Removal Site Evaluation and Interim Removal Action

Black Jack and Mac Mines

McKinley County, New Mexico

Phase 3 Report: Removal Site Evaluation

Revision 1

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1. INTRODUCTION

1.1 Background

Investigations conducted by the U.S. Environmental Protection Agency (EPA) in 2009, as part of the "Health and Environmental Impacts of Uranium Contamination in the Navajo Nation-Five Year Plan" (EPA, 2008), indicate that mine-related materials from the Black Jack and Mac mine sites (Sites) in the Mariano Lake and Smith Lake areas of the Navajo Nation within McKinley County, New Mexico may have elevated levels of radium-226, a "hazardous substance" as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). These Sites may require a Response Action under the CERCLA regulatory framework to protect the public health, welfare, and the environment. The Sites consist of four (4) legacy underground uranium mines owned and formerly operated by Sabre-Pinon Corporation and later by United Nuclear-Homestake Mining Company Partnership, of which Homestake Mining Company of California's (HMC) predecessor, Homestake Mining Company, was a partner. The four Sites include the Black Jack No. 1, Black Jack No. 2, Mac No. 1, and Mac No. 2 mines (Figure 1).

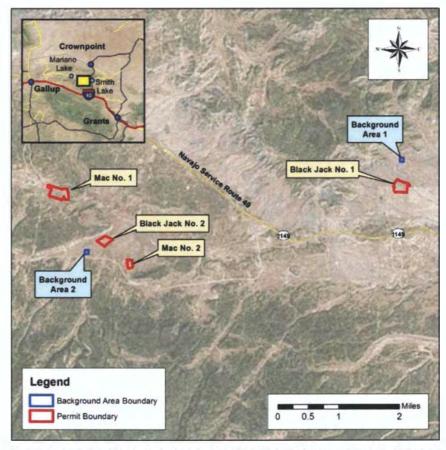


Figure 1: Location of Black Jack and Mac mines and EPA-approved background study areas (adapted from ERG, 2014).

The Black Jack No. 1 mine is located in Township 15 North, Range 13 West (T15N, R13W), Section 12 approximately 2 miles west of Smith Lake, New Mexico. The remaining three mine Sites are located in closer proximity to each other, approximately 6.5 miles west of Smith Lake, with the Black Jack No. 2 and Mac No. 2 sites both in T15N, R13W, Section 18 and the Mac No. 1 site in T15N, R14W, Section 12. These Sites lie within Navajo tribal allotted and/or trust lands administered by the Bureau of Indian Affairs (BIA) on behalf of the Navajo Nation.

1.2 Environmental Setting

The Black Jack and Mac mines are situated at relatively high elevation (approximately 7,450 ft.) on the Colorado Plateau in northwestern New Mexico. The climate is semi-arid with average annual precipitation on the order of 10-12 inches. The regional landscape generally consists of mesas, narrow canyons and relatively wide valleys with sparse desert grassland, sagebrush prairie and pinion/juniper stands. The results of the Phase 1 Geomorphic Study support grazing as the apparent historical land use in the vicinity of the Black Jack and Mac mines.

The geomorphic processes that shaped the landscape at the mine sites are tectonism, mass wasting, and fluvial and eolian erosion and deposition. Tectonism caused the uplift of the Zuni Mountains to the south, which resulted in the tilting of the Chaco Slope where the mines are located. The primary landforms are controlled by the underlying geologic strata and structures. The mine sites are underlain by sedimentary rock of Cretaceous age consisting of shale and sandstone units of the Mancos and Dakota formations. The high ground is formed by mesas and cuestas capped by erosion-resistant sandstone. Low ground consists of dipslopes of sandstone or valleys with shallow alluvial soil over bedrock.

Two relic geologic structures, the Mariano Lake anticline and the Smith Lake syncline with axes running east-west and approximately one-half mile apart, control the terrain and drainage and thus the geomorphology of the mine sites. Mass wasting has caused landslides and rockfalls in the general area, although these features are not present on the Black Jack and Mac mine sites. The present dominant geomorphic process is fluvial erosion and deposition with contribution from and interaction with eolian erosion and deposition.

Except for the north vent at Black Jack 2, the mine sites are located on low ground. Runoff as sheet flow and stream flow from high ground crosses all four mine sites, but watercourses are ephemeral, flowing only after large storms. Wind causes some erosion and deposition of sediment, but the dominant active processes affecting landforms are fluvial, either as sheet flow down slopes or stream flow, which is the more dynamic process in erosion.

The four mine Sites have similar geomorphic features, including: ephemeral, single thread watercourses, low- to moderate- channel sinuosity, slope grades on the mine sites of less than 7%, and sedimentary terrain with bedrock that dips ENE at 4 degrees or less.

1.3 Mine History

Historical information regarding operations at each of the four mines, primarily obtained from a 1970 report from the US Atomic Energy Commission (USAEC) concerning uranium mining methods and production in the Grants Mineral Belt (Holmquist, 1970), is summarized as follows:

- Black Jack No. 1: This former underground uranium mine consisted of a 825-foot, three-compartment shaft with multiple drifts. The mine was operated from 1959 through 1967, though uranium deliveries from stockpiles continued until 1971. In total, the mine produced approximately 1.44 million tons of ore yielding approximately 6,447,000 pounds of uranium concentrate. Mining operations ceased on June 30, 1967. In July 1967, the vent holes and mine shaft were sealed with half-inch steel plates, which were welded in place. Available records (Holmquist, 1970) indicate that the underground workings are situated above the local groundwater table (i.e. the mine was dry). One groundwater well in the area has been identified, and records obtained from the Navajo Nation Water Code Administration (NNWCA) indicate a well depth of 1,000 feet. The historic origin and purpose of this well is unknown.
- Black Jack No. 2: This former underground uranium mine consisted of 330-foot vertical shaft with drifts developed in the range of 280-330 feet. The mine was operated from 1960 through 1964, and ore deliveries from stockpiles at the mine apparently continued until 1970. In total, the mine produced 247,613 tons of ore yielding 1,129,004 pounds of uranium concentrate. In August 1964, Homestake-Sapin Partners requested permission from the United States Department of the Interior to extract the shaft pillars, backfill the shaft and seal the mine. Permission was granted in August 1964, the shaft pillars were extracted, the shaft was backfilled, and the mine's vent holes and shaft were sealed with half-inch steel plates. Subsequently, the mine shaft was covered with a concrete slab. There are indications in historic documentation that portions of this mine required some dewatering (Holmquist, 1970). Historic well records from the NNWCA indicate one well completed at a depth of 350 feet, but HMC has not been able to verify the existence of this well.
- Mac No. 1: The underground mine workings at Mac No. 1 consisted of a 515-foot vertical shaft with two drift levels. The mine was operated from 1968 through April 1971, though uranium deliveries from ore stockpiles at the mine are believed to have continued until 1979 or 1980. In total, the mine produced approximately 400,000 pounds of uranium concentrate. Mine closure in 1971 including backfilling of the shaft and covering with a concrete slab. The reported depth to static water (450 feet) is based on data obtained from the NNWCA for a well located north of the hoist building. The lowest level, situated in the Brushy Basin shale formation, was apparently abandoned before significant mining took place due to "boggy conditions" and a related inability to construct the necessary mine infrastructure.
- Mac No. 2: The underground mine workings at Mac No. 2 consisted of a 288-foot vertical shaft with multiple drifts. The mine was operated from 1968 through 1969 (Holmquist, 1970). In total, the mine produced 31,194 tons of ore yielding 109,009 pounds of uranium concentrate. The mine was closed in late 1969, and the shaft was backfilled followed by installation of a concrete slab. No information regarding wells in the vicinity of this mine was obtained from a records search

conducted by the NNWCA. The USAEC report (Holmquist, 1970) indicates that the "...ore is in the Poison Canyon sandstone and for the most part the formation was dry..."

1.4 Regulatory Requirements

An Administrative Settlement Agreement and Order on Consent (AOC) between HMC and the EPA for Interim Removal Action at the Black Jack and Mac mine Sites became effective on August 27, 2014 (EPA, 2014). Appendix A of the AOC details a scope of work (SOW) to investigate the nature and extent of actual or threatened releases of mine-related material at the Sites. The SOW includes three basic elements:

- SOW Section 4.1 Phase 1: Gamma survey, geomorphologic survey and background study
- SOW Section 4.2 Phase 2: Mitigation of physical mine hazards; posting of caution signage
- SOW Section 4.3 Phase 3: Removal Site Evaluation (RSE)

Phase 1 field work was completed in early May 2017¹, and the Phase 1 Summary Report (ERG and AKA, 2017) required by Section 6.9 of the SOW was accepted by EPA on September 12, 2017. The Phase 2 Report for Site Hazards Assessment (iina ba, 2018) was accepted by EPA and NNEPA on July 2, 2018. This RSE Report summarizes Phase 1 and Phase 2 results, then provides a detailed presentation of the Phase 3 work along with overall RSE conclusions.

For the purposes of this RSE Report, mine-related material means local geologic materials (soil and rock) and remnant mine structures and related debris (e.g. concrete, metal, wood, etc.) having levels of uranium decay series radionuclides that may be elevated relative to that occurring naturally in local background soils/rocks residing at or near the ground surface², and potentially, elevated levels of stable elements (e.g. metals) associated with uranium ore and/or former mining operations. It does not include naturally occurring background concentrations found in local native soils or underlying bedrock formations.

1.5 RSE Report Organization

This RSE Report is organized in general accordance with the three AOC/SOW Phases listed above. The results and conclusions of Phase 1 (Section 2) and Phase 2 (Section 3) SOW elements are summarized with references to previously approved Work Plans and Reports containing detailed information. For Phase 3, new data and information are presented in Section 4 to complete the RSE element of the AOC/SOW (EPA, 2014). This RSE Report will be used in the next step in the process specified Section 7.5 of the AOC/SOW,



¹ Initial gamma radiation surveys and background soil sampling were conducted between April 20-25, 2015. Due to subsequent discussions between EPA, Navajo Nations EPA (NNEPA), and the Bureau of Indian Affairs (BIA) regarding proper procedure for notification/approval of access to Sites located on lands allotted by the BIA to individual members of the Navajo Nation ("Allottees"), or on lands subject to grazing permits, Phase I work was suspended pending resolution of this matter. The Respondent (HMC) was given permission to resume Phase I field work at the Sites in December 2016, and respective field work was completed in early May 2017.

² "Background" levels of gamma radiation, radionuclides and stable elements in local geologic materials have been defined based on Phase 1 SOW characterization surveys conducted at locally representative areas of native soil/rock types situated in upwind and hydrologically upgradient locations expected to be free of impacts by historic mining activities (ERG, 2017a).

which is to develop an Engineering Evaluation and Cost Analysis (EE/CA) in accordance with applicable EPA guidance on non-time-critical removal actions (EPA, 1993).

2. PHASE 1 PROJECT SUMMARY

The Phase 1 Summary Report (ERG and AKA, 2017) was accepted by EPA on September 12, 2017. The objective of this Report was to characterize – both radiologically and geomorphologically – the areas surrounding the Black Jack and Mac mine Sites. In support of this objective, Phase 1 work included four study areas, the results of which are summarized below.

2.1 Phase 1 Transect Gamma Scan

The majority of gamma radiation survey work was performed April 20-25, 2015, with follow-up scanning performed on December 6-7, 2016 and May 3, 2017. All work was performed with Ludlum Model 44-10 sodium iodide scintillation detectors paired to Ludlum Model 2221 ratemeter/scalers and an appropriate global positioning (GPS) receiver and handheld data logger. Two background areas (BA1 and BA2, see Figure 1) and four mine areas were scanned. The gamma data was used to map the spatial extent of the impacted area for each mine location, defined as the 95% upper tolerance limit (UTL) on background gamma radiation readings, which were equivalent to 15 and 13.7 μ R/hr for BA1 and BA2, respectively. Resulting estimates of the total impacted area for each Site are provided in Table 1. Details of these results are provided in the Phase 1 Summary Report (ERG, 2017a).

Mine Site Estimated Areal Extent of Impacted Soils*

Black Jack No. 1 159 acres

Black Jack No. 2 65 acres

Mac No. 1 22 acres

Table 1: Phase 1 estimates of areal extent of mine impacts at the Sites.

42 acres

2.2 Phase 1 Background Study

Mac No. 2

Soil sampling at two background areas was performed from April 20-21, 2015. Soils were analyzed for both radioactive and stable constituents of potential concern (COPCs), including: uranium (U-nat), radium-226 (Ra-226), molybdenum, vanadium, and arsenic. Actinium-228 (Ac-228) and potassium-40 (K-40) were added to the list of analytes for potential diagnostic purposes related to the gamma/Ra-226 correlation.³ All soil COPC concentrations, including surface and subsurface soils, were consistent with published ranges for naturally occurring background.

During the development of this Report, it was discovered that summary statistics for average concentrations of radionuclides and metals in soil as presented in Table 1 of the Phase 1 Summary Report (ERG, 2017a) were incorrectly entered in the table. In addition, analytical results for two subsurface

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^{*}In excess of the upper 95% UTL on background gamma readings.

³ Actinium-228 was analyzed as a surrogate radionuclide to represent natural thorium (Th-232) concentrations based on an assumption of radiological equilibrium.

samples in Background Area 2, as presented in Attachment A1 to the Phase 1 Summary Report (ERG, 2017a), were incorrectly entered in the original data table.

Because two additional discrete samples of surface soil were collected in each Background Area in association with Phase 3 field correlation work (n = 4 samples total), respective analytical results have been added to the Phase 1 Background Area data sets. The Background Area data sets have been corrected/updated accordingly and summary statistics were recalculated as provided in Appendix A (Attachment A1) to this RSE Report. These updated Background Area data tables supersede the original background data sets presented in the Phase 1 Report.

2.3 Phase 1 Characterization of Indoor Radon in Buildings

Ambient indoor radon was measured in the west and east buildings at the Mac No. 1 mine from December 5-7, 2016. The measured concentrations were consistent with typical outdoor background levels, possibly because the buildings were well-ventilated due to structural deterioration (visible holes or openings in walls, windows, and/or doors). Specifically, average results for the west and east buildings at Mac No. 1 Mine were 1.1 pCi/L and 0.8 pCi/L respectively. Complete results are presented in the Phase 1 Summary Report (ERG, 2017a).

2.4 Phase 1 Geomorphic Study

The geomorphology of both the watersheds and the landforms adjacent to and within the four mine Sites were characterized at intermittent intervals between April 2014 and May 2017. The four mine Sites have similar geomorphic features, including: ephemeral, single thread watercourses, low- to moderate-channel sinuosity, slope grades on the mine sites of less than 7%, and sedimentary terrain with bedrock that dips ENE at 4 degrees or less. The results of the geomorphic study support grazing as the apparent historical land use.

Specifications in the AOC/SOW for Phase 1 (EPA, 2014) included interim plugging of open shafts or vents, but this work was deferred to Phase 2 (fencing to prevent access to physical hazards was temporarily improved pending Phase 2 interim hazards mitigation work).

Additional detail concerning the methods and results of the geomorphic studies are provided within the Phase 1 Geomorphic Study Report (AKA, 2017).

3. PHASE 2 PROJECT SUMMARY

Phase 2 work included mitigation (elimination or removal) of physical hazards at the former mine in addition to passive outdoor radon monitoring near mine features.

3.1.1 Mitigation of Physical Hazards

Mitigation work occurred during November and December 2017. Identified physical hazards at the mine Sites included:

- Former mine shafts
- Former mine vents

- Former utility raises
- Concrete slabs
- · Former utility infrastructure
- Former mine buildings
- Miscellaneous open holes

Physical hazards were mitigated in successive actions. The approach to mitigation varied depending upon the hazard being mitigated. Mitigation actions included:

- · Cutting and/or removal of sharp metal objects
- Plugging and/or capping open holes with native soils or flowable fill mixture
- Installation of chain-link fence
- Installation of hazard warning signage

Additional detailed information concerning mitigation work is available in the Phase 2 Physical Hazards Mitigation Report (iina ba, 2018).

3.1.2 Special Outdoor Radon Monitoring near Vents/Shafts

Monitoring of ambient airborne radon gas (Rn-222) concentrations was conducted August 29, 2017 through October 2, 2017 in response to a special request from NNEPA. While not required under the AOC, EPA supported the conduct of this outdoor radon monitoring next to remnant mine features, some of which apparently once served as operational vertical conduits to the underground mine workings at the mine Sites (e.g. mine shafts, ventilation shafts and utility raises). Many of these former operational conduits appear to have previously been backfilled or otherwise closed as part of historic mine reclamation efforts. This monitoring was conducted in accordance with Standard Operating Procedure (SOP) P2-1 "Phase 2 Radon Monitoring" as provided in an Attachment to the Phase 2 Hazards Assessment Work Plan (iina ba, 2017). SOP P2-1 describes the radon monitoring locations, equipment, procedures, and quality assurance/quality control (QA/QC) protocols used for deploying and collecting radon detectors. The purpose was to obtain measures of the time-integrated average concentration of radon gas in outdoor air near the openings of any historic conduits to the underground mine workings, and to evaluate potentially elevated levels relative to ambient outdoor radon concentrations at appropriate background locations.

Outdoor radon monitoring results were presented in a Phase 2 outdoor radon monitoring Data Transmittal (ERG, 2017b) and follow-up addendum (ERG, 2017c). A compilation of results is presented in Table 2. Generally, monitoring data reflect slightly elevated concentrations of ambient radon associated with mine-impacted soils. Near the north and south vent shafts and utility raises at the Black Jack No. 1 mine, however, radon levels were significantly elevated as these features were not sealed to the outside atmosphere. Although releases from these vent shafts and utility raises do not pose a health concern as they are situated far from any dwellings (radon levels decrease rapidly with distance from the source due to atmospheric mixing/dispersion), HMC performed interim mitigation measures to prevent further releases as noted below.

The elevated radon associated with impacted soils will be remedied when these soils are removed to meet site cleanup levels. As part of the Phase 2 hazards mitigation, applicable vent shafts and utility raises at the Black Jack No. 1 Site were temporarily sealed, as approved by EPA on Nov. 8, 2017, with inflatable packer plugs or quick-set epoxy cement to prevent further radon releases (iina ba, 2018) until permanent mitigation measures can be determined through the EE/CA process and implemented once remedies have been selected.

Table 2: Outdoor radon monitoring results near mine shafts, vent holes and utility raises.

Mine Site	Easting*	Northing*	Radon Monitoring Location ID	Phase 1 Summary Report Mine Feature Description	Phase 1 Summary Report Mine Feature ID	Radon Result (pCi/L)
Black Jack 1	2623453	1654060	BJ1-MS	Buried Main Shaft	M1	0.89
Black Jack 1	2623484	1654222	BJ1-VR1	Vent/Utility Raise	VR1 ^a	0.57
Black Jack 1	2623799	1654260	BJ1-VR2	Vent/Utility Raise	VR2 ^a	1.3
Black Jack 1	2624652	1654142	BJ1-NVS	North Vent Shaft	NV	25.2
Black Jack 1	2624744	1654138	BJ1-NUR	Utility Raise (North)	UR	1.6
Black Jack 1	2624635	1653265	BJ1-URS	Utility Raise (South)	HL°	4.9
Black Jack 1	2624519	1652815	BJ1-SVS	South Vent Shaft	SV	150
Black Jack 1	2621953	1654141	BJ1-BKG	Background	N/A ^b	< 0.22
Black Jack 2	2597919	1649435	BJ2-MS	Mine Shaft	M1	2.1
Black Jack 2	2597703	1649704	BJ2-V1	South Vent Shaft	V1	1.3
Black Jack 2	2597441	1650853	BJ2-V2	North Vent Shaft	V2	0.59
Black Jack 2	2597800	1649498	BJ2-U1 ^d	Utility Raise	U2	2.9
Black Jack 2	2597733	1649508	BJ2-U2 ^d	Utility Raise	U1	1.6
Black Jack 2	2597442	1650678	BJ2-U3	Utility Raise	U3	0.24
Black Jack 2	2597411	1650835	BJ2-U4	Utility Raise	U4	< 0.22
Black Jack 2	2598129	1648676	BJ2-BKG	Background	N/A ^b	0.27
Mac 1	2594448	1653248	MAC1-MS	Main Mine Shaft	MS	1.1
Mac 1	2594372	1653338	MAC1-V2	Vent Raise	VR2	1.2
Mac 1	2594535	1653425	MAC1-WW	Water Well	ww	0.62
Mac 1	2593486	1653887	MAC1-BKG	Background	N/A ^b	1.0
Mac 2	2600226	1647216	MAC2-VS	Vent Shaft	V1	0.38
Mac 2	2600070	1647599	MAC2-MS	Main Shaft	M1	1.1
Mac 2	2599576	1646530	MAC2-BKG	Background	N/A ^b	0.54

^{*}State Plane Coordinate System: NAD 83 (ft), NM West (FIPS 3003)

^aIdentified in the P1 Summary Report and/or SOP P2-1 of P2 Work Plan.

^bNot applicable (location not identified in P1 Summary Report or P2 HA Report).

^cA steel utility raise pipe was not identified for radon monitoring near the south vent shaft, but one was identified at the location of "Open Hole" as indicated in the P1Summary Report, P2 HA Work Plan and P2 HA Report.

^dRadon monitoring station IDs for U1 and U2 inadvertently transposed relative to locations shown in the P1 Summary Report and subsequent documents.

4. PHASE 3 RSE REPORT

4.1 Overview

Environmental Restoration Group Inc. (ERG), with input from HMC and Alan Kuhn Associates, LLC (AKA), has prepared this Phase 3 RSE Report in accordance with the specifications of Section 5.1 of the AOC/SOW (EPA, 2014) and the Phase 3 Work Plan (ERG, 2017d).

4.2 Objectives

The objectives of Phase 3 characterization studies were identified in the Phase 3 Work Plan (ERG, 2017d) based on the specifications provided in Section 5.1 of the AOC/SOW. These objectives are summarized in Table 3.

SOW Section No.	SOW Objective			
4.1.4	Gamma/Ra-226 Correlation			
4.3.1	Characterize Lateral/Vertical Extent of Impacts			
4.3.2	Screen for Additional Analytes			
4.3.3	Groundwater Sampling Geotechnical Sampling Radiological Surveys of Buildings			
4.3.4				
4.3.5				
4.3.6	Open Hole Closure			
4.3.7	Testing of Solid Waste			
6.13	Final Report with Removal Site Evaluation			

Table 3: Phase 3 SOW objectives.

As indicated in the Phase 3 Work Plan, interim closure of open holes (SOW objective 4.3.6) was addressed in Phase 2 of the AOC/SOW (iina ba, 2018). With respect to SOW objectives 4.3.5 and 4.3.7, HMC has opted in favor of demolition of all structures and inclusion of all solid wastes along with contaminated soil in a common final disposal solution, to be determined in accordance with the next phase of the AOC/SOW through the EE/CA process. This deviation from the Phase 3 Work Plan has no implications for the other AOC/SOW objectives given in Table 3, which are the subject of the remainder of this RSE Report. Deviations from the Phase 3 Work Plan are summarized and evaluated in Section 4.3.9.

4.3 Methods

4.3.1 Project Team

The project team included HMC technical and managerial staff, community liaison services (Rusted Peak, LLC), environmental health physics support (ERG), geotechnical engineering experts (AKA), and hazard mitigation specialists (iina ba), all of which contributed to the development of the data, evaluations and conclusions presented in this Report. The Project Coordinator (PC) for the Sites is Clark Burton of HMC. The Remedial Project Manager is Jacob Phipps of EPA (Region 9).

4.3.2 Site Access

In accordance with Section 27 of the AOC, HMC made all reasonable efforts to properly notify local members of the Navajo Nation community allotted lands by the BIA ("Allottees") of field activities to be conducted under the AOC/SOW, and to work with applicable agencies and individual Allottees to obtain appropriate permissions for access to the Sites. Approved authorization letters were sent to known Allottees within AOC/SOW project areas, and to the best of HMC's knowledge, all notification requirements for Site access were met prior to initiating Phase 3 field work activities.

In accordance with Sections 3.9 and 3.10 of the AOC/SOW, cultural resource surveys for applicable areas near the Black Jack and Mac Mines were performed and approved by the Navajo Nation Historic Preservation Department (NNHPD) and EPA/NNEPA. In response to a "Data Request" for information on biological resources specific to the Sites ("Data Request") submitted by ERG on behalf of HMC, the Navajo Natural Heritage Program ('NNHP") identified no Known Species of Concern at the Sites, but 11 Potential Species were determined to require a biological evaluation. Biological assessment surveys were conducted at the mine Sites June 29-30, 2017 by a qualified contractor (Dodge Environmental, 2017a and 2017b), and approval of the resulting biological clearance Reports was obtained from the Navajo Nation Department of Fish & Wildlife (NNDFW) on September 18, 2017 (NNDFW, 2017a and 2017b).

In accordance with AOC/SOW requirements, HMC made the appropriate notifications to EPA, NNEPA and the Navajo Nation Department of Justice (NNDOJ) before performing field work under a Site Access Agreement with the NNEPA and NNDOJ (NNEPA and NNDOJ, 2014).

4.3.3 Gamma/Ra-226 Correlation

As indicated in the SOW (EPA, 2014), a statistical correlation between ambient gamma radiation (gamma) and Ra-226 concentrations in surface soils (0-15 cm) was developed in accordance with the methods described in the Phase 3 Work Plan (ERG, 2017d). This portion of the Phase 3 field work took place on October 10-12, 2017. Established field sampling and measurement techniques for gamma/Ra-226 correlations (e.g. Johnson et al., 2006; Whicker et al., 2006 and 2008) were used to generate data for least squares regression analysis, the results of which were used to statistically predict Ra-226 concentrations in surface soils based on Phase 1 gamma survey data (ERG, 2017a). Results are provided in Section 4.4.1 of this Report.

To evaluate prediction error in the correlation, the Phase 3 Work Plan called for 4 randomly located, discrete samples of surface soil to be collected at each Site (ERG, 2017d). While not specifically collected for this purpose, many discrete soil samples were collected for other purposes and those samples were suitable for this evaluation objective and were thus used instead. This includes discrete samples taken at the center of each correlation plot location (n = 20 samples) and at borehole transect sampling locations (n = 53 samples). This deviation from the Work Plan is expected to provide more robust estimates of prediction error across a wider range of conditions across all mine Sites. Results of this evaluation are discussed in Section 4.4.6.

4.3.4 Characterization of Lateral/Vertical Extent of Impacts

4.3.4.1 Lateral Extent

The general lateral (areal) extent of mine-related impacts (above background levels) at each Site was estimated based on Phase 1 gamma survey data (ERG, 2017a). Results are summarized in Section 2.1 of this Report. The original plan was to refine these estimates based on conversion of gamma survey data in to estimates of Ra-226 concentrations in surface soil (0-15 cm) using the results of the gamma/Ra-226 correlation along with the Investigation Level indicated in the SOW (1.24 pCi/g Ra-226 above background) (ERG, 2017d). However, in the region of the gamma/Ra-226 correlation relationship corresponding to the Investigation Level, the statistical relationship appears to have a high bias sufficient to result in significant overestimation of the lateral extent of impacts.

At the boundary of impacted areas, defined at the 95% upper tolerance level (UTL) on background gamma radiation readings as delineated in the Phase 1 report (ERG, 2017a), the correlation predicts that Ra-226 concentrations should generally exceed the Investigation Level for surface soil at each Site (Table 4), a conclusion not supported by gamma survey data alone, or by direct soil sampling results (see Section 4.4.6 for details). This technical problem is believed attributable to differences in methods of estimation and insufficient resolution in the correlation to accurately predict low-level Ra-226 impacts in soil relative to background levels. As a result, the original conservative estimates of the areal extent of impacts were used for estimation of the volume of contaminated soil at each mine Site [this deviation from the Work Plan was discussed with EPA on a bi-weekly conference call (April 18, 2018)]. Details of the methods used to estimate the original areal extent of impacts are given in detail in the Phase 1 Summary Report (ERG, 2017a).

Background Area	Mean Ra-226 (pCi/g)¹	Investigation Level (pCi/g) ²	Site(s) of Investigation Level Applicability
BA1 Surface Samples	1.31	2.6	BJ-1
BA2 Surface Samples	1.01	2.3	BJ-2, Mac-1, Mac-2
BA1 Subsurface Samples	1.21	2.5	BJ-1
BA2 Subsurface Samples	0.89	2.1	BJ-2, Mac-1, Mac-2

¹Based on 13 samples collected within each Background Area (BA) in Phases 1 and 3 of the AOC/SOW (see Appendix A, Attachment A1 for updated analytical results and summary statistics).

4.3.4.2 Vertical Extent

The vertical extent of contamination above background levels was based on downhole measurements of subsurface gamma radiation and soil depth profile samples collected along borehole sampling transects. This data was obtained between October 3-13, 2017 in general accordance with Phase 3 Work Plan



²Defined (in the AOC/SOW) as 1.24 pCi/g Ra-226 in surface soil plus the mean background concentration, herein rounded to the nearest tenth of a pCi/g to avoid unwarranted precision in reporting and use of analytical laboratory results.

specifications (ERG, 2017d), though there were deviations in how these data were evaluated to estimate the maximum depth of soil impacts and inform decisions on the depth at which subsurface soil samples should be collected for confirmatory analysis. This change in data evaluation and sampling strategy was approved by EPA and NNEPA during an October 11, 2017 Site visit to oversee soil boring, gamma logging and subsurface sampling activities. Methods and circumstances leading to these deviations from the Work Plan are described below.

Boreholes were developed at approximately 100-meter intervals along transects as shown in the Work Plan. Boreholes were advanced with a direct-push Geoprobe with a 3.25" diameter probe to allow downhole gamma measurements with a 2" x 2" sodium iodide (NaI) detector attached to a cable with depth increments indicated on the cable. Additional (unplanned) boreholes were collected at biased locations of interest, for example areas of potential "principle threat wastes" such as remnant waste rock piles, or where evidence of subsurface contamination near mine shafts was identified.

At each borehole, the gamma detector was lowered downhole and gamma measurements [in counts per minute (CPM)] were taken at 15 cm depth increments until readings stabilized at apparent background levels or until drilling advancement met refusal. The gamma data were documented in the field logbook for subsequent generation and evaluation of depth profiles. The approach proposed in the Phase 3 Work Plan to identify subsurface impacts based on exceedance of a fixed downhole gamma cutoff criterion (28,000 CPM at Black Jack No. 1 and 22,000 CPM for the other three mine Sites), was determined to be ineffective because of variable background readings encountered at depth for various boreholes, and because downhole "geometry effects" often significantly influenced the shape of depth profiles near the surface.

Instead of a fixed numeric criterion, the maximum depth of subsurface impacts to soil was evaluated on a case-by-case basis, considering relevant information from several qualitative and quantitative factors, including the shape of the gamma depth profile (e.g. the depth of an inflection point in the profile followed by stabilization of gamma readings at a relatively constant level with increasing depth) and later in the data analysis process, the results of confirmatory Ra-226 analysis for select subsurface soil samples (selected based on the shape of the downhole gamma logging profile).

Guidelines for profile evaluation and selection of sampling depths, as discussed with and verbally approved by EPA/NNEPA in the field and via email on October 25, 2017, included taking soil samples in 15-cm increments at a clear inflection point in the gamma depth profile, just below the inflection point, and at a depth of 1-foot (approximately 30 cm) below the gamma inflection point. For areas with evidence of principle threat wastes, additional subsurface soil samples were collected in systematic increments as described in the Phase 3 Work Plan (ERG, 2017d).

4.3.5 Screen for Additional Analytes

All surface/subsurface soil samples taken under the Phase 3 Work Plan were analyzed for uranium, Ra-226, arsenic, molybdenum, selenium and vanadium (per SOW paragraph 3.2).⁴ This includes all

⁴ As previously noted, Ac-228 and K-40 were not required by the AOC/SOW but were parameters included for potential diagnostic purposes with respect to gamma radiation readings in relation to soil Ra-226 concentrations.

correlation samples (Section 4.4.1) and borehole depth samples (Section 4.4.10). Analytical laboratory methods and quality control (QC) requirements are detailed in Section 3.2 of the Work Plan (ERG, 2017d).

4.3.6 Groundwater Sampling

One potential well associated with the Mac No. 1 mine was identified in Phase 1. Two additional potential wells were identified in Phase 2, and these wells were investigated by *iiná bá*, Inc. to determine if groundwater was present, the depth to groundwater, and to analyze samples of any groundwater encountered for the constituents listed in the AOC/SOW. After accessing the well casing at the Black Jack No. 1 location, an electronic water level indicator was lowered down the well casing until a hard, fixed object was encountered at a total depth of 580 feet. At the MAC No. 1 location, a total of 185 feet of water tape was lowered into the well casing until a hard, fixed object was encountered. In both cases, no indication of static groundwater was observed.

At the time of the well investigation, no records regarding these wells were available but the Navajo Nation Water Code Administration (WCA) was contacted to request a search for records in the Smith Lake Chapter area regarding groundwater wells and water level data. Based on information provided by the WCA, the following well statistics were on file for the subject Sites:

MAC No. 1 Well (windmill)

Total Well Depth = 1,376 feet; static water level at 450 feet.

Black Jack No. 1 Well (windmill)

Total Well Depth = 1,000 feet; no water level data available

Black Jack No. 2 Well (inside hoist house)

Total Well Depth = 350 feet; no water level data available

iiná bá attempted to obtain data from the third potential well as identified above from the WCA records (inside the hoist house at Black Jack No. 2). However, it was quickly determined that this feature did not extend vertically into the ground but instead turned 90 degrees to the south, extending horizontally at a shallow depth towards the outside of the hoist house.

Because groundwater was not identified in any of these potential wells, this AOC/SOW objective is not discussed further in this Report.

