷Cs, or other beta emitters, that may be volatile under the conditions associated with flaming.
- 6. Due to current software limitations, the DER determinations in this report were calculated using the 2 sigma TPU. The SOW indicates that the 1 sigma TPU be used in the DER determination. However, the requested DER limit of less than 3 at the 1 sigma level (which is equivalent to 1.5 at the 2 sigma level) was achieved. Data quality is not affected.
- No further anomalous situations were noted during the preparation and analysis of this sample. All remaining quality control criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

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Clare Lenich Radiochemistry Instrument Technician

Radiochemistry Final Data Review

Date Date

PARAGON ANALYTICS, INC.

Sample Results Summary

Client Name: Bechtel Nevada Client Project Name: CAU 262 **Client Project Number: V1885**

Laboratory Name: Paragon Analytics, Inc. PAI Work Order: 0302018

Reported on: Thursday, February 13, 2003 14:33:57 Page: 1 of 1

Lab Sample ID	Client Sample ID	Test	Nuclide	Result +/- 2 s TPU	MDC	Units	Matrix	Prep Batch	Date Analyzed	Flags
0302018-1	250512-WASTE-2	RD_GAB	GrAlpha	4,79E+00 +/- 1,44E+00	1.12E+00	pCilg	Soll	AB00738	2/13/03	LI
0302018-1	250512-WASTE-2	RD_GAB	GrBeta	3.73E+00 +/- 1.32E+00	1.77E+00	pCilg	Soll	AB00738	2/13/03	5

Comments:

Data Package ID: ABS0302018-1

Qualifiers/Flags:

U - Result is less than the sample specific MDC.

LT - Result is less then Requested MDC, greater than sample specific MDC.

MDC - Minimum Detectable Concentration (see PAI SOP 709)

TPU - Total Propagated Uncertainty (see PAI SOP 745)

Abbreviations:

VF-Chemical Yead is in control at 100-110%. Quantitative Yead is assumed

Paragon Analytics Inc.



Paragon Analytics, Inc.

Radiochemistry Case Narrative Gamma Spectroscopy

Bechtel Nevada CAU 262 / V1885

Paragon Work Order 0302018

- This report consists of analysis results for one soil sample received by Paragon on 2/7/03. The analysis results for this sample are reported on a 'dry weight' basis in units of pCi/gram.
- This sample was prepared according to Paragon Analytics, Inc. procedure PAI SOP739R5.
- The sample was analyzed for the presence of gamma emitting radionuclides according to Paragon Analytics, Inc. procedure PAI SOP713R7. The analyses were completed on 2/11/03.
- The samples were analyzed using Seeker Version 2.2, which is a product of Vertechs Software Solutions, Inc.
- 5. Due to current software limitations, the DER determinations in this report were calculated using the 2 sigma TPU. The SOW indicates that the 1 sigma TPU be used in the DER determination. However, the requested DER limit of less than 3 at the 1 sigma level (which is equivalent to 1.5 at the 2 sigma level) was achieved. Data quality is not affected.
- 6. Duplicate analysis results elevated above the DER limit of 1.50 have been flagged as "W". For gamma spectroscopic analysis SOP 715R12 states that 75% of the nuclides must be within the 2 sigma control limit to meet DER or RPD requirements. Elevated DER may be attributable to sample non-homogeneity.
- 7. Activity concentrations above the 2σ TPU are reported in some instances where minimum nuclide identification criteria are not met. Such tentative identifications result when the software attempts to calculate net activity concentrations for analytes where either one or both of the following criteria are not satisfied: the 'diagnostic' peak for a nuclide must be identified above critical level (generally the most abundant, interference-free photopeak), or the minimum library peak tolerance of 75% must be attained. These data have been flagged with a "TF" qualifier.
- 8. There are cases where the magnitude of the negative activity is greater than the 2 sigma TPU. The analyst's review of the data does not indicate a problem with the instrument data or the subsequent reporting systems. The data quality is not believed to be affected and the results are submitted without qualification. Under typical conditions, where background level sample data is normally distributed and analyzed by paired observations, this event is likely to occur at least 2.5% of the time.

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PARAGON ANALYTICS, INC.

No problems were encountered with either the client samples or the associated quality 9. control samples. All quality control criteria were met.

The data contained in the following report have been reviewed and approved by the personnel listed below. In addition, Paragon Analytics, Inc. certifies that the analyses reported herein are true, complete and correct within the limits of the methods employed.

Radiochemistry Instrument Technician

Radjochemistry Final Data Review

2-13-03 Date Date

Method PAI 713R7

Sample Results

Client Name: Bechtei nt Project Name: CAU 26 Project Number: V1885		Laborato	Page: 1 of 2 orted on: Wedness 17:43:16 ory Name: Paragon ork Order: 0302018	Analytics, Inc.
D:250512-WASTE-2 D:0302018-1	Sample Matrix: Soil Date Prepared: 11-Feb-03 Prep SOP: PAI 739R5 Prep Batch: GS01894	Date Collected: 05-F Date Analyzed: 11-F Analytical SOP: PAI Spectrum Code: 0302	eb-03 R 713R7 Count	Final Aliquot: 100.0 g Report Basis: Dry Weigh I Time (min.): 30 Library: GAM-A-001
Target Nuclide	Result +/- 2 s TPU	MDC	Reporting Units	Lab Qualifier
Ac-228	1.31E+00 +/- 3.90E-01	6.64E-01	pCl/g	
Am-241	-3.34E-01 +/- 2.96E-01	5.44E-01	pCi/g	U
Ce-144	2.07E-01 +/- 3.54E-01	5.89E-01	pCi/g	U
Co-60	-3.35E-02 +/- 7.98E-02	1.53E-01	pCi/g	U
Cs-134	-1.01E-01 +/- 1.18E-01	2.19E-01	pCi/g	U
Cs-137	2.13E-01 +/- 1.05E-01	1.42E-01	pCi/g	TI
Eu-152	-1.91E-01 +/- 4.25E-01	8.11E-01	pClig	U
Eu-154	-B.14E-02 +/- 4.74E-01	8.62E-01	pCl/g	U
Eu-155	9.49E-02 +/- 2.12E-01	3.57E-01	pCi/g	U
K-40	2.61E+01 +/- 5.10E+00	2.42E+00	pCi/g	
Pb-212	1.26E+00 +/- 2.90E-01	2.51E-01	pCi/g	
Pm-144	1.07E-02 +/- 8.26E-02	1.44E-01	pCi/g	U
Pm-146	6.35E-02 */- 8.54E-02	1.40E-01	p/Ci/g	U
Ru-106	-4.97E-01 +/- 7.27E-01	1.35E+00	pCl/g	U
Sb-125	-8.62E-02 +/- 1.71E-01	3.23E-01	pCi/g	U
Th-234	6.17E-01 +/- 1.01E+00	1.67E+00	pCi/g	U
U-235	4.69E-02 +/- 3.71E-01	6.39E-01	pCi/g	U
Y-88	-7.28E-02 +/- 9.62E-02	1.81E-01	pCi/g	U

Data Package ID: GSS0302018-1

Method PAI 713R7

Sample Results

Client Name: Bechtel Nevada Reported on: Wednesday, February 12, 2003 Client Project Name: CAU 262 17:43:16 Client Project Number: V1885 PAI Work Order: 0302018 Fleid ID: 250512-WASTE-2 Sample Matrix: Date Collected: 05-Feb-03 Final Allquot: 100.0 g Lab ID: 0302018-1 Prep SOP: PAI 739R5 Analytical SOP: PAI 713R7 Count Time (min.): 30 Prep Batch: GS01894 Spectrum Code: 030245D01A Library: GAM-A.001.U
Client Name: Bechtel Nevada 17:43:16 Client Project Name: CAU 262 Laboratory Name: Paragon Analytics, Inc. Client Project Number: V1885 PAI Work Order: 0302018

Comments:

Qualifiers/Flags:

U - Result is less than the sample specific MOC or less than the associated TPU.

Y1 - Chemical Yield is in control at 100-110%. Quantitative Yield is assumed.

Y2 - Chemical Yield outside default limits.

LT - Result is less than Requested MDC, greater than sample specific MDC.

SO - Spectral quality prevents accurate quantitation.

SI - Nuclide identification and/or quantitation is tentative.

TI - Nuclide Identification is tentative.

R - Nuclide has exceeded 8 halflives.

Abbreviations:

TPU - Total Propagated Uncertainty (see PAI SOP 743)

MDC - Minimum Detectable Concentration (see PAI SOP 709)

CLOSURE RE PORT - CAU 262 Section: Appendix B Revision: 1 Date: July 2003

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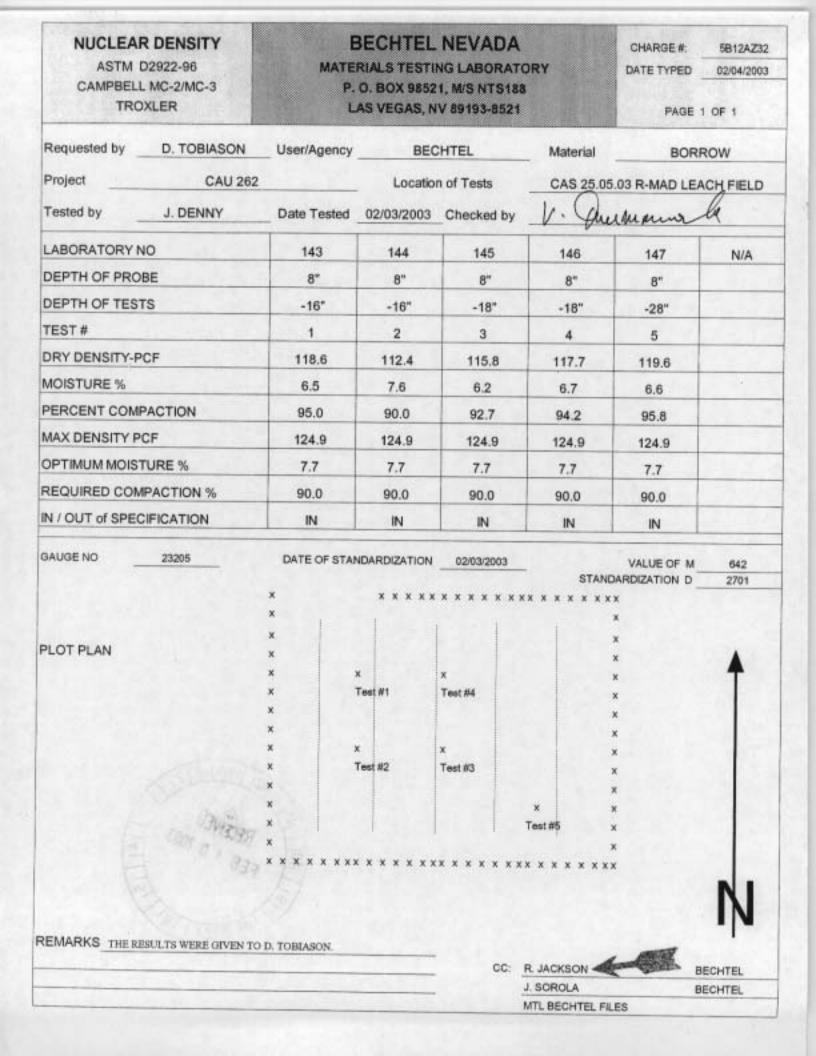
CLOSURE RE PORT - CAU 262 Section: Appendix C Revision: 1 Date: July 2003

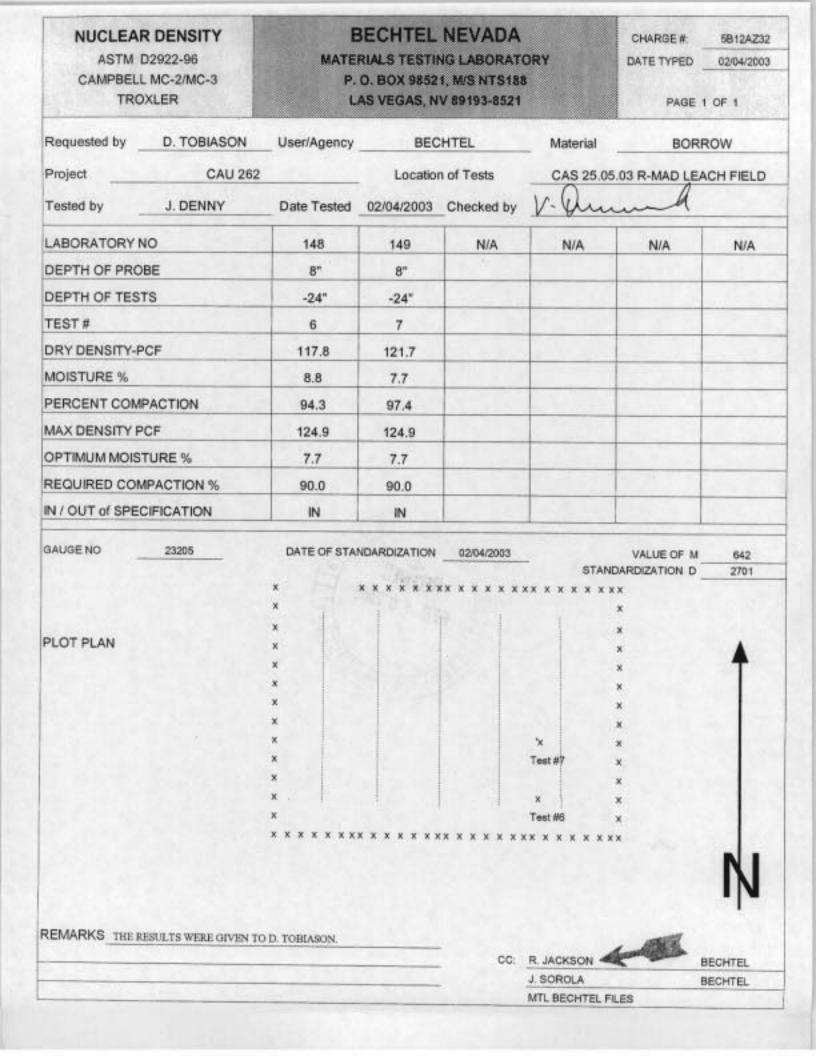
APPENDIX C

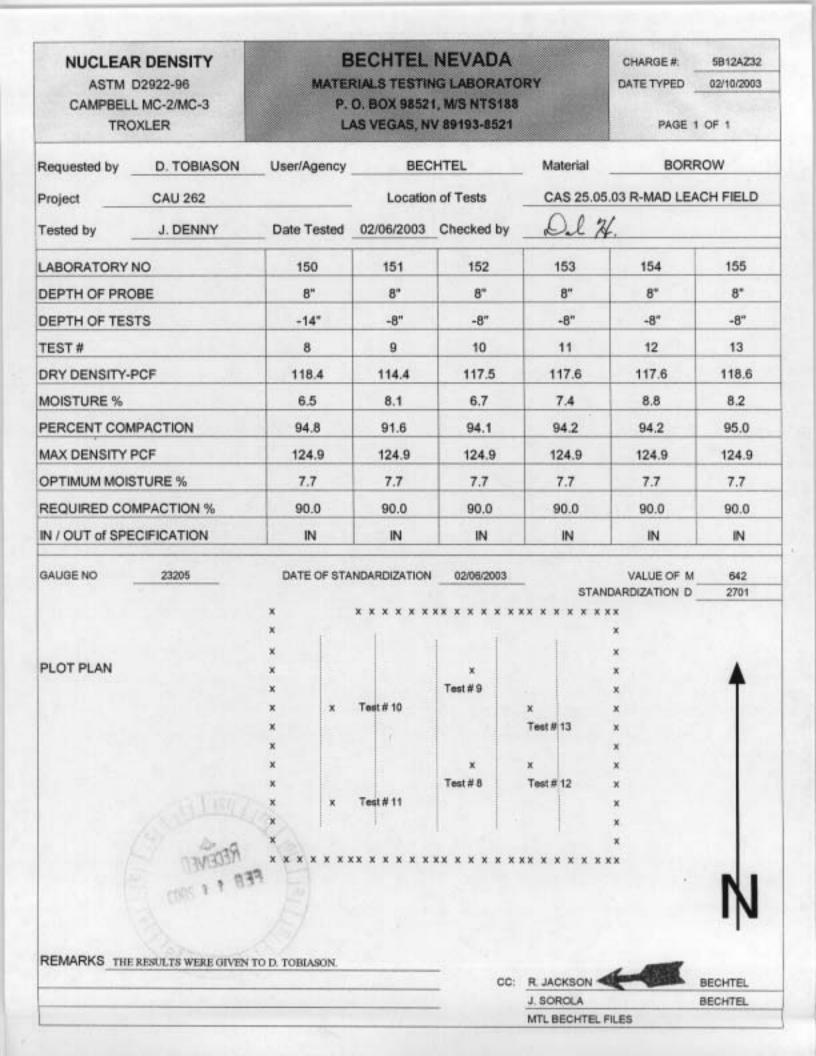
SOIL COMPACTION TEST RESULTS

CLOSURE RE PORT - CAU 262 Section: Appendix C Revision: 1 Date: July 2003

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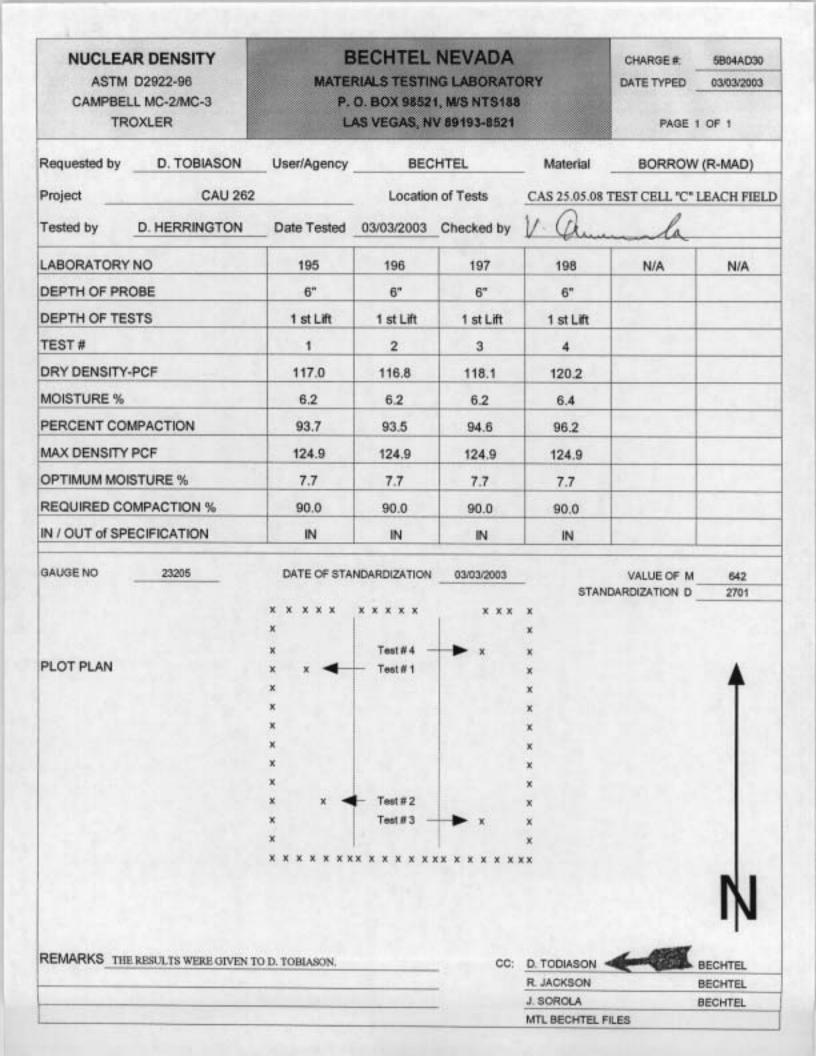