4.3.7 Geotechnical Sampling

Geotechnical sampling of soils at the Sites was conducted in accordance with Section 2.7 and Table 3 of the Phase 3 Work Plan (ERG, 2017d); however, only Geoprobe borehole cores were examined in the field, sampled and subsequently tested by a geotechnical laboratory. Results are discussed in Section 4.4.9. Backhoe test pits were not performed in Phase 3 as field assessment of soil cores and laboratory screening tests for soil classification (e.g. grain size, plasticity) of samples was sufficient to characterize and draw conclusions regarding the geotechnical suitability of soil resources at the mines. Geotechnical specifications for soils identified in Phase 3 to be suitable for remedial applications (repository cover or



backfill) will be determined as needed for future engineering design phases of the project depending on the outcome of the EE/CA (e.g. bulk sample collection and compaction tests per ASTM D 698).

4.3.8 Radiological Surveys of Buildings and Testing of Solid Waste

As previously indicated, these AOC elements were eliminated based on discussions with EPA/NNEPA and a decision by HMC to demolish remaining structures and likely place all solid wastes in the overall waste stream to be managed under a common final disposal solution (to be determined through the EE/CA process). However, depending on the selected action for the mines, segregation of debris for potential separate disposal in an appropriate offsite commercial facility remains a possibility provided radiological acceptance criteria for such disposal can be demonstrated by HMC. This deviation from the Phase 3 Work Plan has no implications for other AOC/SOW objectives (Table 3).

4.3.9 Deviations from Work Plan

Deviations from the Phase 3 Work Plan are summarized below, with comments on implications for meeting the data quality objectives (DQOs) outlined in the Work Plan:

1) Planned correlation locations at Black Jack No. 2 Mine Site, based on the cross-calibration locations used in Phase 1 to normalize detector readings (ERG, 2017a), were modified in the field during Phase 3 to find more uniform radiological conditions across areas > 100 m². Identification of any correlation plots that would meet the variance criteria specified in the Phase 3 Work Plan was not possible as spatial variability in most areas was higher than could be accommodated under the specified variance limitation criteria.

Implications: The observed spatial variability in gamma readings across correlation plots may have increased the amount of prediction error in the correlation, possibly a contributing factor to limitations on use near the Ra-226 Investigation Level (see Table 4 and Figure 13).

Discrete samples of surface soils were taken at correlation plot and borehole transect sampling locations rather than at random locations within the survey area.

Implications: More discrete samples were collected, likely across a wider range of values versus random locations. This deviation has no impact on data quality but should provide more data from which to evaluate prediction error in gamma-based estimates of Ra-226 in soil.

3) Phase 1 estimates of the lateral extent of impacts (ERG, 2017a) were not "refined" based on the correlation. This deviation was necessitated by a slight high bias at the low end of the correlation relationship and potential overestimation of impacts as defined at the Ra-226 Investigation Level.

Implications: This deviation, as discussed with EPA on a bi-weekly conference call (April 18, 2018), avoids significant overestimation of areal extent of impacts, yet is conservative as the outer limits of the lateral extent of impacts are based on the upper range of background rather than on the Ra-226 investigation level (1.24 pCi/g plus background).

4) Elimination of radiological surveys and testing for structures and solid wastes (to be demolished and added to the contaminated soil waste stream). Implications: This deviation has no impact on other project DQOs. HMC's decision not to salvage these structures/materials for potential future use, or depending on the selected action for the mines, to survey at a later time to determine suitability for offsite disposal in an appropriate commercial facility, eliminated the current need for radiological surveys as specified in the AOC/SOW (EPA, 2014).

5) Estimated maximum soil depth of mine impacts was based on downhole gamma depth profiles and analytical results for subsurface soil samples, versus use of a fixed gamma cutoff value for downhole readings based on reference readings from the background areas.

<u>Implications</u>: This deviation has no effect on the quality or usability of the data but does affect the estimated depth of subsurface contamination as respective criteria were modified. The criteria for estimating maximum depth of impacts was based primarily on inflection points in downhole gamma radiation depth profiles and other radiological characteristics of these profiles (such as measurement geometry effects) as previously noted (Section 4.3.4.2). This modification is expected to improve the accuracy of estimated total depth of radiological contamination relative to the criteria specified for this parameter in the Phase 3 Work Plan (ERG, 2017d).

6) Backhoe test pits for geotechnical sampling was not performed in Phase 3 as previously noted.

<u>Implications</u>: This does not represent a data gap at this stage of the AOC/SOW. Geoprobe sampling and field observations were sufficient for the geotechnical team to identify and evaluate remedial engineering options within the EE/CA, the next stage of the AOC/SOW process.

7) Borehole transect location M2-21 at the Mac No. 2 Site was inadvertently not staked out in the field and a borehole was not advanced at this planned location.

<u>Implications</u>: This location was a planned biased location near a small rock pile just west of the main mine rock dump (see empty symbol for this station in Figure 17). While this location may have a maximum depth of soil impacts somewhat deeper than the majority of borehole locations at the Mac No. 2 mine Site, bedrock is relatively shallow in this and most areas of the Site and any affect of this missing data point on the calculated average depth of impacts is expected to be insignificant relative to the uncertainty in estimates of impacted soil volumes. These estimates and the underlying data collected are suitable for use in the EE/CA process for conceptual evaluation of remedial options. Likewise, this missing sampling location will not significantly affect average or median concentration values that may be used for human health and ecological risk assessments under the EE/CA.

4.4 Phase 3 Results

4.4.1 Correlation

Per the Phase 3 Work Plan, gamma/Ra-226 correlation plots were scanned/sampled at 10 locations at the Black Jack 1 Site (Figure 2) and 10 locations at the Black Jack 2 Site (Figure 3). This portion of the Phase 3 field work took place October 10-12, 2017. Locations were selected to span a representative range of gamma radiation readings (in CPM) as observed from Phase 1 gamma survey data (ERG, 2017a). As previously indicated, field adjustments were made to planned locations for some correlation plots to find areas with more uniform gamma radiation levels, though this proved difficult at these Sites in general and the target criteria to limit variability as specified in the Work Plan (ERG, 2017d) could not be achieved. This circumstance is not uncommon and does not warrant rejection of the correlation as a general characterization tool, though the uncertainty in predicted Ra-226 values based on the correlation was likely negatively impacted by this circumstance.

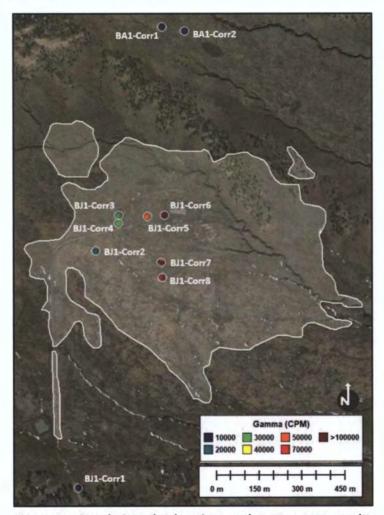


Figure 2: Correlation plot locations and gamma scan results within and near impacted (white shaded) areas at Black Jack No.

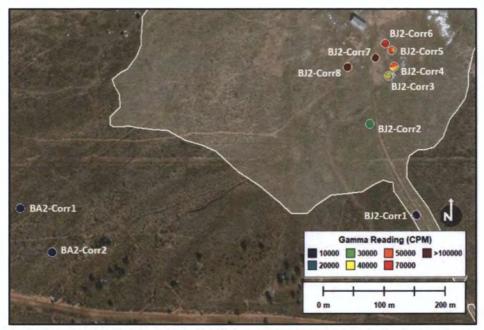


Figure 3: Correlation plot locations and gamma scan results within and near impacted (white shaded) areas at Black Jack No. 2.

At each correlation plot, the average gamma count rate reading was determined by scanning an approximate 100 m^2 area, and soil composite sampling was performed across the same area to estimate the corresponding average concentration of Ra-226 in surface soil (0-15 cm). A least-squares linear regression model was fitted to the paired gamma/Ra-226 results, along with a best-fitting non-linear power function (Figure 4). The coefficient of determination (R²) is very similar for either regression model (R² \approx 0.93). The linear model appears to better represent higher paired gamma/Ra-226 values, while the nonlinear model appears more representative of values at the low end of the range of the relationship (in the range of Ra-226 Investigation Levels for these Sites as given in Table 4).

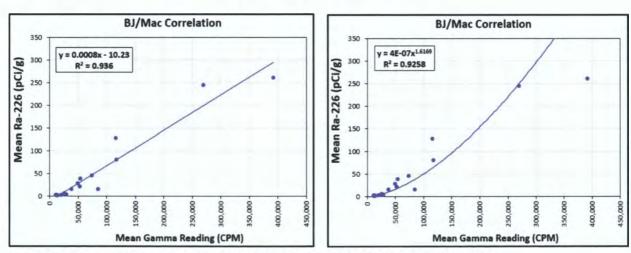


Figure 4: Regression results for a linear model (left) and best-fit nonlinear model (right).

The variance in data scatter about these regression models increases with increasing gamma radiation, and in both cases, several data points reflect relatively large residuals which appear non-representative of the overall relationship (Figure 4). Such residuals may be outliers associated with gamma shine from adjacent areas or confounding effects from small hotspots as indicated in the Phase 3 Work Plan (ERG, 2017d). The bivariate data were evaluated for statistical outliers (Figure 5) using scatter plot matrices (data density ellipses), Mahalanobis Distances, and Jackknife Distances as calculated with the JMP statistical package (SAS, 2016).

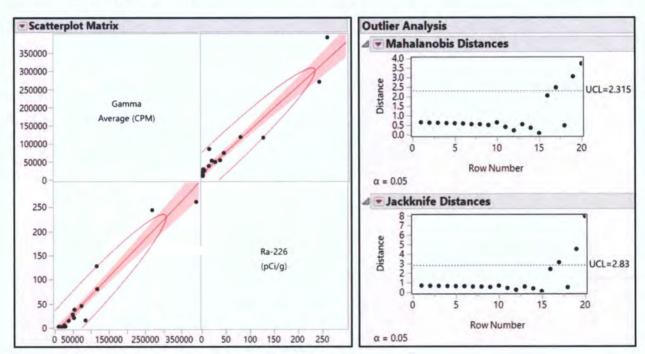


Figure 5: Outlier analysis for bivariate correlation data.

Based on the data in Figure 5, it appears that three data points are statistical outliers, and a fourth value is also distant from the general relationship. An outlier box-plot of the distribution of residuals (Figure 6) indicates that all four data points in question are statistical outliers. Because these outliers may influence the predictive model in a non-representative manner, they were excluded from the model in accordance with the specifications of the Phase 3 Work Plan (ERG, 2017d).

A non-linear power curve provides the best statistical fit to the final correlation data set (Figure 7). This regression is considered a reasonable approximation of the average relationship between gamma radiation and Ra-226 concentrations in surface soils across the four Sites. As previously mentioned and as detailed in Section 4.4.6, this relationship appears to have a high bias on average for predicting concentrations in the range of the Investigation Levels for Ra-226 (Table 4) based on gamma readings. For this reason, the original conservative estimates of areal extent (based on background gamma readings alone) were used for development of volume estimates to be used in the EE/CA process. Analytical results for average gamma readings and all soil analysis parameters for correlation plots are shown in Table 5.

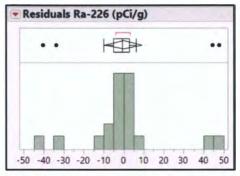


Figure 6: Histogram and outlier box-plot for residuals on the regression.

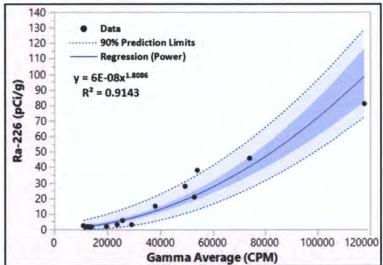


Figure 7: Final regression model for prediction of Ra-226 levels in surface soils (0-15 cm) based on gamma survey data.

Table 5: Average gamma radiation and soil analytes tested in composite samples from correlation plots (data outliers from yellow-highlighted plots were excluded from inclusion in final regression shown in Figure 7).

Field ID	Mean Gamma Reading (CPM)	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BA1-CORR1	13490	10/10/2017	1.55	1.0	1.4	1	29.3	6.3	0.5	0.5	24.7
BA1-CORR2	14160	10/10/2017	1.58	1.1	1.7	5.3	31.4	8	0.4	0.4	34.8
BA2-CORR1	11883	10/12/2017	0.81	0.5	1.7	0.4	25.1	2.8	0.3	0.2	13.7
BA2-CORR2	12903	10/12/2017	1.37	0.9	1.9	2.7	19.6	4.2	0.4	0.2	21.8
BJ1-CORR1	11020	10/10/2017	1.32	0.9	2.5	0.5	17.9	4.8	0.5	0.4	17.3
BJ1-CORR2	19729	10/10/2017	1.57	1.1	1.9	3.9	24.7	9	1.4	0.6	28.1
BJ1-CORR3	23757	10/10/2017	2.81	1.9	3.2	6.4	30.1	9.5	1.2	0.6	36.6
BJ1-CORR4	29160	10/10/2017	5.58	3.8	3.1	2.4	28.7	8.6	1.3	1	33.7
BJ1-CORR5	53074	10/10/2017	16.7	11.3	20.9	6.8	30	6.2	1.2	13.9	49.3
BJ1-CORR6	117798	10/10/2017	66.9	45.3	80.6	6.7	42.4	5.6	4.7	48.2	58.8
BJ1-CORR7	392409	10/10/2017	533	360.8	261	20.8	75.1	12	21.2	79	82.1
BJ1-CORR8	85211	10/10/2017	36.5	24.7	15.7	5.8	28	8.3	1.9	5	33.6
BJ2-CORR1	11744	10/12/2017	3.97	2.7	1.9	2.7	16.5	3.5	0.3	0.6	15.9
BJ2-CORR2	25802	10/12/2017	7.04	4.8	5.8	4.2	23.3	5.1	0.5	1.9	29
BJ2-CORR3	38231	10/12/2017	23.7	16.0	15	6.1	26.7	5.4	1	4.5	50.1
BJ2-CORR4	49572	10/12/2017	44.4	30.1	27.8	0.8	30.1	5.6	2	17.6	114
BJ2-CORR5	54219	10/12/2017	36.6	24.8	38.1	2.2	26.4	6.6	1.3	11.7	79.8
BJ2-CORR6	74084	10/12/2017	112	75.8	45.8	11.7	37.8	7	2.9	28.9	199
BJ2-CORR7	116356	10/12/2017	137	92.7	128	18	40.1	8.4	5.9	50.9	343
BJ2-CORR8	269897	10/12/2017	515	348.7	244	4.9	68.2	13.3	10.3	93	397

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

Mean	77.5	52.4	45.1	5.7	32.6	7.0	3.0	18.0	83.1
Std. Dev.	157.4	106.6	77.9	5.5	14.9	2.7	4.9	28.0	107.5
Median	11.9	8.0	10.4	4.6	29.0	6.5	1.3	3.2	35.7
Minimum	0.8	0.5	1.4	0.4	16.5	2.8	0.3	0.2	13.7
Maximum	533.0	360.8	261.0	20.8	75.1	13.3	21.2	93.0	397.0
n	20	20	20	20	20	20	20	20	20

4.4.2 Estimated Ra-226 Levels in Surface Soil at Black Jack No. 1 Mine

As specified in the Work Plan (ERG, 2017d), the correlation relationship was used to predict Ra-226 concentrations in surface soils (0-15 cm) based on gamma radiation readings across the Black Jack No. 1 Mine and adjacent Background Area (BA1) as shown in Figure 8. These data are based on measured count rates (CPM) and conversion to soil Ra-226 concentration (pCi/g) using the regression equation provided in Figure 7. Gamma-based predictions of Ra-226 were mapped with an interpolated color format for values falling between the discrete legend values as indicated in the legend. Summary statistics for the Black Jack No. 1 Mine are also shown in Figure 8.

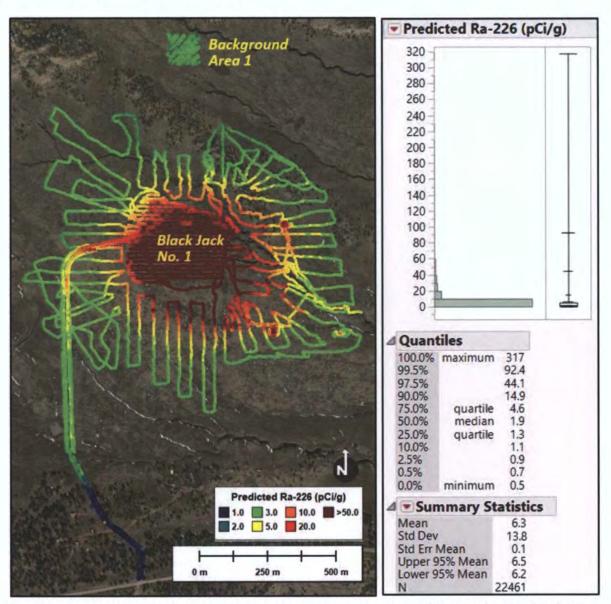


Figure 8: Gamma-based predictions of Ra-226 concentrations in surface soil (0-15 cm) at Black Jack No. 1 and Background Area 1.

4.4.3 Estimated Ra-226 Levels in Surface Soil at Black Jack No. 2 Mine

As specified in the Work Plan (ERG, 2017d), the correlation relationship was used to predict Ra-226 concentrations in surface soils (0-15 cm) based on gamma radiation readings across the Black Jack No. 2 Mine and adjacent Background Area (BA2) as shown in Figure 9. These data are based on measured count rates (CPM) and conversion to soil Ra-226 concentration (pCi/g) using the regression equation provided in Figure 7. Gamma-based predictions of Ra-226 were mapped with an interpolated color format for values falling between the discrete legend values as indicated in the legend. Summary statistics for the Black Jack No. 2 Mine are also shown in Figure 9.

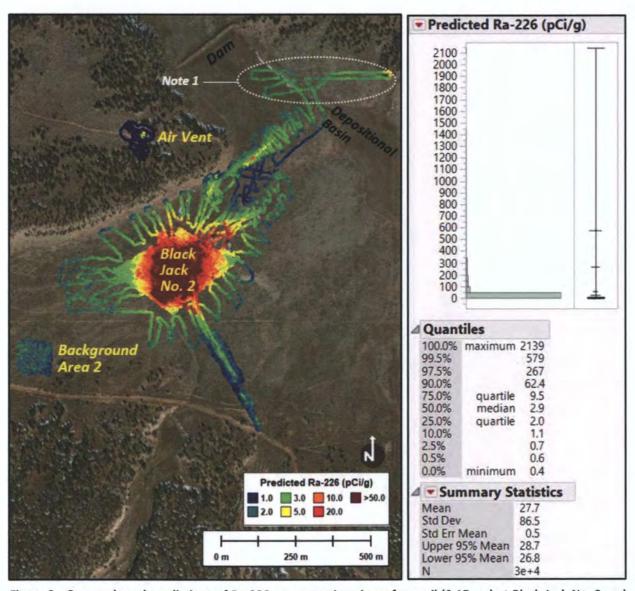


Figure 9: Gamma-based predictions of Ra-226 concentrations in surface soil (0-15 cm) at Black Jack No. 2 and Background Area 2. (Note 1: as concluded in the Phase 1 Report, this area is subject to elevated background levels of naturally occurring radionuclides in soil, sediments and/or underlying geology).

4.4.4 Estimated Ra-226 Levels in Surface Soil at Mac No. 1 Mine

As specified in the Work Plan (ERG, 2017d), the correlation relationship was used to predict Ra-226 concentrations in surface soils (0-15 cm) based on gamma radiation readings across the Mac No. 1 Mine as shown in Figure 10. These data are based on measured count rates (CPM) and conversion to soil Ra-226 concentration (pCi/g) using the regression equation provided in Figure 7. Gamma-based predictions of Ra-226 were mapped with an interpolated color format for values falling between the discrete legend values as indicated in the legend. Summary statistics for the Mac No. 1 Mine are also shown in Figure 10.

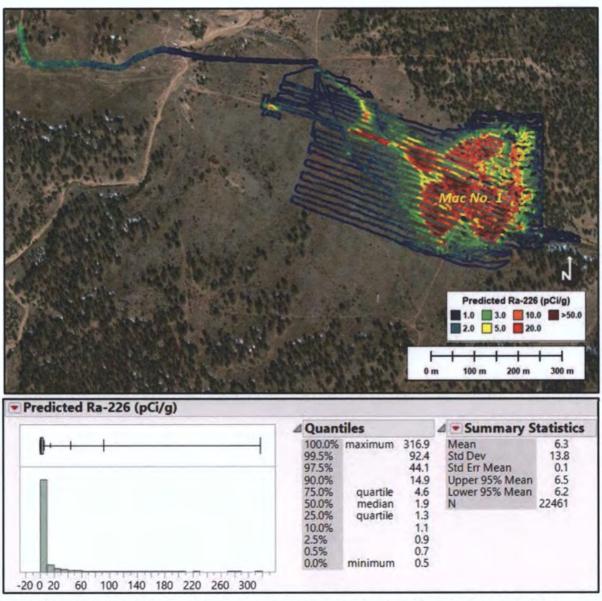


Figure 10: Gamma-based predictions of Ra-226 concentrations in surface soil (0-15 cm) at Mac No. 1.

4.4.5 Estimated Ra-226 Levels in Surface Soil at Mac No. 2 Mine

As specified in the Work Plan (ERG, 2017d), the correlation relationship was used to predict Ra-226 concentrations in surface soils (0-15 cm) based on gamma radiation readings across the Mac No. 2 Mine as shown in Figure 11. These data are based on measured count rates (CPM) and conversion to soil Ra-226 concentration (pCi/g) using the regression equation provided in Figure 7. Gamma-based predictions of Ra-226 were mapped with an interpolated color format for values falling between the discrete legend values as indicated in the legend. Summary statistics for the Mac No. 2 Mine are also shown in Figure 11.

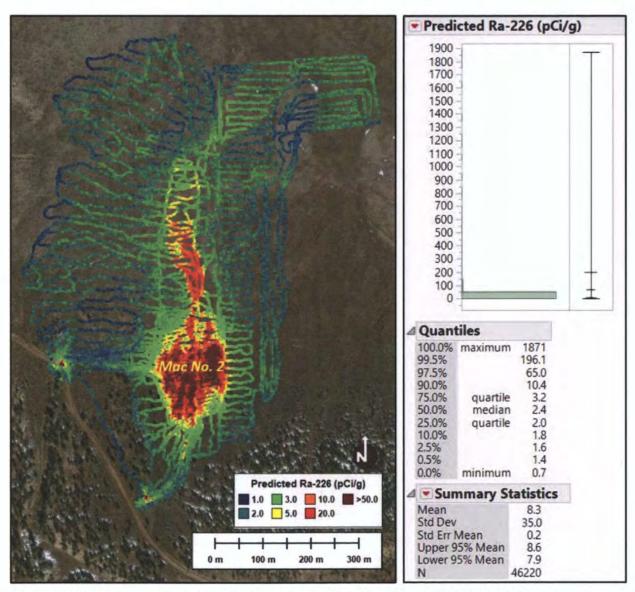


Figure 11: Gamma-based predictions of Ra-226 concentrations in surface soil (0-15 cm) at Mac No. 2.

4.4.6 Prediction Error Assessment

Per the Phase 3 Work Plan (ERG, 2017d), the uncertainty in estimates of Ra-226 in surface soil was evaluated. A total of 73 discrete samples of surface soil (0-15 cm) were collected for other purposes at the Sites, of which 64 locations had some amount of gamma survey data available within a 100 m² area surrounding the sample location. Twenty of these discrete samples were taken at the center of correlation plots, while the remainder (44 samples) were taken as part of borehole transect surveys (downhole gamma logging and depth profile soil sampling). The gamma survey data were converted to predicted Ra-226 values, and for each discrete soil sampling location as noted above, the predicted Ra-226 values (based on gamma survey data) within 100 m² were averaged for comparison with measured concentrations in soil samples. The measured Ra-226 result for each soil sample was subtracted from the corresponding average gamma-based prediction within a 100 m² area to provide an indication of prediction error expected with use of the gamma/Ra-226 correlation relationship.

Evaluation of prediction error as described above was limited to data from locations with relatively low Ra-226 concentrations (Figure 12) in the critical range of interest near the Investigation Level (see Table 4). In this case, only sampling locations with measured Ra-226 concentrations below 4 pCi/g were considered.⁵ For these samples the average prediction error is somewhat right skewed and biased high with a mean of + 1.8 pCi/g and a median of + 1.3 pCi/g. The implications of this high bias in prediction error is spatially apparent as shown in Figure 13, which indicates that use of gamma-based predictions of Ra-226 to estimate areas exceeding the Investigation Level would lead to significant overestimation of the lateral extent of impacts to surface soil from past mining operations in most areas, a conclusion not supported by gamma data alone, or by direct soil sampling results.

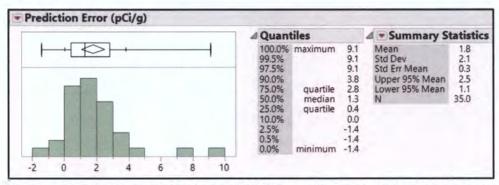


Figure 12: Prediction error for estimated Ra-226 concentrations in surface soils (0-15 cm) near the Investigation level based on gamma survey data.

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⁵ Note that a single location in this category, out of 36 locations, was omitted from the analysis due to a grossly elevated average gamma-based prediction that was clearly a statistical outlier and not representative of the degree of prediction error generally present at the low end of the apparent range of soil Ra-226 values.

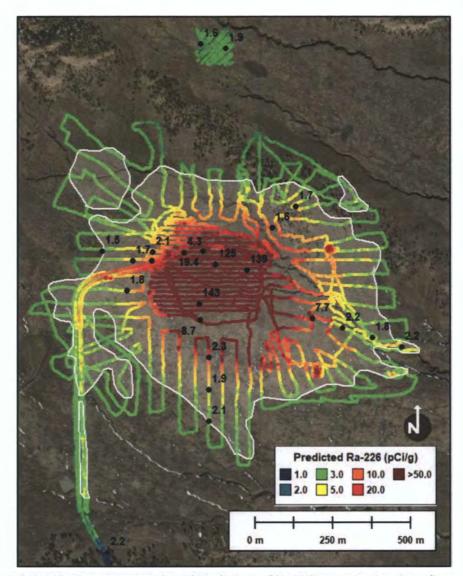


Figure 13: Gamma-survey-based predictions of Ra-226 concentrations in surface soils (0-15 cm) with overlay of annotated Ra-226 values based on direct soil sampling results along with the originally estimated lateral extent of impacts as presented in the Phase 1 Report (white-shaded area in the figure). Note that the Investigation Level for this Site is 2.6 pCi/g (see Table 4).

4.4.7 Subsurface Borehole Investigation

The objective of the subsurface borehole investigation was to estimate the average vertical extent (depth) of impacts to subsurface soils across each Site. The field work for this investigation, including downhole gamma radiation logging and confirmatory soil sampling, was performed October 3-13, 2017. This information, combined with the estimates of lateral (areal) extent of impacts from the Phase 1 Report (ERG, 2017a), was used to generate estimates of the total volume of impacted soil for future use in an EE/CA as specified in the AOC/SOW (EPA, 2014).

The following subsections of this report summarize subsurface borehole survey results for each mine Site. The data for gamma radiation depth profiles and associated confirmatory soil sampling are provided in Appendix A (Attachment A2). Section 4.4.8 provides overall estimates of contaminated soil volumes, and Section 5 provides summary conclusions for the overall RSE project under the AOC/SOW (EPA, 2014).

Downhole gamma logging profiles and subsurface soil Ra-226 values were reviewed with EPA/NNEPA during a conference call on March 2, 2018. Concurrence was reached on 13 archived samples of subsurface soil to send to the lab for supplemental confirmatory analysis, and after receipt and validation of the archived sample results, the respectively updated profile data, depth estimates, estimation rationale, and volume estimates were provided to EPA/NNEPA by email on May 7, 2018.

4.4.7.1 Vertical Extent of Impacts at Black Jack No. 1

Based on the radiological depth profile data provided in Appendix A (Attachment A2), the maximum depth of impacts to soil at each borehole sampling location at the Black Jack No. 1 Site was estimated and mapped (Figure 14). Sampling location coordinates, depth estimates and notes on the basis for estimation are provided in Table 6. Vertical impacts to soil in outlying portions of this Site are generally limited to the top 6 inches (\approx 15 cm) of the soil profile, while the deepest impacts occur in small, localized areas of principle threat wastes such as former ore stockpiles and soils in close proximity to remnant mine structures such as former shafts and vents.

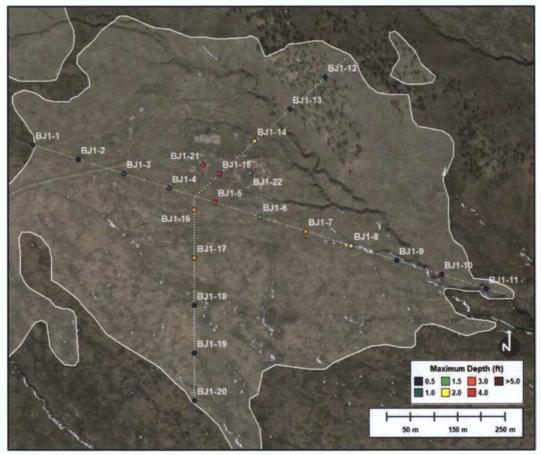


Figure 14: Borehole sampling locations and estimated maximum depth of impacts to soil at Black Jack No. 1 (see Table 6 for tabular reference data).

Table 6: Borehole ID numbers, coordinates, depth estimates and notes on estimation basis for Black Jack No. 1.

Borehole Location	Easting*	Northing*	Estimated Max Depth (feet)	Depth Estimate Basis
BJ1-1	2622299.9	1654114.0	0.0	Gamma profile looks natural (not impacted)
BJ1-2	2622612.6	1654015.0	0.0	Gamma profile looks natural (not impacted)
BJ1-3	2622925.4	1653915.9	1.5	Based on gamma inflection point + soil data
BJ1-4	2623238.2	1653816.9	1.5	Based on gamma inflection point near 30K cpm
BJ1-5	2623550.9	1653717.9	4.0	Based on gamma readings < 30K cpm
BJ1-6	2623863.7	1653618.9	1.5	Based on gamma readings < 30K cpm + soil data
BJ1-7	2624176.5	1653519.9	2.5	Based on gamma readings near 30K cpm + soil data
BJ1-8	2624489.2	1653420.9	2.0	Based on gamma readings < 30K cpm
BJ1-9	2624802.0	1653321.9	0.0	Gamma profile looks natural (not impacted)
BJ1-10	2625114.8	1653222.9	0.0	Gamma profile looks natural (not impacted)
BJ1-11	2625427.5	1653123.9	0.0	Gamma profile looks natural (not impacted)
BJ1-12	2624311.6	1654580.8	0.0	Gamma profile looks natural (not impacted)
BJ1-13	2624069.0	1654360.0	0.0	Gamma profile looks natural (not impacted)
BJ1-14	2623826.3	1654139.2	2.0	Based on gamma < 30K cpm + soil data
BJ1-15	2623583.7	1653918.4	3.5	Based on gamma near 30K cpm + soil data
BJ1-16	2623409.5	1653667.4	2.5	Based on gamma < 30K cpm + soil data
BJ1-17	2623409.5	1653339.3	2.5	Based on gamma < 30K cpm + soil data
BJ1-18	2623409.5	1653011.3	0.5	Based on gamma profile shape + soil data
BJ1-19	2623409.5	1652683.2	0.0	Gamma profile looks natural (no impacts)
BJ1-20	2623409.5	1652355.1	0.0	Gamma profile looks natural (no impacts)
BJ1-21	2623472.8	1653976.4	3.5	Based on apparent inflection point + soil data
BJ1-22	2623798.1	1653922.2	1.5	Based on inflection point + soil data

^{*}State Plane Coordinate System: NAD 83 (ft), NM West (FIPS 3003).

Average Depth (ft) = 1.3

4.4.7.2 Vertical Extent of Impacts at Black Jack No. 2

Based on the radiological depth profile data provided in Appendix A (Attachment A2), the maximum depth of impacts to soil at each borehole sampling location at the Black Jack No. 2 Site was estimated and mapped (Figure 15). Sampling location coordinates, depth estimates and notes on the basis for estimation are provided in Table 7. Vertical impacts to soil in outlying portions of this Site are generally limited to the top 6 inches (≈ 15 cm) of the soil profile, while the deepest impacts occur in small, localized areas of principle threat wastes such as former ore stockpiles and soils in close proximity to remnant mine structures such as former shafts and vents.

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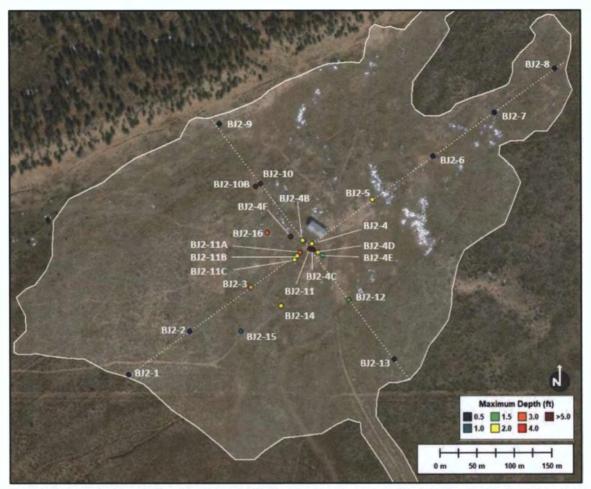


Figure 15: Borehole sampling locations and estimated maximum depth of impacts to soil at Black Jack No. 2 (see Table 7 for tabular reference data).

Table 7: Borehole ID numbers, coordinates, depth estimates and notes on estimation basis for Black Jack No. 2.