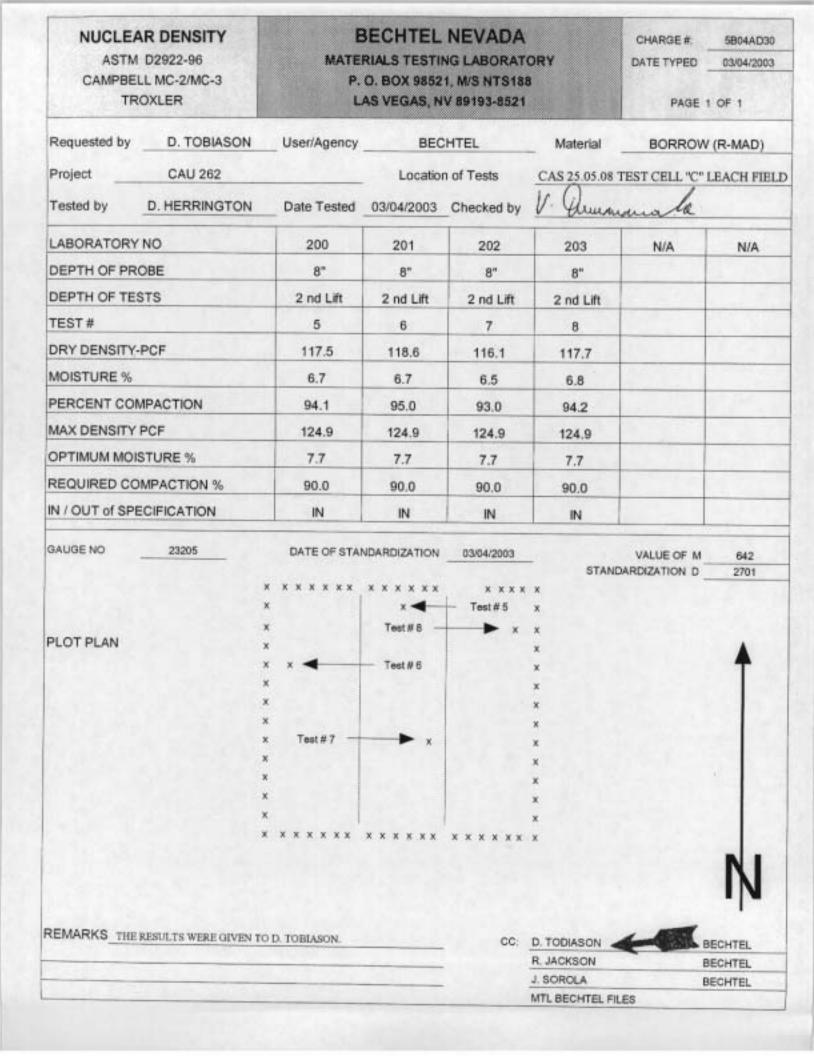


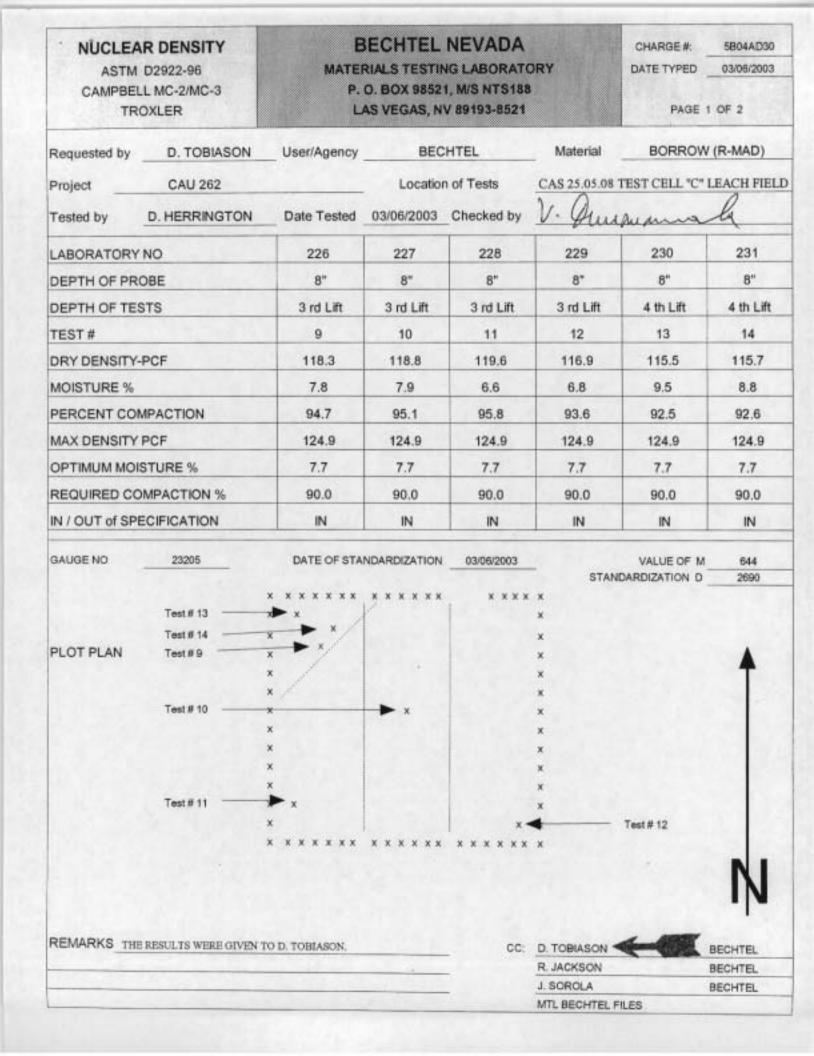
NUCLEAR DENSITY ASTM D2922-96 CAMPBELL MC-2/MC-3 TROXLER	MATEI P.	BECHTEL NEVADA MATERIALS TESTING LABORATORY P. O. BOX 98521, M/S NTS188 LAS VEGAS, NV 89193-8521				5804AD30 02/11/2003 1 OF 1
Requested by D. TOBIASON	User/Agency	User/Agency BECHTEL		Material	BORROW	
Project CAU 262		Location	n of Tests	CAS 25.0	5.03 R-MAD LE	ACH FIELD
Tested by J. DENNY	Date Tested	02/11/2003	Checked by	Del	¥.	
LABORATORY NO	165	166	167	168	N/A	N/A
DEPTH OF PROBE	8"	8"	8"	8"		
DEPTH OF TESTS	Grade	Grade	Grade	Grade		
TEST #	14	15	16	17		
DRY DENSITY-PCF	118.3	119.6	118.3	116.6		
MOISTURE %	6.2	8.6	10.1	7.7		
PERCENT COMPACTION	94.7	95.8	94.7	93.4		
MAX DENSITY PCF	124.9	124.9	124.9	124.9		
OPTIMUM MOISTURE %	7.7	7.7	7.7	7.7		
REQUIRED COMPACTION %	90.0	90.0	90.0	90.0		
IN / OUT of SPECIFICATION	IN	IN	IN	IN		112
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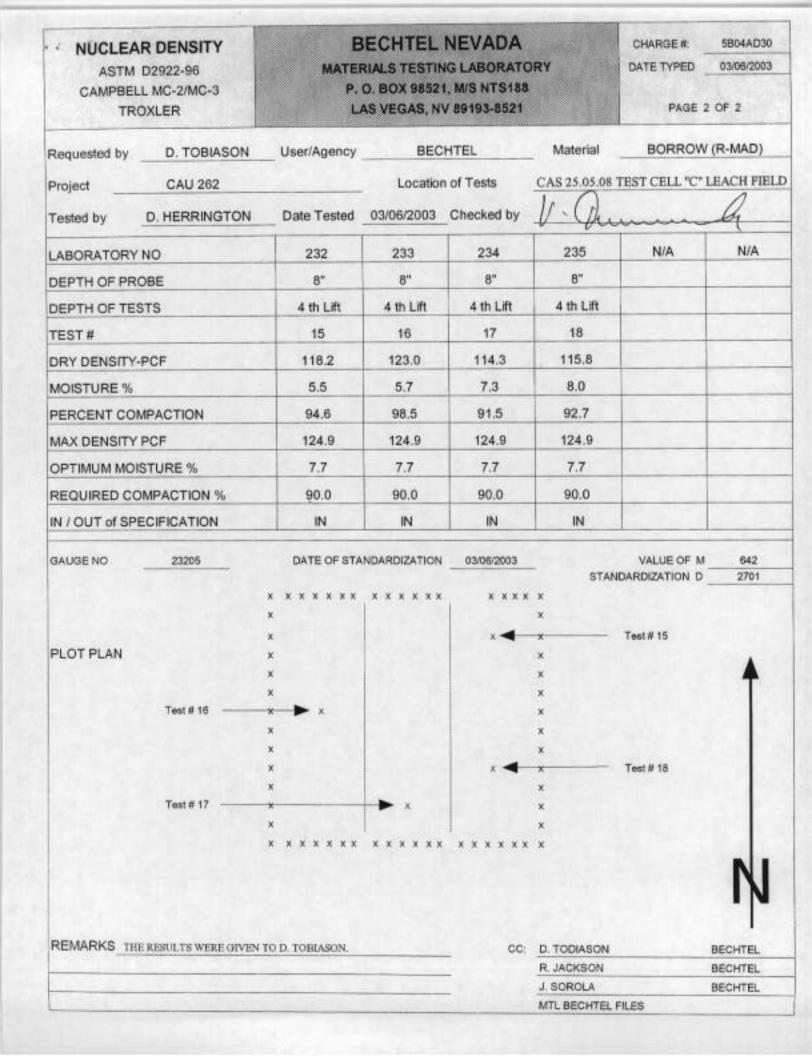
NUCLEAR DENSITY ASTM D2922-96 CAMPBELL MC-2/MC-3 TROXLER	BECHTEL NEVADA MATERIALS TESTING LABORATORY P. O. BOX 98521, M/S NTS188 LAS VEGAS, NV 89193-8521				CHARGE # DATE TYPED PAGE	5804AD30 02/25/2003 1 OF 1
Requested by D. TOBIASON	User/Agency	BEC	HTEL	Material	BOF	ROW
Project CAU 262	1.	Location	n of Tests	CAS 25.0	5.03 R-MAD LE	ACH FIELD
Tested by D. HERRINGTON	_ Date Tested	02/24/2003	Checked by	V-Gu	mlu	
LABORATORY NO	182	183	N/A	N/A	N/A	N/A
DEPTH OF PROBE	6*	6"				
DEPTH OF TESTS	Grade	Grade				
TEST #	18	19				
DRY DENSITY-PCF	118.6	117.4				
MOISTURE %	4.1	5.5		1		
PERCENT COMPACTION	95.0	94.0				
MAX DENSITY PCF	124.9	124.9				
OPTIMUM MOISTURE %	7.7	7.7				1
REQUIRED COMPACTION %	90.0	90.0				
IN / OUT of SPECIFICATION	IN	IN				1000
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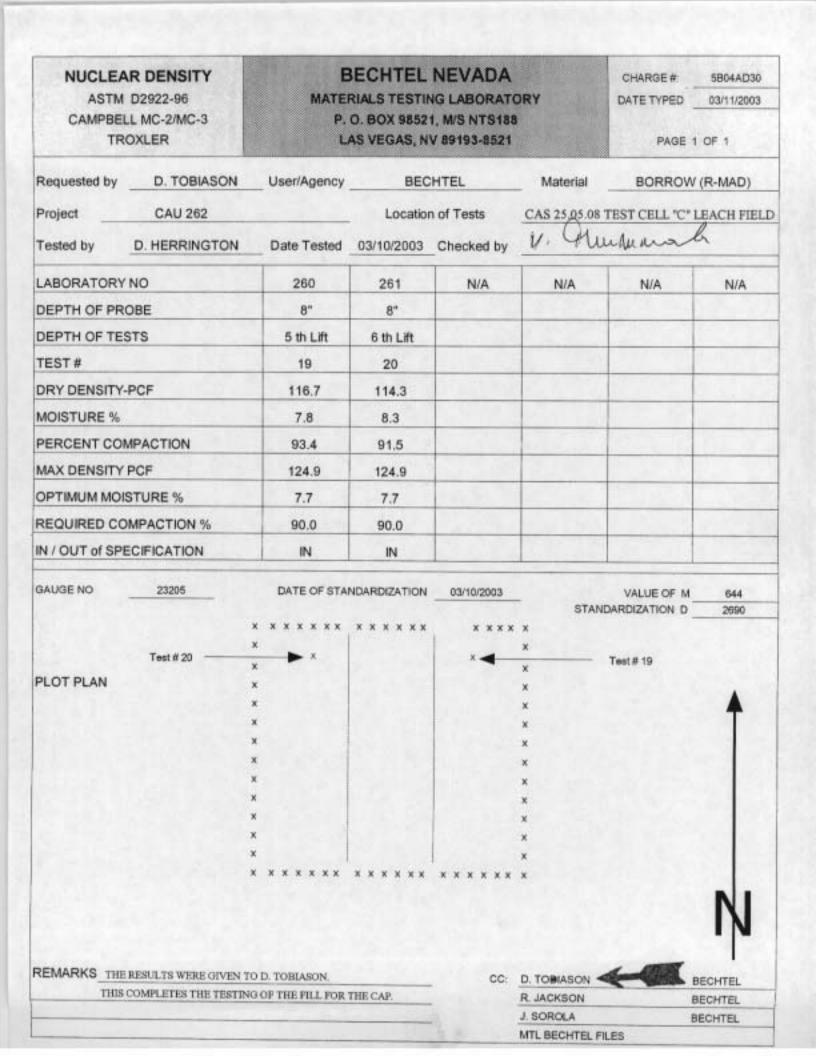
NUCLEAR DENSITY ASTM D2922-96 CAMPBELL MC-2/MC-3 TROXLER		BECHTEL NEVADA MATERIALS TESTING LABORATORY P. O. BOX 98521, M/S NTS188 LAS VEGAS, NV 89193-8521				CHARGE #: DATE TYPED PAGE	5804AD30 04/03/2003 1 OF 1
Requested by D. TOBIASON		User/Agency BECHTEL		Material	BORROW		
Project	CAU 262		Location of Tests C		CAS 25.0	5.03 R-MAD LEACH FIELD	
	D. HERRINGTON	Date Tested	04/02/2003	_Checked by	V.Qu	m	
LABORATORY	10	442	N/A	N/A	N/A	N/A	N/A
DEPTH OF PRO	BE	4*					
DEPTH OF TES	TS	Final Grade					
TEST #		20					
DRY DENSITY-	PCF	115.9					
MOISTURE %		5.0					
PERCENT COM	PACTION	92.8					
MAX DENSITY F	PCF	124.9					
OPTIMUM MOIS	TURE %	7.7					
REQUIRED CO	MPACTION %	90.0					
IN / OUT of SPE	CIFICATION	IN					
GAUGE NO	23205		NDARDIZATION	• <u>• • • • • • • • • • • • • • • • • • </u>		VALUE OF M NDARDIZATION D	
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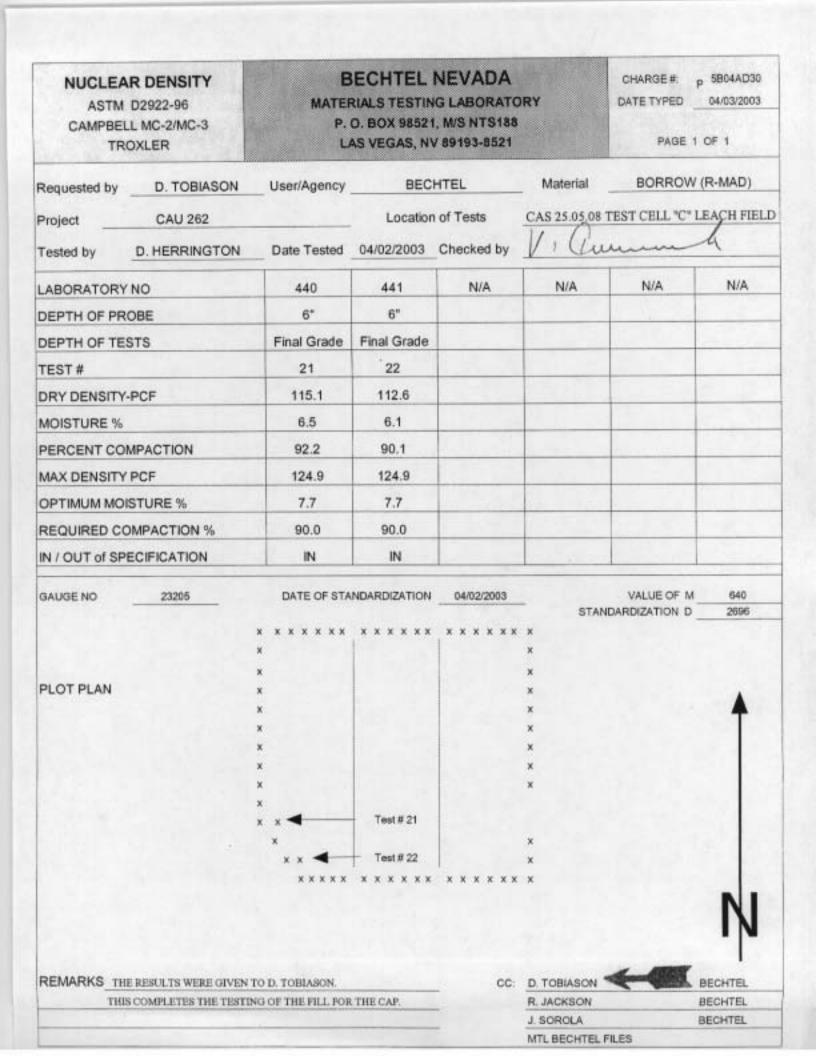












CLOSURE RE PORT - CAU 262 Section: Appendix D Revision: 1 Date: July 2003

APPENDIX D

RADIOLOGICAL SURVEY REPORTS

CLOSURE RE PORT - CAU 262 Section: Appendix D Revision: 1 Date: July 2003

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CLOSURE RE PORT - CAU 262 Section: Appendix D Revision: 1 Date: July 2003

RADIOLOGICAL SURVEY REPORT LOG

CAS NUMBER	RADIOLOGICAL SURVEY REPORT NUMBER
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25-05-06	03-ER-25-41, 03-ER-25-191, 03-ER-25-215, 03-ER-25-644
25-05-08	03-ER-25-151, 03-ER-25-324, 03-ER-25-644

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CLOSURE RE PORT - CAU 262 Section: Appendix D Revision: 1 Date: July 2003

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CLOSURE RE PORT - CAU 262 Section: Appendix E Revision: 1 Date: July 2003

APPENDIX E

WASTE DISPOSITION DOCUMENTATION

CLOSURE RE PORT - CAU 262 Section: Appendix E Revision: 1 Date: July 2003

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Bechtel Nevada		Landfill I					121.5
SWO USE (Circle C			23	1	K	9	LANDFILL
For waste characteriza	ation, approva	l, and/or assist	ance, contact	Solid	Waste Ope	ration (S	WO) at 5-7898.
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SOLID WASTETE ADAMO SYSTEM

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Waste Management System - [Sanitation Module]

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-	0554	~		
R	0555	Spinnard 184506	5-2-6	VIENING CAUCEY TRASH
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Please refer to instructions on page

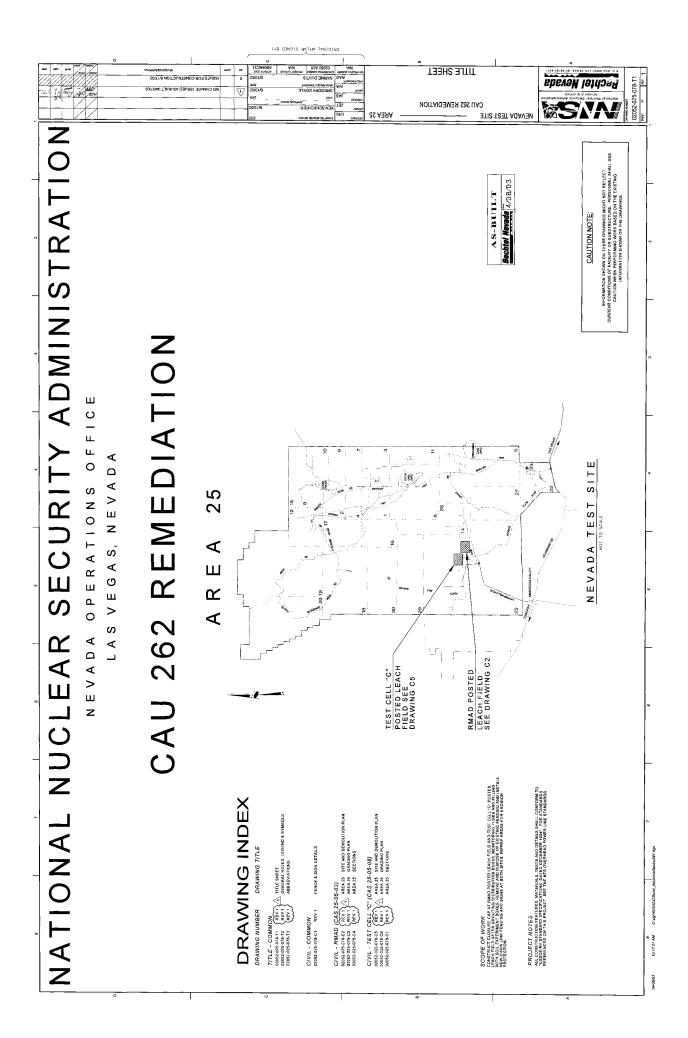
CLOSURE RE PORT - CAU 262 Section: Appendix F Revision: 1 Date: July 2003

APPENDIX F

"AS-BUILT" DRAWINGS

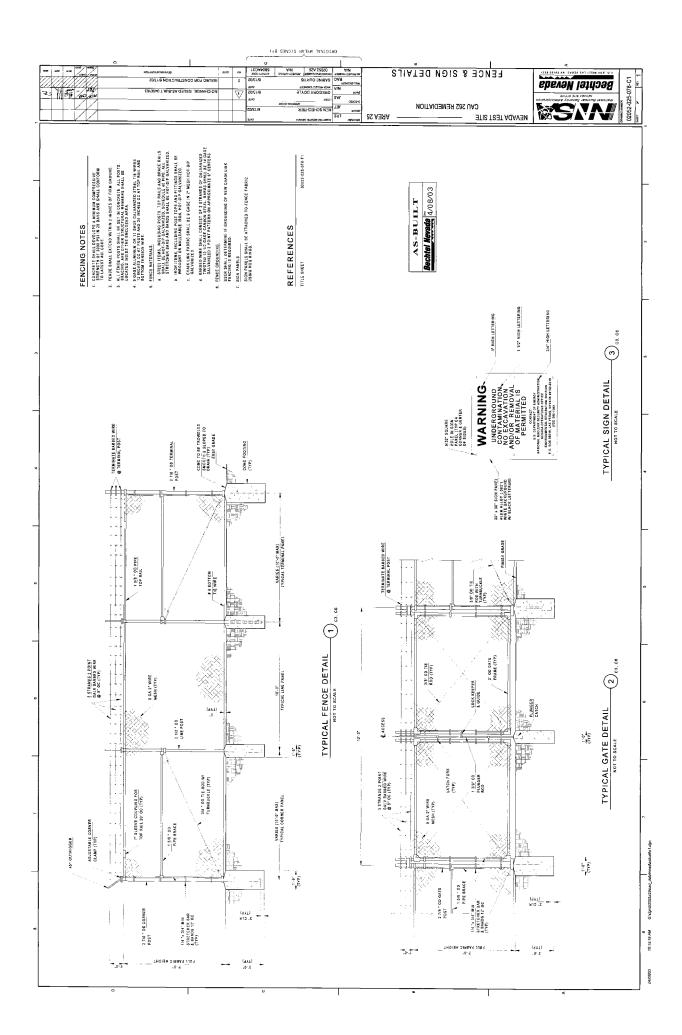
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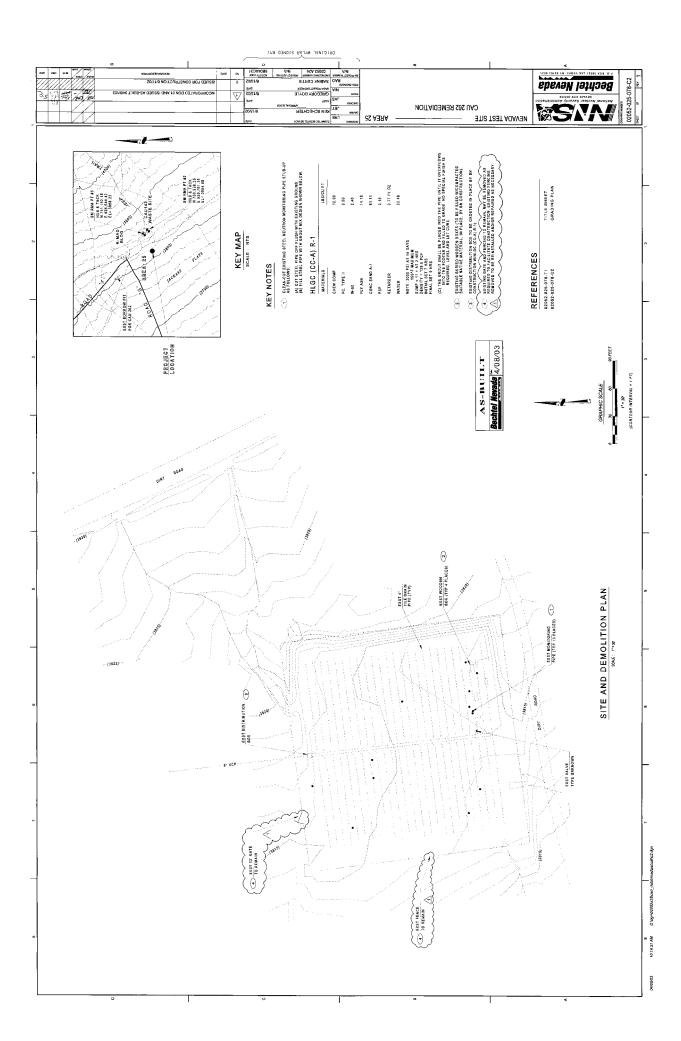
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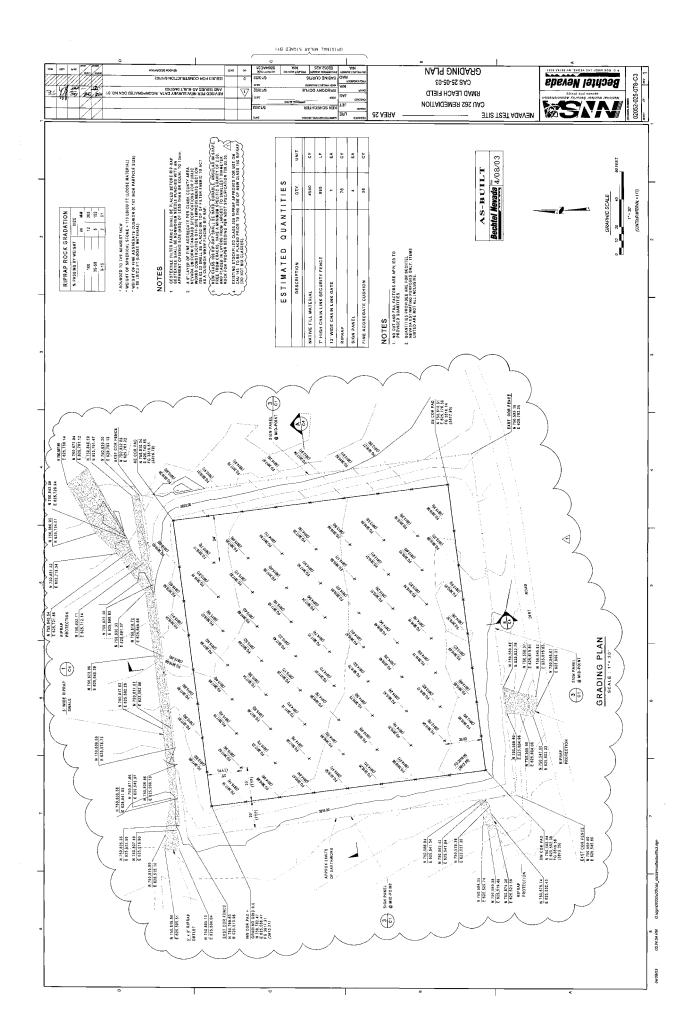


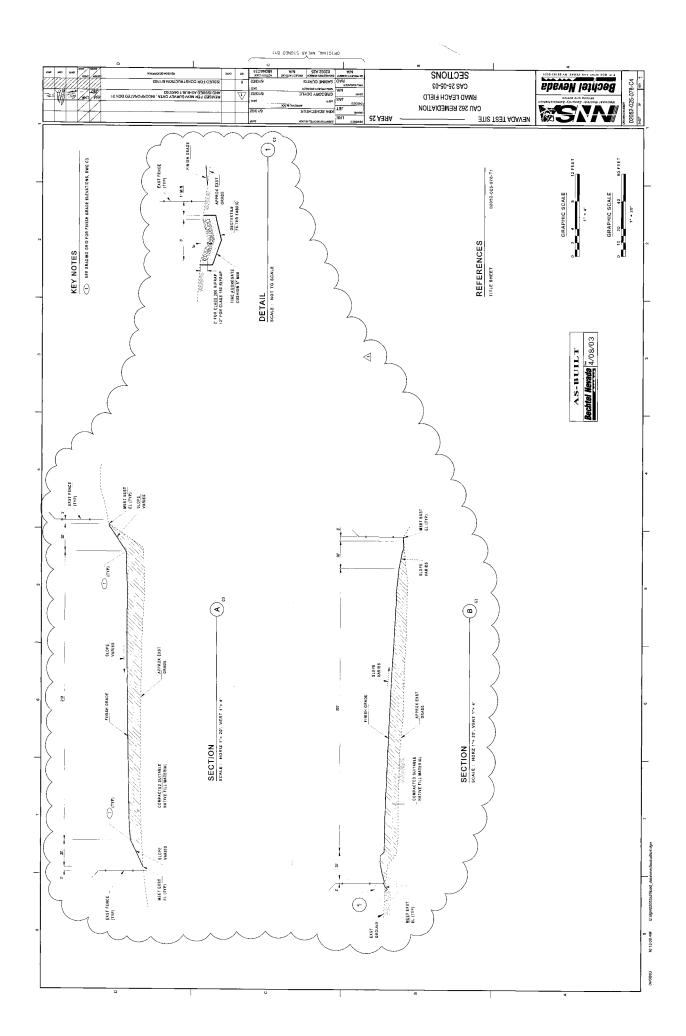
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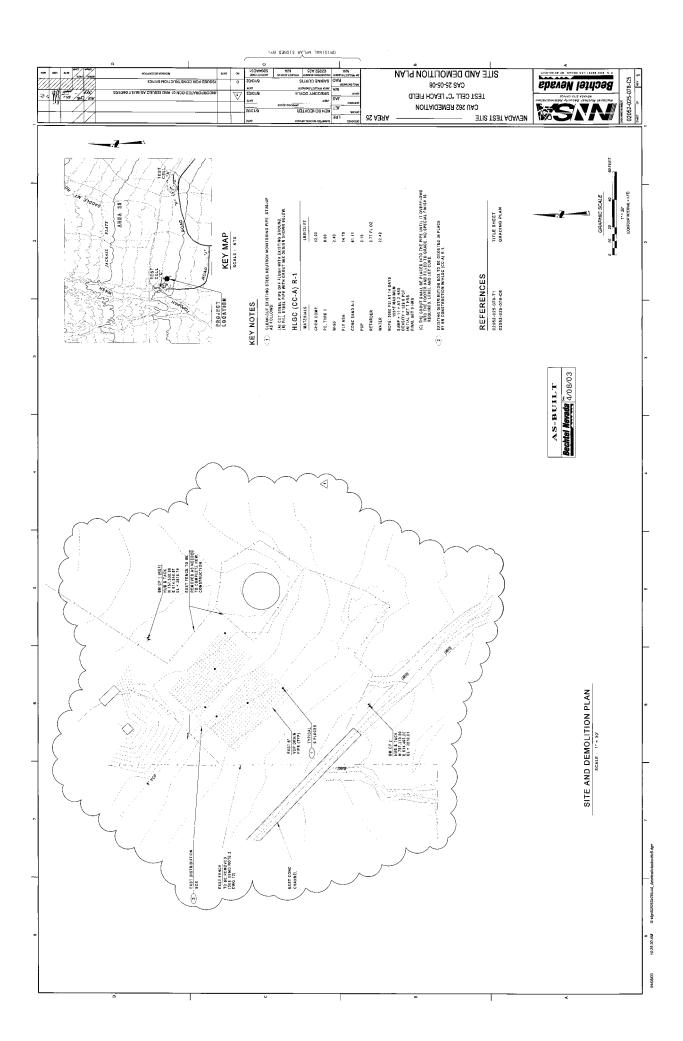
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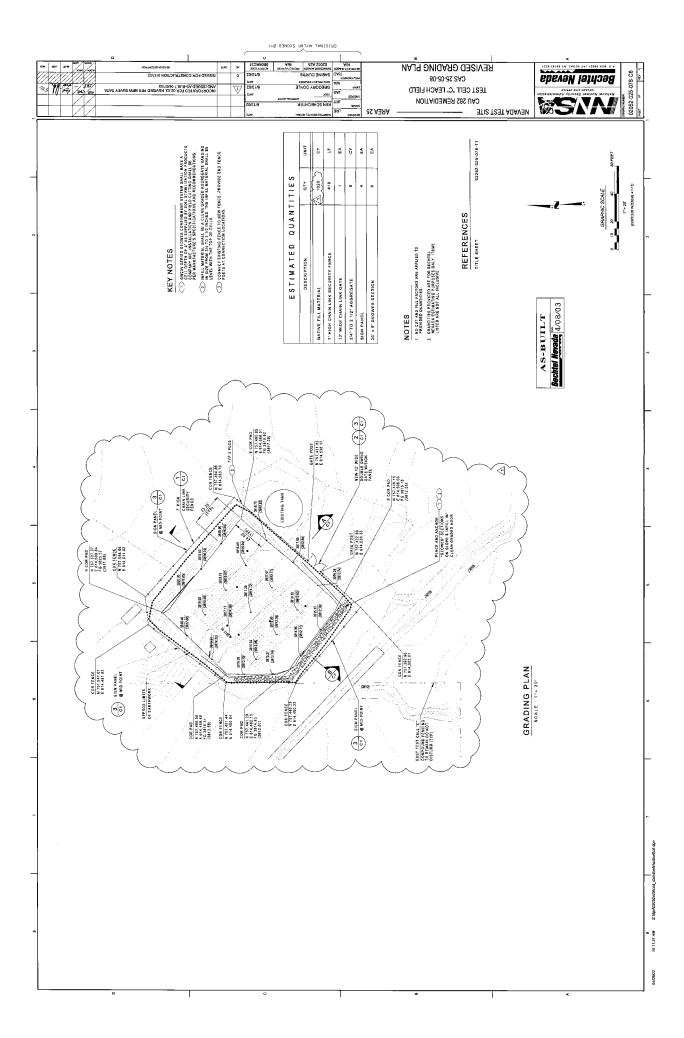


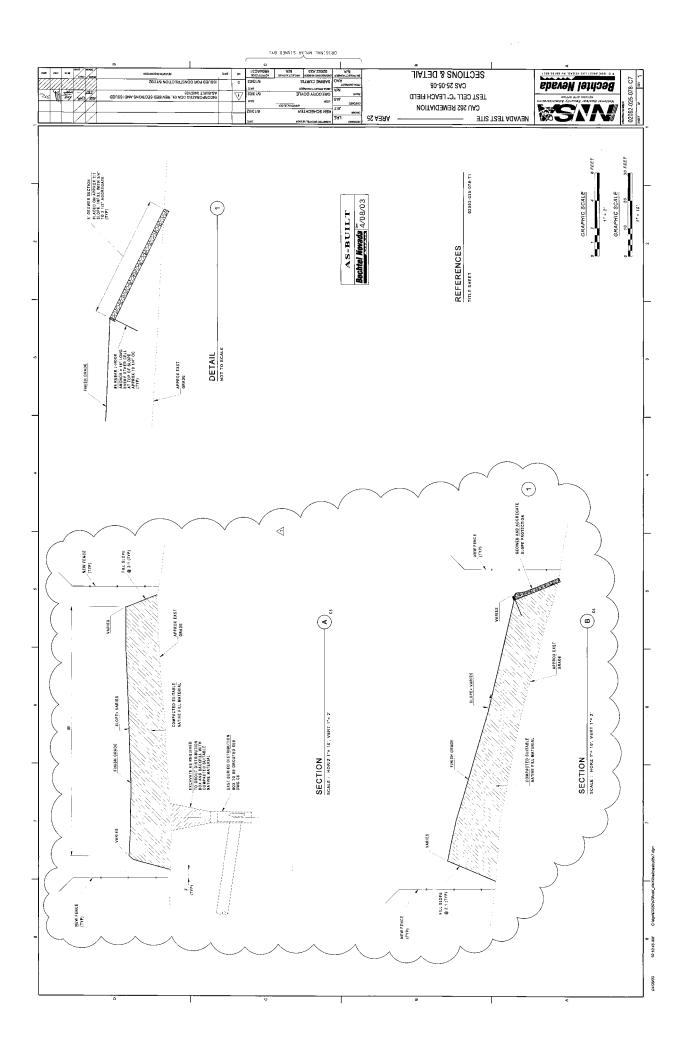












APPENDIX G

USE RESTRICTION DOCUMENTATION

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CAU Number/Description: <u>CAU 262</u>: Area 25 Septic Systems and UDP, Nevada Test Site, <u>Nevada</u>

Applicable CAS Numbers/Descriptions: CAS 25-02-06, Underground Storage Tank

Contact (organization/project): NNSA/NSO Industrial Sites Project Manager

Surveyed Area (UTM coordinates, Zone 11, NAD 27):

CAS 25-02-06, Underground Storage Tank			
NW tank corner:	4,073,319.88 m N	562,076.91 m E	
NE tank corner:	4,073,319.36 m N	562,079.77 m E	
SE tank corner:	4,073,304.24 m N	562,076.32 m E	
SW tank corner:	4,073,304.85 m N	562,073.85 m E	

Survey Date 02/13/2003 Survey Method Transit Datum NAD 1927 Zone UTM Zone 11

Site Monitoring Requirements: Visual Inspections

Monitoring Frequency (quarterly, annually?): <u>Annually</u>

If Monitoring Has Started, Indicate Last Completion Date: <u>N/A</u>

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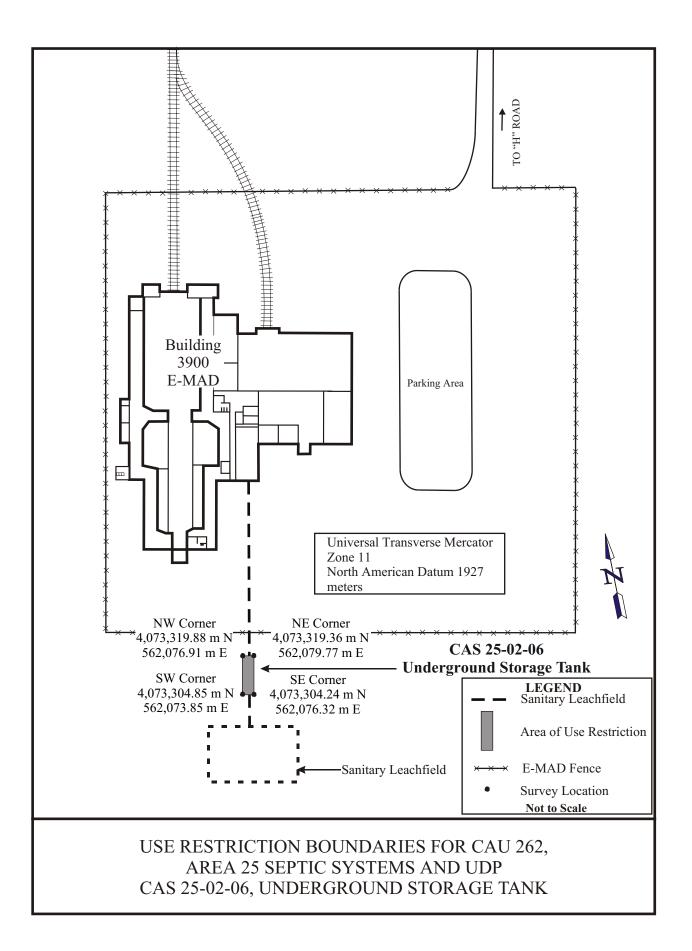
Use Restrictions

The future use of any land related to this Corrective Action Unit (CAU), as described by the above surveyed location, is restricted from any DOE or Air Force activity that may alter or modify the containment control as approved by the state and identified in the CAU Closure Report or other CAU documentation unless appropriate concurrence is obtained in advance.