Borehole Location	Easting*	Northing*	Estimated Max Depth (feet)	Depth Estimate Basis
BJ2-1	2597127.5	1648875.9	0.0	Gamma profile looks natural
BJ2-2	2597394.6	1649066.3	0.0	Gamma profile looks natural
BJ2-3	2597661.7	1649256.7	2.5	Based on gamma profile + soil data
BJ2-4	2597928.8	1649447.2	2.0	Based on gamma profile inflection point + soil data
BJ2-4B	2597889.8	1649461.6	2.0	Based on gamma profile inflection point + soil data
BJ2-4C	2597935.8	1649420.1	7.0	Based on gamma profile inflection point (apparent)
BJ2-4D	2597956.6	1649409.4	2.0	Based on gamma profile inflection point (apparent)
BJ2-4E	2597974.6	1649396.3	1.5	Based on gamma profile inflection point
BJ2-4F	2597837.4	1649479.2	6.0	Based on gamma inflection point ≈ 30K cpm
BJ2-5	2598196.0	1649637.6	2.0	Based on gamma inflection point + soil data
BJ2-6	2598463.1	1649828.1	0.0	Gamma profile looks natural (no apparent impacts)
BJ2-7	2598730.2	1650018.5	0.0	Gamma profile looks natural (no apparent impacts)

Borehole Location	Easting*	Northing*	Estimated Max Depth (feet)	Depth Estimate Basis
BJ2-8	2598997.3	1650209.0	0.0	Gamma profile looks natural (no apparent impacts)
BJ2-9	2597524.2	1649968.7	0.0	Gamma profile looks natural (no apparent impacts)
BJ2-10	2597705.0	1649708.8	6.5	Based on gamma inflection point (< 30K cpm) + soil data
BJ2-10B	2597683.9	1649696.2	9.0	Assume bedrock at 9 ft (everything above impacted)
BJ2-11	2597920.3	1649425.7	8.0	Based on gamma inflection point near 30K cpm, + soil data
BJ2-11A	2597876.8	1649409.0	3.0	Based on gamma inflection point near 30K cpm, + soil data
BJ2-11B	2597865.1	1649393.3	2.0	Based on gamma inflection point
BJ2-11C	2597852.5	1649378.5	2.0	Based on gamma inflection point
BJ2-12	2598091.1	1649203.5	1.5	Based on gamma inflection point + soil data
BJ2-13	2598290.3	1648942.9	0.0	Gamma profile looks natural (not impacted)
BJ2-14	2597792.6	1649177.2	2.0	Gamma inflection point not clear (based on soil data)
BJ2-15	2597618.1	1649066.7	1.0	Based on gamma inflection point
BJ2-16	2597733.3	1649495.0	3.0	Based on gamma inflection point near 30K cpm

^{*}State Plane Coordinate System: NAD 83 (ft), NM West (FIPS 3003).

Average Depth (ft) = 2.5

4.4.7.3 Vertical Extent of Impacts at Mac No. 1

Based on the radiological depth profile data provided in Appendix A (Attachment A2), the maximum depth of impacts to soil at each borehole sampling location at the Mac No. 1 Site was estimated and mapped (Figure 16). Sampling location coordinates, depth estimates and notes on the basis for estimation are provided in Table 8. Vertical impacts to soil at this Site are generally relatively shallow (within the top 2 feet), with the deepest impacts occurring primarily in localized areas of principle threat wastes such as former ore or mine waste stockpiles. Bedrock is relatively shallow across most areas of this Site.

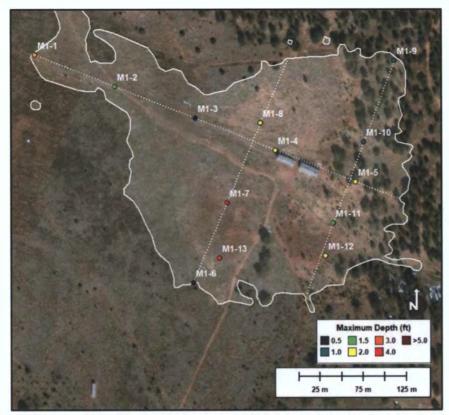


Figure 16: Borehole sampling locations and estimated maximum depth of impacts to soil at Mac No. 1 (see Table 8 for tabular reference data).

Table 8: Borehole ID numbers, coordinates, depth estimates and notes on estimation basis for Mac No. 1.

Borehole Location	Easting*	Northing*	Estimated Max Depth (feet)	Depth Estimate Basis
M1-1	2593426.9	1653762.8	2.5	Based on inflection point
M1-2	2593732.0	1653642.3	1.5	Based on inflection point
M1-3	2594037.1	1653521.8	0.5	Based on soil data more than gamma
M1-4	2594342.2	1653401.2	2.0	subsurface looks natural, but assume dig to bedrock
M1-5	2594647.4	1653280.7	2.0	Subsurface looks natural, but assume dig to bedrock
M1-6	2594028.9	1652901.1	0.0	Gamma profile looks natural
M1-7	2594157.8	1653202.7	4.0	Assumes bedrock at 4 ft.
M1-8	2594286.8	1653504.4	2.0	Based on inflection point + soil data
M1-9	2594796.1	1653739.2	1.0	Based on inflection point + soil data
M1-10	2594679.6	1653432.5	1.0	Assumes bedrock at 1 foot
M1-11	2594563.1	1653125.8	1.5	Assumes bedrock at 1.5 ft
M1-12	2594534.3	1653001.4	2.0	Assumes bedrock at 2 ft
M1-13	2594128.1	1652992.5	3.5	Assumes bedrock at 3.5 ft

^{*}State Plane Coordinate System: NAD 83 (ft), NM West (FIPS 3003).

Average Depth (ft) = 1.8

4.4.7.4 Vertical Extent of Impacts at Mac No. 2

Based on the radiological depth profile data provided in Appendix A (Attachment A2), the maximum depth of impacts to soil at each borehole sampling location at the Mac No. 2 Site was estimated and mapped (Figure 17). Sampling location coordinates, depth estimates and notes on the basis for estimation are provided in Table 9. Vertical impacts to soil are generally limited to the top 6 inches (\approx 15 cm) of the soil profile, with the deepest impacts occurring primarily in small, localized areas of principle threat wastes such as former ore stockpiles or remnant waste rock piles, or within small drainage channels where sediments have accumulated downgradient from mine waste deposits.

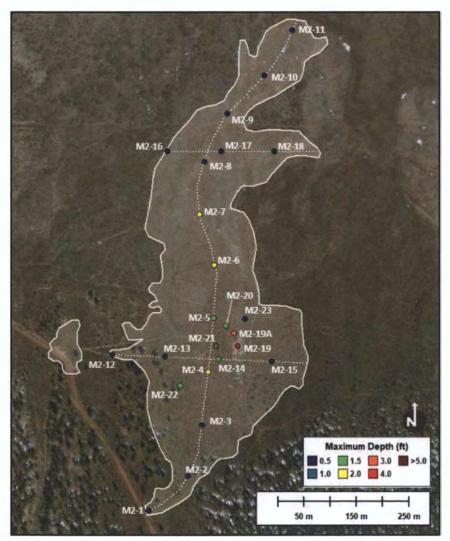


Figure 17: Borehole sampling locations and estimated maximum depth of impacts to soil at Mac No. 2 (see Table 9 for tabular reference data).

Table 9: Borehole ID numbers, coordinates, depth estimates and notes on estimation basis for Mac No. 2.

Borehole Location	Easting*	Northing*	Estimated Max Depth (feet)	Depth Estimate Basis
M2-1	2599606.3	1646417.6	0.5	Based on soil data, gamma looks natural
M2-2	2599848.5	1646629.7	0.0	Gamma profile looks natural
M2-3	2599933.9	1646942.2	0.0	Gamma profile looks natural
M2-4	2599974.5	1647267.8	2.0	Assumes refusal @ 2 ft
M2-5	2600006.8	1647594.2	1.5	No clear inflection point (based on soil data)
M2-6	2600012.9	1647920.4	2.0	Based on inflection point
M2-7	2599920.9	1648233.6	2.0	Based on profile & soil data
M2-8	2599949.6	1648553.4	0.5	G-profile looks natural, yet high soil result @ surface
M2-9	2600089.7	1648848.7	0.0	G-profile looks natural
M2-10	2600317.5	1649084.7	0.0	G-profile looks natural
M2-11	2600494.0	1649359.1	0.0	G-profile looks natural
M2-12	2599382.1	1647373.8	0.0	G-profile looks natural
M2-13	2599709.8	1647359.3	0.0	G-profile looks natural
M2-14	2600037.6	1647344.8	1.5	Assumes bedrock @ 1.5 ft
M2-15	2600365.3	1647330.4	0.0	G-profile looks natural
M2-16	2599724.4	1648619.1	0.0	G-profile looks natural
M2-17	2600052.4	1648619.1	0.0	G-profile looks natural
M2-18	2600380.5	1648619.1	0.0	G-profile looks natural, including increase near 4'
M2-19	2600154.5	1647424.5	4.5	Assumes bedrock @ 4.5 ft
M2-19A	2600132.7	1647503.3	3.0	Assumes bedrock @ 3 ft
M2-20	2600082.9	1647550.8	1.5	Based on G-profile + sample data
M2-21	2600023.1	1647424.7	-	Location inadvertently not drilled/sampled
M2-22	2599801.4	1647181.4	1.5	Gamma profile looks natural
M2-23	2600199.3	1647592.2	0.5	Based on soil data more than gamma

^{*}State Plane Coordinate System: NAD 83 (ft), NM West (FIPS 3003).

Average Depth (ft) = 1.0

4.4.8 Estimated Volumes of Impacted Soil

The estimated volume of radiologically impacted soil for each mine Site is shown in Table 10. These estimates are conservative as the estimated maximum depths of impacts are based on average values, even though the data distributions are right-skewed and slightly lower median values could be more representative and result in somewhat smaller volume estimates. As previously noted, additional conservatism is built into volume estimates since delineation of the areal extent of impacts to surface soil was not based on predicted Ra-226 concentrations (using the correlation) relative to the Investigation Level as originally proposed, but was instead based on raw gamma readings in excess of 95% UTLs on background gamma readings. The volume estimates given in Table 10 will be used for development of an EE/CA as specified in the AOC/SOW (EPA, 2014).

Areal Extent Areal Extent Volume Volume Average Mine Site Depth (ft)b (yd3)c (acres)a (ft2) (ft3) 159 6,926,040 1.3 9,003,852 333,476 Black Jack 1 65 2,831,400 2.5 7,078,500 262,167 Black Jack 2 22 958,320 1,724,976 63,888 1.8 Mac 1 42 0.9 1,829,520 1,646,568 60,984 Mac 2

Table 10: Estimated volume of contaminated soil.

Total = 720,515

4.4.9 Geotechnical Testing Results

Geotechnical examination and testing of Geoprobe soil cores was performed as described in Section 4.3.7). The general geologic settings of the Black Jack and Mac mine Sites are in the lower part of the Mancos Formation and the upper part of the Dakota Formation, which intertongue along the ESE-WNW trending Smith Lake Syncline and the Mariano Lake Anticline. Black Jack 1 is located over the thickest amount of Mancos Shale, and the other three mine sites are in the zone where the lower Mancos and upper Dakota intertongue to create interbedded, relatively thin layers of shale and sandstone/siltstone at ground surface and the shallow subsurface. At Black Jack 2, these interbeds have been eroded to at least 10 feet depth and replaced by alluvial soils derived from the mesas to the south.

As a result of these geologic conditions:

- Black Jack 1 has shallow windblown and colluvial/alluvial deposits overlying apparently continuous Mancos shale across the entire mine Site.
- Black Jack 2 has colluvial/alluvial soil to at least 10 feet depth over the erosion surface of Mancos/ Dakota bedrock.
- Mac 1 sits on the axis of the Smith Lake Syncline where shallow sandstone controls the ground surface and is exposed in windows in the thin soil cover.
- Mac 2 is on the south limb of the Smith Lake Syncline where the ground surface exposes a succession of thin sandstone layers alternating with thin shale down the north-facing slope.

Geoprobe samples were collected below the depth of contamination at Black Jack 1 and Black Jack 2. Because of the shallow sandstone, no geotechnical samples were collected at Mac 1 and Mac 2.

^aFrom Phase 1 Report (ERG, 2017a)

^bFrom Phase 3 Borehole Investigations (Section 4.4.7) per Work Plan (ERG, 2017d)

^cCalculated per Phase 3 Work Plan (ERG, 2017d)

Soil samples collected within the Black Jack 1 disturbed area and below the depth of contamination (3 to 5 feet) were consistently low to moderate plasticity clay (USCS classification CL) with some sandy clay. This type of soil has naturally low permeability and compacts well to form good covers.

The soils below the depth of contamination at Black Jack 2 (2 to 9 feet) are predominantly silty sand (USCS classification SP-SM) with some SP and SC (clayey sand). This soil is naturally moderately permeable, would compact to about the same permeability, and would be more erodible than a more clayey soil.

Although no soil samples from Mac 1 or Mac 2 were tested for geotechnical properties, visual examination indicates that Mac 1 soils are colluvial (derived from upgradient rock sources) and reflect the properties of the source rocks – predominantly fine sand with some clay. Mac 2 soils have relatively more sand and less clay than Mac 1 soils. The shale interbeds at both Sites are potential sources of clay, but test pit exploration is needed to characterize the locations, extents, and properties of these potential sources.

Based on this Phase 3 geotechnical characterization and the previous geomorphological characterization, the following conclusions are supported:

- Locations of mine-related material disposal facilities Black Jack 1, Mac 1, and Mac 2 are suitable
 locations for a permanent mine-related material disposal facility. Black Jack 2 is not suitable
 because of its position in a floodplain and relatively large up-gradient watershed.
- 2. Suitable subgrade soil Black Jack 2 has relatively permeable subgrade soils, making it unsuitable for either at-grade or below-grade mine-related material disposal. Mac 1 and Mac 2 have rock at or near ground surface, making both suitable for at-grade disposal but unsuitable for below-grade disposal of mine-related material. Black Jack 1 has low-permeability soils at surface or shallow depths, providing suitable subgrade for either at-grade or below grade disposal of mine-related material.
- 3. Suitable cover soil Black Jack 2 lacks suitable clean cover soil within the disturbed area. Mac 1 and Mac 2 are likely to have suitable soil sources in the shale interbeds but exploiting these sources would probably require excavation of sandstone between the shale layers. Black Jack 1 has ample quantities of readily-excavated Mancos shale with good cover-soil properties across the entire mine site. The clay-rich Mancos soil has good radon-attenuation properties and would be suitable for waste cover and void backfill but will require erosion protection where exposed to runoff.
- 4. Erosion control material Both Black Jack 1 and Black Jack 2 lack durable rock sources within the disturbed area, but sandstone outcrops exist immediately adjacent to these two mine Sites. At both Mac 1 and Mac 2, sandstone outcrops provide easy access to rock that can be exploited for rock mulch within the soil cover or for riprap on the rock cover. Rock durability testing will be needed to qualify these or other rock sources for riprap application. As part of long-term erosional stability of the mine-related material containment structure, a vegetative cover will be used, but until the vegetation is established, short-term erosion protection of the soil cover will be needed. In place of, or in addition to, riprap or rock mulch, natural materials (straw, wood chips, etc.) or synthetics (e.g., plastic netting) may be used.

The volumes of cover soil and rock required for the removal action depend on the selected action. Assuming that the selected removal action is excavation and removal of all contaminated material from three mine Sites and disposal and stabilization at a fourth mine site, and a 2.0-foot-thick soil cover is placed over the combined waste pile, approximately 135,000 cubic yards of soil and up to 14,000 cubic yards of crushed rock are estimated to be needed. If the mine-related materials from the four mine Sites are moved to two or more of the four Sites, these volumes will probably increase.

4.4.10 Radiological and Chemical Soil Properties

Tabulated results of all radiological and chemical borehole soil sampling data is provided in Appendix A (Attachment A3). Investigation Levels and summary statistics for radionuclides and metals specified in the AOC/SOW (Table 11) and correlation matrices (Figure 18) reflect positive, and statistically significant, covariate relationships between these soil parameters. While most of these relationships appear strongly influenced by a few high outliers, increasing covariate trends are generally qualitatively apparent.

To evaluate whether the analytes specified in the AOC/SOW as shown above are elevated relative to background at each mine Site, all soil sampling results for each mine Site and applicable Background Area were pooled and tested for differences in average values based on parametric T-tests, and for differences in median values based on non-parametric Wilcoxon Rank Sum (WRS) tests (Table 12). The data distributions appear right-skewed for concentrations of most analytes at the mine Sites noted in Table 12, suggesting that the non-parametric test results are more appropriate. These statistical tests indicate that with the potential exceptions of arsenic at Mac 1 and selenium at Mac 2, all analytes evaluated are statistically elevated relative to background levels at each of the four mine Sites.

Table 11: Summary statistics for Phase 3 borehole samples at each mine Site.

Investigation Level*

Pathway	Uranium (mg/kg)	Uranium (pCi/g)**		Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
Carcinogenic	-		1.24 + Bkg.	0.7		-	-
Non-Carcinogenic	16.0	10.8	-	35.0	390	390	390

^{*}Based on AOC for Ra-226, or for other constituents, EPA Regional Screening Levels for residential soil

Black Jack No. 1

Statistic	Uranium (mg/kg)	Uranium (pCi/g)**	Ra-226 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
Mean	44.3	30.0	12.7	7.8	6.1	10.7	33.5
Std. Dev.	111.9	75.8	29.1	2.0	18.4	29.2	14.0
Median	7.1	4.8	2.2	8.1	1.4	1.0	31.4
Minimum	1.0	0.7	1.4	1.5	0.5	0.3	12.3
Maximum	650	440	139	14	105	148	89
n	57	57	57	57	57	57	57

Black Jack No. 2

Statistic	Uranium (mg/kg)	Uranium (pCi/g)**	Ra-226 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
Mean	72.7	49.2	20.8	4.7	3.1	7.9	69.7
Std. Dev.	162.1	109.7	53.9	2.3	6.4	19.6	146.4
Median	8.2	5.5	2.0	4.1	1.1	0.6	22.5
Minimum	0.5	0.3	1.1	2.1	0.2	0.1	7.0
Maximum	1110	751	376	15	39	124	978
n	74	74	74	74	74	74	74

Mac No. 1

Statistic	Uranium (mg/kg)	Uranium (pCi/g)**	Ra-226 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
Mean	166.9	113.0	59.4	4.6	3.2	5.2	158.3
Std. Dev.	359.1	243.1	148.1	3.7	5.5	8.8	363.4
Median	41.4	28.0	6.8	3.1	1.2	2.0	41.8
Minimum	1.0	0.7	1.2	1.6	0.3	0.1	6.1
Maximum	1590	1076	638	17	29	45	1560
n	37	37	36	37	37	37	37

Mac No. 2

Statistic	Uranium (mg/kg)	Uranium (pCi/g)**	Ra-226 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
Mean	27.9	18.9	17.8	6.4	1.2	2.1	56.4
Std. Dev.	56.4	38.2	62.3	2.1	1.3	5.0	74.6
Median	3.1	2.1	2.1	6.6	0.7	0.3	27.5
Minimum	0.6	0.4	1.0	2.0	0.2	0.1	9.5
Maximum	378	256	462	14.0	6.0	33	425
n	62	62	62	62	62	62	62

^{**}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

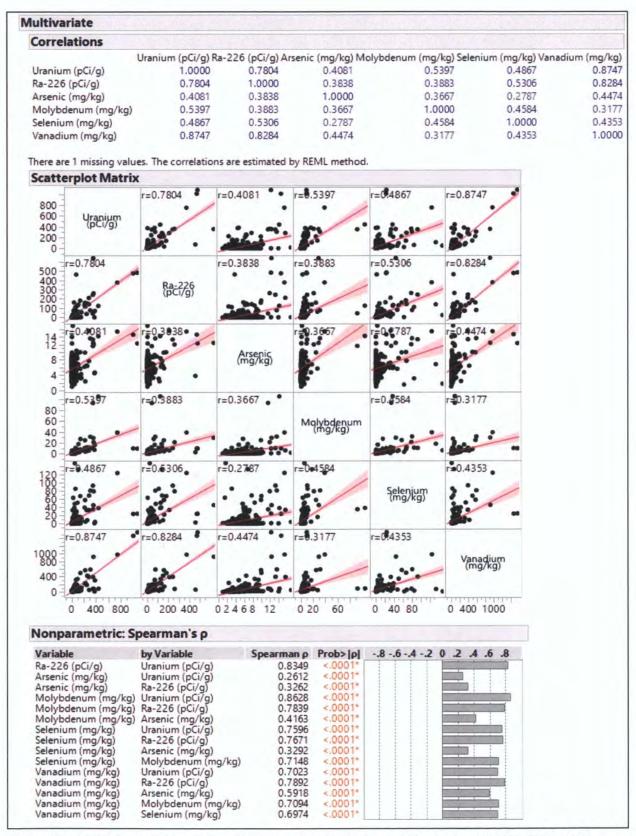


Figure 18: Bivariate correlation relationships between soil analytes specified in the AOC/SOW (EPA, 2014).

Areas Co	mpared	P-v	alue from Pa	rametric T-t	est For Difference	s Between Are	eas*	
Mine Site	Bkg Area	Uranium	Ra-226	Arsenic	Molybdenum	Selenium	Vanadium	
BJ1	BA1	0.2800	0.4861	0.0166	0.0107	0.0148	0.7656	
BJ2	BA2	0.0613	0.2086	<0.0001	0.1998	0.0563	0.1312	
Mac1	BA2	0.0001	0.0013	0.0353	0.2243	0.2758	0.0005	
Mac2	BA2	0.4913	0.2973 <0.0001		0.6839	0.6681	0.2637	
Areas Co	mpared	P-value	from Non-P	arametric W	RS Test For Differe	ences Between	n Areas*	
Mine Site	Bkg Area	Uranium	Ra-226	Arsenic	Molybdenum	Selenium	Vanadium	
BJ1	BA1	<0.0001	<0.0001	<0.0001	<0.0001	0.0214	<0.0001	
BJ2	BA2	< 0.0001	<0.0001	0.0008	<0.0001	0.0156	<0.0001	
Mac1	BA2	< 0.0001	<0.0001	0.8349	<0.0001	<0.0001	<0.0001	
Mac2	BA2	<0.0001	<0.0001	<0.0001	<0.0001	0.9886	<0.0001	

^{*}P-values < 0.05 (highlighted) show statistical differences inferred with 95% probability.

Table 12: Statistical testing results for differences in analyte levels relative to Background Area locations.

5. SUMMARY AND CONCLUSIONS

General

This Phase 3 RSE Report, in conjunction with the Phase 1 Summary Report (ERG and AKA, 2017) and Phase 2 Report for Physical Hazards Mitigation (iina ba, 2018), provides supporting documentation of completion of the following AOC/SOW objectives (EPA, 2014) regarding characterization of the nature and extent of actual or threatened releases of mine-related material at the Black Jack and Mac mine Sites. The AOC/SOW included three basic elements:

- SOW Section 4.1 Phase 1: Gamma survey, geomorphologic survey and background study
- SOW Section 4.2 Phase 2: Mitigation of physical mine hazards; posting of caution signage
- SOW Section 4.3 Phase 3: Removal Site Evaluation (RSE)

The data for each phase of the project, collected in accordance with work plans approved by EPA/NNEPA, are complete and are of sufficient quantity and quality to meet the objectives outlined in the AOC/SOW. Interim mitigation of physical mine hazards has been completed, along with posting of caution signage. The characterization data and information presented in this and earlier project reports and data transmittals (for Phases 1-3) will be used to develop an EE/CA to support selection of an appropriate remedy for lands impacted by these former uranium mines.

Phase 1 (Gamma survey, geomorphologic survey and background study)

- Comprehensive gamma radiation surveys provided data used to delineate the areal extent of impacts to surface soil (0-15 cm) at each mine Site as follows:
 - o Black Jack No. 1 = 159 acres
 - o Black Jack No. 2 = 65 acres
 - o Mac No. 1 = 22 acres
 - o Mac No. 2 = 42 acres

- These estimates, totaling 288 acres, are conservatively based on areas where terrestrial gamma radiation exceeds the 95% UTL on local background readings.
- Concentrations of radionuclides and metals in surface and subsurface soils in locally representative
 background areas are generally consistent with published ranges for naturally occurring background.
 Analytes tested included U-nat, Ra-226, arsenic, molybdenum, selenium and vanadium. Elevated
 gamma radiation levels northeast of the Black Jack No. 2 Site are indicative of naturally occurring,
 low-level uranium mineralization in underlying geologic formations.
- Ambient indoor radon in the west and east buildings at the Mac No. 1 mine were 1.1 pCi/L and 0.8 pCi/L respectively. These levels are consistent with typical outdoor background levels.
- All four mine Sites have similar geomorphic features, including: ephemeral, single thread
 watercourses, low- to moderate- channel sinuosity, slope grades of less than 7%, and sedimentary
 terrain with bedrock that dips ENE at 4 degrees or less. The results of the geomorphic study support
 livestock grazing as the apparent historical land use.

Phase 2 (Mitigation of physical mine hazards; posting of caution signage)

- Physical hazards identified in Phase 2 included former mine shafts, vents, utility raises, concrete slabs, exposed rebar, etc. Interim mitigation measures included cutting/removal of sharp metal objects, plugging/capping open holes with native soil or flowable fill, installation of chain link fencing and posting of hazard caution signage.
- While not required under the AOC, special monitoring of ambient outdoor radon gas (Rn-222) levels was conducted near remnant mine features that once served as vertical conduits to the underground mine workings. Respective monitoring data showed slightly elevated concentrations of ambient radon associated with mine-impacted soils, and significantly elevated levels near the north and south vent shafts and utility raises at Black Jack No. 1. Previously unsealed vent shafts and utility raises were temporarily sealed with inflatable packer plugs or quick-set epoxy cement to prevent further radon releases until permanent mitigation measures can be determined through the EE/CA process and implemented as part of the selected remedy.

Phase 3 (Removal Site Evaluation)

• A non-linear regression model (a power function) provides the best statistical fit to the gamma/Ra-226 correlation data. While the correlation provides reasonable estimates of Ra-226 concentrations in surface soils, there is a demonstrated high bias in prediction error in the regression model for concentrations near the Ra-226 Investigation Level (1.24 pCi/g above background). This bias is sufficient to significantly overpredict the areal extent of soil impacts when defined at the Ra-226 Investigation Level. As a result, estimates of the areal (lateral) extent of impacts from the Phase 1 Summary Report (ERG, 2017a), defined at the 95% UTL on background gamma readings, were carried forward for use in calculating estimates of the volume of impacted soil at each mine Site.

- Based on borehole gamma radiation logging and subsurface sampling, the majority of vertical impacts
 to soil across all of these mine Sites are relatively shallow in outlying areas (e.g. within the top 15 cm
 of the soil profile), whereas the deepest impacts tend to occur in isolated locations associated with
 principle threat wastes (e.g. near former ore stockpiles, shafts and vents). Estimates of the depth of
 impacts were conservatively based on average values for use in calculating the volume of impacted
 soil at each mine Site.
- The total estimated volume of impacted soil among all four mine Sites is 710,943 yd³, about 45% of which resides at Black Jack No. 1 and 37% resides at Black Jack No. 2. The remainder (about 18%) is split nearly evenly between the Mac No. 1 and Mac No. 2 mine Sites.
- Based on Phase 3 geotechnical examination and testing of subsurface soil along with the Phase 1 geomorphic investigation results, Black Jack 1, Mac 1, and Mac 2 are suitable locations for a permanent mine-related material disposal facility. Black Jack 2 is not suitable because of its position in a floodplain and relatively large up-gradient watershed. Black Jack 1 has low-permeability soils at surface or shallow depths, providing suitable subgrade for either at-grade or below grade disposal of mine-related material, and also has ample quantities of readily-excavated Mancos shale with good cover-soil properties across the entire mine site. The clay-rich Mancos soil has good radon attenuation properties and would be suitable for waste cover and void backfill but will require erosion protection where exposed to runoff. Both Black Jack 1 and Black Jack 2 lack durable rock sources within the disturbed area, but sandstone outcrops exist immediately adjacent to these two mine Sites.
- In general, the data and statistical testing supports a conclusion that all analytes specified in the AOC/SOW have elevated (above background) concentrations to some extent in soil at each of the mine Sites. A positive and statistically significant correlation exists between each soil testing parameter, though the significance of these relationships is typically driven by a few influential data points at the high end of the range of measured data.

6. QUALITY ASSURANCE

This Section describes the requirements and procedures used to ensure acceptable data quality for use in addressing Phase 3 AOC/SOW objectives. The quality assurance (QA) specifications of the Phase 3 Work Plan (ERG, 2017d) are consistent with EPA guidance on quality assurance (QA) (EPA, 1998 and 2001). This Section provides a summary of results of data QA and quality control (QC) protocols and evaluations, including validation of analytical laboratory data.

6.1 Data Quality Objectives

Data quality objectives (DQO's) are statements that define the type, quality and quantity of data needed to address the stated study objectives. DQOs were developed in the Phase 3 Work Plan (ERG, 2017d) based on EPA guidance document QA/G-4 (EPA, 2006). Table 13 shows select DQO statements and objectives as outlined in the Work Plan, followed by comments regarding the quality and adequacy of data relative to project objectives and QC specifications.



Table 13: Retrospective DQO assessment.

Step 1: Problem Statement	Step 2: Identify Study Objective	Objectives Achieved?	Step 6: Specify Performance or Acceptance Criteria	Useable Data Quality?	
Existing estimates of lateral extent of mine impacts need to be refined for Phase 3 volume estimation.	Characterize lateral extent of soil Ra-226 levels relative to Ra- 226 Investigation Level specified in SOW.	Partially – A statistical Gamma/Ra-226 correlation was developed based on gamma measurements, but the correlation has slight high bias at the low end of the scale sufficient to overestimate extent of impacts based on the Ra-226 Investigation Level.	Least squares regression slope coefficient should be statistically significant at the 90% confidence level.	Yes – regression slope is significant at the 90% confidence level (P-value < 0.1). However, prediction error at low end of the scale has a high bias sufficient to significantly overestimate the extent of impacts based on the Ra-226 Investigation Level.	
Vertical extent of mine impacts unknown and needs to be estimated for volume calculations.	Characterize vertical extent of soil Ra-226 levels.	Yes – Downhole gamma logging and soil depth sampling completed along borehole transects across areas of known surface impacts.	At least 95% of soil samples collected below gamma-based prediction of max vertical extent should confirm that Ra-226 concentrations are ≤ the Investigation Level.	Yes – less than 5% of confirmatory samples taken below the estimated maximum depth of impacts exceeded the Investigation Level.	
Ra-226 is associated with mine impacts, but other mine-related constituents have not been characterized.	for additional for u-nat, Ra-226, arsenic, molybdenum, selenium and vanadium. Additional radionuclides, not required		Analytical data quality specifications indicated in the Phase 3 Work Plan (ERG, 2017d) observed for data validation purposes.	Yes – while a number of analytical results were qualified during data validation as estimates ("1") or undetected ("U"), none of the data were determined to be unusable for the objectives specified in the Phase 3 Work Plan.	
Potential wells at Mac-1 and Black Jack 1 identified. Need to evaluate any mine impacts to groundwater.	Determine if groundwater well is present and sample/analyze for acts to Determine if groundwater well is present and sample/analyze for SOW parameters		N/A – data quality specifications not relevant as no samples were taken.	N/A	
Suitable fill/cover soils and erosion control materials may be needed to stabilize mine related material and fill/cover physical void space hazards.	Identify and characterize suitable borrow materials to address mine-related materials and physical hazards	Yes – Suitability of materials residing below impacted soils within impacted areas successfully evaluated for fill/cover and erosion control purposes. However, additional sampling and geotechnical soil testing will be required for engineering design work once a remedial remedy is selected.	Applicable data quality specifications indicated in the references cited in Section 2.7 of the Phase 3 Work Plan will be observed for data validation purposes.	Yes – the geotechnical soil analysis data were generated in accordance with applicable specifications provided in the Work Plan.	

Table 13: Retrospective DQO assessment.

Step 1: Problem Statement	Step 2: Identify Study Objective	Objectives Achieved?	Step 6: Specify Performance or Acceptance Criteria	Useable Data Quality?	
Indoor concentrations of airborne radon-222 and its short-lived decay products could be present. Surfaces of mine buildings could be contaminated.	If needed, conduct additional monitoring for airborne radon. Develop preliminary data regarding the presence or absence of surface contamination.	N/A – radon monitoring completed in Phase 1. Mac 1 buildings showed radon levels < 4 pCi/L (ERG, 2017a), so no further radon measurements were necessary. N/A - surface contamination surveys eliminated from SOW by HMC decision to demolish structures and dispose of debris with impacted soil waste stream.	N/A	N/A	
Mine-related solid waste materials, miscellaneous debris and old equipment may be contaminated.	Document, characterize and categorize mine related solid waste and equipment as "impacted" or "non- impacted".	N/A – Objectives rendered N/A by HMC's decision to demolish all structures and place debris in contaminated soil waste stream for final disposition.	N/A	N/A	

6.2 Analytical Method Quality Objectives

Table 14 provides the laboratory data quality objectives and analytical methods for soil parameters associated with soil sampling objectives specified for the RSE under the AOC/SOW (note that Ac-228 and K-40 are not required by the AOC but were added as potential diagnostic tools related to the gamma/Ra-226 correlation). A data validation report is provided in Appendix A (Attachment A4). Analytical laboratory data reports are provided in Appendix B (Attachment B1).

Table 14: Soil sample analytical methods and QC requirements.

Parameter	Method	Detection or Reporting Limit	Minimum Sample Size	Preservation Method	Comments
Digestion	EPA Method 3050B	N/A 1-2 g		None	Strong acid digestion prep for ICP-MS analysis.
Arsenic	EPA Method 6020A	0.2 mg/kg	500 g	None	Sample size governed by radium-226 analysis
Molybdenum	EPA Method 6020A	0.1 mg/kg	500 g None		u
Natural Uranium	EPA Method 6020A	0.01 mg/kg	500g	None	"
Radium-226	EPA 901.1M	0.2 pCi/g	500 g	None	u
Actinium-228*	EPA 901.1M	0.2 pCi/g	500 g	None	"
Potassium-40	EPA 901.1M	0.2 pCi/g	500 g	None	"
Selenium	EPA Method 6020A	0.1 mg/kg	500g	None	"
Vanadium	EPA Method 6020A	0.1 mg/kg	500 g	None	u

^{*} The measured Ac-228 concentration will be considered equivalent that of its precursor Thorium-232 based on an assumption of secular equilibrium between the long-lived Th-232 parent (≈ 10¹0 yr half-life) and its Ac-228 progeny (≈ 6 hr half-life).

6.3 Field Procedures

Standard operating procedures (SOPs) provided in the Phase 3 Work Plan (ERG, 2017d) were followed, including the SOP titles below (Table 15) as provided in Appendix A of the Work Plan.

Table 15: Standard Operating Procedure (SOP) numbers and titles for the Phase 3 SOW.

SOP ITC.101	Calibration of a Radiological Survey Meter
SOP ITC.102.R1	Calibration of a Radiological Survey Detector
SOP ITC.201	Operational Checkout of Single-Channel Detector with Meter
SOP ITC.202	Operational Checkout of Dual-Channel Alpha/Beta Detector with Meter
SOP PWT.105	Performing a GPS-Based Gamma Radiation Survey
SOP PWT.106	Making Exposure Rate Measurements Using a High-Pressure Ionization Chamber (HPIC)
SOP PWT.108	Soil Sampling for Analytical Purposes
SOP PWT.109	Developing a Correlation
SOP 2.15	Sample Control and Documentation
SOP 4.10	Technical Quality Control
SOP 4.12	Soil Data Validation

6.4 Personnel Qualifications

All project personnel met the minimum requirements for their assignments through formal education, experience, and project-specific training as appropriate. This included training in the specific data collection, surveying, sampling, sample handling, and site safety procedures required for their respective assignments on this project. A certified health physicist (CHP) directed the field sampling and survey efforts, evaluated environmental characterization data, and developed this RSE Report in collaboration with geotechnical engineers and mine reclamation specialists.

6.5 Quality Assurance for Field Survey Data

6.5.1 Field Documentation

Multiple forms of field data sheets were maintained to document information relevant to data QA/QC:

- 1. Field logbook (Appendix A, Attachment A5)
- 2. Soil sampling sheets (Appendix A, Attachment A6)
- 3. Instrument function check forms (Appendix A, Attachment A7)
- 4. Instrument calibration certificates (Appendix A, Attachment A8)

6.5.2 Sample Handling, Chain of Custody, and Sample Shipment

A chain-of-custody (CoC) form accompanied all samples sent to the analytical laboratory. Completed CoC forms are provided with the analytical data results from the laboratory (lab data packages are provided on CD as Attachment B1 to Appendix B). Several discrepancies in sample IDs were noted by the lab during sample login, primarily mislabeled split or field duplicate sample designators. Corrections were made as noted in the case narrative for each data report.

6.5.3 Quality Control

Equipment and instruments used for radiological field surveys were inspected before use to ensure proper function. Radiation detection instruments were calibrated within a year prior to use and were subject to daily function checks and documentation on function check forms. All field instruments met applicable performance and data quality criteria specified in the Phase 3 Work Plan (ERG, 2017d). Quality control documentation for field measurements and sampling is provided in Appendix A as noted above.

6.6 Quality Assurance for Analytical Laboratory Data

Laboratory QC samples were analyzed in accordance with standard analytical method protocols, including field splits/duplicates, lab duplicates, matrix spikes, laboratory control standards and method blanks. All analytical laboratory data reports included Level IV backup information for use in the data validation process. Quality control data for each laboratory data package and were reviewed and evaluated for accuracy, precision and completeness based on data validation criteria specified in the Phase 3 Work Plan (ERG, 2017d). Data validation results are briefly summarized in Section 6.8 with reference to a complete data validation report provided in Appendix A (Attachment A4).

6.7 Data Management and Records Keeping

Data generated for the Black Jack and Mac mine Sites under Phase 3 of the AOC/SOW (EPA, 2014) is managed in accordance with the Data Management Plan provided in the Phase 3 Work Plan (ERG, 2017d). HMC has compiled in the Appendices to this RSE Report all field data sheets as noted above, along with analytical data packages and reports as needed to document and support the findings of the Phase 3 investigation. Analytical laboratory data have been imported into the project database (a MS Access database), and if possible, an attempt will be made to also import these data into the SCRIBE database format as previously requested by EPA.

6.8 Data Quality and Usability

The requirements and methods specified in the Phase 3 Work Plan (ERG, 2017d) for data review, validation, and verification were followed as described in this Section. The data QA/QC process for this project facilitated generation of consistent and defensible analytical data to address project DQOs.

6.8.1 Data Validation

All analytical laboratory data generated were reviewed and validated prior to import into the project database. A qualified and independent staff member from ERG (someone not involved with previous or subsequent work at the Black Jack and Mac mine sites) performed the validation of laboratory data in accordance with Phase 3 Work Plan specifications. The following elements of each laboratory data report were reviewed as part of the data validation/verification process:

- Method
- Holding times
- Instrument calibration
- Method blanks
- Matrix Spikes
- Laboratory control standards (LCS)
- · Field splits/duplicates and laboratory duplicates
- Detection or reporting Limits
- Data completeness

The data validation report provided in Appendix A (Attachment A4) reveals a small percentage of results falling outside various QC specifications of the Work Plan (ERG, 2017d). Such results have been appropriately qualified, and their use is not considered limited in a context of the stated DQOs as the potential degree of associated data uncertainty would not significantly affect any of the estimates or conclusions developed in this RSE Report.

6.8.2 Data Verification

Data verification included a review of procedures used for field data collection, sample labeling, chain-of-custody and data assessment protocols to verify that procedural specifications of the Work Plan were followed. Deviations from specifications of the Work Plan were identified and their potential impact



relative to the DQOs was assessed [see Section 4.3.9 and Appendix A (Attachment A4)]. None of these deviations have significant implications for the estimates and conclusions drawn in this RSE Report.

7. REFERENCES

Alan Kuhn Associates, LLC. (AKA). 2017. Phase 1 Summary Report, Part 2: Geomorphological Characterization and Assessment. *In*: ERG and AKA (2017).

Dodge Environmental. 2017a. Biological Evaluation for the Proposed Project Actions, Smith Lake and Mariano Lake Uranium Mines Project, Black Jack No. 1 and Black Jack No. 2 Mines, Navajo Nation, McKinley County, New Mexico. July 26, 2017.

Dodge Environmental. 2017b. Biological Evaluation for the Proposed Project Actions, Smith Lake and Mariano Lake Uranium Mines Project, Mac No. 1 and Mac No. 2 Mines, Navajo Nation, McKinley County, New Mexico. July 26, 2017.

Environmental Restoration Group, Inc. (ERG). 2014. Phase I Work Plan Investigation of the Black Jack and Mac Mine Sites. September.

Environmental Restoration Group, Inc. (ERG). 2017a. Phase 1 Summary Report, Part 1: Radiological Characterization Surveys. *In*: ERG and AKA (2017).

Environmental Restoration Group, Inc. (ERG). 2017b. Data Transmittal: Phase 2 Outdoor Radon Monitoring Results for the Black Jack / Mac Mines. November 8, 2017.

Environmental Restoration Group, Inc. (ERG). 2017c. Addendum to Nov. 8, 2017 Data Transmittal regarding passive radon monitoring near mine shafts, vents and utility raises. November 28, 2017.

Environmental Restoration Group, Inc. (ERG). 2017d. Phase 3 Work Plan: Removal Site Evaluation. Black Jack and Mac Mines, McKinley County, New Mexico. Revision 1. September 13, 2017.

Environmental Restoration Group, Inc. (ERG) and Alan Kuhn Associates (AKA). 2017. Phase 1 Summary Report for Removal Site Evaluation and Interim Removal Action, Black Jack and Mac Mines, McKinley County, New Mexico Revision 1). August 27, 2017.

Holmquist, R.J. 1970. The discovery and development of uranium in the Grants Mineral Belt, New Mexico. United States Atomic Energy Commission, Grand Junction Office, Production Evaluation Division.

iina ba, Inc. (iina ba). 2017. Work Plan for Site Hazards Assessment on Abandoned Uranium Mine Lands, Former Black Jack No. 1&2, and Mac No. 1&2, Smith Lake, McKinley County, New Mexico. June.

iina ba, Inc. (iina ba). 2018. Phase 2 Physical Hazards Mitigation, Former Abandoned Uranium Mine Sites, Smith Lake and Mariano Lake Chapters, McKinley County, New Mexico. June 2018.

Johnson, J.A., H.R. Meyer, and M. Vidyasagar. 2006. Characterization of Surface Soils at a Former Uranium Mill. Operational Radiation Safety. Supplement to Health Physics, Vol. 90, February.

Navajo Nation Department of Fish & Wildlife (NNDFW). 2017a. NNDFW Review No. 14erg101 BJ. Biological Resources Compliance Form. September 18, 2017.

Navajo Nation Department of Fish & Wildlife (NNDFW). 2017b. NNDFW Review No. 14erg101 Mac. Biological Resources Compliance Form. September 18, 2017.

Navajo Nation Environmental Protection Agency (NNEPA) and Navajo Nation Department of Justice (NNDOJ). 2014. Letter to Homestake Mining Company of California regarding "Access to Black Jack 1 & 2 and Mac 1 & 2 mines, Navajo Eastern Agency". May 6, 2014.

Navajo Natural Heritage Program (NNHP). 2014. Smith Lake and Mariano Lake Uranium Mines, Characterization Investigation. Letter to Homestake Mining Company of California regarding an information request for biological resources in the vicinity of the Black Jack 1 & 2 and Mac 1 & 2 mines, McKinley County, New Mexico. November 20, 2014.

SAS. 2016. JMP® Statistical Software, version 13.2.1

U.S. Environmental Protection Agency (EPA). 1993. Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA. Office of Solid Waste and Emergency Response. Washington, DC 20460. August.

U.S. Environmental Protection Agency (EPA). 1998. Guidance for Quality Assurance Project Plans (QA/G-5), EPA/600/R-98/018, February 1998.

U.S. Environmental Protection Agency (EPA). 2001. Requirements for Quality Assurance Project Plans (QA/R-5), EPA/240/B-01/003, March 2001.

U.S. Environmental Protection Agency (EPA), 2006. Guidance on Systematic Planning Using the Data Quality Objectives Process. EPA QA/G-4. February.

U.S. Environmental Protection Agency (EPA). 2008. Health and Environmental Impacts of Uranium Contamination in the Navajo Nation, Five-year Plan. United States Environmental Protection Agency, Region 9 EPA.

U.S. Environmental Protection Agency (EPA). 2014. Scope of Work for Administrative Settlement Agreement and Order on Consent for Interim Removal Action for Black Jack Mines Numbers 1 and 2 and Mac Mines Numbers 1 and 2. Appendix A to Administrative Settlement Agreement and Order on Consent for Interim Removal Action, Black Jack and Mac Mine Sites, New Mexico. Homestake Mining Company of California (Respondent). August 27, 2014. U.S. EPA Region 9, CERCLA Docket No. 2014-06.

Whicker, R., M. Whicker, J. Johnson, and H. Meyer. 2006. Mobile Soils Lab: On-site Radiological Analysis Supporting Remedial Activities. Health Physics. Operational Radiation Safety. 91(2) Supplement 1: S24-S31, August.

Whicker, R., P. Cartier, J. Cain, K. Milmine, and M. Griffin. 2008. Radiological Site Characterizations: Gamma Surveys, Gamma/Ra-226 Correlations and Related Spatial Analysis Techniques. Operational Radiation Safety, Health Physics, Vol. 95 (Supplement 5): S180-S189; November.

APPENDIX A

Attachment A1 (Updated Background Data)

Table A1-1: Updated analytical results and summary statistics for Background Area 1 soil samples (supersedes Table 1 from ERG, 2017a).

Background Area 1 - Surface Soil (0-15 cm)

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BA1-01-S-0015	4/20/2015	1.2	0.8	1.5	2.6	23.5	5.2	0.4	0.6	17.9
BA1-02-S-0015	4/20/2015	1.3	0.9	1.1	0.6	13.9	5.9	0.4	0.6	18.7
BA1-03-S-0015	4/20/2015	1.2	0.8	0.9	2	22.8	6.2	0.4	0.6	20.6
BA1-04-S-0015	4/20/2015	1.4	0.9	1.4	2.6	23.6	7.7	0.5	0.7	26.4
BA1-05-S-0015	4/20/2015	1.5	1.0	1.2	1.3	22.3	7.1	0.4	0.7	23
BA1-06-S-0015	4/20/2015	1.5	1.0	1.4	3	23.5	7	0.4	0.7	22.6
BA1-07-S-0015	4/20/2015	1.8	1.2	1.4	0.9	22.2	6.6	0.4	0.6	22
BA1-08-S-0015	4/20/2015	1.5	1.0	1.2	2.9	24.9	6.5	0.5	0.7	21.8
BA1-09-S-0015	4/20/2015	1.5	1.0	1.3	2.1	17.4	1	0.5	0.7	3.8
BA1-10-S-0015	4/20/2015	1.3	0.9	1	1.5	20.5	6.3	0.4	0.7	20.1
BA1-11-S-0015	4/20/2015	1.3	0.9	1.1	2.1	15.5	6.4	0.4	0.6	21.1
BA1-CORR1-DIS	10/10/2017	1.3	0.9	1.6	4.7	25.8	6.9	0.4	0.3	27.6
BA1-CORR2-DIS	10/10/2017	1.5	1.0	1.9	2.1	27	8.1	0.4	0.4	35.2

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

Mean Std. Dev. Median Minimum Maximum

1.4	1.0	1.3	2.2	21.8	6.2	0.4	0.6	21.6
0.2	0.1	0.3	1.1	3.9	1.7	0.0	0.1	7.0
1.4	0.9	1.3	2.1	22.8	6.5	0.4	0.6	21.8
1.2	0.8	0.9	0.6	13.9	1.0	0.4	0.3	3.8
1.8	1.2	1.9	4.7	27.0	8.1	0.5	0.7	35.2
13	13	13	13	13	13	13	13	13

Background Area 1 - Subsurface Soil (15-60 cm)

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BA1-01-S-1560	4/20/2015	1.3	0.9	1.1	1.6	16	6.4	0.4	0.7	19.5
BA1-02-S-1560	4/20/2015	1.3	0.9	1.8	2.9	18.9	6.5	0.4	0.7	23.1
BA1-03-S-1560	4/20/2015	1.3	0.9	1	2.5	19.6	6.1	0.4	0.7	18.4
BA1-04-S-1560	4/20/2015	1.5	1.0	1.1	1.8	21.4	6.6	0.4	0.8	22.7
BA1-05-S-1560	4/20/2015	1.5	1.0	1.1	2.8	23.7	6.9	0.4	0.8	24.2
BA1-06-S-1560	4/20/2015	1.7	1.2	1.1	1.9	22	7.1	0.5	0.7	23.6
BA1-07-S-1560	4/20/2015	1.7	1.2	1.4	1.5	19.3	6.9	0.4	0.8	22.6
BA1-08-S-1560	4/20/2015	1.2	0.8	0.8	1.9	20.9	6	0.4	0.6	18.6
BA1-09-S-1560	4/20/2015	1.5	1.0	1.5	1.6	20.7	7	0.4	0.7	21.9
BA1-10-S-1560	4/20/2015	1.3	0.9	1.2	2.8	16.7	6.5	0.5	0.8	22.8

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

Mean Std. Dev. Median Minimum Maximum

A 7 A 7				1			1	
1.4	1.0	1.2	2.1	19.9	6.6	0.4	0.7	21.7
0.2	0.1	0.3	0.6	2.3	0.4	0.0	0.1	2.1
1.4	0.9	1.1	1.9	20.2	6.6	0.4	0.7	22.7
1.2	0.8	0.8	1.5	16.0	6.0	0.4	0.6	18.4
1.7	1.2	1.8	2.9	23.7	7.1	0.5	0.8	24.2
10	10	10	10	10	10	10	10	10

Table A1-2: Updated analytical results and summary statistics for Background Area 2 soil samples (supersedes Table 1 from ERG, 2017a).

Background Area 2 - Surface Soil (0-15 cm)

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BA2-01-S-0015	4/21/2015	0.9	0.6	1	1.6	12.8	3.3	0.3	0.4	13.4
BA2-02-S-0015	4/21/2015	1.1	0.7	0.9	2.2	16.7	3.4	0.4	0.4	14.9
BA2-03-S-0015	4/21/2015	1	0.7	1	1.8	14.2	3.1	0.3	0.4	14.3
BA2-04-S-0015	4/21/2015	0.9	0.6	0.7	1.3	18.6	2.7	0.3	0.3	14.3
BA2-05-S-0015	4/21/2015	1.1	0.7	0.8	1.3	10.7	3.3	0.3	0.3	14.6
BA2-06-S-0015	4/21/2015	0.9	0.6	1.2	1.5	17.5	3.1	0.3	0.4	15.3
BA2-07-S-0015	4/21/2015	1.1	0.7	0.8	1.4	17.2	3.3	0.4	0.4	15.3
BA2-08-S-0015	4/21/2015	1	0.7	1.2	1.3	15	3.3	0.4	0.3	15.4
BA2-09-S-0015	4/21/2015	1.1	0.7	1.1	1.4	15.9	4	0.3	0.3	16.8
BA2-10-S-0015	4/21/2015	0.5	0.3	0.8	0	12.2	2.3	0.2	0.3	9.7
BA2-11-S-0015	4/21/2015	0.6	0.4	0.8	0.9	14.4	2.2	0.2	0.3	10.1
BA2-CORR1-DIS	10/12/2017	0.8	0.5	1.2	1	21.6	2.7	0.3	0.1	13.3
BA2-CORR2-DIS	10/12/2017	1.2	0.8	1.6	3.2	25.7	4	0.4	0.2	20.2

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

Mean Std. Dev. Median Minimum Maximum

0.9	0.6	1.0	1.5	16.3	3.1	0.3	0.3	14.4
0.2	0.1	0.2	0.7	4.0	0.5	0.1	0.1	2.7
1.0	0.7	1.0	1.4	15.9	3.3	0.3	0.3	14.6
0.5	0.3	0.7	0.0	10.7	2.2	0.2	0.1	9.7
1.2	0.8	1.6	3.2	25.7	4.0	0.4	0.4	20.2
13	13	13	13	13	13	13	13	13

Background Area 2 - Subsurface Soil (15-60 cm)

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BA2-01-S-1560	4/21/2015	0.9	0.6	0.7	1	17.1	3.3	0.3	0.3	12.9
BA2-02-S-1560	4/21/2015	1.1	0.7	1.2	2.2	16.5	3.9	0.4	0.4	16.4
BA2-03-S-1560	4/21/2015	1.1	0.7	0.9	0	17.3	3.7	0.3	0.4	16.3
BA2-04-S-1560	4/21/2015	0.8	0.5	0.7	0	15.3	2.9	0.2	0.3	14.5
BA2-05-S-1560	4/21/2015	0.9	0.6	0.8	1.5	13.1	3.2	0.3	0.4	14.4
BA2-06-S-1560	4/21/2015	0.9	0.6	1.1	2.5	19.6	3.8	0.7	0.4	17.7
BA2-07-S-1560	4/21/2015	1.2	0.8	0.9	1.7	16.8	4.8	0.4	0.4	17.3
BA2-08-S-1560	4/21/2015	1.1	0.7	1	2.4	17.4	4.4	0.4	0.8	17.9
BA2-09-S-1560	4/21/2015	0.9	0.6	1	1.4	15.3	3.6	0.3	0.4	14.4
BA2-10-S-1560	4/21/2015	0.5	0.3	0.6	1.2	14.4	2.2	0.2	0.3	10.7

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

Mean Std. Dev. Median Minimum Maximum

i lactor c	1 0.077 pc	& bei mg/	ъ.					
0.9	0.6	0.9	1.4	16.3	3.6	0.4	0.4	15.3
0.2	0.1	0.2	0.9	1.8	0.7	0.1	0.1	2.3
0.9	0.6	0.9	1.5	16.7	3.7	0.3	0.4	15.4
0.5	0.3	0.6	0.0	13.1	2.2	0.2	0.3	10.7
1.2	0.8	1.2	2.5	19.6	4.8	0.7	0.8	17.9
10	10	10	10	10	10	10	10	10

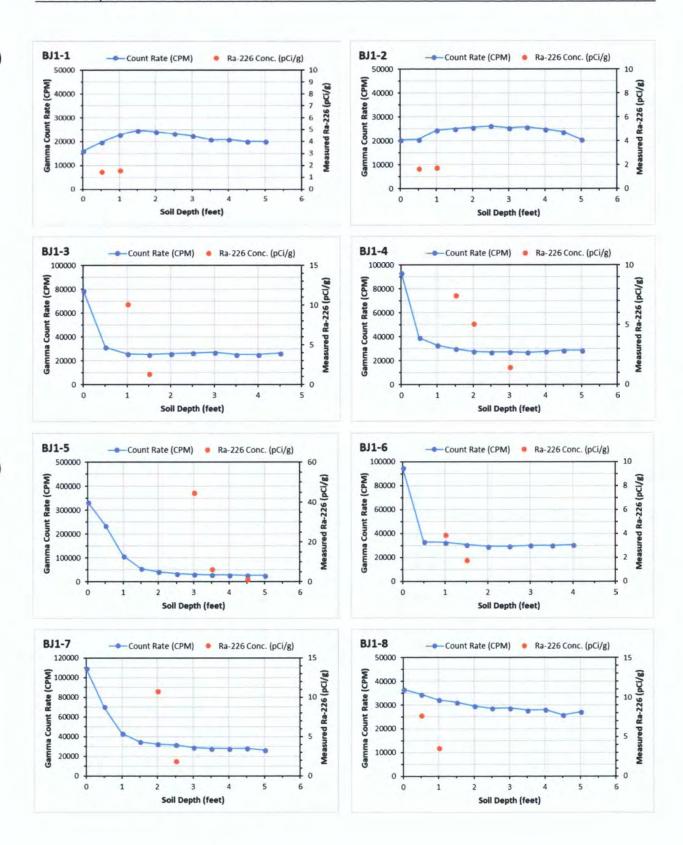


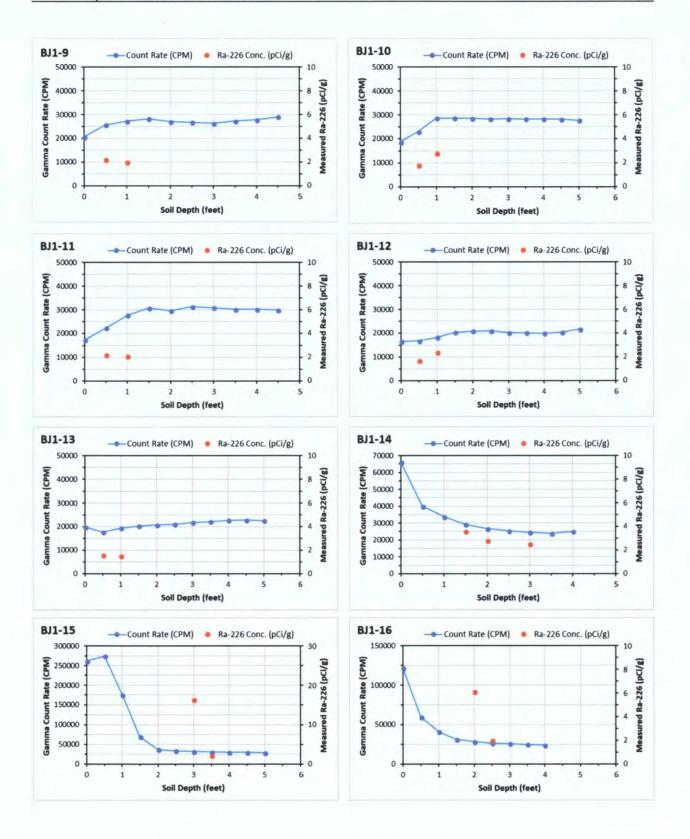
Table A1-3: Corrected analytical lab results (yellow highlighted cells) for soil samples collected in Background Area 2 (supersedes corresponding table in Attachment A1 from ERG, 2017a).

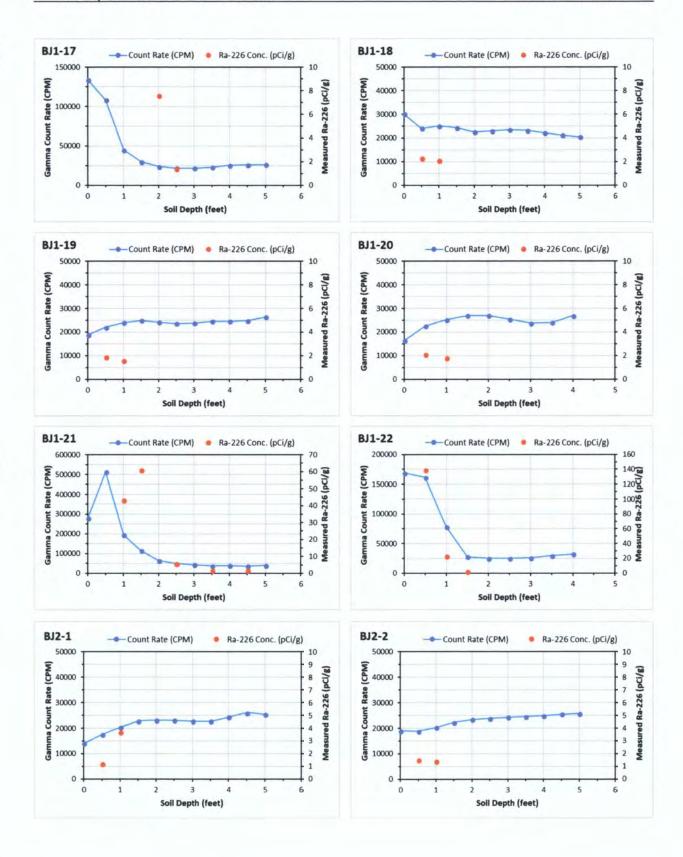
Sample ID	Location	Depth	Ra	a-226 (p	Ci/g)	А	c-228 (pCi/g)	1	K-40 (p	Ci/g)	Urar (mg		Molybo (mg/		Vanad (mg/		Selen (mg/		Arse (mg/		Moistu	re (%
Sample 10	Location	(cm)	Final Result	MDC	Precision (±)	Final Result	MDC	Precision (±)	Final Result	MDC	Precision (±)	Final Result	PQL	Final Result	PQL	Final Result	PQL	Final Result	PQL	Final Result	PQL	Final Result	PQI
BA2-01-S-0015-04212015	BA2-01	0-15	1	0.4	0.3	1.6	1.1	0.7	12.8	3.3	3.5	0.9	0.05	0.3	0.10	13.4	1	0.4	0.1	3.3	1	4.2	0.1
BA2-01-S-1560-04212015	BA2-01	15-60	0.7	0.6	0.4	1	1.6	0.4	17.1	1.7	3.3	0.9	0.06	0.3	0.10	12.9	1	0.3	0.1	3.3	1	6.1	0.1
BA2-02-S-0015-04212015	BA2-02	0-15	0.9	0.6	0.4	2.2	1.1	0.6	16.7	2.1	3.3	1.1	0.06	0.4	0.10	14.9	1	0.4	0.1	3.4	1	5.5	0.1
BA2-02-S-1560-04212015*	BA2-02	15-60	0.07 (1.2)	0.8 (0.3)	0.5 (0.2)	1.2 (2.2)	1.1 (0.3)	0.4 (0.3)	14.6 (16.5)	4.4 (1.1)	4.4 (2.3)	1.1	0.06	0.4	0.10	16.4	1	0.4	0.1	3.9	1	8.2	0.1
BA2-03-S-0015-04212015	BA2-03	0-15	1	0.5	0.4	1.8	0.5	0.4	14.2	1.7	3	1	0.05	0.3	0.10	14.3	1	0.4	0.1	3.1	1	3.8	0.1
BA2-03-S-1560-04212015	BA2-03	15-60	0.9	0.6	0.4	0	1.7	0.3	17.3	2.8	3.8	1.1	0.06	0.3	0.10	16.3	1	0.4	0.1	3.7	1	7.6	0.1
BA2-04-S-0015-04212015	BA2-04	0-15	0.7	0.5	0.4	1.3	1	0.4	18.6	1.7	3.4	0.9	0.06	0.3	0.10	14.3	1	0.3	0.1	2.7	1	5.8	0.1
BA2-04-S-1560-04212015	BA2-04	15-60	0.7	0.6	0.4	0	0.5	0.3	15.3	1.8	3.2	0.8	0.06	0.2	0.10	14.5	1	0.3	0.1	2.9	1	8.2	0.1
BA2-05-S-0015-04212015	BA2-05	0-15	0.8	0.6	0.4	1.3	1.1	0.6	10.7	3.8	3.9	1.1	0.06	0.3	0.10	14.6	1	0.3	0.1	3.3	1	4.9	0.1
BA2-05-S-1560-04212015	BA2-05	15-60	0.8	0.6	0.4	1.5	1.4	0.5	13.1	4.2	4.2	0.9	0.06	0.3	0.10	14.4	1	0.4	0.1	3.2	1	6.7	0.1
BA2-06-S-0015-04212015	BA2-06	0-15	1,2	0.6	0.4	1.5	1.2	0.5	17.5	1.7	3.3	0.9	0.05	0.3	0.10	15.3	1	0.4	0.1	3.1	1	4.1	0.1
BA2-06-S-1560-04212015	BA2-06	15-60	1.1	0.5	0.5	2.5	0.8	0.7	19.6	1.7	3.5	0.9	0.06	0.7	0.10	17.7	1	0.4	0.1	3.8	1	6.6	0.1
BA2-07-S-0015-04212015	BA2-07	0-15	0.8	0.6	0.4	1.4	1.3	0.6	17.2	1.6	3.2	1.1	0.05	0.4	0.10	15.3	1	0.4	0.1	3.3	1	4.1	0.1
BA2-07-S-1560-04212015	BA2-07	15-60	0.9	0.6	0.4	1.7	0.5	0.4	16.8	1.7	3.2	1.2	0.06	0.4	0.10	17.3	1	0.4	0.1	4.8	1	6.6	0.1
BA2-08-S-0015-04212015	BA2-08	0-15	1.2	0.5	0.4	1.3	1.5	0.5	15	3.5	4	1	0.06	0.4	0.10	15.4	1	0.3	0.1	3.3	1	5	0.1
BA2-08-S-1560-04212015	BA2-08	15-60	1	0.5	0.4	2.4	0.5	0.8	17.4	1.7	3,3	1.1	0.06	0.4	0.10	17.9	1	0.8	0.1	4.4	1	7.2	0.1
BA2-09-S-0015-04212015	BA2-09	0-15	1.1	0.4	0.3	1.4	0.5	0.4	15.9	1.7	3.2	1.1	0.06	0.3	0.10	16.8	1	0.3	0.1	4	1	4.6	0.1
BA2-09-S-1560-04212015	BA2-09	15-60	1	0.5	0.4	1.4	0.5	0.4	15.3	1.6	3	0.9	0.06	0.3	0.10	14.4	1	0.4	0.1	3.6	1	6.9	0.1
BA2-10-S-0015-04212015	BA2-10	0-15	0.8	0.5	0.4	0	0.5	583	12.2	4.2	4.3	0.5	0.05	0.2	0.10	9,7	1	0.3	0.1	2.3	1	3.1	0.1
BA2-10-S-1560-04212015*	BA2-10	15-60	0.4 (0.6)	0.6 (0.3)	0.3 (0.2)	0.5 (1.2)	1.2 (0.5)	0.3	17.6 (14.4)	1.7 (1.1)	3.4 (2.2)	0.5	0.06	0.2	0.10	10.7	1	0.3	0.1	2.2	1	5.3	0.1
BA2-11-S-0015-04212015	BA2-11	0-15	0.8	0.4	0.3	0.9	1	0.3	14.4	1.6	2.9	0.6	0.05	0.2	0.10	10.1	1	0.3	0.1	2.2	1	3	0.1

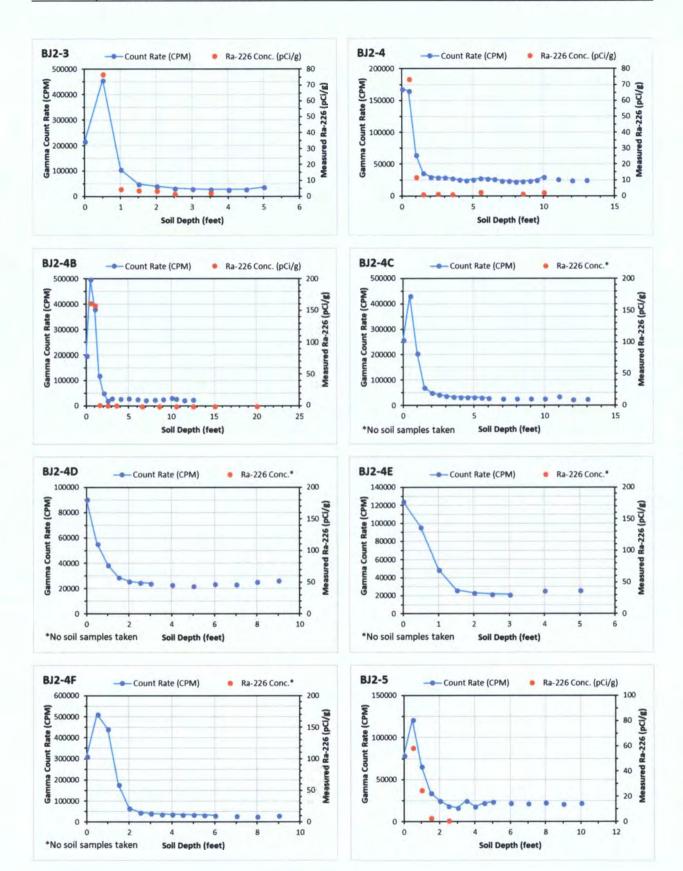
^{*}Original data entry errors (in parentheses) corrected to match official lab results