Comments: See the CAU 262 Closure Report (DOE/NV--897) for additional information on the condition of the site and any monitoring and/or inspection requirements. The "Underground Storage Tank" is actually the septic tank for the septic system.

Submitted By:SIGNATURE APPROVEDDate:5/6/03

Attachments: Site Figure showing survey locations and coordinates (CAS250206 UR.cdr).



CAU Number/Description: <u>CAU 262</u>: Area 25 Septic Systems and UDP, Nevada Test Site, <u>Nevada</u>

Applicable CAS Numbers/Descriptions: CAS 25-05-03, Leachfield

Contact (organization/project): <u>NNSA/NSO Industrial Sites Project Manager</u>

Surveyed Area (UTM coordinates, Zone 11, NAD 27):

CAS 25-05-03, Leachfield			
NW fence corner:	4,074,083.46 m N	567,978.01 m E	
NE fence corner:	4,074,093.86 m N	568,053.31 m E	
SE fence corner:	4,074,020.84 m N	568,063.26 m E	
SW fence corner:	4,074,010.41 m N	567,987.90 m E	

Survey Date 02/19/2003 Survey Method Transit Datum NAD 1927 Zone UTM Zone 11

Site Monitoring Requirements: Visual Inspections

Monitoring Frequency (quarterly, annually?): <u>Annually</u>

If Monitoring Has Started, Indicate Last Completion Date: <u>N/A</u>

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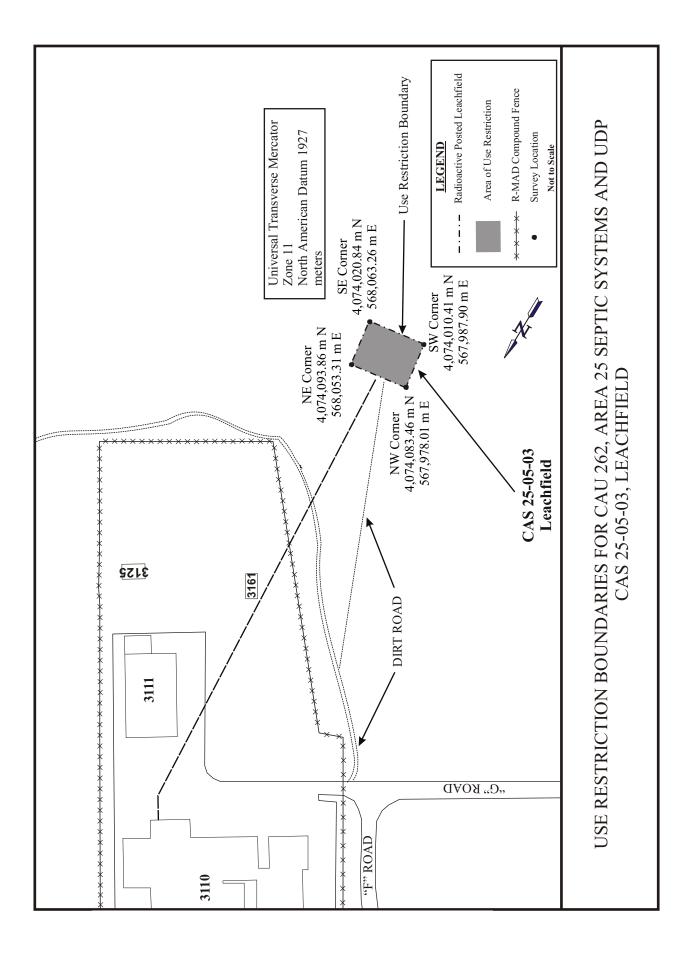
Use Restrictions

The future use of any land related to this Corrective Action Unit (CAU), as described by the above surveyed location, is restricted from any DOE or Air Force activity that may alter or modify the containment control as approved by the state and identified in the CAU Closure Report or other CAU documentation unless appropriate concurrence is obtained in advance.

Comments: <u>See the CAU 262 Closure Report (DOE/NV--897) for additional information on the condition of the site and any monitoring and/or inspection requirements.</u>

Submitted By:SIGNATURE APPROVEDDate:5/6/03

Attachments: Site Figure showing survey locations and coordinates (CAS250503 UR.cdr).



CAU Number/Description: <u>CAU 262</u>: Area 25 Septic Systems and UDP, Nevada Test Site, <u>Nevada</u>

Applicable CAS Numbers/Descriptions: CAS 25-05-06, Leachfield

Contact (organization/project): <u>NNSA/NSO Industrial Sites Project Manager</u>

Surveyed Area (UTM coordinates, Zone 11, NAD 27):

CAS 25-05-06, Leachfield			
NW fence corner:	4,073,210.00 m N	561,978.86 m E	
NE fence corner:	4,073,200.11 m N	562,040.77 m E	
SE fence corner:	4,073,126.43 m N	562,028.05 m E	
SW fence corner:	4,073,136.21 m N	561,965.51 m E	

Survey Date 02/13/2003 Survey Method Transit Datum NAD 1927 Zone UTM Zone 11

Site Monitoring Requirements: Visual Inspections

Monitoring Frequency (quarterly, annually?): <u>Annually</u>

If Monitoring Has Started, Indicate Last Completion Date: <u>N/A</u>

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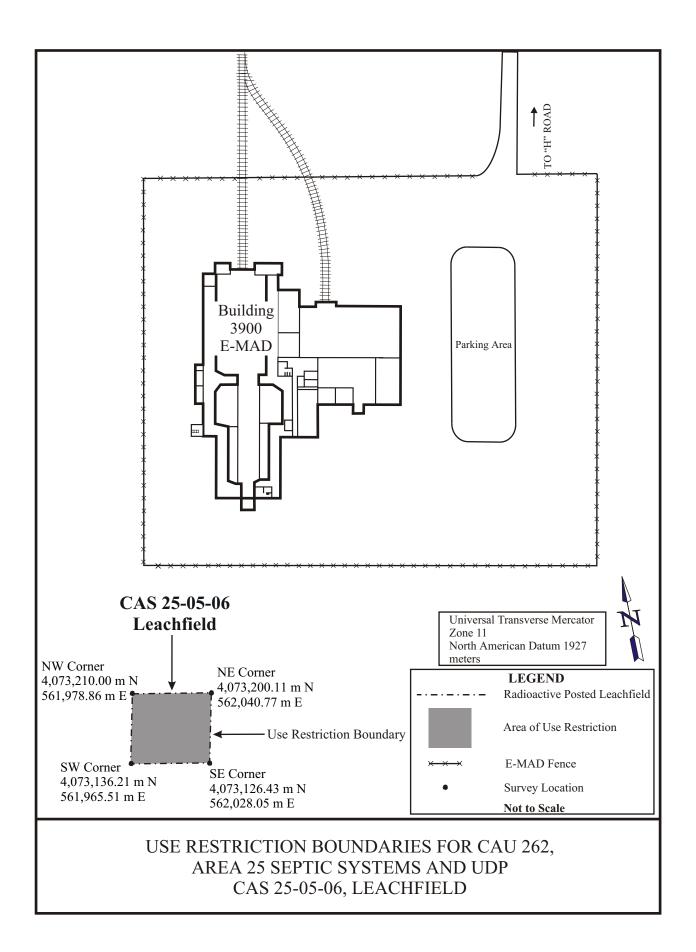
Use Restrictions

The future use of any land related to this Corrective Action Unit (CAU), as described by the above surveyed location, is restricted from any DOE or Air Force activity that may alter or modify the containment control as approved by the state and identified in the CAU Closure Report or other CAU documentation unless appropriate concurrence is obtained in advance.

Comments: <u>See the CAU 262 Closure Report (DOE/NV--897) for additional information on the condition of the site and any monitoring and/or inspection requirements.</u>

Submitted By:SIGNATURE APPROVEDDate:5/6/03

Attachments: Site Figure showing survey locations and coordinates (CAS250506 UR.cdr).



CAU Number/Description: <u>CAU 262</u>: Area 25 Septic Systems and UDP, Nevada Test Site, <u>Nevada</u>

Applicable CAS Numbers/Descriptions: CAS 25-05-08, Radioactive Leachfield

Contact (organization/project): NNSA/NSO Industrial Sites Project Manager

Surveyed Area (UTM coordinates, Zone 11, NAD 27):

CAS 25-05-08, Radioactive Leachfield		
Fence angle 1: 4,076,095.23 m N	564,599.61 m E	
Fence angle 2: 4,076,110.82 m N	564,599.50 m E	
Fence angle 3: 4,076,127.80 m N	564,612.21 m E	
Fence angle 4: 4,076,128.42 m N	564,618.30 m E	
Fence angle 5: 4,076,108.96 m N	564,640.24 m E	
Fence angle 6: 4,076,081.06 m N	564,616.33 m E	

Survey Date 03/19/2003 Survey Method Transit Datum NAD 1927 Zone UTM Zone 11

Site Monitoring Requirements: Visual Inspections

Monitoring Frequency (quarterly, annually?): <u>Annually</u>

If Monitoring Has Started, Indicate Last Completion Date: <u>N/A</u>

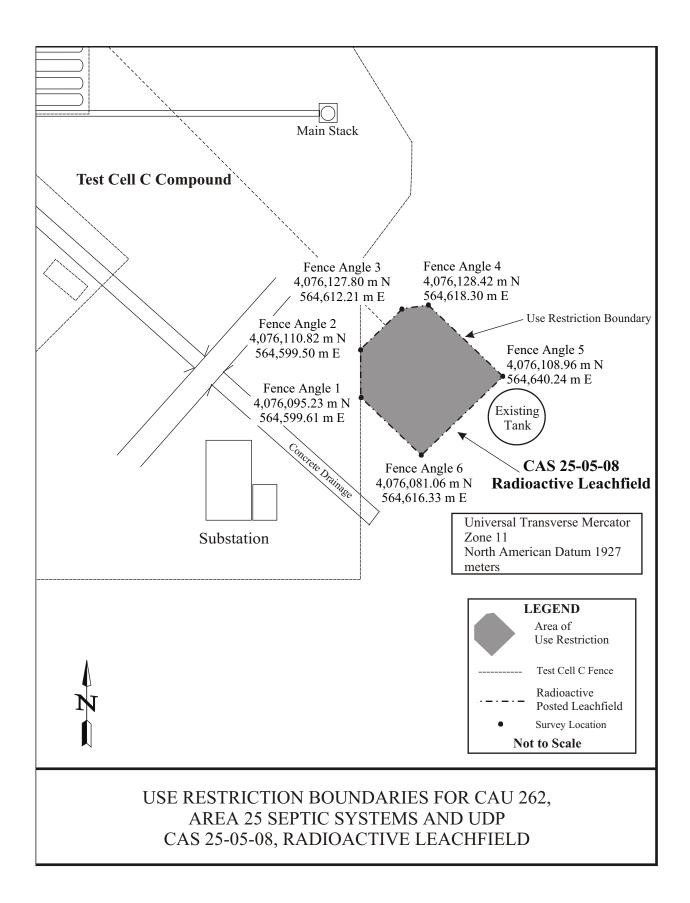
Use Restrictions

The future use of any land related to this Corrective Action Unit (CAU), as described by the above surveyed location, is restricted from any DOE or Air Force activity that may alter or modify the containment control as approved by the state and identified in the CAU Closure Report or other CAU documentation unless appropriate concurrence is obtained in advance.

Comments: The Radioactive Leachfield Use Restriction is delineated by an irregularly-shaped fence. Survey points were measured at those locations where an angle in the fence occurred. See the CAU 262 Closure Report (DOE/NV--897) for additional information on the condition of the site and any monitoring and/or inspection requirements.

Submitted By:SIGNATURE APPROVEDDate:5/6/03

Attachments: Site Figure showing survey locations and coordinates (CAS250508 UR.cdr).