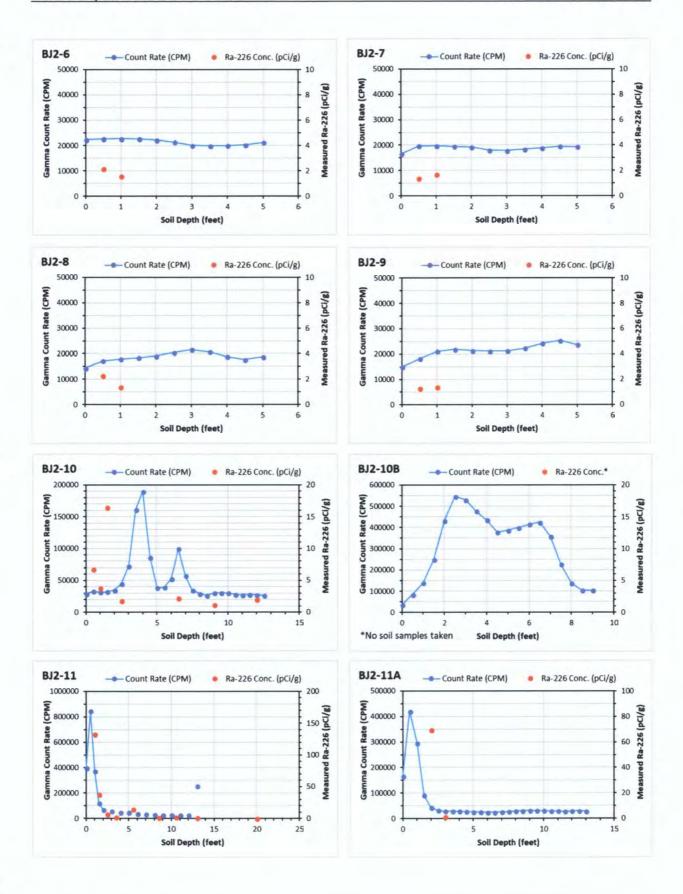
Attachment A2 (Radiological Depth Profile Data)

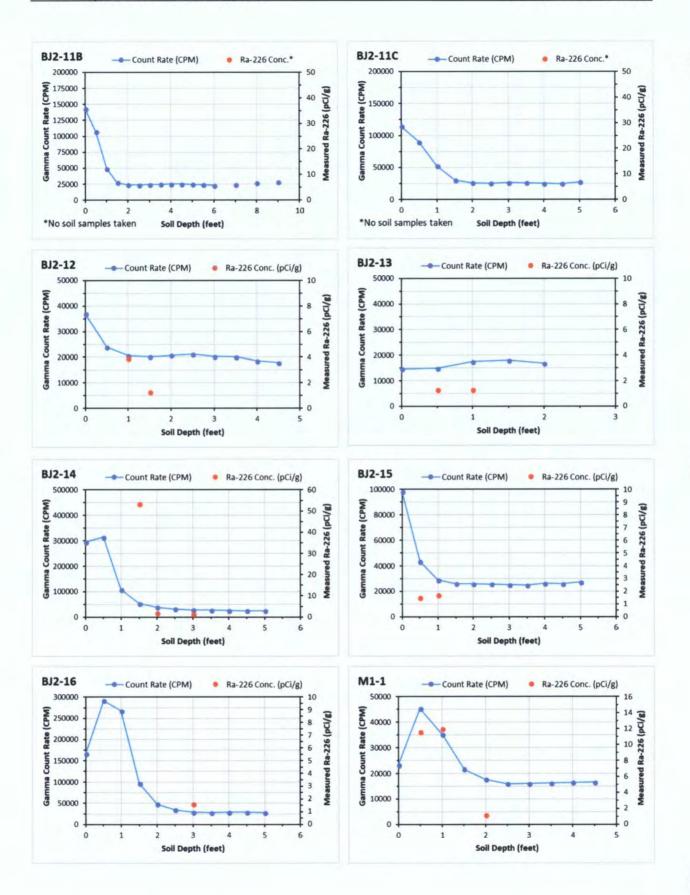


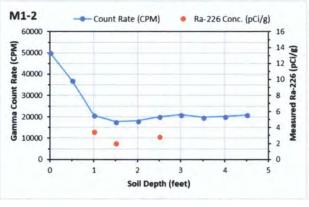


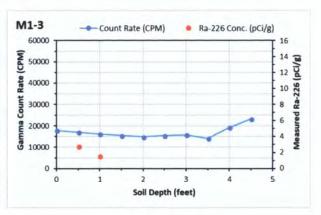


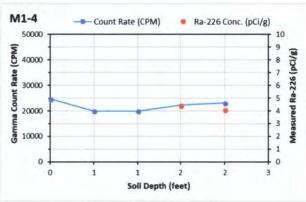


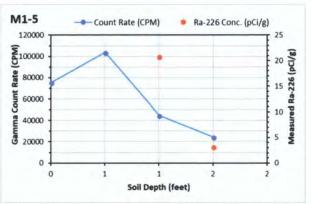


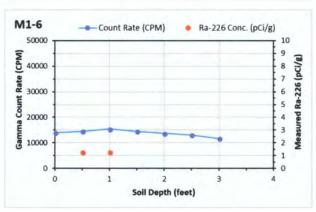


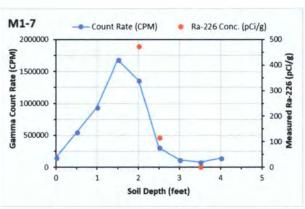


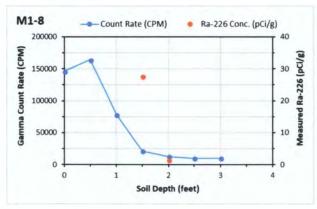


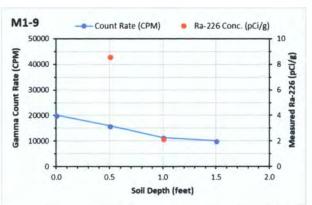


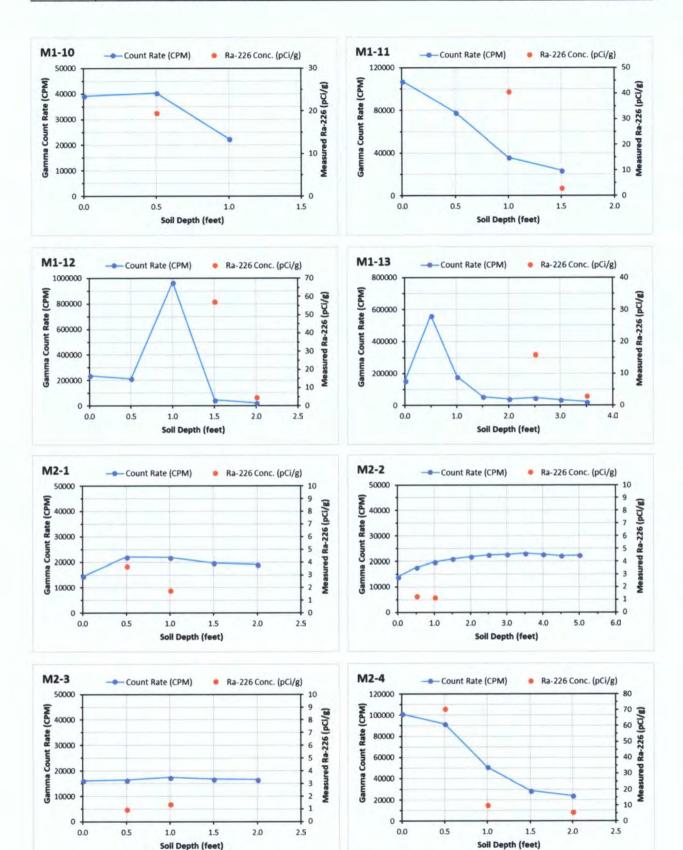


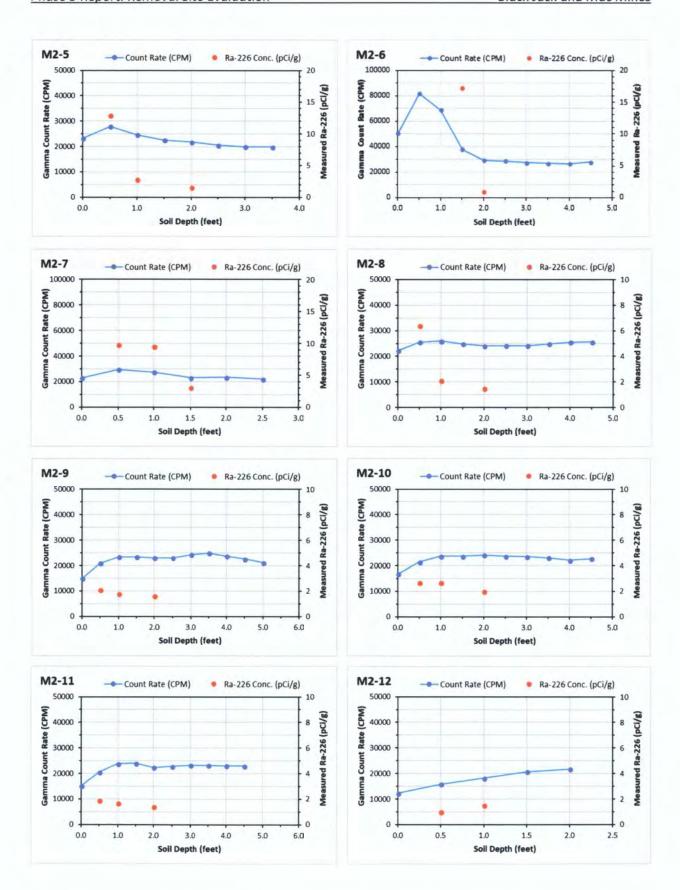


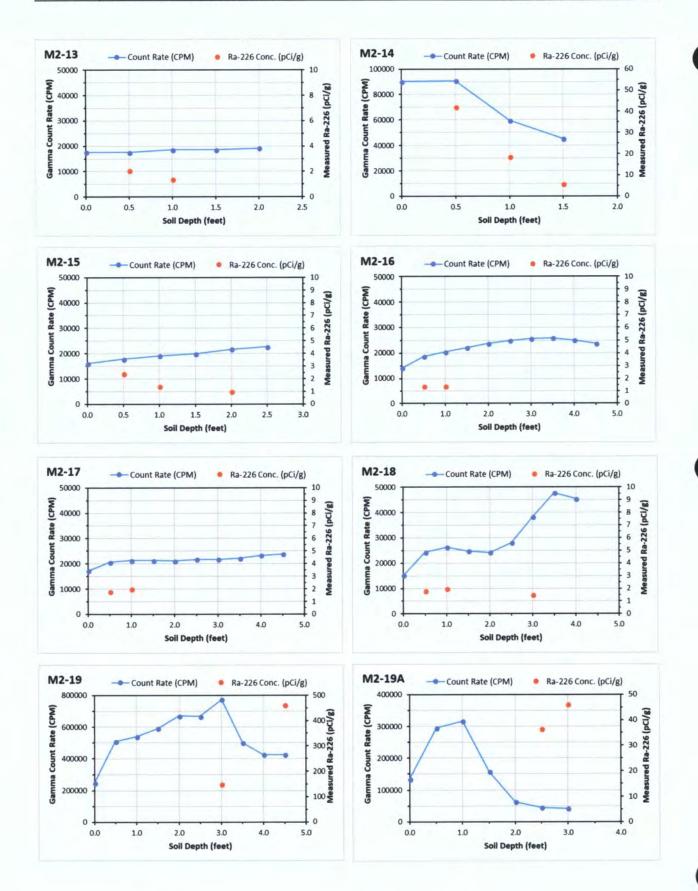


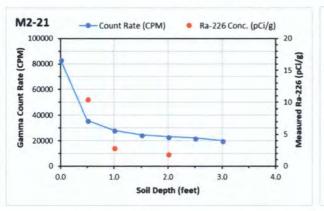


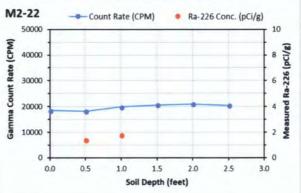


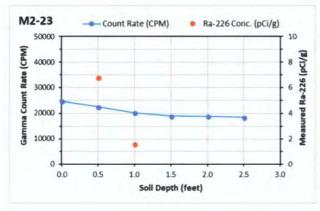












Attachment A3 (Analytical Results for Borehole Samples)

ble A3-1: Analytical results for Black Jack No. 1 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	*Uranium (pCi/g)	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BJ1-1-0006-S-01	10/13/2017	1.2	0.8	1.5	0.7	27.0	6.9	0.8	0.4	26.3
BJ1-1-0006-S-02D	10/13/2017	1.5	1.0	1.6	5.0	28.4	8.2	0.9	0.5	31.4
BJ1-1-0612-S-01	10/13/2017	1.0	0.7	1.6	2.6	25.6	7.2	0.9	0.4	23.8
BJ1-2-0006-S-01	10/13/2017	2.4	1.7	1.7	4.0	30.2	7.1	0.9	0.4	25.5
BJ1-2-0612-S-01	10/13/2017	1.6	1.1	1.8	2.1	25.5	7.8	1.0	0.4	28.4
BJ1-3-0012-S-01	10/13/2017	16.3	11.0	10.2	3.4	28.6	8.0	1.4	4.4	40.2
BJ1-3-1218-S-01	10/13/2017	17.9	12.1	1.4	2.6	24.8	7.2	1.4	0.6	21.7
BJ1-4-0018-S-01	10/13/2017	28.2	19.1	7.5	0.3	33.1	8.5	1.6	1.0	34.2
BJ1-4-0018-S-02S	10/13/2017	25.8	17.5	5.1	2.2	32.9	8.2	1.5	1.2	34.4
BJ1-4-1824-S-01	10/13/2017	7.1	4.8	2.6	0.5	29.4	8.4	1.2	1.2	29.5
BJ1-4-3036-S-01	10/13/2017	1.2	0.8	1.5	4.1	29.5	7.5	1.1	0.9	23.5
BJ1-5-0036-S-01	10/13/2017	127.0	86.0	45.0	11.1	36.9	8.8	7.9	14.7	40.6
BJ1-5-3642-S-01	10/13/2017	30.6	20.7	6.4	6.6	29.7	8.2	2.7	5.5	37.5
BJ1-5-4854-S-01	10/13/2017	1.2	0.8	1.4	0.9	29.9	6.0	0.9	0.9	14.8
BJ1-6-0012-S-01	10/13/2017	42.1	28.5	3.9	0.6	22.9	6.2	2.3	3.5	30.1
BJ1-6-1218-S-01	10/13/2017	33.5	22.7	1.8	2.3	25.6	8.1	1.5	1.9	33.9
-7-0024-S-01	10/13/2017	48.2	32.6	10.8	5.7	30.2	8.7	3.3	3.1	30.5
-7-0024-S-02S	10/13/2017	51.0	34.5	9.9	6.2	29.6	8.6	3.5	3.4	34.2
BJ1-7-2430-S-02S	10/13/2017	16.0	10.8	1.9	1.6	27.7	8.4	1.8	0.8	36.0
BJ1-8-0006-S-01	10/9/2017	13.6	9.2	7.7	0.8	30.0	8.9	1.6	2.0	37.9
BJ1-8-0612-S-01	10/9/2017	7.6	5.2	3.6	6.4	29.1	8.8	1.4	2.0	39.2
BJ1-9-0006-S-01	10/9/2017	2.7	1.8	2.2	0.5	26.4	8.3	1.1	0.6	39.5
BJ1-9-0612-S-01	10/9/2017	2.6	1.8	2.0	3.8	25.5	8.3	1.2	0.7	38.1
BJ1-10-0006-S-01	10/9/2017	1.6	1.1	1.8	4.7	28.6	8.8	1.5	0.5	39.9
BJ1-10-0612-S-01	10/9/2017	1.5	1.0	2.8	5.5	28.1	8.5	0.5	0.5	35.0
BJ1-11-0006-S-01	10/9/2017	1.9	1.3	2.2	0.6	30.6	12.3	0.7	0.6	44.9
BJ1-11-0612-S-01	10/9/2017	1.5	1.0	2.1	5.9	28.0	8.2	0.6	0.5	34.2
BJ1-12-0006-S-01	10/9/2017	9.6	6.5	1.7	0.2	21.6	7.1	1.4	0.5	27.6
BJ1-12-0006-S-02D	10/13/2017	5.4	3.7	1.8	2.5	21.6	5.9	1.3	0.5	26.6
BJ1-12-0612-S-01	10/9/2017	7.1	4.8	2.4	5.8	22.0	6.6	0.8	0.6	26.9
BJ1-13-0006-S-01	10/13/2017	3.7	2.5	1.6	2.5	24.3	7.9	1.1	0.6	31.0
BJ1-13-0612-S-01	10/13/2017	1.3	0.9	1.5	0.2	23.6	7.1	0.8	0.3	25.5
BJ1-14-0018-S-01	10/13/2017	32.2	21.8	3.6	6.3	27.6	8.7	1.9	1.9	36.0
BJ1-14-1824-S-01	10/13/2017	27.3	18.5	2.8	2.3	27.2	8.4	1.4	1.4	34.8
BJ1-14-3036-S-01	10/13/2017	6.1	4.1	2.5	1.4	28.9	7.8	1.7	1.4	21.2
BJ1-15-0036-S-01	10/13/2017	85.4	57.8	16.3	8.9	35.5	5.4	8.9	15.1	36.3
BJ1-15-3642-S-01	10/13/2017	4.0	2.7	2.2	0.8	24.6	9.0	1.1	2.6	29.9
-16-0024-S-01	10/13/2017	41.7	28.2	6.1	2.9	28.8	8.1	3.8	1.7	32.9

Table A3-1: Analytical results for Black Jack No. 1 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	*Uranium (pCi/g)	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BJ1-16-2430-S-01	10/13/2017	3.6	2.5	2.6	2.5	28.3	7.5	1.1	0.8	29.0
BJ1-17-0024-S-01	10/13/2017	29.7	20.1	7.6	2.5	22.7	7.5	2.8	1.9	23.3
BJ1-17-2430-S-01	10/13/2017	5.2	3.5	1.4	2.7	22.8	7.1	1.0	0.6	19.0
BJ1-18-0006-S-01	10/13/2017	8.5	5.8	2.3	0.3	29.5	7.1	0.9	1.8	25.0
BJ1-18-0612-S-01	10/13/2017	2.3	1.6	2.1	1.5	31.5	7.7	0.9	0.6	23.6
BJ1-19-0006-S-01	10/13/2017	1.6	1.1	1.9	0.6	28.3	9.1	1.4	0.6	30.9
BJ1-19-0612-S-01	10/13/2017	1.5	1.0	1.6	1.3	27.9	8.7	1.3	0.6	32.8
BJ1-20-0006-S-01	10/13/2017	1.3	0.9	2.1	4.3	29.4	7.6	1.2	0.4	35.5
BJ1-20-0612-S-01	10/13/2017	1.4	0.9	1.8	0.7	26.1	8.3	1.2	0.4	33.1
BJ1-21-0006-S-01	10/13/2017	650.0	440.1	125.0	11.5	47.9	14.2	105.0	37.8	89.3
BJ1-21-0612-S-01	10/13/2017	516.0	349.3	43.2	9.7	36.2	11.6	92.8	34.6	88.4
BJ1-21-1218-S-01	10/13/2017	210.0	142.2	60.9	5.1	29.8	5.7	27.3	15.7	45.4
BJ1-21-2430-S-01	10/13/2017	28.0	19.0	5.7	1.2	29.7	8.6	1.8	3.8	30.8
BJ1-21-3642-S-01	10/13/2017	2.8	1.9	1.9	7.4	29.6	8.5	1.2	1.2	30.1
BJ1-21-4854-S-01	10/13/2017	2.0	1.4	1.9	0.7	29.2	7.8	1.0	0.6	27.5
BJ1-22-0006-S-01	10/13/2017	162.0	109.7	139.0	15.4	62.3	6.8	18.0	133.0	73.0
BJ1-22-0006-S-02D	10/13/2017	86.9	58.8	111.0	3.1	44.0	3.1	10.8	85.3	32.2
BJ1-22-0612-S-01	10/13/2017	69.8	47.3	22.8	10.6	40.7	1.7	5.7	148.0	13.1
BJ1-22-1218-S-01	10/13/2017	30.0	20.3	2.2	2.7	36.2	1.5	3.0	63.1	12.3

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

^{**}Values highlighted in yellow exceed the Investigation level for the indicated analyte.

pble A3-2: Analytical results for Black Jack No. 2 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadiun (mg/kg)
BJ2-1-0006-S-01	10/4/2017	0.7	0.5	1.2	1.5	21.0	2.8	0.3	0.1	14.3
BJ2-1-0612-S-01	10/4/2017	0.9	0.6	3.7	0.9	21.3	3.2	0.6	0.2	18.7
BJ2-2-0006-S-01	10/4/2017	1.2	0.8	1.5	2.9	21.9	3.0	0.3	0.3	17.6
BJ2-2-0612-S-01	10/4/2017	1.1	0.7	1.4	1.9	21.5	4.0	0.5	0.2	20.7
BJ2-3-0006-S-01	10/4/2017	452.0	306.0	77.2	11.8	40.0	13.6	31.5	80.8	590.0
BJ2-3-0612-S-01	10/4/2017	116.0	78.5	5.0	2.5	20.5	3.4	3.3	1.1	20.6
BJ2-3-1218-S-01	10/4/2017	176.0	119.2	4.1	2.1	22.7	3.5	2.6	0.2	21.6
BJ2-3-1824-S-01	10/4/2017	169.0	114.4	3.8	1.2	23.3	3.9	3.9	0.4	24.3
BJ2-3-2430-S-01	10/4/2017	102.0	69.1	1.8	2.7	24.1	4.5	3.7	0.2	25.7
BJ2-3-3642-S-01	10/4/2017	1.0	0.7	1.3	1.2	20.5	3.2	1.8	0.3	15.3
BJ2-4-0006-S-01	10/3/2017	42.3	28.6	73.7	5.1	44.6	4.9	1.9	16.9	115.0
BJ2-4-0612-S-01	10/3/2017	7.9	5.3	12.0	4.6	29.1	3.9	1.1	0.5	13.3
BJ2-4-114120-S-01	10/3/2017	2.2	1.5	2.4	1.9	22.6	3.7	0.5	0.7	22.7
BJ2-4-1218-S-01	10/3/2017	16.5	11.2	1.4	0.9	25.0	5.6	1.5	0.2	15.0
BJ2-4-2430-S-01	10/3/2017	34.3	23.2	1.5	0.7	21.4	3.7	1.8	0.2	18.6
BJ2-4-3642-S-01	10/3/2017	8.5	5.8	1.2	0.3	17.5	2.8	0.5	0.2	14.5
2-4-6066-S-01	10/3/2017	14.6	9.9	2.7	0.3	21.6	4.6	2.2	1.5	27.3
BJ2-4-96102-S-01	10/3/2017	1.5	1.0	1.6	2.6	21.9	4.4	0.6	0.2	20.1
BJ2-4B-0006-S-01	10/3/2017	52.4	35.5	162.0	29.8	59.3	5.8	4.5	21.7	144.0
BJ2-4B-0612-S-01	10/3/2017	325.0	220.0	159.0	12.1	73.8	9.9	24.8	57.6	570.0
BJ2-4B-120126-S-01	10/3/2017	1.7	1.1	1.9	0.5	22.5	5.8	6.1	0.8	35.5
BJ2-4B-1218-S-01	10/3/2017	554.0	375.1	1.7	6.3	22.9	4.5	7.2	0.6	16.5
BJ2-4B-144150-S-01	10/3/2017	0.7	0.5	1.4	0.9	20.8	2.8	0.2	0.1	14.9
BJ2-4B-174180-S-01	10/3/2017	0.5	0.3	1.1	0.3	15.4	2.2	0.3	0.1	11.1
BJ2-4B-234240-S-01	10/3/2017	1.4	0.9	2.3	3.1	23.0	4.3	1.2	0.2	27.6
BJ2-4B-2430-S-01	10/3/2017	27.7	18.8	1.4	2.3	20.9	3.2	1.2	0.6	17.8
BJ2-4B-3642-S-01	10/3/2017	0.7	0.5	1.2	3.5	15.2	2.4	0.3	1.1	11.4
BJ2-4B-7278-S-01	10/3/2017	0.9	0.6	2.1	2.6	24.2	4.1	0.4	0.5	23.8
BJ2-4B-96102-S-01	10/3/2017	0.8	0.5	1.5	0.9	19.0	3.3	0.4	0.3	17.0
BJ2-5-0006-S-01	10/4/2017	88.0	59.6	59.0	6.0	36.1	5.9	3.1	31.3	188.0
BJ2-5-0612-S-01	10/4/2017	108.0	73.1	25.4	6.7	36.0	8.9	2.4	16.2	124.0
BJ2-5-1218-S-01	10/3/2017	31.0	21.0	3.0	2.1	24.2	4.5	1.4	0.6	22.1
BJ2-5-2430-S-01	10/12/2017	2.4	1.6	1.2	2.0	17.6	2.8	0.5	0.2	15.4
BJ2-6-0006-S-01	10/4/2017	4.5	3.0	2.2	4.8	22.7	7.7	0.8	1.0	38.6
BJ2-6-0006-S-02D	10/4/2017	5.8	3.9	2.3	1.6	25.0	7.5	0.8	0.8	36.1
BJ2-6-0612-S-01	10/4/2017	1.3	0.9	1.6	0.3	22.1	5.1	0.7	0.5	28.6
BJ2-7-0006-S-01	10/4/2017	1.1	0.7	1.4	3.1	20.4	3.7	0.4	0.2	20.6
2-7-0612-S-01	10/4/2017	27.9	18.9	1.7	0.8	0.1	5.8	1.0	4.3	48.5

Table A3-2: Analytical results for Black Jack No. 2 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
BJ2-8-0006-S-01	10/4/2017	5.0	3.4	2.3	3.8	22.7	7.0	0.7	1.0	34.1
BJ2-8-0612-S-01	10/4/2017	1.3	0.9	1.4	1.7	18.6	4.0	0.4	0.3	24.6
BJ2-9-0006-S-01	10/4/2017	2.1	1.4	1.3	0.6	20.3	3.9	0.5	0.9	15.7
BJ2-9-0612-S-01	10/4/2017	0.8	0.5	1.4	0.5	24.5	6.9	0.6	0.3	24.6
BJ2-10-0006-S-01	10/4/2017	13.2	8.9	6.8	1.9	24.2	4.4	0.9	5.0	36.8
BJ2-10-0612-S-01	10/4/2017	4.1	2.8	3.8	3.3	20.8	4.1	0.5	0.8	24.7
BJ2-10-102108-S-01	10/4/2017	5.2	3.5	1.2	0.9	16.0	3.1	1.4	1.2	10.2
BJ2-10-1218-01	10/12/2017	97.4	65.9	16.5	2.0	22.6	3.2	1.1	1.6	25.5
BJ2-10-138144-S-01	10/4/2017	2.0	1.4	2.0	5.6	31.5	5.8	0.6	0.2	34.8
BJ2-10-2430-S-01	10/4/2017	8.5	5.8	1.8	2.7	23.0	4.2	1.2	0.8	22.2
BJ2-10-4248-S-01	10/4/2017	55.8	37.8	33.0	10.2	42.3	5.8	4.1	38.4	146.0
BJ2-10-7278-S-01	10/4/2017	5.3	3.6	2.2	1.0	21.4	2.1	0.6	1.5	7.0
BJ2-11-0006-S-01	10/3/2017	1110.0	751.5	376.0	28.1	111.0	15.4	39.1	124.0	978.0
BJ2-11-0612-S-01	10/4/2017	313.0	211.9	133.0	20.4	79.3	6.2	10.5	39.3	224.0
BJ2-11-120126-S-01	10/3/2017	1.7	1.2	1.9	4.7	29.1	7.3	0.6	0.3	41.3
BJ2-11-1218-S-01	10/3/2017	363.0	245.8	38.4	10.2	36.7	6.5	11.8	32.9	186.0
BJ2-11-150156-S-01	10/3/2017	0.6	0.4	1.4	0.9	21.6	2.9	0.2	0.1	12.2
BJ2-11-234240-S-01	10/3/2017	0.8	0.6	1.4	1.7	20.6	2.8	0.2	0.1	16.5
BJ2-11-2430-S-01	10/3/2017	66.3	44.9	7.1	0.5	19.1	4.1	5.1	10.2	62.5
BJ2-11-3642-S-01	10/12/2017	3.3	2.2	2.0	1.8	18.3	3.9	0.5	2.7	20.8
BJ2-11-6066-S-01	10/3/2017	63.9	43.3	14.5	3.1	21.8	4.7	3.1	9.7	58.8
BJ2-11-96102-S-01	10/3/2017	1.0	0.7	1.2	1.4	17.0	3.9	0.5	0.3	14.1
BJ2-11A-0024-S-01	10/4/2017	106.0	71.8	69.4	13.8	48.3	5.3	2.4	19.0	125.0
BJ2-11A-0024-S-02S	10/4/2017	114.0	77.2	57.4	11.9	34.2	5.6	2.4	16.5	125.0
BJ2-11A-3036-S-01	10/4/2017	27.9	18.9	1.3	3.2	18.4	2.9	1.4	0.3	13.9
BJ2-12-0012-S-01	10/3/2017	11.3	7.7	3.9	6.5	21.8	5.3	1.3	1.7	34.3
BJ2-12-1218-S-01	10/3/2017	0.8	0.6	1.3	3.7	18.8	3.4	0.5	0.3	19.0
BJ2-13-0006-S-01	10/3/2017	2.5	1.7	1.3	0.2	18.3	2.6	0.5	0.4	15.7
BJ2-13-0612-S-01	10/3/2017	0.8	0.5	1.3	1.3	18.4	3.4	0.7	0.3	17.5
BJ2-14-0018-S-01	10/4/2017	153.0	103.6	53.5	10.0	39.5	6.8	4.2	16.7	134.0
BJ2-14-0018-S-02D	10/4/2017	144.0	97.5	63.0	8.6	36.0	6.8	4.2	14.8	127.0
BJ2-14-1824-S-01	10/4/2017	127.0	86.0	2.1	1.7	19.8	3.8	2.9	0.2	22.9
BJ2-14-3036-S-01	10/12/2017	38.8	26.3	1.5	2.2	18.6	3.1	1.6	0.2	15.4
BJ2-15-0006-S-02S	10/4/2017	2.3	1.6	1.5	2.4	23.7	4.2	0.5	0.5	21.2
BJ2-15-0612-S-01	10/4/2017	57.1	38.7	1.7	1.0	18.7	2.7	0.7	0.6	17.2
BJ2-16-3036-S-01	10/12/2017	83.4	56.5	1.6	2.4	20.9	3.7	3.3	0.5	20.1

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

^{**}Values highlighted in yellow exceed the Investigation level for the indicated analyte.

able A3-3: Analytical results for Mac No. 1 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
M1-1-0006-S-01	10/13/2017	18.6	12.6	11.6	4	19.5	3	0.8	4.7	54
M1-1-0612-S-01	10/13/2017	20.8	14.1	12	8	22.9	3.3	1.2	1.5	42
M1-1-1824-S-01	10/13/2017	7.09	4.8	1.2	1.2	21.2	3.5	0.8	0.2	24.9
M1-2-0012-S-01	10/13/2017	21.3	14.4	3.5	4.2	16.3	5.4	1.7	4	50.1
M1-2-1218-S-01	10/13/2017	24	16.2	2.1	2	17	16.9	1.8	3.5	51.3
M1-2-2430-S-01	10/13/2017	4.96	3.4	2.9	3.2	17.5	8	0.7	2.3	29.4
M1-3-0006-S-01	10/13/2017	5.4	3.7	2.8	2.3	26.8	2.5	0.3	0.4	6.1
M1-3-0612-S-01	10/13/2017	3.05	2.1	1.6	0.3	15.7	2.3	0.5	0.4	9.2
M1-4-0018-S-01	10/13/2017	13.3	9.0	4.4	0.8	13.1	2.4	1.2	1	19.5
M1-4-0018-S-02S	10/13/2017	12.1	8.2	4.2	0.8	10.5	2.4	1.2	1.6	18.9
M1-4-1824-S-01	10/13/2017	12.6	8.5	4.1	0.4	12.3	2.5	0.6	1.2	19.4
M1-5-0012-S-01	10/13/2017	77	52.1	20.8	3.2	15.9	2.8	0.9	4.8	49.8
M1-5-1218-S-01	10/13/2017	23.8	16.1	3.2	0.3	13	1.9	0.8	2	19.1
M1-6-0006-S-01	10/13/2017	1.33	0.9	1.3	1.5	18.8	2.8	0.6	0.2	21.7
M1-6-0612-S-01	10/13/2017	1.02	0.7	1.3	3.4	19.9	3.1	0.4	0.1	23.8
M1-7-0024-S-01	10/13/2017	1490	1008.7	475	11.3	74.6	14.6	9.8	23.5	1470
/1-7-0024-S-02S	10/13/2017	1590	1076.4	482	41.9	68.2	12.3	9.5	24.1	1560
M1-7-2430-S-01	10/13/2017	332	224.8	118	19.2	47.9	2.4	3.9	4.5	235
M1-7-3642-S-01	10/13/2017	228	154.4	3.3	2.7	12.7	4.3	5.9	5.8	41.8
M1-8-0018-S-01	10/13/2017	117	79.2	27.7	1.7	20.5	3.3	2.7	5	116
M1-8-1824-S-01	10/13/2017	9.75	6.6	1.6	0.6	10	1.6	0.6	0.7	14.8
M1-9-0006-S-01	10/13/2017	61.7	41.8	8.6	0.8	12.7	2.4	0.9	1.7	35.7
M1-9-0006-S-02D	10/13/2017	43.1	29.2	10.8	2.1	16.2	2	0.8	1.2	33
M1-9-0612-S-01	10/13/2017	8.8	6.0	2.2	0.9	13.9	2.3	0.5	0.4	17.3
M1-10-0006-S-01	10/13/2017	71.7	48.5	19.6	4.6	15.6	2.3	0.8	2.8	46.5
M1-10-0006-S-02D	10/13/2017	88.4	59.8	23.3	0.9	17.1	2.7	0.8	3.4	60
M1-10-0612-S-01	10/13/2017	14	9.5	14.6	0.7	13.2	5.7	0.8	1.9	18.8
M1-11-0012-S-01	10/13/2017	45.5	30.8	40.8	7.1	27.1	4.1	2.1	9.1	72.9
M1-11-0012-S-02S	10/13/2017	44.7	30.3	44.6	5.5	35.9	4.6	2.3	12.1	108
M1-11-1218-S-01	10/13/2017	41.4	28.0	3.2	0.9	11.8	3.1	1.3	0.7	15.9
M1-12-0018-S-01	10/13/2017	235	159.1	57.5	8.7	45.9	3.3	5.4	12.6	114
M1-12-1824-S-01	10/13/2017	111	75.1	4.9	1	10	2.5	3	2.2	20.1
M1-13-0006-S-01	10/13/2017	525	355.4	638	26.5	65.8	12.4	29.2	44.9	921
M1-13-0612-S-01	10/13/2017	564	381.8	71	12.8	43.2	4.7	16.5	4.1	306
M1-13-1824-S-01	10/13/2017	215	145.6	8.6	1.6	22.5	3.2	5.6	0.7	97.7
M1-13-2430-S-01	10/13/2017	88	59.6	16.1	1.4	18.3	8	3.2	1.5	99.5
M1-13-3642-S-01	10/13/2017	4.73	3.2	3.1	0.4	11.2	4.9	0.6	0.8	14.3

Table A3-3: Analytical results for Mac No. 1 borehole soil samples.

Date (mg/kg) (pCi/g)* (pCi/g) (pCi/g) (mg/kg) (mg/kg) (mg/kg) (mg/kg) (mg/kg)	Sample ID	Collection	Uranium (mg/kg)	Uranium (pCi/g)*		100000000000000000000000000000000000000	The second second		Molybdenum (mg/kg)	Selenium (mg/kg)	100000000000000000000000000000000000000
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^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

Table A3-4: Analytical results for Mac No. 2 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
M2-1-0006-S-01	10/12/2017	3.1	2.1	3.7	1.4	23.3	4.8	0.9	0.6	25.3
M2-1-0612-S-01	10/12/2017	3.2	2.1	1.8	3.2	25.3	6.2	0.8	0.3	27.0
M2-2-0006-S-01	10/12/2017	1.0	0.7	1.3	0.3	24.0	7.7	0.5	0.2	27.7
M2-2-0612-S-01	10/12/2017	1.3	0.9	1.2	1.2	22.7	8.0	0.5	0.2	21.4
M2-3-0006-S-01	10/12/2017	1.6	1.1	1.0	2.1	23.6	8.0	0.5	0.2	19.4
M2-3-0612-S-01	10/12/2017	1.1	0.7	1.4	0.2	22.0	7.3	0.4	0.2	23.9
M2-4-0006-S-01	10/11/2017	99.7	67.5	71.0	14.6	41.1	9.3	6.0	12.8	320.0
M2-4-0006-S-02D	10/11/2017	77.4	52.4	90.6	6.3	56.7	8.9	3.7	12.8	207.0
M2-4-0612-S-01	10/11/2017	126.0	85.3	10.3	7.8	29.1	9.5	4.7	11.5	184.0
M2-4-1824-S-01	10/11/2017	15.4	10.4	5.9	5.1	25.1	7.2	0.9	32.8	31.5
M2-5-0006-S-01	10/11/2017	42.4	28.7	12.9	7.1	27.3	6.5	1.2	2.9	81.2
M2-5-0612-S-01	10/11/2017	14.3	9.7	2.8	0.4	29.5	7.0	0.8	0.8	40.0
M2-5-1824-S-01	10/12/2017	1.1	0.8	1.6	1.1	26.0	6.0	0.4	0.2	24.6
M2-6-0018-S-01	10/11/2017	37.1	25.1	17.3	4.6	30.7	6.5	2.1	1.7	68.9
M2-6-0018-S-02S	10/11/2017	38.3	25.9	14.2	0.5	28.9	7.3	1.3	1.9	66.7
M2-6-1824-S-01	10/11/2017	5.2	3.5	1.0	2.3	24.7	7.0	0.5	0.2	35.4
M2-7-0006-S-01	10/11/2017	26.7	18.1	9.8	6.2	30.1	7.6	0.9	1.1	55.5
M2-7-0612-S-01	10/11/2017	33.1	22.4	9.5	7.4	29.4	6.8	1.1	1.2	55.4
M2-7-1218-S-01	10/11/2017	11.0	7.4	3.1	2.0	24.4	6.7	0.9	0.4	36.5
M2-8-0006-S-01	10/11/2017	31.0	21.0	6.4	3.2	26.6	7.7	1.2	1.6	62.2
M2-8-0612-S-01	10/11/2017	3.7	2.5	2.1	5.6	27.0	7.0	0.6	0.3	37.6
M2-8-1824-S-01	10/11/2017	1.3	0.9	1.5	2.5	29.4	5.8	0.5	0.3	16.4
M2-9-0006-S-01	10/11/2017	2.3	1.5	2.1	1.2	25.3	6.0	0.5	0.2	28.2
M2-9-0612-S-01	10/11/2017	2.4	1.6	1.8	3.5	25.6	7.9	0.9	0.4	29.6
M2-9-1824-S-01	10/11/2017	0.8	0.5	1.6	0.9	26.9	5.0	0.4	0.3	13.4
M2-10-0006-S-01	10/11/2017	3.1	2.1	2.7	6.8	26.3	5.5	0.6	0.3	27.8
M2-10-0612-S-01	10/11/2017	4.1	2.8	2.7	2.5	29.3	7.0	0.6	0.2	30.0
M2-10-1824-S-01	10/11/2017	2.3	1.6	2.0	0.7	29.8	5.0	0.5	0.3	16.9
M2-11-0006-S-01	10/11/2017	2.7	1.8	1.9	2.2	24.1	6.1	0.6	0.2	27.2
M2-11-0612-S-01	10/11/2017	1.2	0.8	1.7	2.5	26.8	7.5	0.5	0.2	29.0

^{**}Values highlighted in yellow exceed the Investigation level for the indicated analyte.

Table A3-4: Analytical results for Mac No. 2 borehole soil samples.

Sample ID	Collection Date	Uranium (mg/kg)	Uranium (pCi/g)*	Ra-226 (pCi/g)	Ac-228 (pCi/g)	K-40 (pCi/g)	Arsenic (mg/kg)	Molybdenum (mg/kg)	Selenium (mg/kg)	Vanadium (mg/kg)
M2-11-1824-S-01	10/11/2017	0.6	0.4	1.4	0.6	25.5	4.7	0.3	0.2	11.9
M2-12-0006-S-01	10/12/2017	1.4	1.0	1.0	3.4	25.4	2.0	0.2	0.1	11.8
M2-12-0612-S-01	10/12/2017	0.6	0.4	1.5	2.2	26.8	2.0	0.4	0.1	9.5
M2-13-0006-S-01	10/12/2017	4.2	2.9	2.1	3.0	27.7	3.8	0.5	0.3	23.8
M2-13-0612-S-01	10/12/2017	0.9	0.6	1.4	2.7	22.2	3.8	0.3	0.1	18.7
M2-14-0006-S-01	10/11/2017	65.8	44.5	42.1	10.4	31.0	7.0	4.5	8.7	187.0
M2-14-0612-S-01	10/11/2017	57.2	38.7	18.7	5.6	31.1	6.6	3.4	3.5	140.0
M2-14-1218-S-01	10/11/2017	88.2	59.7	5.7	2.3	26.1	8.5	3.1	3.6	92.5
M2-15-0006-S-01	10/11/2017	3.1	2.1	2.4	2.7	23.8	3.5	0.7	0.5	18.1
M2-15-0612-S-01	10/11/2017	1.9	1.3	1.4	2.2	22.0	3.5	0.5	0.2	21.2
M2-15-1824-S-01	10/11/2017	0.9	0.6	1.0	1.6	27.3	4.1	0.5	0.2	14.7
M2-16-0006-S-01	10/11/2017	0.7	0.5	1.4	2.1	23.0	4.7	0.4	0.1	15.2
M2-16-0612-S-01	10/11/2017	0.7	0.5	1.4	0.1	23.7	4.3	0.3	0.1	16.8
M2-17-0006-S-01	10/11/2017	2.5	1.7	1.8	3.2	28.6	5.2	0.4	0.2	21.1
M2-17-0006-S-02S	10/11/2017	1.5	1.0	2.2	3.0	31.5	5.0	0.4	0.2	22.5
M2-17-0612-S-01	10/11/2017	2.6	1.7	2.0	1.9	26.6	5.8	0.7	0.3	22.8
M2-18-0006-S-01	10/11/2017	1.2	0.8	1.8	3.5	30.1	7.0	0.7	0.1	18.4
2-18-0006-S-02D	10/11/2017	1.2	0.8	1.4	0.6	24.3	5.3	0.6	0.1	18.2
M2-18-0612-S-01	10/11/2017	1.8	1.2	2.0	6.1	29.2	9.9	0.7	0.1	19.4
M2-18-3036-S-01	10/12/2017	1.0	0.7	1.5	4.8	21.7	14.0	1.1	0.1	14.9
M2-19-0036-S-01	10/11/2017	378.0	255.9	151.0	11.9	83.1	6.4	5.1	8.1	425.0
M2-19-4854-S-01	10/11/2017	108.0	73.1	462.0	25.9	89.7	3.8	2.8	2.3	61.5
M2-19A-0030-S-02S	10/11/2017	97.1	65.7	36.4	2.6	33.9	5.0	1.5	2.7	131.0
M2-19A-0036-S-01	10/11/2017	112.0	75.8	2.5	0.6	28.4	10.4	2.3	0.5	22.6
M2-19A-3036-S-01	10/11/2017	74.1	50.2	46.1	11.5	32.9	5.4	2.5	5.0	168.0
M2-21-0006-S-01	10/11/2017	61.2	41.4	10.5	0.3	27.7	7.3	1.9	2.1	88.9
M2-21-0612-S-01	10/11/2017	31.6	21.4	2.9	3.3	30.1	9.3	1.3	0.5	40.3
M2-21-1824-S-01	10/11/2017	12.5	8.5	1.9	3.0	23.7	6.9	1.1	1.5	53.6
M2-22-0006-S-01	10/12/2017	1.1	0.7	1.4	0.6	23.8	4.6	0.6	0.1	17.9
M2-22-0612-S-01	10/12/2017	1.3	0.8	1.8	0.8	22.2	3.8	0.4	0.1	18.4
M2-23-0006-S-01	10/12/2017	14.3	9.7	6.8	4.3	25.8	7.7	1.0	0.9	57.2
M2-23-0612-S-01	10/12/2017	5.9	4.0	1.6	0.2	25.8	7.0	0.5	0.2	26.0

^{*}Calculated value based on conversion factor of 0.677 pCi/g per mg/kg.

^{**}Values highlighted in yellow exceed the Investigation level for the indicated analyte.

Attachment A4 (Data Validation Report)

NOTE: The following table represents the data validation report for Phase 3 soil sampling results. It provides validation categories, requirements, evaluation and conclusions regarding data quality for intended use under the project DQOs.

Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
		I. Re	elevant Field	Data Review	
	Field Logbook is present and complete according to the Work Plan. Information required: survey/sample date, survey/sample team, weather conditions, daily activities, deviation of SOPs.	Yes	None	All samples	
Sample Documentation,	Field data sheets are present and complete according to the Work Plan, including instrument function check sheets, instrument calibration certificates and soil sampling sheets.	Yes	None	All samples	All field QC documentation provided in Appendix A, though soil sampling sheets were generated retrospectively based on field logbook data entries. The time of day that soil samples were collected was not recorded, but this specification is not applicable as hold time specifications for radionuclides (none) and metals (6 months) in all soil samples were met to the nearest day.
Handling, and Custody Requirements.	The relevant chain of custodies are present and complete according to the Work Plan.	Yes	None	All samples	All COC forms contained complete information and were properly signed by applicable custody personnel. Copies of the original COC forms were kept on file. However, not all COC entries matched the labels written on the samples received by the lab. This issue, primarily limited to data transcription errors in designation of field splits versus duplicates under the specified sample ID nomenclature, was resolved through contact with the Lab, and the case narrative for each lab report specifies the corrected sample ID numbers where applicable.
	Samples were labeled and packaged according to the Work Plan.	Yes	None	All samples	Modifications were made to the sample ID nomenclature: I naming field duplicate samples a "D" was added to the end of the sample name and an "S" was added to samples that

were field splits.

Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
		II. A	nalytical Lal	Data Review	
Holding Times	Was the time between sampling and analysis less than six months for all samples?	Yes	None	All samples	Due to the time required for data reviews by EPA/NNEPA and related decisions regarding potential analysis of archived samples, one of the archived subsurface soil samples was not analyzed for metals until exactly 6 months after collection (narrowly meeting the applicable hold time specification).
	Did lab results for Arsenic meet the detection limit specifications of the Work Plan?	Yes	None	All samples	
Detection Limits	Did lab results for Actinium-228 meet the detection limit specifications of the Work Plan?	No	υ, ι	Report C17110208: BJ2-4-6066-S-01, BJ2-6-0612-S-01, BJ2-13-0006-S-01 Report C17110183: M1-4-1824-S-01, M1-5-1218-S-01 Report C17110195: BJ1-4-0018-S-01, BJ1-12-0006-S-01, BJ1-13-0612-S-01	Specified detection limits for these samples were not achieved by the lab, yet results for this analyte were flagged as below detection at a (higher) detection limit as reported by the lab. The appropriate qualifiers of undetected (U) and estimated value (J) are applicable to these samples. These qualifiers are not considered significant relative to the DQOs specified in the Phase 3 Work Plan.
	Did lab results for Molybdenum meet the detection limit specifications of the Work Plan?	Yes	None	All samples	
	Did lab results for Potassium-40 meet the detection limit specifications of the Work Plan?	No	U,J	Report C17110208: BJ2-7-0612-S-01	Specified detection limits for this sample was not achieved by the lab, and results for this analyte were flagged as below detection at a (higher) detection limit as reported by the lab. The appropriate qualifiers of undetected (U) and estimated value (J) are applicable to this sample. These qualifiers are not considered significant relative to the DQOs specified in the Phase 3 Work Plan.



Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
	Did lab results for Radium-226 meet the detection limit specifications of the Work Plan?	Yes	None	All samples	
	Did lab results for Selenium meet the detection limit specifications of the Work Plan?	No	N/A	Report C17110204: M2-12-0006-S-01, M2-12-0612-S-01 Report C17110208: BJ2-4B-144150-S-01, BJ2-11-150156-S-01	Specified detection limits for these samples were not achieved by the lab, and results for this analyte were not reported. Results for these samples were labeled as "ND" for not detected at the (higher) detection limit. For data analysis, the reported detection limit is assumed to be a suitably conservative estimated value.
	Did lab results for Uranium meet the detection limit specifications of the Work Plan?	Yes	None	All samples	
	Did lab results for Vanadium meet the detection limit specifications of the Work Plan?	Yes	None	All samples	
Calibration and Internal Standards	Energy Labs followed calibration standards and procedures according to the Work Plan.	Yes	None	All samples	
Laboratory Blanks	Analytes should not be detected above detection limits in calibration blank samples and the number of blanks reported in a data package should be 10% of the total number of samples reported.	Yes	None	All samples	

Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
	Preparation blanks should not exhibit contaminant concentrations > MDL and the number of preparation blanks should be at least 5% of the total number of samples reported.	No	В	Report C17110183: MB-39563, MB-50694 Report C17110195: MB-39563, MB-50706 Report C17110208: MB-50743 Report C17110204: MB-39598, MB-50722	According to Energy Labs, preparation blanks are method blanks. Method blank MB-39563 had a detectable amount of Uranium (0.04 mg/kg). None of the field samples in lab report C17110183 had a uranium concentration that was less than 10 times this amount, so a B qualifier (for "blank detection") does not apply to any samples in this data package. Method blank MB-39598 had a detectable amount of Molybdenum (0.05 mg/kg). The following field samples for lab report C17110204 had concentrations less than 10 times this amount, and are thus qualified as "B" for blank detection of molybdenum: M2-3-0612-S-01, M2-12-0006-S-01, M2-12-0612-S-01, M2-13-0612-S-01, M2-16-0006-S-01, M2-16-0612-S-01, M2-17-0006-S-01, M2-16-0612-S-01, M2-17-0006-S-01, M2-17-0006-S-02S, M2-22-0612-S-01 The other method blanks had detection of various radionuclides by gamma spectroscopy, including MB-50694 (K-40), MB-50706 (Ac-228, Ra-226), MB-50743 (Ac-228, K-40, Ra-226), and MB-50722 (Ac-228, K-40, Ra-226). These detected parameters are all naturally occurring in geologic materials and may have been present in the blank sample matrix or sample container. For this reason, a blank detection qualifier is not appropriate in a context of data use under project DQOs.
Laboratory Control Standard Analysis	The LCS frequency must be at least 5% of the total reported samples. The LCS must fall within manufacturer's certified acceptance limits.	Yes	None	All samples	
Laboratory Duplicate Sample Analyses	Was a laboratory duplicate performed at a frequency of 5 percent of all investigative samples?	Yes	None	All samples	

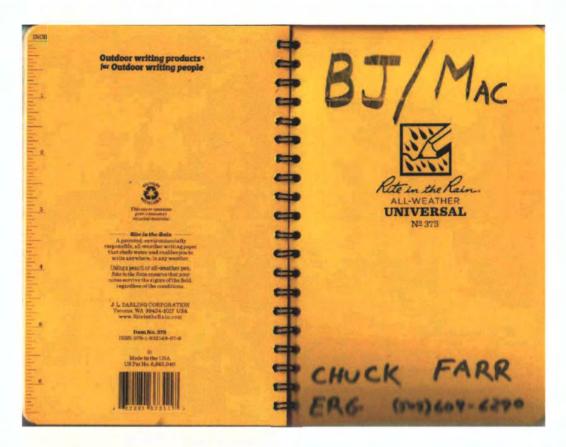


Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
	With respect to radionuclides, do laboratory duplicates have a RER value of 2.0 or less?	No	j	Report C17110208: C17110208-080 C17110208-080Dup	With respect to Ac-228 this sample pair has a RER value of 2.9.
	With respect to metals and uranium do the laboratory duplicate pairs share a RPD value of 40% or less? Or alternatively, does the absolute difference of the pairs fall below 1 x RL?	N/A	None	All samples	Note: According to Energy Labs matrix spikes and a matrix spike dups serve as a metal duplicate sample (see Matrix Spike requirement below).
	Field splits/replicates will be collected at a frequency of 5 percent of all soil samples collected (1 field split per 20 investigative samples).	Yes	None	All samples	Field splits/replicates were collected at a frequency of approximately 7% of all borehole samples.
Field Duplicate Analysis	With respect to the metals and uranium the acceptance criteria for field splits/replicates will be a relative percent difference (RPD) that does not exceed 40 percent.	No	J	Report C17110195: BJ1-22-0006-S-02D, BJ1-12-0006-S-2D Report C17110204: M2-4-0006-S-02D, M2-6-0018-S-02S, M2-17-0006-S-02S Report C17110183: M1-4-0018-S-02S Report C17110204: M2-4-0006-S-02D, M2-6-0018-S-02S, M2-17-0006-S-02S	These sample duplicates/splits exceed the specified RPD for at least one analyte. Results for applicable analytes in these samples are considered only estimates (qualifier J). This does not impact estimates of contaminated soil volume based on Phase 3 data (these estimates are based primarily on gamma radiation measurements).

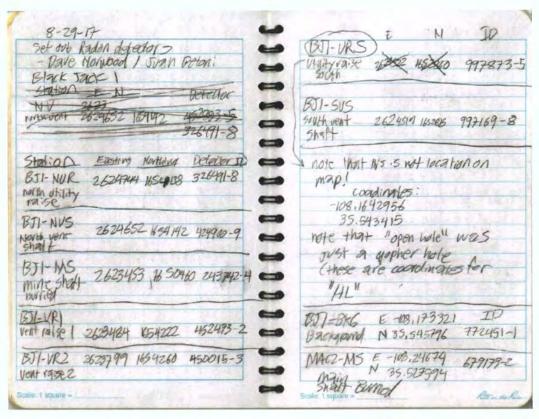
Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
	In the case of radiometric data with associate error reported, a replicate error ratio (RER) of 2 must not be exceeded.	No	J	Report C17110195: BJ1-22-0006-S-02D, BJ1-12-0006-S-2D, BJ1-4-0018-S-02S Report C17110208: BJ2-14-0018-S-02D, BJ2-6-0006-S-02D Report C17110183: M1-9-0006-S-02D, M1-10-0006-S-02D	These sample duplicates/splits exceed the acceptable RER for at least one radionuclide. Results for applicable analytes in these samples are considered only estimates (qualifier J). This does not impact estimates of contaminated soil volume based on Phase 3 data (those estimates are based primarily on gamma radiation measurements).
Matrix Spike	Do chemical recoveries of spike amounts fall within the control limit of 75-125% for metals and uranium?	No	J	Report C17110183: C17110183-024AMS, H17110372-001BMS, C17110183-035AMS Report C17110195: H17110341-004AMS Report C17110208: C17110208-080AMS, C17110208-060AMS	The following matrix spikes C17110183-024AMS, H17110372-001BMS, C17110183-035AMS, C17110208-080AMS, C17110208-060AMS have chemical recoveries greater than 125%, with respect to Vanadium. These spikes are all associated with batch report C17110183 and C17110208. All Vanadium sample results in these batches exceed the MDL and have been qualified as "J". Matrix spike C17110183-035AMS has a chemical recovery greater than 125%, with respect to Uranium. This matrix spike is associated with batch report C17110183. All Uranium sample results in this batch exceed the MDL and have been qualified as "J". The following matrix spikes H17110372-001BMS and H17110341-004AMS have chemical recoveries less than 75% or greater than 125%, with respect to Arsenic. These spikes are all associated with batch report C17110183 and C17110195. All Arsenic sample results in these batches exceed the MDL and have been qualified as "J".
Serial Dilution	Analysis of a 5-fold dilution must agree within 10 percent difference (5%) of the original results.	No	J	Report C17110204: H17110390-002ADIL Report C17110208: C17110208-080ADIL, C17110208-099ADIL, C17110208-002ADIL	A majority of the results showed that the analyte concentration was not sufficiently high enough to calculate a RPD for the serial dilution test. The samples listed to the left had results where the RPD exceeded specified limits.

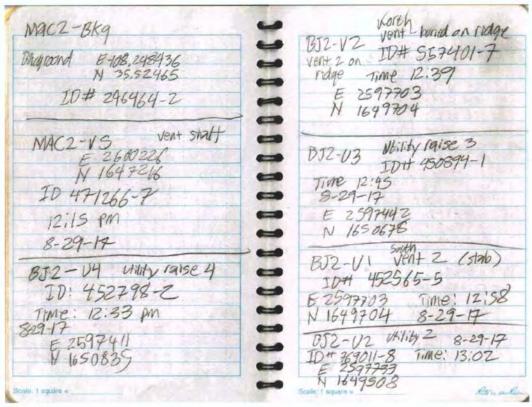
Validation Category	Specified Requirements	Validation Requirement Met?	Qualifiers	Samples Affected	Comments
Assessment of Data Completeness	The percentage of valid data (%C) must meet the criteria established in the project plans (95%).	Yes	None	All samples	
Sample Result Verification	Are the reported results accurate and complete?	Yes	None	All samples	

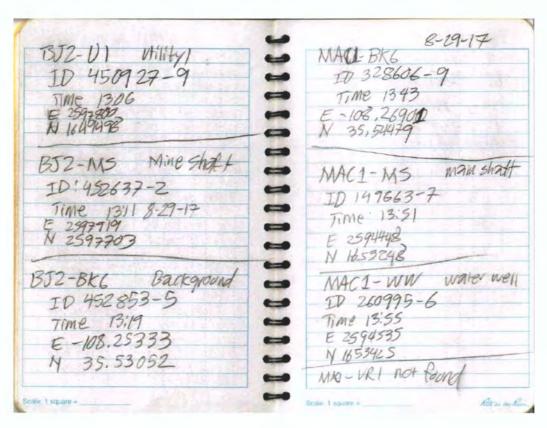
Attachment A5 (Field Logbook Notes)

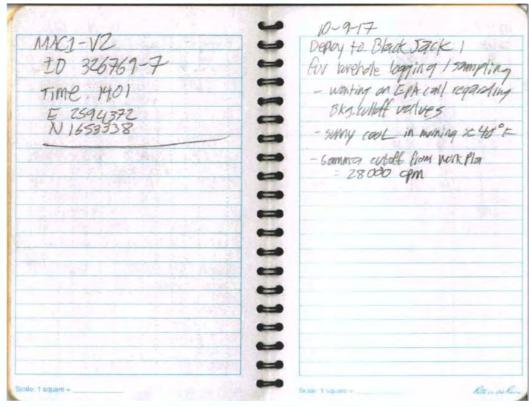


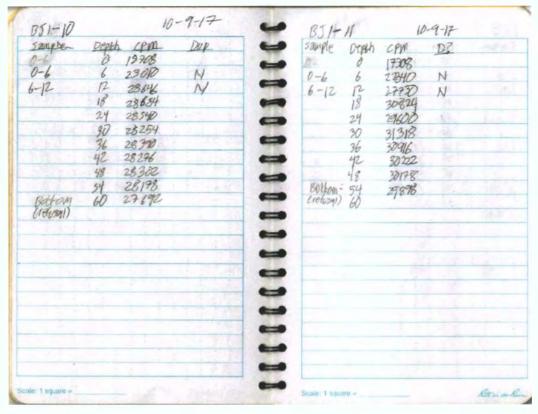


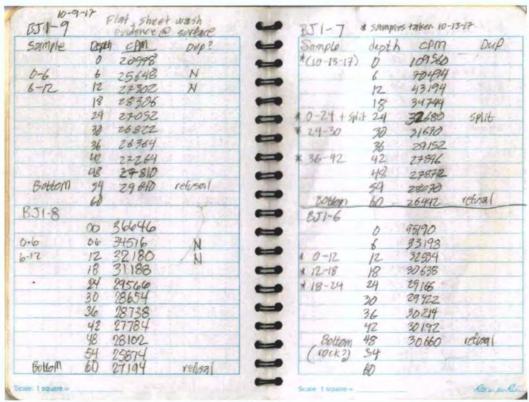








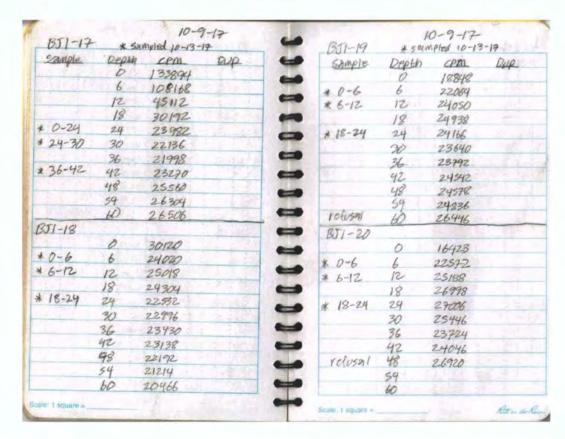


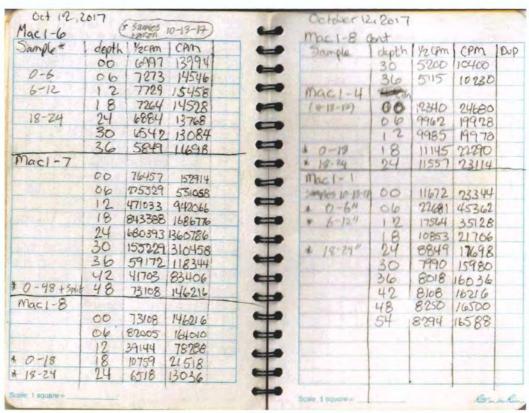


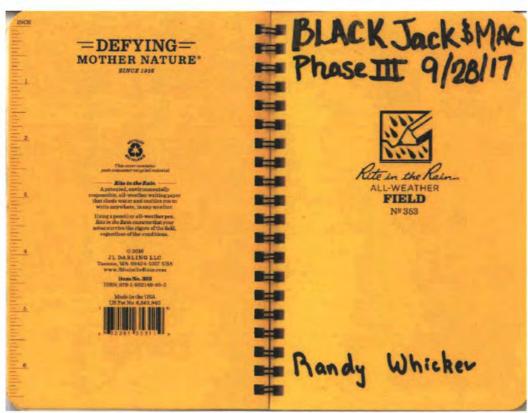
BJ1-22 Waste voice pile ** 59 mpile 10 pp ** 0-6+dup 6 /6/342 Dup ** 6-12 12 78396 ** 12-18 18 27-724 ** 24-30 20 25128 36 25756 42 27562 relival 48 32/62 54 6 BJ1-15 0 26/128 6 274/190 12 175990 18 574360 69364	8J1-5 ************************************	Dop
# 0-6+dup 6 161342 Dup # 6-12 12 78396 # 12-18 18 27724 - 24 25058 # 24-30 20 26128 - 36 25756 - 42 27562 - 126128 - 1262 - 54 - 10 - 10 - 1261128 - 6 274120 - 12 178990	3397552 6 22736 23 12 108064 18 55264 24 97122 24 97122 30 341240 36 36 30916 48 36-42 42 289726 48 78402 48 78402	36190
# 0-6+aup 6 16/34\$ DUP # 6-12 12 78396 # 12-18 18 27-724 - 24 25058 # 24-30 20 26/28 36 25756 42 27562 relival 48 32/62 54 6 274/20 12 175990	6 22736 23 12 108064 18 55264 24 92122 30 34240 30 3496 36-42 42 28926 48 28402 48 27362	180
# 6-12 12 78396 # 12-18 18 27-724 - 24 25058 # 24-30 20 26128 36 25756 42 27562 121021 48 32162 54 10 BJ1-15 0 261128 6 274120 12 178990	12 108064 18 55264 24 92122 30 54240 36 36 36916 36-42 42 28436 48 78402 48 78402	180
* 12-18 18 27-724 - 24 25058 * 24-30 90 26128 36 25756 42 27562 120 18 32162 54 10 10 10 10 10 10 10 10 10 10 10 10 10	18 55264 24 92122 30 341240 30 341240 36-36 36 30916 36-42 42 28926 48 28402 48 28402	15-1
24-30 90 25128 36 25756 42 27562 148 32162 54 6 274120 12 175990	24 9272 30 54240 30 54240 30 30916 36-42 42 28936 48 28402 48 28402	15-1
\$ 24-30 90 26128 36 25756 42 27562 148 32162 54 60 261128 6 274170 12 175990	\$ 0-36 36 30916 \$ 36-42 42 28936 48 78402 \$ 48-54 54 23362	<i>१९६७७</i> व।
36 25756 42 27562 128 32162 54 10 BJ1-15 0 261128 6 274190 12 175990	* 0-36 36 30916 * 36-42 42 28936 48 28402 * 48-54 54 23362	resura!
12 29562 18 32162 54 60 BJ1-15 0 261128 6 274190 12 175990	36-42 42 289.26 48 284.02 49-54 54 2736.2	retura
8J1-15 0 261128 6 274190 12 175990	48 78402	refura!
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8J1-15 0 261128 6 274190 12 175990	46 2/2013	refusa
0 261123 6 274190 12 175990	ACT //	
6 274190	B51-4	The Authority
12 175990	0 93580	
	6 39150	
10 6913/19 192/11	39/50	
18 174100 01104	0-18 18 32044 18 32044	Split
24 37344	★ 18-24 24 27750	
30 33860	3.0 22124	
* 0-36 36 32634	* 30-36 36 7.7402	
* 36-42 42 31 390	w2 24018	
48 30026	48 27778	
* 48-54 54 39938	E/1 00.40.0	4-16
60 29246 refusal	60 28706	
calo: 1 square =	DU 28 TUD	Retain on A

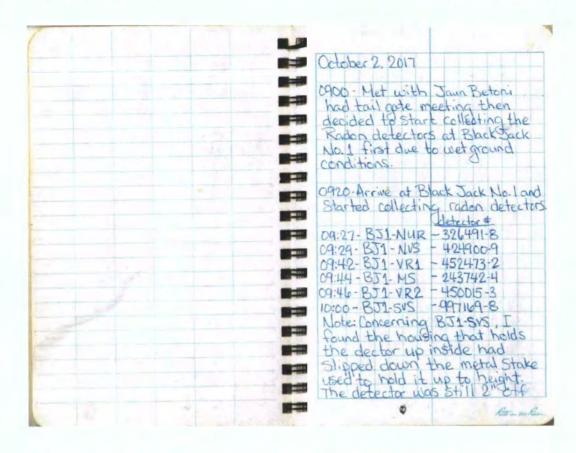
BJ1-21	**	ampled 10-	9-17	-	BJ1-1		0-9-17 Dies taken 16	1-13-14
Sample	Depth	CPM	Dup		sample	Doorto	cem	DUP
	0	279246				0	16100	
* 0-6	6	572645		110	* 0-6+04	6	19798	DOP.
x 6-12	12	194774		No. of Concession, Name of Street, or other party of the Concession, Name of Street, or other pa	* 6-12	12	22888	IT.
* 12-18	18	119782		-		18	24592	
	24	69324			* 18-24	24	24168	
* 24-30	30	49438		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		30	23370	
I suis	30	43420				36	22564	
* 36-42	42	38168				42	21042	
	48	38890		=		48	21010	
* 48-54	54	37210				54	20232	
	60	40408	retusal	-	bottom	60	20102	refusal
BJ1-3	0/4	163-511	DAY OF	-	BJ1-2		The state of	11
	0	78802		-	0.0	0	20482	
	6	31410			x 0-6	6	20618	
*0-12	12	25890		-	* 6-12	12	24474	
# 12-18	18	25266		-	0.10	18	25084	
	29	26142		9	# 18-24	24	29608	
* 24-30	30	26690			10 1	30	26286	
	36	27122	a call	-		36	25428	
	42	25380	a de la constante de la consta	-		42	25802	
	48	25258		-		48	24888	
	59	26448	reform			54	23798	
	60			111		60	20106	
cale: 1 square =				-	Scale square			Rete in ever