APPENDIX H

SITE CLOSURE PHOTOGRAPHS

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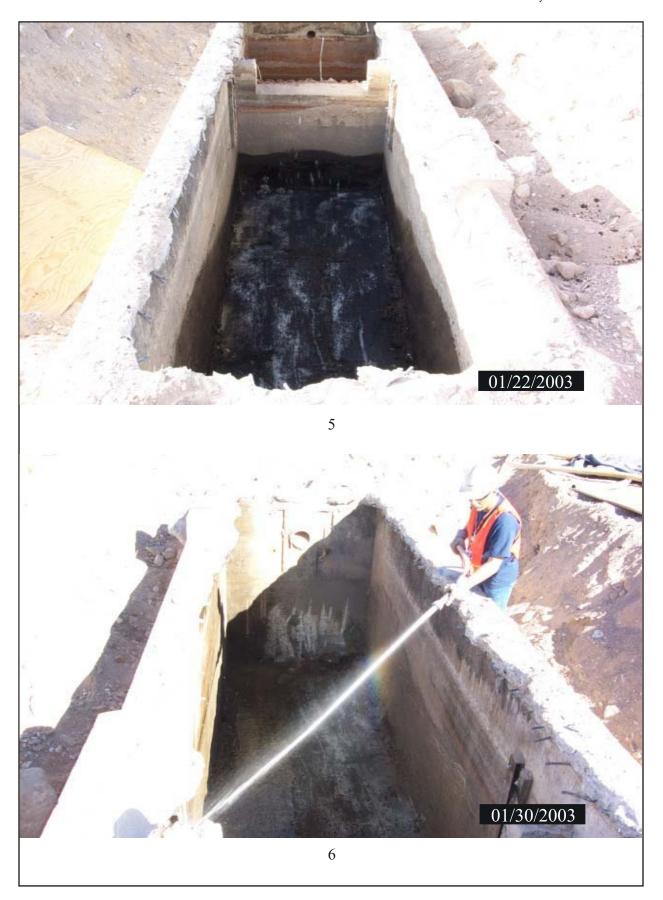
PHOTOGRAPH LOG

PHOTOGRAPH NUMBER	DATE	DESCRIPTION	
		CAS 25-05-05	
1	12/04/2002	Pumping septic tank	
2	12/04/2002	Adding soil to solidification basin	
3	01/08/2003	Septic tank top opened	
4	01/08/2003	Mixing septic tank contents	
5	01/22/2003	Removing septic tank contents	
6	01/30/2003	Rinsing septic tank	
7	03/05/2003	Septic tank filled with concrete	
8	03/06/2003	Excavation backfilled	
CAS 25-05-12			
9	12/09/2002	Pumping septic tank	
10	01/09/2003	Septic Tank Exposed	
11	01/16/2003	Septic tank top opened	
12	01/30/2003	Septic tank excavation	
13	02/04/2003	Removing septic tank contents	
14	03/05/2003	Septic tank filled with concrete	
15	03/10/2003	Excavation backfilled	
		CAS 25-04-07	
16	12/17/2002	Filling septic tank with grout	
17	12/17/2002	Septic tank filled with grout	
18	12/19/2002	Septic tank area backfilled	
	CAS 25-04-06 System A		
19	12/17/2002	Septic tank and excavation filled with grout	
20	12/19/2002	Septic tank area backfilled	
	CAS 25-04-06 System B		
21	12/17/2002	Septic tank filled with grout	

PHOTOGRAPH NUMBER	DATE	DESCRIPTION		
	CAS 25-02-06			
22	01/27/2003	Septic tank exposed		
23	01/30/2003	Filling septic tank with bulk cement		
24	02/10/2003	Septic tank filled with grout		
25	03/06/2003	Use Restriction signs		
	CAS 25-05-03			
26	01/28/2003	Distribution box filled with grout		
27	01/28/2003	Installing soil cover		
28	02/19/2003	Soil cover completed		
29	02/20/2003	Installing erosion protection		
30	02/24/2003	Installing rip rap		
31	03/05/2003	Use Restriction signs		
	CAS 25-05-06			
32	03/05/2003	Use Restriction signs and chain link security fence		
	CAS 25-05-08			
33	02/04/2003	Filling monitoring tubes with grout		
34	02/18/2003	Leachfield before closure activities		
35	02/28/2003	Distribution box filled with grout		
36	02/28/2003	Installing soil cover		
37	03/17/2003	Installing erosion protection		
38	04/10/2003	Use Restriction signs and chain link security fence		
	CAS 25-51-01			
39	06/19/2003	CAS location looking north		
40	06/19/2003	CAS location looking south		





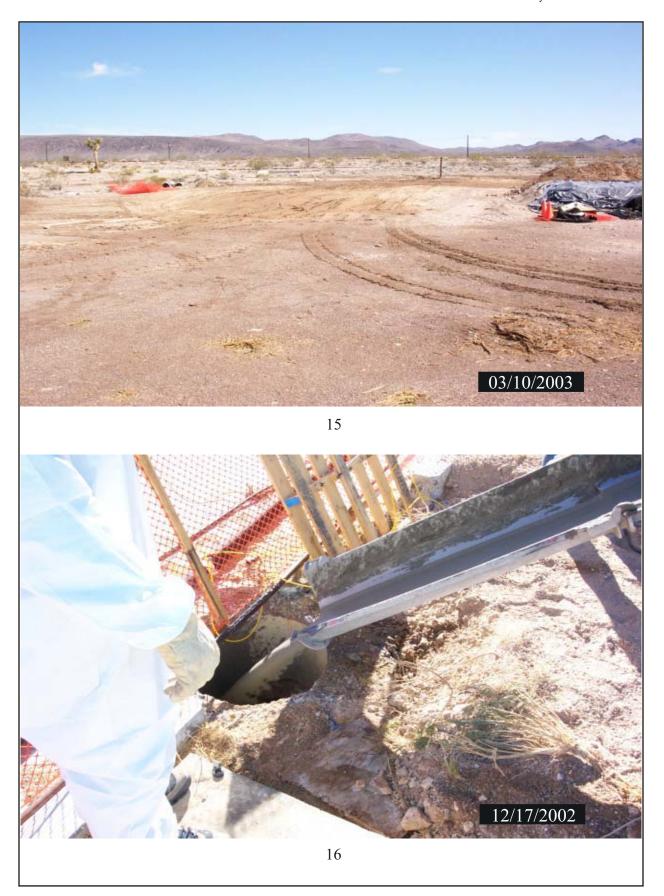




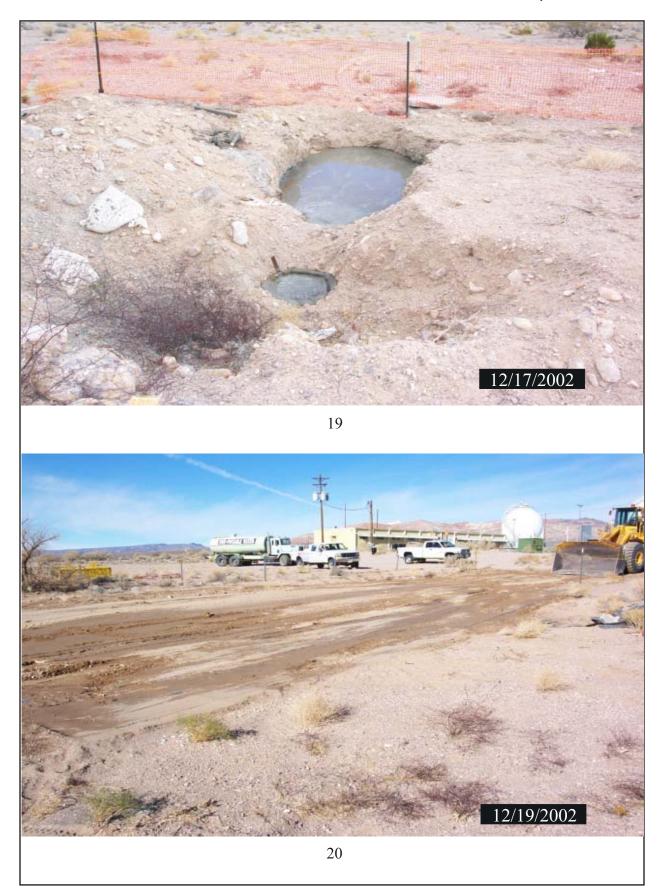














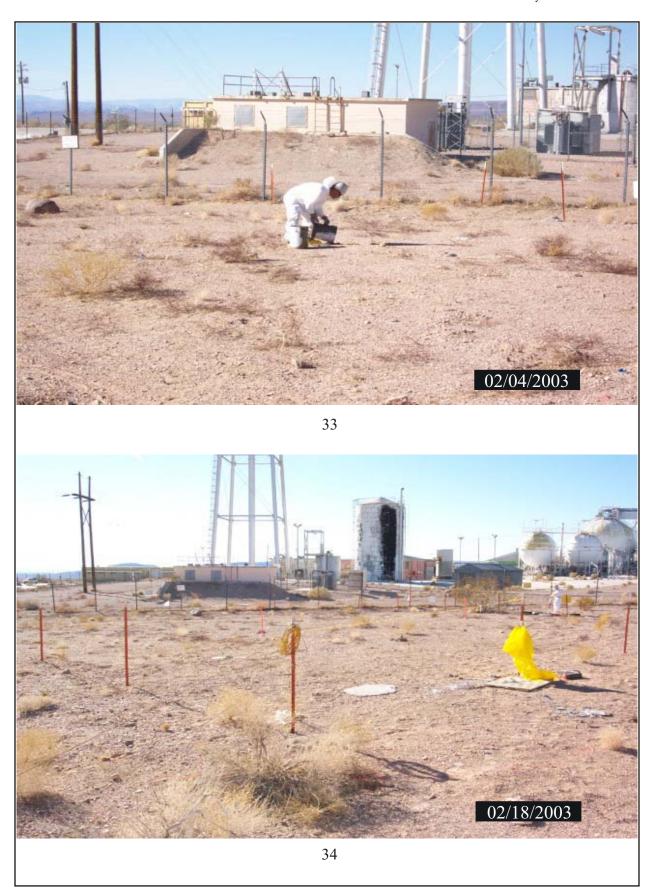


















APPENDIX I

APPROVED RECORDS OF TECHNICAL CHANGE

10-24-02	OZ:18pg	From-HSF ENVIRONMENTAL MONNT	702 2955303	T-091	P.002/003	
		USTIU AN NV ENV PROTECTION	FAX NO.	702 486 2863	3	

RECORD OF TECHNICAL CHANGE

Jechnical Change	No. 1034-FY01-003
Project/Job No	CAU 262
Project Tab Name	Aven 75 Sentie Summers and Dadamounted Dischasse Bains

Page_	1	_of_	2
Date _		10/21/2	002

P. 02

100

The following technical changes (including fustification) are requested by:

Brad Jackson	Task Manager
(Name)	(Tide)

- 1. Sections 2.1.2.2 and 2.1.2.4 of the Corrective Action Plan (CAP) discuss the construction of soil covers over the posted leachfields requiring a soil compaction of 90% of maximum density. This requires density tests to be done after each lift is emplaced. The technical change would require only a compaction performance standard be done to accomplish 90% compaction. This involves using a test plot of backfill material and determining the number of heavy equipment passes necessary to solieve 90% compaction. This eliminates the need to perform density tests after each lift is emplaced.
- 2. Section 2.1.2.2 and Drawing number 02052-025-078-C2 in the CAP indicate that Corrective Action Site 25-05-03 closure includes the replacement of the existing security fence. The current condition of the existing security fence is such that replacement is not peceasary. Only minor repairs are required for the fence to meet specifications. Therefore the technical change is to repair the existing fence as necessary. Replacement of the fence is not needed.
- 3. Connective Action Site 25-05-03 closure (Section 2.1.2.2 and Drawing number 02052-025-078-C3 of the CAP) calls for construction of erosion control in existing washes. The erosion control includes Chass 150 rip rap. There is an existing stockpile of Class 300 rip rap nearby that was left over from CAU 143 closure. BN Engineering has approved the use of the Class 300 rip rap instead of the Class 150 rip rap. This will constitute a cost and time savings and unlize otherwise unused material. Use of the Class 300 rip rap will require an increase of the engineered depth of the emplaced rip rap from 12 inches to 24 inches.

The project time will be Unchanged .

Applicable Project-Specific Document(s):

Corrective Action Plan for Corrective Action 262: Area 25 Septic Systems and Underground Discharge Foint, Nevada Test Sim, Nevada. DOE/NV-824

UUT-31-2002 THU 01:16 PM NV ENV PROTECTION FAX NO. 702 486 2863 10-24-02 02:18ps From-HSF ENVIRONMENTAL MONT P. 02 702 2255100 T-001 P. 003/003 F-300 Technical Change No. TCN-FY03-003 Page 1 of 1 Project/Job No. ____CAU 262 Data 10/21/2001 Project/Job Name __Area 25 Septic Systems and Underground Discharge Point Dato 10/24/02 Approved By: Propert Manager Industrial Sites Project Date 10-20-22 Division Director Environmental Restoration Division Client Notified Yes_No__ Date__ Change I disapprove NDEP Concurrence Yes No _ Date_10-31-02 00 2 NDEP Signature 2 ~ LOO. Contract Change Order Required Yes ___ No ___ approve. 3 Contract Change Order No.___

FEB-12-2003 WED US:12 HI NV ENV PROTECTION

MA NJ. /UZ 480 2863 K. UZ TUZ 2055300 T-328 P.002/005 F-778

Page 1 of 3

RECORD OF TECHNICAL CHANGE

Technical Change No. TCN-FY03-008

ProjuceJob No. CAU 262

Project/Job Name CAU 262: Area 25 Septie Systems and Underground Discharge Point

Date 02/05/2001

The following technical changes (including justification) are requested by:

Diag Jackson	
(Name)	Bechnel Neyada Task Manuger
Research and an other statement of the s	(Tide)

Technical Change to CAU 262 Corrective Action Plan

1. pg. 7 / Table 1 / under 25-02-06 replace comment with the following: "Liquids in tank will be solidified and the remaining void space backfilled with concrete".

2. pg. 12 / Section 2.1.1.3 / following the second sentence replace the remainder of the paragraph with the following text:

"The septic tank will be clean closed by opening the tank top to allow access to the tank interior so the contents of the tank can be removed. A waste characterization sample(s) will be collected and submitted for laboratory analysis of total petroleum hydrocarbons-diesel range organics (IPH-DRO), volatile organic compounds (VOCs) by the toxicity characterization leaching procedure (U.S. Environmental Protection Agency, 1996), and gross alpha/beta. Septic tank contents will be pumped, as feasible, placed in a lined basin, and solidified/absorbed using clean fill. Clean fill will be used to solidify any residual material within the tank and the solidified/absorbed material will be removed from the tank using a backhoe, or equivalent equipment. The tank interior will be pressure washed/steam cleaned and rinsed to remove any removable scale or residual material. A sample of the final rinse water will be collected from within the septic tank and analyzed for TPH full scan and gross alpha/beta radioactivity to varify clean closure of the tank. If analytical results of the final rinse water indicate residual contamination in excess of the COC action levels, additional cleaning and rinsing will be completed until acceptable analytical results are obtained. Upon receipt of analytical results showing the rinsate is below COC action levels NNSA will be notified. The rinsate remaining in the septic tank will be solidified in place using clean fill, and the remaining void space backfilled with concrete containing Type II Portland Cement or equivalent.

All waste removed from the septic tank will remain on site in the lined basin which is a designated Waste Accumulation Area (WAA). Waste characterization samples of the material in the basin will be collected and submitted for gross alpha/beta and gamma radioactivity analysis. After results for the waste characterization samples are received, the waste will be solidified and containerized, if necessary, and transported to an appropriate facility for disposal as determined by the analytical waste sample results."

3. pg. 13 / Section 2.1.1.4 / following the second sentence replace the remainder of the paragraph with the following text:

"The septic tank will be clean closed by opening the tank top to allow access to the tank interior so the contents of the tank can be removed. A waste characterization sample(s) will be collected and submitted for laboratory analysis of TPH-DRO and gross alpha/beta. Septic tank contents

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Technical Change No. <u>TCN-FY03-009</u> Project/Job No. <u>CAU 262</u> Project/Job Name <u>CAU 262</u>: Area 25 Septie Systems and Understound Discharge Point

Page 2 of 3 Date 02/03/2003

will be pumped, as feasible, placed in a lined basin, and solidified/absorbed using clean fill. A characterization sample of the waste material removed from the tank will be collected and analyzed, and the waste will be disposed at an appropriate land disposal unit. Clean fill will be used to solidify any residual material within the tank and the solidified/absorbed material will be removed from the tank using a backhoe, or equivalent equipment. The tank interior will be pressure washed/steam cleaned and rinsed to remove any removable scale or residual material. A sample of the final rinse water will be collected from within the septic tank and analyzed for TPH full scan to verify clean closure of the tank. If analytical results of the final rinse water indicate completed until acceptable analytical results are obtained. Upon receipt of analytical results showing the rinsate is below COC action levels NNSA will be notified. The rinsate remaining in the septic tank will be solidified in place using clean fill and the remaining void space backfilled with concrete containing Type II Portland Cement or equivalent.