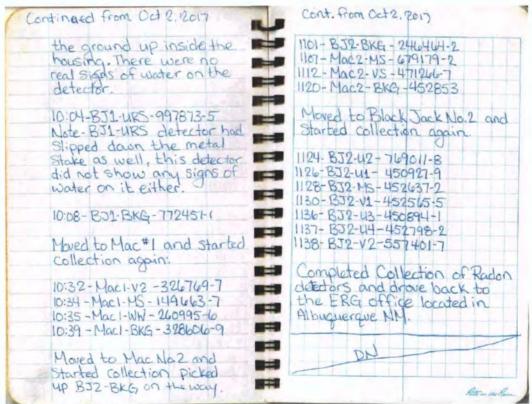
BJ1-12	* 921	10-9- upled 10-13-		-	BJ1-14	- 12	10-9-17 Sampled 10		
Sample	Depth	CPM	DUP	3	sample	Depth	CPM	DUP	
	0	16608		-		0	66126	top	
* 0-6 + day	6	16900	Dup			6	39928		
* 6-12	- 12	18292		-		12	33796		
	18	20286		-	* 0-18	18	29254		
* 18-24	29	20832			* 18-24	24	26774		
1 20 1 20 2	30	20944		411/10/20 200		30	25420		
	36	20200			# 30-36	36	24606		
	42	20084				42	23920		
	48	19896		-		48	25096		
	54	20394			refusal	94	10		
refusal	60	21934	18	-		60			
B51-13		197			BJ1-16				
	0	19806		-		0	121822		
+ 0-6	6	17790	1.50			6	59674		
4 6-12	12	19408	1.5	-		12	40892		
	18	20342	1019			18	31182		
× 18-24	24	20734	- 11		* 0-24	24	28550		
	30	21032	11.19		* 24-30	30	26 338		
	36	21776		-		36	25846		
	42	22148			# 36-42	42	24668		
	48	22706	. (3 7)	-		48	23994		
***	54	22782	1100771	1027	refusal	54			
refugal	60	22512				60	1 1		
Scale: 1 square =				-	Scalo: 1 square =			Roma	0

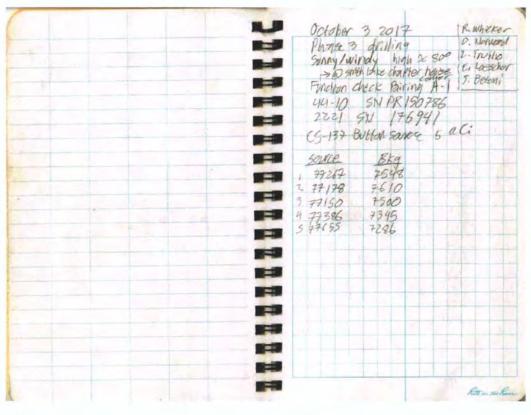






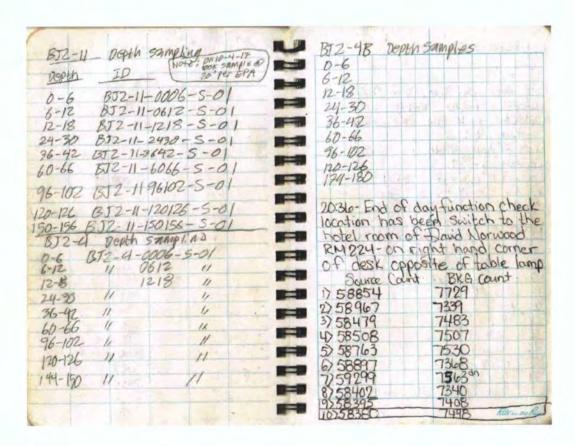


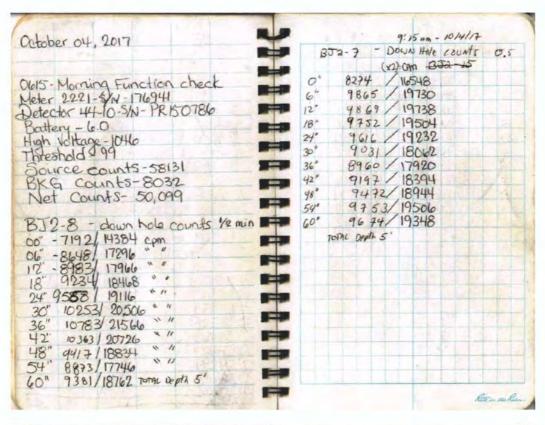


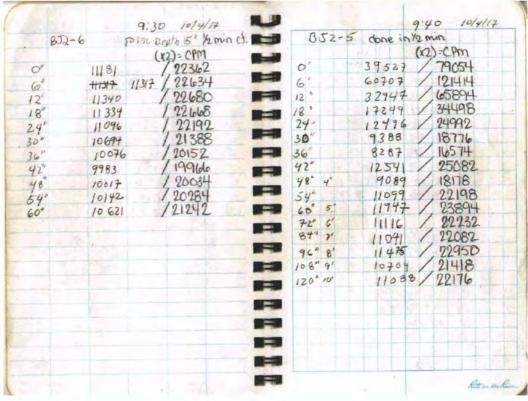


10-3-17 22,000 com colot	10-3-17	83% compadian
872-12	BT2-13	
5. 2 A-11 6.2 4 Dec	Depth(in)	CPM
27 D 36999	0	14.595 sampled
6 15 23 938	6	14658 0-611
12 30 20659 3 Sample	l p"	17456 6-1211
18 45 20212 12-1811	19	17978 Sage brush 14812 Sandy/clay/
24 60 20730 12-18	24"	16812 SANGY/Clay1:
30 75 21209		
90 20322	BT2-13-6	0006-5-01
105 20 114	352-13-	0612-5-01
120 18605		
135 199 09	BJ2-4	logging
-in inches	Depth(in)	com 3 next to
-1817-17-1216-01 /below.	×10	165 718 Mine Shape
Contain)	176	168610 apth cpm
BJZ-12-00/2-01 comp	12	
	* (18,	36 30 72" 27572
BJ2-12-1216-5-01 12-16"	1 29"	3021 24 242720
BJZ-12 00 Z-6-0 0-12" comp	30"	29270 90 23626
	41 1 00	29398 196 2238
	42"	27814 102 23392
X 2-	48	2578 108 23780
and the second	54	24888 +114 23/20
	* (60	26964 120 30302
	0.0	27812 Retrinsultan

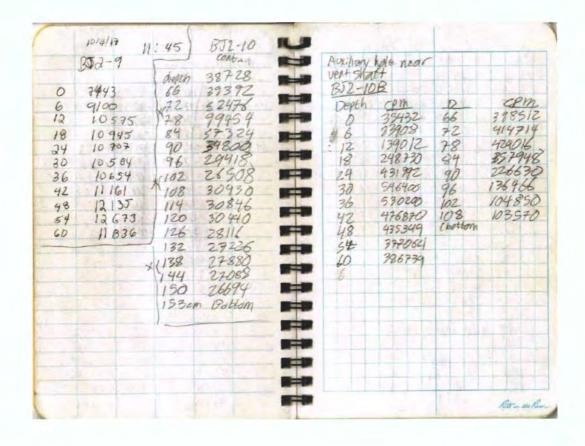
126	BJ2-4 cont.	BT2	rous page -48 cont	Note: on
132 26420		The second second	127	
138	126			
194 24424 138 23230 20'per EPPA 150 156 25090 162 5000 168 174 152 168 174 168 174 168 174 168 174 168 174 168 174 168 174 168 174 175 1	132 26920			
150 156 25090 162				20 DOT EPA
156 25090 162				To to
162		X		
162 168 174 BJ2-11 Pepth Gin CPM Will Ing every 1' (6 439428 66 30344 (12 380884 472 26328 (24 52058 78 30 30200 90 48 28500 102 54 - 108 29702 54 - 108 29702 54 - 108 29702 54 - 108 29702 54 - 108 29702 54 - 108 29702 54 - 108 29702 55 - 108 29702 56 - 108 29702 56 - 108 29702 57 - 108 29702 58 - 108 29702 59 - 108 29702 50 - 108 29702 50 - 108 29702 50 - 108 29702 50 - 108 29702 50 - 108 29702 50 - 108 29702 50 - 108 29702				
BJ2-II Pepth (in) CPM Will 199 every 1' (6 947234 84 33494 (6 439123 60 30344 (7 22,000 (8 122970 4,96 29994 (12 380898 66 (12 380898 46 (12 380898 46 (12 380898 46 (12 380898 46 (13 122970 4,96 29994 (14 30 - 108 27886 (15 30 30200 90 (16 30200 90 (17 380800 84 24302 (18 120844 48 28500 102 (19 30200 90 (10 30200 90 (10 30200 90 (10 39500 4) 50 (10 39500	162 - Bottom@ 1601	1 15	2 - hit Batton	n of hole
BJZ-11 BJZ-14B LOGAMORE - COURTS R 15' REPHAGED CPM BSZ-4B LOGAMORE - COURTS R 15' RCO 348470 73 RCO 348470 75 RCO 348470 73 RCO 348470 74 RCO 34847			3.	099719
Bf2-4B LOGIMANTE - COUNTS & 15' Bf2-4B LOGIMANTE - COUNTS & 15' POPHICINI CPM Will 109 every 1' LO 398490 78 LO 398490 70 LO 398490 108 LO	119		-11	
B\$2-4B LOGANOTE - COUNTS R 15' 7 27,000 Peth (in) CPM Will leg every 1' \$(6 947234 84 33494) \$(6 439428 60 30344	The state of the s			Depth CAM
1	Loggingrapa - Courts			78 -
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	722,000	26	847234	89 33994
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			59430	
(30 3020) 84 24302 48 48922 126 - (36 3020) 90 54 - 132 28104 (42 - 132 28104) 48 28500 102 29702 460 47620 138 - 144 29422 54 - 108 29702 72 39500 1150 257340	1 Ph	X con		120 27990
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(42 - 496 24844 *(60 47620 138 - 144 29422 54 - 102 29702 72 39500 1150 257340			the state of the s	
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114		02 72	39500 H	150 257340
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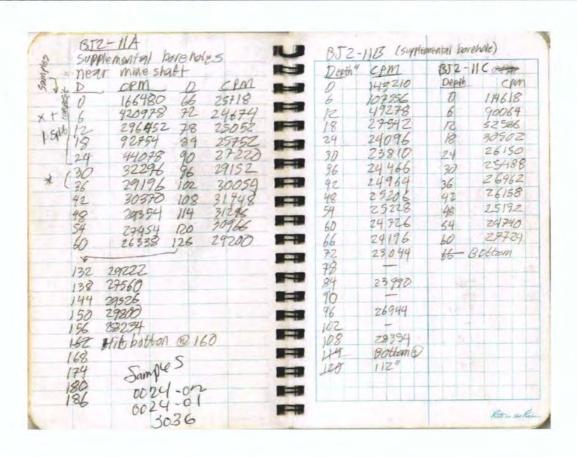


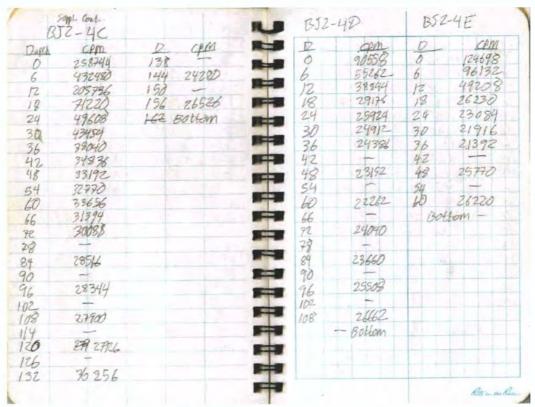




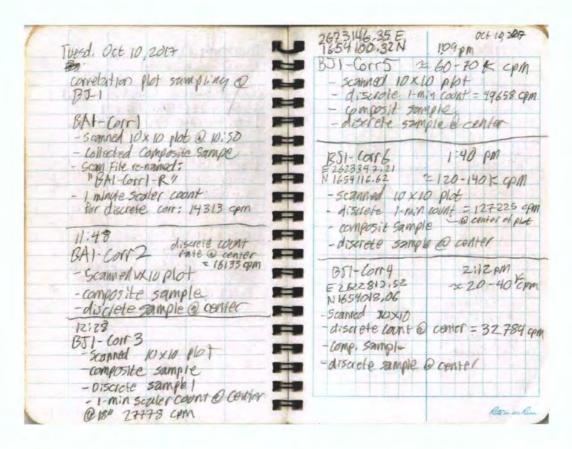
	B52-3 10/4/17 10:05	119	10/4/17 103	5	10:50
1	1/2 min ct. (x2)=CPM point pent = 5	B	J2-1 5FF DEPT	352	-15
0	108542/ 217084	-		1 %	
6	229021/458042	0	705/ NIO2		49147
121	53105/106210	6	0794 17588	643594	
18"	24 380/48760	12	10191 20382		14537
24"	20 094/40188 Soil From	18	11346 82692	18 26104	13052
30	16 468 /32936 TOP toll 1 1161e	24	11550 23100		12940
36	15242/30484	30	11512 23024	30 25656	
42	14340/28680	36	11 376 22752	36 25156	12578
48	13 959/ 27918	142	11382 22764	42 249 24	
541	14 250/ 28500	90	12 138 24276	4926168	13084
600	20,425 18651 7 37302	54	12965 25930	5475846	
	TENTO CONTRACTOR OF	60	12696 25392	60 27326	
	8J2-36 ct. (x2)=000 dn 5' pcpth	11:10		11:25	802-10
0	12 mig 490/18980 dr 5' pepth	0	147 843	0	14468
6	9409/18818	6	157 371	0	16576 3
12	1013112000	12	54 568	R	15865 2
18		18	26771	18	16 229 3
24	117/0/23420	30	19206	24	17467
30	11 130 1 738 (0	00	10100	30	22 418
36		36	14338	36	36318
42	12255124510	42	13 552 X	142	80485
48	12452124904	40	12873 ^	46	94822
54	1235/25502	51	12 251	54	43048
60	12858/25716	60	12302	60	23121

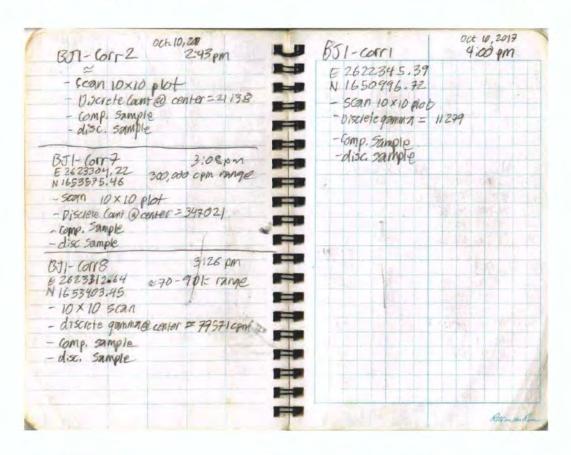


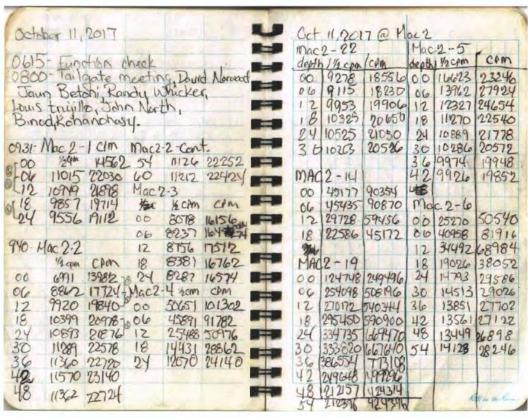




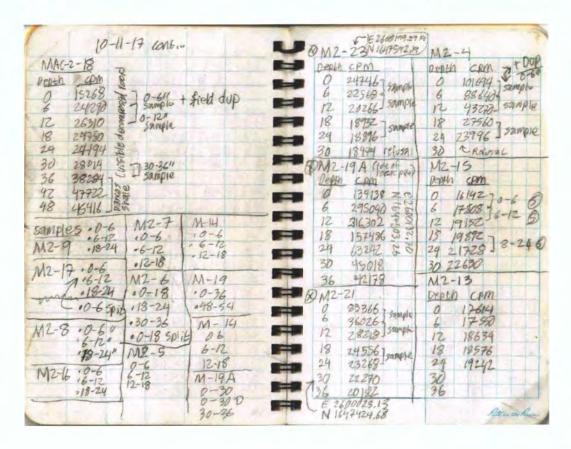
	BJ2-4F	BJ	2-16	Thursday Ortober 5, 2017	
12	C&M	D_	cen	Heavy Rain, wind	
	311876	0	188614		
06	511902	6	292094	0615- Morning Function Check	
12	441192	12	267576	Meter 2721 S/N 176941	
18	179146	18	97136	Detector 4410 S/N PR 150786	
24	66538	29	48050	Battery-5.9	
30	46550	30	34542	- High voltage - 1045	
36	41116	36	28912	threshold-499	
42	38414	42	27706	Source Count 56710	1
48	36756	48	28868	BKG Count- 6956	4
54	36330	54	29108	Net Count_49,754	+
60	39200	60	28080		
66	34154	-150	ttom -	8:00- Met with Louis, Jam,	
72	31810			and all decide Dave, Randi	į
28	1000	1		and all decided it was to	
84	28602			well to savery were, were	ł
96	2000			back to hotel.	÷
76	28206	-			ł
102	2000				
(08	30909				t
-	gottom-				t
	-		-		
				Plats on the	-

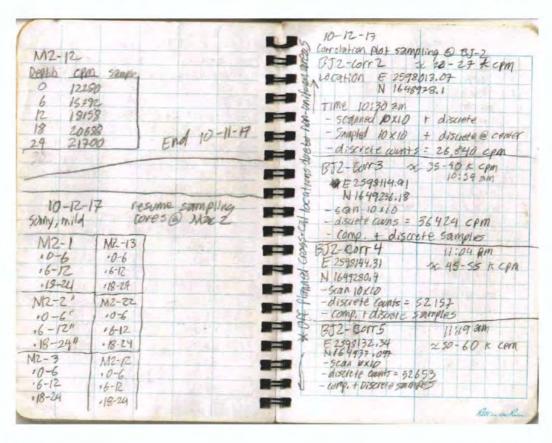


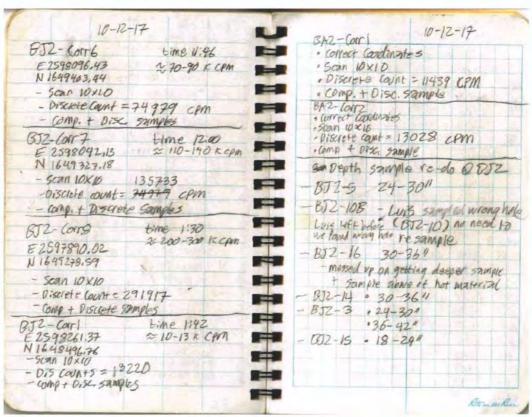


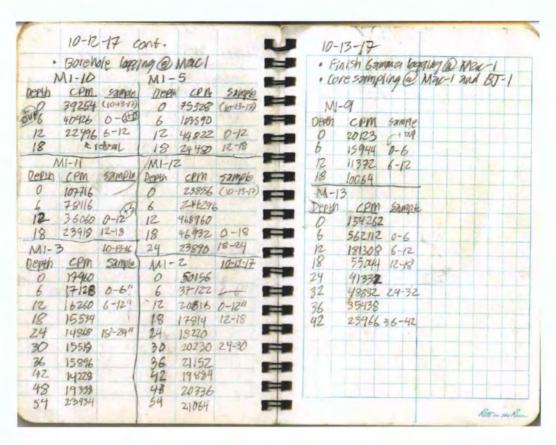


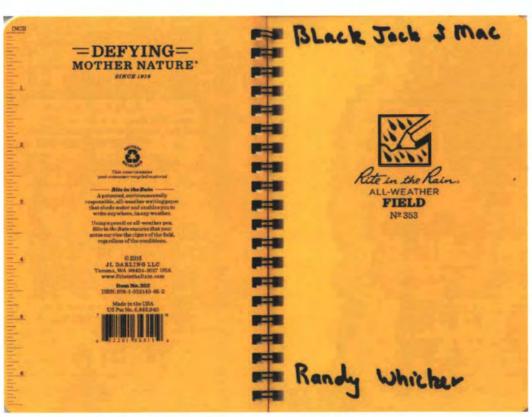
Mac	11,201-		Mac 2	-8	-		Mai	11,20			cz-11	
	1/2 Cpm	CPM	depth	1/2 CAM	CPM	-	depti	1 1/2 CAM	cem	depth	Yegen	CPM
00	16520	3040	00	11132	22264		00	7482	14964			15238
06	14800	29612	06		25586		06	10515	21080		10278	20556
12	13370	27540	12		25962	-	12	11714	23428	12	11950	23900
18	11557	23114	18	12458	24916	-	18	11715	23430	18	12038	24076
30	11783	23566	24	12036	24072		24	11530	23060	24	11/78	22356
		12/64	30	12088	24176		30	11518	23036		11415	22930
BACT	2-16		36	12017	241 54	-	36	19117	24234			23 269
00	€ 7088		42		24894		42		24928		11649	23 298
06		18658	48	12802	25604	-	48	11895	23790	48	11 555	23110
12	16852		54		25636		54	111326	27652	54	11505	23010
18		22186		2-17				10627	21254	100		
39		23792	00		19202		The second secon	c2-10	1	50	mpling	
	172446	24892	06	10277	20534	-	00	8432	16864	Mac	2-11	
360		25726		10665	21320		06		21448	.0	-67	
42		25944	16		21280		12	11839	123678	. 6.	-12"	
48		25048	24	10555	21110		18	11849	23698	. 18	-24"	
54	11908	23816	30		21680	-	24			MA	C-10	
	-		36		21720		30	11841	23682	.0	-6 91	
4	-	3- 0	42		22124		36	11751	23502		10"	
	-	-	48	11624	23248	-	42	11532	23064	. 18	-24"	
		-	54	11881	23762	-	54	11069	227 38		44	

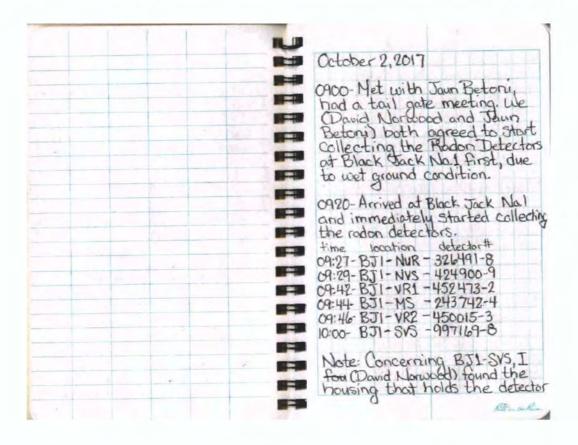


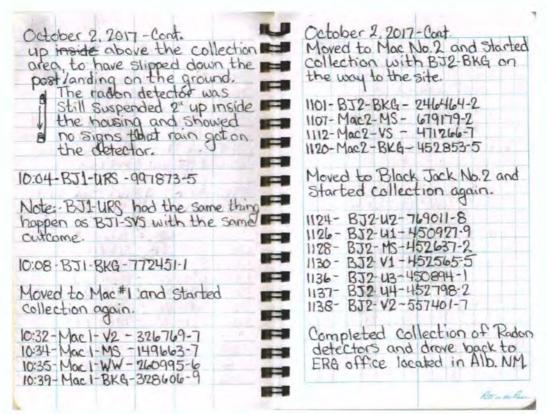


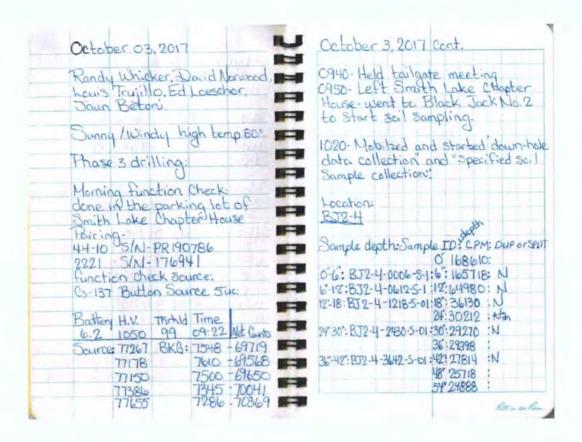






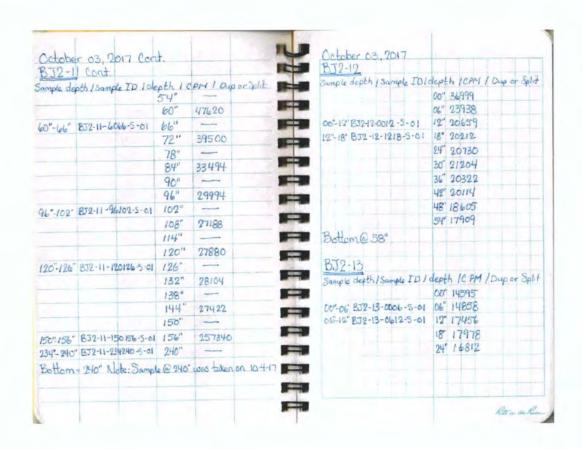


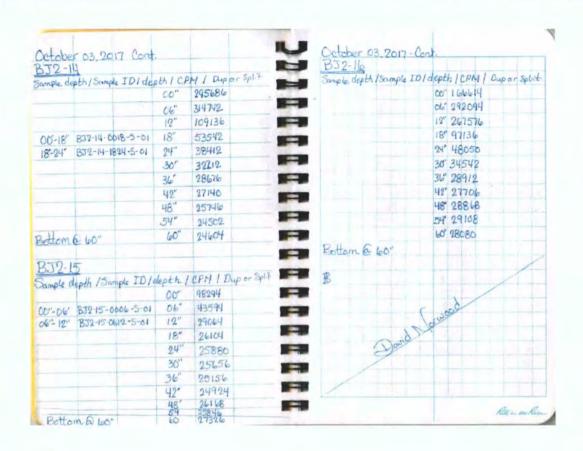


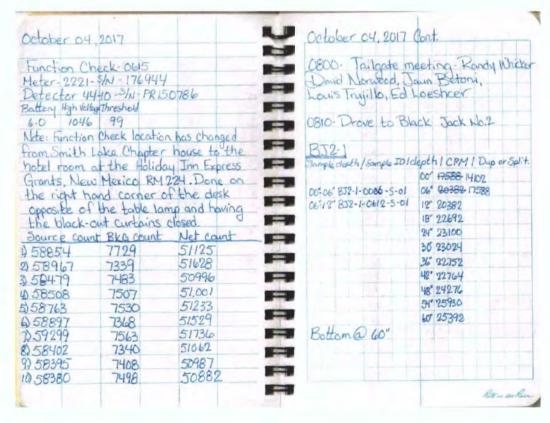


		-				
Location: BJ2-4 (ont.		- 11=	BJZ-4B		
Sample depth /sample ID	Idepth.	CPM/Du	porsplit	pample neprotagniple Tat of	opth 1 CPM 1 Duy	or Split
	60"	26264	-	- 00-N6" BJ2-4B-6006-5-01 6"	198015 499628	N
60-66" BJ2-4-6066-5-01		77812	N	06-12 832-48-0612-5-01		M
100 00 100 1000	72"	27572		12" 18" BJZ-4B-1218-S-01	18" 120884	M
	78"	26430			24 52058	
	84"	24272		24°30° BJ2-48-2430-S-01	30 22000	
	90"	23626	7000		36" 30200	
	96"	22380	-	36-42 BJ2-4B-3642-5-01	42"	
96-102" BJ2-4-96102-5-01	102"	23392	N		46" 28500	
TO TO L	108"	23780	-		54" —	
	114"	25120	and a		60" 30314	
14-120" BJ2-4-114120-5-01	120"	30302			ldo" -	
Note: Skipping to l'incoments	126"	30001			72 26328	
	132"	26420		72-78" BJ2-4B-7278-5-01	18"	
	138"		1.0		84" 24302	
	144"	24484			90" —	
	150"	2	-		96" 24844	
	156"	25090		96°-102 BJ2-46-96102-5-01	102"	
Bottom @ 160"	100				108 27702	
Dorrour B 1PO	-				114"	

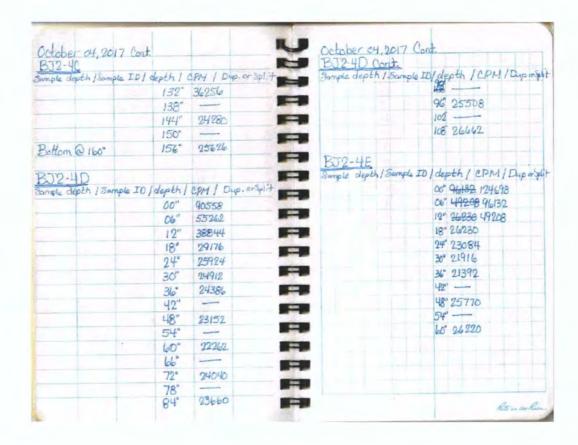
OCTOBE	cr 03.2017		1	October 03, 2017 Ca BJ2-10B-Cont.	
BT2-	4B Cont.		1 3 3 9 9		Idepth ICPM / Dupor Split
001					60 386739
ample dep	h / Sample ID / depth.	1cpm1	Dup or Split	-	66" 398712
	The second	120"			72 414714
20-126	BJ2-48-120126-5-01	126"	28068	A	78 424016
		132"	- 1		84" 357948
	/	138"	23230		90" 226630
		144"		-	96 136466
44"-150"	832-48-144150-5-01	150"	25914		102" 104850
water black	BJ2-48-234240-Sci	240"			108 103570
11			was taken on 10-4-17	Bottom = 108"	
Bottom/ BJ2-	240" Note:Samp 108	6 840,	was taken on 10-4-17	BJ2-11	Ideath I CPM / Quaer Solit
Bottom/ BJ2-	240" Note:Samp 108	6 6 840°	CPM 1 DuporSplit	BJ2-11	ldepth I CPM / OuperSplit
Bottom	240" Note:Samp 108	lepth 1	CPM 1 DuporSplit 35452	BJ2-11 Sample depth Isample II	ldepth / CPM / OuperSplit 00° 398490 06° 847234
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06"	100 to Dupor Split 35452 83908	BJ2-11. Sample depth / Sample IC 00°-06° BJ2-11-0006-5-01	06" 398490
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06" 12"	CPM 1 DuporSplit 35452 83908 139012	BJZ-11 Sample depth / Sample II 00:06" BTZ-11-0006-S-01 06:12" BJZ-11-0612-5-01 12-16" BJZ-11-1218-5-01	06° 398490 06° 847234 12° 373356 18° 122970
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06"	CPM 1 DuporSplit 35452 83908 139012 248730	BJZ-11 Sample depth /Sample IC 00:06" BTZ-11-0006-5-01 06:12" BJZ-11-0642-5-01	06" 398490 06 847234 12" 373356
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06" 12"	CPM 1 DuporSplit 35452 83908 139012	BJZ-11 Sample depth / Sample II 00:06" BTZ-11-0006-S-01 06:12" BJZ-11-0612-5-01 12-16" BJZ-11-1218-5-01	06° 398490 06° 847234 12° 373356 18° 122970
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06" 12" 18" 24"	CPM 1 DuporSplit 35452 83908 139012 248730 431992	BJ2-11 Sample depth / Sample IC OC-06" BT2-11-0006-5-01 06-12" BJ2-11-0612-5-01 12"-18" BJ2-11-1218-5-01	06° 398490 06° 841234 12° 373356 18° 122970 24° 69152
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06" 12" 18" 24" 30"	CPM_1_Dup-orSplit 35452 83908 139012 248730 431992 546400	BJ2-11 Sample depth /Sample II 00°-06° BT2-11-0006-5-01 00°-12" BJ2-11-0612-5-01 12°-16° BJ2-11-1218-5-01 24°-30° BJ2-11-2430-5-01 36°-42° BJ2-11-3642-5-01	06° 398490 06° 841234 12° 373356 18° 122970 24° 69152 30° — 36° 59438 42° —
Bottom/ BJ2-	240" Note:Samp 108	lepth 1 00" 06" 12" 18" 24" 30" 36"	CPM_1_DuporSplit 35452 83908 139012 248730 431992 546400 530200	BJ2-11 Sample depth /Sample II 00°-06° BJ2-11-0006-5-01 00°-12° BJ2-11-0612-5-01 12°-18° BJ2-11-1218-5-01 24°-30° BJ2-11-2430-5-01	06° 398490 06° 841234 12° 373356 18° 122970 24° 69152 30° —