All waste removed from the septic tank will remain in the lined basin which is a designated WAA. Waste characterization samples will be collected from the material in the basin and submitted for gross alpha/beta and gamma radioactivity analysis. After results for the waste characterization samples are received, the waste will be solidified and containerized, if necessary, and transported to an appropriate facility for disposal as determined by the analytical waste sample results."

4. pg. 14 / Section 2.1.2.1 first paragraph / following the third sentence replace the remainder of the paragraph with the following text:

"During fieldwork it was determined that the septic tank was constructed in place and no removable lid is present. Access to the septic tank interior will be through the existing four manholes in the top of the septic tank. The tank contents will be solidified in place by mixing the liquid/sludge with dry Portland Type II coment, or equivalent. After adding the coment to the tank, a wooden paddle will be used to thoroughly mix any potential liquids with the sludge and coment. The remaining vold space within the septic tank will be backfilled with concrete or equivalent."

Justification

Due to the specific configuration of the septic tanks access to the tank contents is limited and it is not possible to mix and remove the TPH contaminated liquid and sludge by pumping as originally specified as in the approved CAP. This means that the septic tanks must be opened to provide access to the contents for removal, cleaning of the tanks and sampling.

Dry carnent will be added to the CAS 25-02-06 septic tank through the existing manholes and mixed with the tank contents. The existing manholes provide sufficient access to the tank interior for solidification of liquid/sludge and backfilling the remaining void space. No removable tank lid is present, and therefore, there is no lid to remove, survey, and dispose, and no need to install a new reinforced tank cover.

Technical Change No. ______________ Project/Job No. CAU 262

Project/Job Name ____CAU 262: Area 25 Septie Systems and Understand Discharge Point

Page 3 of 3 Date_ 1/2/03/2003

The project time will be Unchanged.

Applicable Project-Specific Document(s): Corrective Action Plan for Corrective Action 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site,

Approved By: Date San Project Manager

Industrial Sites

Date

Environmental Restouction Division

Client Notified Yes X No ___ Date. NDEP Concurrence Yes X No_ _ Date 2/11/03 NDEP Signature Contract Change Order Requi Contract Change Order No. N/A

APPENDIX J

"A THROUGH K" EVALUATION*

* As presented and published in the approved Corrective Action Decision Document for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada, September 2001, NNSA/NV 744, Rev. 1. Las Vegas, NV.

ACRONYMS AND ABBREVIATIONS

bgs	Below ground surface
CADD	Corrective Action Decision Document
CAS	Corrective Action Site(s)
CAU	Corrective Action Unit(s)
COC	Contaminant(s) of concern
DOE/NV	U.S. Department of Energy, Nevada Operation Office
E-MAD	Engine-Maintenance Assembly and Disassembly
ft	Foot (feet)
in.	Inch(es)
NAC	Nevada Administrative Code
NDEP	Nevada Division of Environmental Protection
NTS	Nevada Test Site
PAL	Preliminary action level(s)
PCB	Polychlorinated biphenyl(s)
R-MAD	Reactor-Maintenance Assembly and Disassembly
SNPO	Space Nuclear Propulsion Office
TPH-DRO	Total petroleum hydrocarbons-Diesel range organics
USGS	United States Geological Survey

CAU 262 CADD Section: 3.0 Revision: 1 Date: 09/21/2001 Page 46 of 77

radionuclides and strontium-90. This will ensure complete removal of contaminated soil with concentrations exceeding PALs.

Contaminated material will be disposed of at an appropriate disposal facility. All excavated areas will be returned to surficial conditions compatible with on-site maintenance operations. Overburden soil along with additional clean fill will be used to backfill the excavations after removal of the contaminated soils. Clean borrow soil will be removed from a nearby location for placement in voids as necessary.

This CAS will be closed in accordance with NAC 445A (NAC, 1998b) as described in this section.

3.3.2.9 CAS 25-05-08 (Test Cell C Posted Leachfield)

Alternative 2 includes excavating and disposing of soil and debris with radionuclide concentrations above PALs or contaminated above free release criteria. This includes the entire leachfield, with additional 15-ft extensions on all four sides from surface grade down to a depth of 17.5 ft bgs. Alternative 2 also includes trenching to remove overburden soil to expose and remove the collection system piping and diversion box, both determined to be radiologically contaminated above free release criteria.

A visual determination will be made to ensure that debris (i.e., piping, diversion box, leachrock) has been removed. Verification soil samples will be collected and analyzed for gamma-emitting radionuclides and strontium-90. This will ensure complete removal of contaminated soil with concentrations exceeding PALs.

Contaminated material will be disposed of at an appropriate disposal facility. All excavated areas will be returned to surficial conditions compatible with on-site maintenance operations. Clean borrow soil will be removed from a nearby location for placement in voids as necessary.

This CAS will be closed in accordance with NAC 445A (NAC, 1998b) as described in this section.

3.3.3 Alternative 3 - Close in Place with Administrative Controls

Alternative 3 will utilize administrative controls to prevent inadvertent contact with COCs and contaminated media with activity exceeding the free release criteria. These controls would consist of

CAU 262 CADD Section: 3.0 Revision: 1 Date: 09/21/2001 Page 47 of 77

use restrictions to minimize access and prevent unauthorized intrusive activities. The future use of the CAU would be restricted from any activity that would alter or modify the containment control unless appropriate concurrence was obtained from NDEP. This alternative does not apply to CASs 25-04-06 A and B, and 25-04-07. Additionally, this alternative does not apply to CAS 25-05-05 because of the potential for mixed waste.

These sites will be closed in accordance with NAC 445A (NAC, 1998b) as described in this section.

3.3.3.1 CAS 25-02-06 (E-MAD Complex Leachfield)

Alternative 3 includes closure in place of the septic tank contents. Free liquids will be solidified. After solidification is completed, the septic tank will be filled with an inert material and a concrete cover will be installed. The concrete cover will be reinforced with wire mesh/rebar. Administrative Controls would consist of use restrictions to prevent unauthorized intrusive activities and impose long-term maintenance requirements for the concrete cover. The future use of the CAS would be restricted from any activity that would alter or modify the containment control unless appropriate concurrence was obtained from NDEP. Additional measures under this alternative include removal of the existing septic tank cover with a backhoe and disposal in an appropriate landfill.

The combination of these measures will effectively prevent inadvertent intrusive activities by humans and native wildlife and mobilization of COCs.

The following evaluation of NAC 445A.227 (2) (a-k) (NAC, 1998b) supports the protection of groundwater from COCs at this CAS:

- a. Depth to groundwater at the nearest well (J-11) is approximately 1,040 ft bgs (USGS, 1993). This well is located 1.8 mi southeast of E-MAD. Groundwater flow is generally to the southwest and may discharge at Ash Meadows (SNPO, 1970).
- b. The distance to the nearest active water-supply well, Well J-12, is approximately 5.1 mi north of E-MAD (DOE/NV, 1996a). Well J-12 is primarily used to provide potable water for Area 25. Groundwater flow is generally to the southwest (Laczniak et al., 1996).
- c. No soil is contaminated at this site.
- d. Average annual precipitation for valleys in the South-Central Great Basin ranges from 3 to 6 inches (Winograd and Thordarson, 1975). Annual evaporation is roughly 5 to 25 times the

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annual precipitation (Winograd and Thordarson, 1975). The high evaporation and low precipitation rates create a negative water balance for the area; therefore, no driving force associated with precipitation is available to mobilize COCs vertically.

- PCBs, TPH-DRO, and limited radionuclides are contained within the septic tank.
- f. The contaminants are contained within the septic tank.
- g. Presently, CAS 25-02-06 is located on a government-controlled facility. The NTS is a restricted area that is guarded on a 24-hour, 365-day per year basis; unauthorized personnel are not admitted to the facility. CAS 25-02-06 is contained within a restricted zone classified as the "Yucca Mountain Site Characterization Zone" (DOE/NV, 1998a) (i.e., non-residential).
- h. There are no preferred routes of vertical and lateral migration because septic tank integrity has not been compromised.
- See Section 2.3.1 for site-specific considerations.
- The potential for a hazard related to fire, vapor, or explosion is nonexistent for the COCs at the site.
- No other site-specific factors are known at this time.

Based on this evaluation, impacts to groundwater are not expected. Therefore, groundwater monitoring is not proposed for this site and is not considered an element of the alternatives.

3.3.3.2 CAS 25-05-12 (R-MAD Building 3126 Septic System)

Alternative 3 includes closure in place of the septic tank contents. Free liquids will be solidified. After solidification is completed, the septic tank will be filled with an inert material and a concrete cover will be installed. The concrete cover will be reinforced with wire mesh/rebar. Administrative controls would consist of use restrictions to prevent unauthorized intrusive activities and impose long-term maintenance requirements for the concrete cover. The future use of the CAS would be restricted from any activity that would alter or modify the containment control unless appropriate concurrence was obtained from NDEP. Additional measures under this alternative include removal of the existing septic tank cover with a backhoe and disposal in an appropriate landfill.

The combination of these measures will effectively prevent inadvertent intrusive activities by humans and native wildlife and mobilization of COCs.

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The following evaluation of NAC 445A.227 (2) (a-k) (NAC, 1998b) supports the protection of groundwater from COCs at this CAS:

- a. Depth to groundwater at the nearest well (J-11) is approximately 1,040 ft bgs (USGS, 1993). This well is located 3.3 mi southwest of R-MAD. Groundwater flow is generally to the southwest and may discharge at Ash Meadows (SNPO, 1970).
- b. The distance to the nearest active water-supply well, Well J-12, is approximately 7 mi northwest of R-MAD (DOE/NV, 1996a). Well J-12 is primarily used to provide potable water for Area 25. Groundwater flow is generally to the southwest (Laczniak et al., 1996).
- c. No soil is contaminated at this site.
- d. Average annual precipitation for valleys in the South-Central Great Basin ranges from 3 to 6 inches (Winograd and Thordarson, 1975). Annual evaporation is roughly 5 to 25 times the annual precipitation (Winograd and Thordarson, 1975). The high evaporation and low precipitation rates create a negative water balance for the area; therefore, no driving force associated with precipitation is available to mobilize COCs vertically.
- e. TPH-DRO and limited radionuclides are contained within the septic tank.
- f. The contaminants are contained within the septic tank.
- g. Presently, CAS 25-05-12 is located on a government-controlled facility. The NTS is a restricted area that is guarded on a 24-hour, 365-day per year basis; unauthorized personnel are not admitted to the facility. CAS 25-05-12 is contained within a restricted zone classified as a "Research Test and Experiment Zone." This zone is designated for small-scale research and development projects and demonstrations; pilot projects; outdoor tests; and experiments for development, quality assurance, or reliability of material and equipment under controlled conditions. This includes compatible nondefense research, development and testing projects, and activities (DOE/NV, 1998a).
- h. There are no preferred routes of vertical and lateral migration because septic tank integrity has not been compromised.
- See Section 2.3.6 for site-specific considerations.
- The potential for a hazard related to fire, vapor, or explosion is nonexistent for the COCs at the site.
- k. No other site-specific factors are known at this time.

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Based on this evaluation, impacts to groundwater are not expected. Therefore, groundwater monitoring is not proposed for this site and is not considered an element of the alternatives.

3.3.3.3 CAS 25-05-03 (R-MAD Posted Leachfield)

Alternative 3 includes an engineered surface cap that will be constructed over the leachfield footprint and extended to the boundaries of the currently fenced area. Administrative controls will be implemented to restrict inadvertent contact with contaminated media within the leachfield and collection system piping. Administrative controls would consist of use restrictions to prevent unauthorized intrusive activities and impose long-term maintenance requirements for the surface cap. The future use of the CAS would be restricted from any activity that would alter or modify the containment control unless appropriate concurrence was obtained from NDEP.

The combination of these measures will effectively prevent inadvertent intrusive activities by humans and native wildlife and mobilization of COCs.

Additional measures under this alternative include grouting the distribution box and the monitoring tubes to the ground surface; and backfilling voids at the site which includes installed subsurface features consisting of three large vaults, the 55-gallon diversion drum, and the two valve boxes. Redirecting surface water run-on may be required to prevent localized flooding from impacting the surface cap.

The following evaluation of NAC 445A.227 (2) (a-k) (NAC, 1998b) supports the protection of groundwater from COCs at this CAS:

- a. Depth to groundwater at the nearest well (J-11) is approximately 1,040 ft bgs (USGS, 1993). This well is located 3.3 mi southwest of R-MAD. Groundwater flow is generally to the southwest and may discharge at Ash Meadows (SNPO, 1970). Field screening and analytical data indicate that COCs are confined to the leachfield footprint primarily 0 to 10 ft below the base of the leachfield. This indicates minimal vertical migration has occurred in the past and, with the removal of man-made driving forces, vertical migration will be negligible in the future.
- b. The distance to the nearest active water-supply well, Well J-12, is approximately 7 mi northwest of R-MAD (DOE/NV, 1996a). Well J-12 is primarily used to provide potable water for Area 25. Groundwater flow is generally to the southwest (Laczniak et al., 1996).

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- c. The soil beneath the leachrock was a poorly sorted, silty-gravelly sand with abundant pebbles, some gravel, and a few cobbles. Geotechnical data were collected and the results are included in Appendix F of this CADD.
- d. Average annual precipitation for valleys in the South-Central Great Basin ranges from 3 to 6 inches (Winograd and Thordarson, 1975). Annual evaporation is roughly 5 to 25 times the annual precipitation (Winograd and Thordarson, 1975). The high evaporation and low precipitation rates create a negative water balance for the area; therefore, no driving force associated with precipitation is available to mobilize COCs vertically.
- e. The types of regulated substances released are arsenic, PCBs, TPH-DRO, and limited radionuclides. Downward migration of COCs is slowed by the following parameters:
 - Volume of release it is assumed that small volumes of COCs were released over a long
 period of time rather than a large volume over a short duration.
 - Soil saturation the soil tends to be very dry, especially near the surface and below the leachfield where the COCs are concentrated.
 - Soil particle adsorption/desorption PCB, petroleum hydrocarbons, and radionuclides tend to adsorb to the soil particles with little desorption as suggested by the limited vertical migration of COCs.
- f. The lateral extent of contamination is defined by the leachfield boundaries based on reduced concentrations and the lack of contamination found in nearby sampling locations demonstrating minimal lateral mobility. Contaminant concentrations below the upper sampling horizons were significantly lower, demonstrating minimal vertical migration. The vertical extent of contamination is confined to 10 ft below the diversion drum (16 ft bgs) and 0 to 10 ft below the base of the leachfield based on field screening and analytical data.
- g. Presently, CAS 25-05-03 is located on a government-controlled facility. The NTS is a restricted area that is guarded on a 24-hour, 365-day-per-year basis; unauthorized personnel are not admitted to the facility. CAS 25-05-03 is contained within a restricted use zone classified as a "Research Test and Experiment Zone." This zone is designated for small-scale research and development projects and demonstrations; pilot projects; outdoor tests; and experiments for development, quality assurance, or reliability of material and equipment under controlled conditions. This includes compatible nondefense research, development and testing projects, and activities (DOE/NV, 1998a).
- Preferred routes of vertical and lateral migration are nonexistent since the sources have been eliminated and driving forces are not viable.
- See Section 2.3.8 for site-specific considerations.

- The potential for a hazard related to fire, vapor, or explosion is nonexistent for the COCs at the site.
- k. No other site-specific factors are known at this time.

Based on this evaluation, impacts to groundwater are not expected. Therefore, groundwater monitoring is not proposed for this site and is not considered an element of the alternatives.

3.3.3.4 CAS 25-05-06 (E-MAD Posted Leachfield)

Under Alternative 3, administrative controls will be implemented to restrict inadvertent contact with subsurface contaminated media within the leachfield and collection system piping. Administrative controls would consist of use restrictions to prevent unauthorized intrusive activities. The future use of the CAS would be restricted from any activity that would alter or modify the containment control unless appropriate concurrence was obtained from NDEP.

Additional measures under this alternative include grouting the distribution box; cutting and grouting the monitoring tubes to the ground surface; and replacing the current leachfield fence with security fencing and appropriate signage. The remaining debris (monitoring tube sections and fencing) will be disposed of in an appropriate disposal facility.

The following evaluation of NAC 445A.227 (2) (a-k) (NAC, 1998b) supports the protection of groundwater from COCs at this CAS:

- a. Depth to groundwater at the nearest well (J-11) is approximately 1,040 ft bgs (USGS, 1993). This well is located 1.8 mi southeast of E-MAD. Groundwater flow is generally to the southwest and may discharge at Ash Meadows (SNPO, 1970). Field screening and analytical data indicate that COCs are confined primarily within 0 to 8.8 ft below the base of the leachfield. This indicates minimal vertical migration has occurred in the past and, with the removal of man-made driving forces, vertical migration will be negligible in the future.
- b. The distance to the nearest active water-supply well, Well J-12, is approximately 5.1 mi north of E-MAD (DOE/NV, 1996a). Well J-12 is primarily used to provide potable water for Area 25. Groundwater flow is generally to the southwest (Laczniak et al., 1996).
- c. Lenses of sand and silt were present at some locations. The soil beneath the leachrock was a moderately sorted, silty sand with some gravel, and a few cobbles. Geotechnical data were collected and the results are included in Appendix F of this CADD.

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- d. Average annual precipitation for valleys in the South-Central Great Basin ranges from 3 to 6 inches (Winograd and Thordarson, 1975). Annual evaporation is roughly 5 to 25 times the annual precipitation (Winograd and Thordarson, 1975). The high evaporation and low precipitation rates create a negative water balance for the area; therefore, no driving force associated with precipitation is available to mobilize COCs vertically.
- e. The types of regulated substances released are radionuclides. Downward migration of COCs is slowed by the following parameters:
 - Volume of release it is assumed that small volumes of COCs were released over a long
 period of time rather than a large volume over a short duration.
 - Soil saturation the soil tends to be very dry, especially near the surface and below the leachfield where the COCs are concentrated.
 - Soil particle adsorption/desorption radionuclides tend to adsorb to the soil particles with little desorption as suggested by the limited vertical migration of COCs.
- f. The lateral extent of contamination is defined by the leachfield boundaries based on reduced concentrations and the lack of contamination found in nearby sampling locations demonstrating minimal lateral mobility. Contaminant concentrations below the upper sampling horizons were significantly lower, demonstrating minimal vertical migration. The vertical extent of contamination is primarily confined to 0 to 8.8 ft below the base of the leachfield based on field screening and analytical data.
- g. Presently, CAS 25-05-06 is located on a government-controlled facility. The NTS is a restricted area that is guarded on a 24-hour, 365-day per year basis; unauthorized personnel are not admitted to the facility. CAS 25-05-06 is contained within a restricted zone classified as the "Yucca Mountain Site Characterization Zone" (DOE/NV, 1998a) (i.e., non-residential).
- Preferred routes of vertical and lateral migration are nonexistent since the sources have been eliminated and driving forces are not viable.
- i. See Section 2.3.9 for site-specific considerations.
- The potential for a hazard related to fire, vapor, or explosion is nonexistent for the COCs at the site.
- k. No other site-specific factors are known at this time.

Based on this evaluation, impacts to groundwater are not expected. Therefore, groundwater monitoring is not proposed for this site and is not considered an element of the alternatives.

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3.3.3.5 CAS 25-05-08 (Test Cell C Posted Leachfield)

Alternative 3 includes an engineered surface cap that will be constructed over the leachfield footprint and extended 15 ft in the horizontal dimensions. Administrative controls will be implemented to restrict inadvertent contact with contaminated media within the leachfield and collection system piping. Administrative controls would consist of use restrictions to prevent unauthorized intrusive activities and impose long-term maintenance requirements for the surface cap. The future use of the CAS would be restricted from any activity that would alter or modify the containment control unless appropriate concurrence was obtained from NDEP.

The combination of these measures will effectively prevent inadvertent intrusive activities by humans and native wildlife and mobilization of COCs.

Additional measures under this alternative include grouting the distribution box and the monitoring tubes to the ground surface; and replacing the current leachfield fence with security fencing and appropriate signage. The remaining fencing will be disposed of in an appropriate disposal facility. Redirecting surface water run-on may be required to prevent localized flooding from impacting the surface cap.

The following evaluation of NAC 445A.227 (2) (a-k) (NAC, 1998b) supports the protection of groundwater from COCs at this CAS:

- a. Depth to groundwater at the nearest well (J-11) is approximately 1,040 ft bgs (USGS, 1993). This well is located 3 mi southwest of Test Cell C. Groundwater flow is generally to the southwest and may discharge at Ash Meadows (SNPO, 1970). Field screening and analytical data indicate that COCs are confined primarily to within 0 to 10 ft below the base of the leachfield. This indicates minimal vertical migration has occurred in the past and, with the removal of man-made driving forces, vertical migration will be negligible in the future.
- b. The distance to the nearest active water-supply well, Well J-12, is approximately 4.7 mi northwest of Test Cell C (DOE/NV, 1996a). Well J-12 is primarily used to provide potable water for Area 25. Groundwater flow is generally to the southwest (Laczniak et al., 1996).
- c. The soil beneath the leachrock was a poorly sorted, silty-gravelly sand with abundant pebbles, some gravel, and a few cobbles. Geotechnical data were collected and the results are included in Appendix F of this CADD.

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- d. Average annual precipitation for valleys in the South-Central Great Basin ranges from 3 to 6 inches (Winograd and Thordarson, 1975). Annual evaporation is roughly 5 to 25 times the annual precipitation (Winograd and Thordarson, 1975). The high evaporation and low precipitation rates create a negative water balance for the area; therefore, no driving force associated with precipitation is available to mobilize COCs vertically.
- e. The types of regulated substances released are radionuclides. Downward migration of COCs is slowed by the following parameters:
 - Volume of release it is assumed that small volumes of COCs were released over a long
 period of time rather than a large volume over a short duration.
 - Soil saturation the soil tends to be very dry, especially near the surface and below the leachfield where the COCs are concentrated.
 - Soil particle adsorption/desorption radionuclides tend to adsorb to the soil particles with little desorption as suggested by the limited vertical migration of COCs.
- f. The lateral extent of contamination is defined by the leachfield boundaries based on reduced concentrations and the lack of contamination found in nearby sampling locations demonstrating minimal lateral mobility. Contaminant concentrations below the upper sampling horizons were significantly lower, demonstrating minimal vertical migration. The vertical extent of contamination is primarily confined to within 0 to 10 ft below the base of the leachfield based on field screening and analytical data.
- g. Presently, CAS 25-05-08 is located on a government-controlled facility. The NTS is a restricted area that is guarded on a 24-hour, 365-day per year basis; unauthorized personnel are not admitted to the facility. CAS 25-05-08 is contained within a restricted use zone classified as a "Research Test and Experiment Zone." This zone is designated for small-scale research and development projects and demonstrations; pilot projects; outdoor tests; and experiments for development, quality assurance, or reliability of material and equipment under controlled conditions. This includes compatible nondefense research, development and testing projects, and activities (DOE/NV, 1998a).
- Preferred routes of vertical and lateral migration are nonexistent since the sources have been eliminated and driving forces are not viable.
- i. See Section 2.3.10 for site-specific considerations.
- The potential for a hazard related to fire, vapor, or explosion is nonexistent for the COCs at the site.
- k. No other site-specific factors are known at this time.

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Based on this evaluation, impacts to groundwater are not expected. Therefore, groundwater monitoring is not proposed for this site and is not considered an element of the alternatives.

3.4 Evaluation and Comparison of Alternatives

Because NAC 444.818 (NAC, 1999) requires removal of septic tank contents, only Alternative 2 applies to CASs 25-04-06 A and B, and 25-04-07; therefore, an evaluation and comparison of alternatives is not required for these CASs. Only Alternative 2 applies to CAS 25-05-05 because the potential for mixed waste cannot be excluded until the contents are homogenized for removal and subsequent sampling.

The general corrective action standards and remedy selection decision factors described in Section 3.2 were used to conduct detailed and comparative analyses of each corrective action alternative. The advantages and disadvantages of each alternative were assessed to select preferred alternatives for CAU 262. Tables 3-1, 3-3, 3-5, and 3-7 present a summary of the detailed analysis of the alternatives for CASs 25-02-06, 25-05-12, 25-05-03, 25-05-06, and 25-05-08. Tables 3-2, 3-4, 3-6, and 3-8 present the comparative analysis of the alternatives for the same CASs. Cost summaries are provided in Appendix C.

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DOE/NV, see U.S. Department of Energy, Nevada Operations Office

Laczniak, R.J., J.C. Cole, D.A. Sawyer, and D.T. Trudeau. 1996. <u>Summary of Hydrogeological</u> <u>Controls on Ground-Water Flow at the Nevada Test Site, Nye County, Nevada</u>, U.S. Geological Survey Water-Resources Investigations Report 96-4109. Denver, CO: U.S Geological Survey.

NAC, see Nevada Administrative Code

Nevada Administrative Code. 1998b. NAC 445A, "Water Controls. Carson City, NV.

SNPO, see Space Nuclear Propulsion Office

- Space Nuclear Propulsion Office. 1970. <u>NRDS Master Plan 1969-1970, Nuclear Rocket</u> <u>Development Station, Jackass Flats, Nevada</u>. Las Vegas, NV.
- U.S. Department of Energy, Nevada Operations Office. 1996a. <u>Final Environmental Impact</u> <u>Statement for the Nevada Test Site and Off-Site Locations in the State of Nevada</u>, DOE/EIS 0243. Las Vegas, NV.
- U.S. Department of Energy, Nevada Operations Office. 1998a. <u>Nevada Test Site Resource</u> <u>Management Plan</u>, DOE/NV 518. Las Vegas, NV.
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- U.S. Geological Survey. 1993. <u>Selected Ground-Water Data for yucca Mountain Region</u>, <u>Southern Nevada and Eastern California, Calendar Year 1993</u>, Open-File report 95-158.
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APPENDIX K

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION DOCUMENT REVIEW SHEET

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NEVADA DIVISION OF ENVIRONMENTAL PROTECTION DOCUMENT REVIEW SHEET

Title/N nd Unde	umber Cl	Document Title/Number Closure Report for Corrective Action Unit 262: Area 25 Septic Systems and Underground Discharge Point, Nevada Test Site, Nevada	 Document Date <u>May 2003</u> 4. Originator/Organization <u>BN</u> 	
Responsible DOE/NV	NV ERP	Responsible DOE/NV ERP Project Mgr. Janet Appenzeller-Wing/Sabine Curtis		
Review Criteria				
n/Organiz	ation/Pho	Reviewer/Organization/Phone No. John Wong, NDEP, 486-2866	9. Reviewer's Signature	
10. Comment Number/ Location	11. Type*	12. Comment	13. Comment Response	14. Accept
General Comment	W	Provide the completed NEPA Checklist, referenced in Section 2.1, for review.	The NEPA Checklist will be submitted under a separate cover.	×
1) Section 4.0, pages 14-17, Tables 1-2	W	Include results in Table 1, Waste Characterization Results, for alpha, beta, gamma, and any other analyses performed on samples, 250505-Waste-2, 250406B-Waste-1, and 250512-Waste-2.	The additions to Table 1 were made.	*
2) Page 23, Section 3.0/ Appendix E	W	Waste quantities and descriptions specified in Section 3.0 need to be cross-referenced and clearly supported/documented in Appendix E; waste quantities are not presented in the Landfill Load Verification Forms or the Waste Travelers.	Solid Waste Tracking forms were included in Appendix E. These forms include the weight of each waste shipment. Waste volumes are not typically included on the Solid Waste Tracking forms, Landfill Access Registers, Load Verification Forms, or Waste Travelers. The waste volumes given in Section 3.0 are estimates based on field observations of the number of truck loads. A table describing generated waste was included in Section 3.0.	*
3) Section 4.2.2, 4.2.4, page 27	W	Correct typographical errors pertaining to the CAS numbers within the text in each section.	Corrections were made.	>

^aComment Types: M = Mandatory, S = Suggested.

Page 2 of 2

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION DOCUMENT REVIEW SHEET

Document Title/Number Closure Report for Corrective Action Unit 262: Area 25 Septic Systems and

Revision Number 0

Document Title/Number Closure Report for Corrective Action Curr 2022, And 2022 Underground Discharge Point, Nevada Test Site, Nevada

Reviewer/Organization John Wong, NDEP, 486-2866

Accept	>	*	*	¥
13. Comment Response	Change was made to include a section for each CAS requiring post-closure monitoring. The first Post-Closure Monitoring report is typically due approximately one year after NDEP approves the final CAU 262 Closure Report. Proposed dates for inspections and the monitoring report will be included in the CR.	A table was added to Appendix D which identifies the CAS associated with each radiological survey report.	The typographical error was corrected. No stake is present at CAS 25-51-01. However, photographs of the CAS 25-51-01 location were added to Appendix H.	This Appendix was taken from Section 3.0 of the Corrective Action Decision Document (CADD) for Corrective Action Decision Document (CADD) for CAU 262. Reference to the CADD is provided on page 29 and the Appendix J title page of the Closure Report. Only that portion of Section 3.0 of the CADD that was relevant to the closure was included in the Appendix. That portion includes the A-K analyses supporting the closure in place. Because Section 3.0 is from a previously published document the Section can not be changed.
12. Comment	Define specific post-closure monitoring (PCM) activities/inspection items for each CAS where PCM applies. Establish an annual date that such activities will be conducted.	Provide the CAS number associated with each radiological survey performed.	Correct the typographical error for CAS 25-04-07 (recorded as 25-05-07). Also, although no further action was the selected closure alternative for CAS 25- 51-01, it may be appropriate to include a photograph of the site location (stake) for completeness and so the CAS can be accounted for.	Confirm that this Appendix is complete; text appears to be missing from the initial page in the Appendix; ensure that an A-K analysis (NAC 445A.227) is presented for all applicable CASs.
11. Type*	м	W	W	M
10. Comment Number/ Location	4) Section 5.2, page 30	5) Appendix D	6) Page H-1, Appendix H	7) Appendix J

^aComment Types: M = Mandatory, S = Suggested.

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