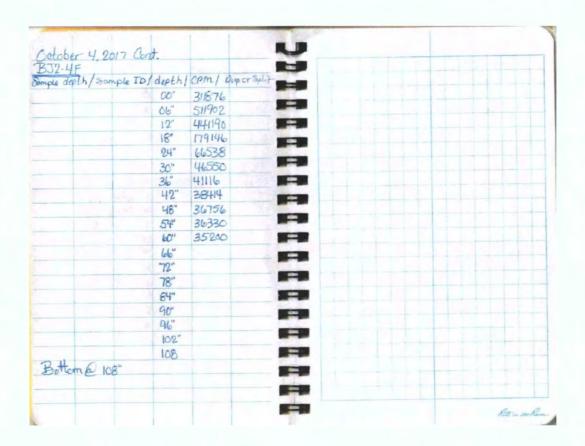






BJ2-	04,2017 Con	и.		October 04, 2017 (bpt. BJ2-4C
Sample of	lepth / Sample ID/	depth/	10 514	Sample depth/ Sample ID / depth / CPM / Dup or Salt
		00"	18980	06" 258744
00-06"	BJ2-2-0006-5-01	06"	18818	OE" 432480
the State of the last	BJ2-2-0612-5-01	12"		12" 205736
		18"	22306	18" 71220
		24"	23420	24 49608
		30"	23870	30" 43454
	10 4	36"	The state of the s	36" 38040
		42"	24510	47 34846
		48"	24904	48' 33192
		54"	25502	54 32770
2.11	n @ 100"	60"		60" 33656
Journ	1 20			W 31394
372-3				72" 30088
	Jeath I Samola TOI	death !	CPM / Dup or Split	78" —
oripat c	appril and a series	00"	217084	84 28516
00"-06"	832-3-0006-5-01	06"	William Co.	90' —
6-12	BJ2-3-0612-5-01	12"	106210	96" 28344
2"-18"	872-3-1218-5-01	18"	48760	102'
8"- 24"	BJ2-3-1824-5-01	24"		108 27900
		30"	20021	uf —
		36"	30484	120" 27926
		42"	28480	126" —
		713	8000	
-		60"	37362	Reto in see he





Attachment A6 (Soil Sampling Sheets)

- · Name(s) of personnel collecting soil samples:
 David Norwood 3 Rardy Whicker
- Survey Instrument(s) with Serial Number(s): A Ludhum 2221-176941/4440-PR150786
 Bladlum 2221-212334/4410-PR321856
- · Calibration Due Date(s): A) Sept. 19, 2018/09-26-2018 8) 09-26-2018/09-26-2018

· Project: Phase 3, Removal Site Evaluation

· Date: October 3,4 2017

· Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gamma Rending (cpm) (µR/hr)	Thu (24:0	The state of the s	Comments	nillials
1	BJ2-1-6006-S-01	0-15	17588	-	-1	All gamma readings are given	DA
2	BJ2-1-0612-5-01	15-30	20382			for the max depth of the	7
3	BJ2-2-0006-S-01	0-15	18818			range given.	+
4	BJ2-2-0612-S-01	15-30	20302			7.00	+
5	BJ2-3-0006-S-01	0-15	458042				+
6	BJ2-3-0612-S-01	15-30	106210	1			+
7	BT2-3-1218-S-01	略地	48760	\neg			+
8	BJ2-3-1824-5-01	45-60	40188	\neg			+
9	BJ2-3-2430-5-01	60-75	32936				+
10	BJ2-4-0006-S-01	0-15	165718				+
11	BJ2-4-0612-5-01	15-30	64980				+
12	BJ2-4-1218-5-01	30-45	36130				+
13	BJ2-4-2430-S-01	60-75	29270	\top			+
	BJ2-4-3642-S-01	90-105	27814	1			+
$\overline{}$	BJ2-4-6066-5-01	150-165	27812	1			+

CRG Soil Sample Collection Log

- · Name(s) of personnel collecting soil samples: David Norwood & Randy Whicker
- . Survey Instrument(s) with Serial Number(s): Aladi
- · Calibration Due Date(s): A Sect. 12, 2018/09-26-2018 (\$) 09-21-2018/09-26-2018
- · Project: Phase 3, Removal Site Evaluation
- · Date: October 3,4 2017
- . Weather/Field Conditions: Worm, Windy

Namber	Sample ID	Depth (em)	Gamma Reading (epm) (µR/hr)	Time (24:00)	GPS Positions Recorded	Comments	Initials
1	BJ2-4-96102-5-01	240.265	23392	-		All gamma readings are given	DN
2	BJ2-4-114120-5-01	295-310	30302			for the max depth of the	
3	BJ2-48-0006-S-01	0-15	499628			range given.	
4	BJ2-48-0612-5-01	15-30	380898				
5	BJ2-4B-1218-5-01	30-45	120884				
6	BJ2-48-2430-5-01	60-75	22000				
7	BJ2-48-3642-S-01	90-105	no counts			See field Dook	
8	BJ2-48-7278-S-01	180-195	no counts			See field book	
9	BJ2-4B-96102-S-01	240-265	no counts			See field book	
10	BJZ-4B-120126-S-01	310-325	28068				
11	BJ2-48-144150-S-01	370-385	25914				
12	BJ2-4B-174180-S-01	445-460	no counts			See field book	
13	BJ2-48-234246-S-01	585-600	no Courds			See field Dook	
14	BJ2-5-0006-5-01	0-15	121414				
15	BJ2-5-0612-5-01	15-30	65894	+			*

- · Name(s) of personnel collecting soil samples:
 David Norwood J Randy Whicker
- Survey Instrument(s) with Serial Number(s): A) Ludium 2221-176941/4440-PR150786
 B) Ludium 2221-262334/4440-PR321856
- · Calibration Due Date(s): ASed. 19. 2018/09-26-2018 8) 09-26-2018/09-26-2018

· Project Phase 3, Removal Site Evaluation

· Date: October 3,4 2017

· Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gamma Rending (cpm) (uR/hr)	Time (24:00)	GPS Position Recorded	Comments	Initials
1	BJ2-5-1218-S-01	30-45	34498	-		All gamma readings are given	DA
2	BJ2-5-2430-S-01	60-75	18776		-	for the max depth of the	1
3	BJ2-6-0006-S-01	0-15	22634			range given.	
4	BJ2-6-0006-S-02D	0-15	22634				
5	BJ2-6-0612-S-01	15-30	22680				
6	BJ2-7-0006-S-01	0-15	19730				
7	BJ2-7-0612-5-01	15-30	19738				
8	BJ2-8-0006-S-01	0-15	17296				
9	BJ2-8-0612-S-01	15-30	17966				
10	BJ2-9-0006-5-01	0-15	9100				
11	BJ2-9-0612-S-01	15-30	10575				
12	BJ2-10-0006-S-01	0-15	16576				
13	BJ2-10-0612-5-01	15-30	15865				
14	BJ2-10-1218-01	30-45	16229				
15	BJ2-10-2430-01	60-75	22418	+			*

CRO Soil Sample Collection Log

· Name(s) of personnel collecting soil samples: David Norwood 3 Randy Whicker

- Survey Instrument(s) with Serial Number(s): A)Ludle
 Survey Instrument(s) with Serial Number(s): A)Ludle
- Calibration Due Datc(s): A)Sect. 19, 2018/09-26-2018 8) 09-26-2018/09-26-2018
- · Project: Phase 3, Removal Site Evaluation
- · Date: October 3,4 2017
- · Weather/Field Conditions: Worm, Windy

Number	Sample ID	Depth (cm)	Garma Reading (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Comments	Initials
1	BJ2-10-2430-S-01	60-75	22418	-	1	All gamma readings are given I	M
2	BJ2-10-4248-5-01	105-120	94822		_	for the max depth of the	
3	BJ2-10-7278-5-01	180-195	99454			range given.	
4	BJ2-10-102108-5-01	265-280	30430				
5	BJ2-10-138144-S-01	355-370	27088				
6	BJ2-11-0006-S-01	0-15	33494	847 23	4		
7	BJ2-11-0612-S-01	15-30	373356				L
8	BJ2-11-1218-5-01	30-45	122970				
9	BJ2-11-2430-5-01	60-75	no count			See field book	L
10	BJ2-11-3642-5-01	90-105	no count			See field book	
11	BJ2-11-96102-S-01	240-265	no count			See field book	L
12	BJ2-11-120126-5-01	310-325	no Count			See field book	L
13	B32-11-150156-S-01	385400	257340				
14	BJ2-11-234240-5-01	585-600	no count			See field book	
15 dn	BD -114-0024-S-01	0-60	44078	×			*

- · Name(s) of personnel collecting soil samples:
 David Norwood \$ Randy Whicker
- · Project: Phase 3, Removal Site Evaluation
- · Date: October 3,4 2017
- Survey Instrument(s) with Serial Number(s): A)Ludlum, 2221-176941/4410-PR150786
 D)Ludlum, 2221-242334/4410-PR321856 - Calibration Due Date(s): ASed 12, 2018/09-24-2018 83 09-24-2018/09-24-2018
- . Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth	Gamma Reading	Time	GPS Position	Comments	skeli
		(con)	(cpm) (µR/hr)	(24:00)	Recorded		A
1	BJ2-11A-0024-5-025	0-60	44078	-		All gamma readings are given	DA
2	BJ2-11A-3036-S-01	75-90	29196			for the max depth of the	
3	BJ2-12-0012-S-01	0-30	20659			range given.	
4	BJ2-12-1218-5-01	30-45	20212				
5	BJ2-13-0006-S-01	0-15	14858				
6	BJ2-13-0612-5-01	15-30	17456				
7	BJ72-14-0018-5-01	0-45	26771				
8	BJ2-14-0018-S-02D	0-45	26771				
9	BJ2-14-1824-S-01	45-60	19206				
10	BJ2-14-3036-5-01	75-90	14338				
11	BJ2-15-0006-S-01	0-15	43594				
12	BJ2-15-0612-S-01	15-30	29064				
13	BJ2-16-3036-5-01	75-90	28912				
14	BJ2-1-CORR-	0-15					

CRG Soil Sample Collection Log

BJZ-1- CORR- DIS

· Name(s) of personnel collecting soil samples:
David Norwood 3 Randy Whicker

- · Project: Phase 3, Remaral Site Evaluation
- · Date: October 3,4 2017
- Survey Instrument(s) with Serial Number(s): A) Ludlam 2221-176941/4410-PR150786 B) Ludlam 2221-242334/4410-PR321856

0-15

. Weather/Field Conditions: Worm, Windy · Calibration Due Date(s):

13220

Sumber	Sample ID	Depth (cm)	Gamma Reading (epm) (µR/hr)	Time: (24:00)	GPS Position Recorded	Comments	Talifale
1	BJ2-2-CORR	0-15		-		All gamma readings are given	DN
2	BJ2-2-CORR-DIS	0-15	26840			for the max depth of the	
3	852-3-CORR	0-15				range giver.	
4	BJ2-3-CORR-DIS	0-15	36424				
5	BJ2-4- CORR	0-15					
6	BJ2-4-CORR-DIS	0-15	52157				
7	BJ2-5-COAR	0-15					
8	BJ2-5- CORR-DIS	0-15	52653				
9	BJ2-6-CORR	045	-				
10	8J2-6-CORR-DIS	0-15	74979				
11	BJ2-7-CORR	0-15					
12	BJ2-7- CORR-DIS	0-15	135733		12		
13	BJS-8-COISE	0-15					
14	BJ2-8-CORR-DIS	0-15	291917				1
15	BAI-CORRI-Comp	0.15	14313	*			*

· Name(s) of personnel collecting soil samples:
David Norwood & Rondy Whicker

- · Project: Phase 3, Removal Sibe Evaluation
- · Date: October 3,4 2017
- Survey Instrument(s) with Serial Number(s): A)Ludlum 2221-176941/4410-PR150786 E)Ludlum 2221-262334/4410-PR321856 • Calibration Due Date(s): ASed 12, 2018/09-26-2018 (\$) 09-26-2018/09-2
- · Weather/Field Conditions: Warm, Windy

75ex 18, 208/09-26-2018 8) 09-26-2018									
Number	Sample ID	Depth (ent)	Gamma Reading (cpm) (µH/hr)	Thme (24:00)	GPS Position Recorded	Comments	altitals		
1	BAI-CORRI-DIS	0-15	14313			All gamma readings are given	DA		
2	BAI-CORR2-	0-15	-			for the max depth of the	1		
3	BAI-CORR 2-DIS	0-15	16133			range given.	T		
4	BAZ-CORRI-	0-15				0 0			
	BA2-CORRI-DIS	0-15	11439				1		
6	BA2-CORR2-	0-15							
7	BA2-CORR2-DIS	0-15	13028				+		
8							+		
9							+		
10							+		
11							+		
12							+		
13							+		
14							+		
15				1			\pm		

CRG Soil Sample Collection Log

· Name(s) of personnel collecting soil samples: David Norwood 3 Randy Whicker

- · Project: Phase 3, Removal Site Evaluation
- · Date: October 9,2017
- Survey Instrument(s) with Serial Number(s): A) Ludlum 2221-1769+1/4410-PR150786

 Weather/Field Conditions: Warm, Windy
 Calibration Due Date(s): A Conditions: Warm, Windy
 Calibration Due Date(s): A Conditions: Warm, Windy

· Calibration Due Date(s):AlSant 10 94

Number	Sample 1D	Depth (cm)	Gamma Reading (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Conuncats	Initials
1	BJ1-1-0006-S-01	0-15	19798	-		All gamma readings are	DN
2	BJ1-2-1-0006-5-02D	0-15	19798	_		given for the max death	DN
3	BJ1-1-0612-5-01	15-30	22888	-		of the range given	DN
4	BJ1-2-0006-5-01	0-15	20618	_		0.0	DN
5	BJ1-2-0612-S-01	15-30	24474	-			DN
6	BJ1-3-0012-5-01	0-30	@30 26690	_			DN
7	BJ1-3-1218-5-01	30-45	25 266				DN
8	BJ1-4-0018-S-01	0-45	30044	_			DN
9	BJ1-4-0018-S-02S	0-45	30044	_			DN
10	BJ1-4-1824-S-01	45-60	21750				DN
11	BJ1-5-0036-S-01	0-90	30916	_			DN
12	BJ1-5-3642-S-01	90-105	28936	_			DN
13	BJ1-6-0012-5-01	0-30	32554	_			DN
14	BJ1-6-1218-S-01	30-45	30638	-			DW
15	BJ1-7-0024-S-01	0-60	32680	_			DN

- · Name(s) of personnel collecting soil samples:
 David Norwood 3 Randy Whicker
- Survey Instrument(s) with Serial Number(s): A) Ladlam 2221-176941/4440-PR150786
 B) Ladlam 2221-262334/4410-PR321856
- · Calibration Due Date(s): A) Sept. 19, 2018/09-26-2018 (6) 09-26-2018/09-26-2018
- · Project: Phase 3. Removal Site Evaluation
- · Date: October 9, 2017
- · Weather/Field Conditions: Worm, Windy

Number	Sample 1D	Depth (car)	Gauqua Resding (cpm) (pR/hr)	Time (34:00)	GPS Position Recorded	Comments S
1	BJ1-7-0024-5-025	0-60	32680	-		All gamma readings are given DA
2	BJ1-7-2430-5-01	60-75	31670			for the max depth of the
3	BJ1-8-0006-S-01	0-15	34516			range given.
4	BJ1-8-062-S-01	15-30	32180			
5	BJ1-9-0006-S-01	0-15	25648			
6	BJ1-9-0612-S-01	15-30	27302			
7	BJ1-10-0006-5-01	0-15	23010			
8	BJ1-10-0612-S-01	15-30	28646			
9	BJ1-11-0006-5-01	0-15	22340			
10	BJ1-11-0612-S-01	15-30	27730			
11	BJ1-12-0006-5-01	0-15	16900			
12	BJ1-12-0006-5-20	0-15	16900			
13	BJ1-12-0612-5-01	15-30	18292			
14	BJ1-13-0006-5-01	0-15	17750			
15	BJ1-13-0612-S-01	15-30	19408	*		+

CRG Soil Sample Collection Log

- · Name(s) of personnel collecting soil samples:
 David Norwood & Rardy Whicker
- Survey Instrument(s) with Serial Number(s): (A) Ludhum, 2221-176941/4440-PR/50786 (B) Ludhum, 2221-262334/4440-PR/321856
- Calibration Due Date(s): A) Sept. 18, 2018/09-26-2018 (\$) 09-26-2018/09-26-2018
- · Project: Phase 3, Removal Site Evaluation
- · Date: October 9,2017
- · Weather/Field Conditions: Warm, Windy

Number	Sample III	Depth (cm)	Gamon Reading (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Comments	Linkship
1	BJ1-14-0018-5-01	0-45	29254	-		All gamma readings are given D	N
2	BJ1-14-1824-S-01	45-60	26774			for the max depth of the	
3	BJ1-15-0036-S-01	0-90	32634			range giver.	
4	BJ1-15-3642-S-01	90-105	31390				
5	BJ1-16-0024-5-01	0-60	28550				
6	BJ1-16-2430-5-01	60-75	26338				
7	BJ1-17-0024-S-01	0-60	23982				
8	BJ1-17-2430-S-01	60-75	22136				
9	B11-18-000P-2-01	0-15	24020				
10	BJ1-18-0612-5-01	15-30	25018				
11	BJ1-19-0006-S-01	0-15	22064				
12	BJ1-19-0612-S-01	15-30	24050				
13	BJ1-20-0006-S-01	0-15	22572				
14	BJ1-20-0612-S-01	15-3D	25188				
15	BJ1-21-0006-5-01	0-15	512645	*			1

- · Nume(s) of personnel collecting soil samples:
 David Norwood 3 Randy Whicker
- Survey Instrument(s) with Serial Number(s): A) Ludlum, 2221-176941/4410-FR150786
 B) Ludlum, 2221-262334/4410-FR321856
- Calibration Due Date(s): ASed 12, 2018/09-26 2018 63 09-26-2018/09-26-2018
- · Project: Phase 3, Remaral Site Evaluation
- · Date: October 9,2017
- · Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (em)	Gamma Reading (cpm) (pR/hr)		me :00)	GPS Position Recorded	Comments S
1	BJ1-21-0612-S-01	15-30	194774	-			All gamma readings are given DN
2	BJ1-21-1218-S-01	30-45	114782				for the max depth of the
3	BJ1-21-2430-S-01	60-75	49438				range given.
4	BT1-21-3642-5-01	90-105	38168				
5	BJ1-21-4854-S-01	120-135	37210				
6	BJ1-22-0006-S-01	0-15	161348				
7	BJ1-22-0006-S-020	0-15	161348				
8	BJ1-22-0612-S-01	15-30	78396				
9	BJ1-22-1218-S-01	30-45	27724				
10	BJI-I-CORR-	0-15					
11	BJI-1-CORR-DIS	0-15	1431300	112	19		
12	BJ1-2-Corr-	0-15	-				
13	BJ1-2-CORR-DIS	0-15	1613304	21	138		
14	BJ1-3-CORR-	0-15					
15	BJ1-3-CORR-DIS	0-15	27778	,	4		*

CRG Soil Sample Collection Log

- · Name(s) of personnel collecting soil samples; David Norwood & Randy Whicker
- Survey Instrument(6) with Serial Number(8): A) Laddum, 2221-176941/4410-PR/50786
 Bludlum, 2221-262334/4410-PR-321856
- Calibration Due Date(s): ASect 12, 2018/09-26-2018 (\$) 09-26-2018/09-26-2018
- · Project Phase 3, Removal Site Evaluation
- · Date: October 9,2017
- · Weather/Field Conditions: Worm, Windy

Number	Sample ID	Depth (cm)	Gamma Rending (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Comments	
1	BJ1-4-CORR-	0-15	-	-		All gamma readings are given DA	1
2	BJI-4-CORR-DIS	0-15	32784			for the max depth of the	
3	BT1-5-CORR-	0-15				range given.	
4	BJ1-5-CORR-DIS	0-15	49658				
5	BJI-6-CORR-	0-15	_				
6	BJI-6-CORR-DIS	0-15	127225				
7	BJ1-7-CORR-	0-15					
8	BJ1-7-CORR-DIS	0-15	347021				
9	BJI-8-CORR-	0-15	_				
10	BJI-8-CORR-DIS	0-15	77571				
11							
12							
13							
14							
15				¥			

- · Name(s) of personnel collecting soil samples:
 David Norwood & Rardy Whicker
- · Project: Phase 3, Removal Site Evaluation
- · Date: October 11,2017
- · Weather/Field Conditions: Warm, Windy

Number	tion Due Dutc(s): A) Sept. 19, 2018/6	Depth (cm)	Gumma Randing (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Comments	Intilials
1	M2-1-0006-5-01	0-15	22030	-		All gamma readings are given	DA
2	M2-1-0612-5-01	15-30	21898			for the max depth of the	T
3	M2-2-0006-5-01	0-15	17724			range given.	
4	M2-2-0612-5-01	15-30	19840				
5	M2-3-0006-S-01	0-15	16474				
6	M2-3-0612-5-01	15-30	17512				
7	M2-4-0006-5-01	0-15	88140				
8	M2-4-0006-5-02D	0-15	88640				
9	M2-4-0612-5-01	15-30	43270				
10	M2-5-0006-5-01	0-15	27924				1
	M2-5-0612-5-01	15-30	24654			~	
	M2-5-1218-S-01	30-45	22540				
13	M2-5-1824-S-01	45-60	21778				
14	M2-6-0018-S-01	0-45	38052				T
15	M2-6-0018-5-025	0-45	38052	1			1

CAG Soil Sample Collection Log

- · Name(a) of personnel collecting soil samples:
 David Norwood & Randy Whicker
- Survey Instrument(s) with Serial Number(s): 1) Ludlum, 22 21-176941/4410-PR150786
 10 Ludlum, 22 21-242 334/4410-PR 321856 · Calibration Due Date(s): A)Sept. 19, 2018/09-26-2018 (8) 09-26-2018/09-26-2018
- · Project: Phase 3. Removal Site Evaluation
- · Date: October 11,2017
 - · Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cut)	Gamma Rending (cpm) (µR/hr)	Time (14:00)	GPS Position Recorded	Comments	Initials
1	M2-6-1824-5-01	45-60	23792	-		All gamma readings are given	DA
2	M2-7-0006-5-01	0-15	29612			for the max depth of the	T
3	M2-7-0612-5-01	15-30	27540			range given.	T
4	M2-7- 1218-5-01	30-45	23114				
5	M2-8-0006-S-01	0-15	25586				\Box
6	M2-8-0612-5-01	15-30	25962				
7	M2-9-6006-S-01	0-15	21030				T
8	M2-9-0612-5-01	15-30	23428				
9	M2-10-0006-5-01	0-15	21448				
10	M2-10-0612-501	15-30	23678				
11	M2-11-0006-5-01	0-15	20556				
12	M2-11-0612-5-01	15-30	23900				
13	M2-12-0006-5-01	0-15	15792				
14	M2-12-0612-5-01	15-30	18158				
15	M2-13-0006-5-01	0-15	17550				

- Name(s) of personnel collecting soil samples:

 David Norwood 3 Randy Whicker
- Survey Instrument(s) with Serial Number(s): A) Lud lum, 2221-176941/4410-PR/50786
 B) Ludlum, 2221-242334/4410-PR/321856
- Calibration Due Date(s): A) Sect 18, 2018/09-26-2018 8) 09-26-2018/09-26-2018

· Project: Phase 3, Removal Site Evaluation

· Date: October 11, 2017

· Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gamma Reading (cpm) (µll/hr)	Time (24:00)	GPS Position Recorded	Comments	Initials
1	M2-13-0612-5-01	15-30	18634	1		All gamma readings are given	DN
2	M2-14-0006-5-01	0-15	90354			for the max depth of the	
3	M2-14-0612-5-01	15-30	59456			range given.	
4	M2-14-1218-5-01	30-45	45172				
5	M2-15-0006-S-01	0-15	17808				
6	M2-15-0612-5-01	15-30	19152				
7	M2-16-0006-5-01	0-15	18658				
8	M2-16-0612-5-01	15-30	20504				
9	M2-17-0006-501	0-15	20554				
10	M2-17-0006-5-025	0-15	20554				
11	M2-17-0612-5-61	15-30	213 20				
12	M2-18-0006-5-01	0-15	24290				
13	M2-18-0006-5-02D	0-15	24290				
	M2-18-0612-5-01	15-30	26310				
15	M2-19-0036-5-01	0-90	773108	+			

CAG Soil Sample Collection Log

- · Name(s) of personnel collecting soil samples: David Norwood & Rordy Whicker
- Survey Instrument(s) with Serial Number(s): A) Luddam 2221-176941/4416-PR150786
 B) Luddam 2221-262334/4410-PR2721856
- Calibration Due Date(s): ASect. 12, 2018/09-26-2018 8) 09-21-3018/09-26-2018

· Project: Phase 3, Removal Site Evaluation

· Date: October 11,2017

- Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gamma Reading (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Comments
1	M2-18-3036-5-01	75-90	38284	-		All gamma readings are given DN
2	M2-19-4854-5-01	120-135	42396			for the max depth of the
3	M2-19A-0030-5-01	0-75	45018			range given.
4	M2-19A-0030-5-025	0-75	45018			
5	M2-19A-3036-5-01	75-90	42178			
6	M2-21-0006-5-01	0-15	36026			
7	M2-21-0612-5-01	15-30	28218			
8	M2-21-1824 -S-01	45-60	23268			
9	M-22-0006-5-01	0-15	18230			
10	M-22-0612-5-01	15-30	19906			
11	M-23-0006-S-01	0-15	22568			
12	M-23-0612-5-01	15-30	20266			
13	-	-				
14						
15				*		+

- · Name(s) of personnel collecting soil samples:
 David Norwood 3 Randy Whicker
- Survey Instrument(s) with Scrial Number(s): A Ludium, 2221-176941/44to-PR150786
 Catilogica Tour Detectors
 Detectors Tour Detectors
- Calibration Due Date(s): ASect 19, 2018/09-26-2018 6) 09-26-2018/09-26-2018

· Project: Phase 3, Removal Site Evaluation

· Date: October 12, 2017

· Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gastma Reading (cpm) (µR/hr)	Time (24:00)	GPS Position Recorded	Comments	Initials
1	MI-1-0006-5-01	0-15	45362	1		All gamma readings are given	DA
2	MI-1-0612-5-01	15-30	35128			for the max depth of the	T
3	MI-2-0012-5-01	0-30	20816			range given.	
4	MI-2-1218-5-01	30-45	17814				
5	M1-3-0006-S-01	0-15	17128				T
6	M1-3-0612-5-01	15-30	16260	1			
7	MI-4-0018-S-01	0-45	22290				
8	MJ-4-0018-S-02S	0-45	22290				
9	M1-4-1824-S-01	45-60	23114				\top
10	MI-5-0012-S-01	0-30	44822				
11	MI-5-1218-5-01	30-45	24480				
12	MI-6-0006-9-01	0-15	14546				T
13	MI-6-0612-5-01	15-30	15458				
14	MI-7-0024-S-01	0-60	1360786				\top
	MI-7-0024-S-025	0-60	1360786	1			1

CRG Soil Sample Collection Log

- · Name(s) of personnel collecting soil samples:
 David Norwood \$ Randy Whicker
- Survey Instrument(s) with Serial Number(s): A Ludlum, 2221-176941/4440-Re250786
 Bludlum, 2221-242334/440-Re321856
 Calibration Duc Date(s): A Sept. 19, 2018/09-26-2018
 B 09-26-2018/09-26-2018
- · Project: Phase 3, Removal Site Evaluation
- · Date: October 12, 2017
- · Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gamum Reading (cpm) (pR/hr)	Time (24:00)	GPS Position Recorded	Comments	Initials
1	MI-7-2430-S-01	60-75	310458	-		All gamma readings are given	DA
2	MI-8-0018-5-01	0-45	21518			for the max depth of the	T
3	MI-8-1824-5-01	45-60	13036			range given.	
4	M1-9-0006-5-01	0-15	15944				
5	M1-9-0612-5-01	15-30	11372				
6	MI-10-0006-S-01	0-15	40426				
7	MI-10-0612-5-01	15-30	22496				
8	MI-11-0012-S-01	0-30	36060				T
9	MI-11-0012-5-025	0-30	36060				
10	MI-11-1218-5-01	30-45	23918				
	MI-12-0018-5-01	0-45	46932				
	MI-12-1824-S-01	45-60	23890				T
	MI-13-0006-S-01	0-15	562112				
	M1-13-0612-5-01	15-30	181308				
	MI-13-1824-S-01	45-60	41332	1			*

- · Name(s) of personnel collecting soil samples:

 David Norwood & Randy Whicker
- Survey Instrument(s) with Sorial Number(s): Aludium 2221-176941/44to-PR150786
- Calibration Due Date(s): A) Sept. 12, 2018/09-26-2018 6) 09-26-2018/09-26-2018

· Project: Phase 3, Removal Sibe Evaluation

· Date: October 12, 2017

Weather/Field Conditions: Warm, Windy

Number	Sample ID	Depth (cm)	Gapuna Reading (cpm) (nR/hr)		me :00)	GPS Position Recorded	Comminuts	Initials
1	MI-13-3642-S-01	90-105	23466	-	_		All gamma readings are given	DA
2	MI-9-0006-5-02D	0-15	15944				for the max depth of the	
	M1-10-0006-S-020	0-15	40426				range giver.	
	M1-13-2430-5-01	60-75	48832					
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15				1	,			*

Attachment A7 (Instrument Function Check Forms)

Single-Channel Function Check Log

	METER
Manufacturer	LUDLUM
Model	2221
Serial No.	218564
Cal. Due Date:	4/16/16

	DETECTOR
Manufacturer	LUDLUM
Model	44-10
Serial No.	PR 288465
Cal Due Date	4/16/16

446	J16		THE	N	HARBSAA
VET	entres	-	ישראש	٤	1 HKKING
LOT					

Source C9-137 Serial No.: 332-94 Activity: 4.81 uCi Source Date: 6/16/94 Distance to Source 4.5"

4/20/15	11:00	6.2						
4/20/15 1			1000	52825	6928	45892	ef	T7+2: 105
	17:10	6.1	1003	52114	6594	45,520	cf	7th2: 104
4/21/15	7:55	6.1	1003	53483	7154	46329	cf	THE: 105
1/21/15/	17:45	60	1005	51901	6684	45217	f	17th : 110
4/22/15	8:00	6.1	1005	52154	6905	45249	W	7the: 106
4/22/15	_	Not us	to Tars	DAY.				
4/23/15	8100	6.1	1008	53870	7194	46676	cF	THAL: 108
4/23/15		NOT	מל מסנט	DAY				
4/24/15	7:45	6.1	1006	54678	7143	47535	4	7HR = 107
4/24/15	-	MOT	סד להצט	DAY.				

#2

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Single-Channel Function Check Log

	METER
Manufacturer:	LUDLUM
Model	2221
Serial No.:	282973
Tal Due Date	10/22/15

	DETECTOR
Manufacturer:	LUBLUM
Model:	44-10
Serial No.:	PK 118986
Cal. Due Date:	10/20/15

EXG	J16	6	THE	NAAZ BAAH
UCTO			STER	PARKING
LOT				

Source: (3-137 Serial No. 332-94 Activity: 4.81 uC) Source Date 6/16/94 Distance to Source: 4-5

4/20/15 17 4/21/15 3 4/21/15 17	7:55	6.2	1100	53197 55192 55507	7336 7379 7548	47813	cF cF	7th : 98	
4/21/15 17	7:55	6.2	1104	55507				100000000000000000000000000000000000000	
4/21/15 17	7:45				7548				
-		6.0	lin/			47959	cr	TIM: 99	
4/22/15 8			1101	52845	7367	45578	cf	THE: 98	
	8:00	6.0	1106	53844	8035	45305	5	TAK: 85	
4/22/15 18	8:10	5.8	1099	56276	9615	46661	cf	mel: 98	* AT LOHD
1/23/15 08	8:00	5-9	1107	53702	7716	45486	cF	77t2: 99	
4/23/15 16	115	5.7	1101	54458	7415	47043		THE : 98	
4/24/15 7	7:45	5.8	1106	552 9 Jan	7493 7195	48034	eF	TAH 2	7:55527 BEG 7493
4/24/15 10	5:00	5.6	1104	54270	7155	47115	cf	THE = 58	

#3

ERG

Single-Channel Function Check Log

	METER
Manufacturer:	LUDLUM
Model:	2221
Serial No:	86306
Cal. Due Date.	10/22/15

	DETECTOR
Manufacturer	LUDLUM
Model	44-10
Serial No.:	PR 090262
Cal. Due Date.	10/22/15

Comments:			
EA6	716	0	NAAZBAAH
VETEL	trus	CONTER	PARKING
LOT			

Source: C5-137 Serial No.: 332 ~ 94

Activity: 4.81 uCi Source Date 6/16/94 Distance to Source 4.5"

Date	Time	Battery	High Voltage	Source Counts	BKG Counts	Net Counts	Initials	Nute(s):
4/20/15	11200	6.2	1150	52475	6824	45 651	J.	1742 102
4/20/15	17:10	6.1	1155	52717	7494	45223	es	THR: 102
4/21/15	7:55	6.2	1157	53305	2265	46040	cof	THE: 102
4/21/15	17:45	6.0	1154	53359	7315	46044	et	776x 102
4/22/15	8.00	6.0	1160	52012	7606	44406	cf	72te: 103
4/22/15	18:10	5.8	1152	55996	2756	46 240	cof	Pare: 102
4/23/15	8:00	5.9	1159	53418	7558	45860	E	THE: 103
4/23/5	16:15	5.7	1154	53030	7327	45703	5	TTTR: 102
4/24/15	7:45	2.8	1160	53987	7335	46652	5	777 (0)
4/24/15	16:00	5.6	1158	52580	7192	45788	5	THR: 103



Single-Channel Function Check Log

	METER
danufacturer:	LUDLUM
Model:	12
Serial No.:	274087
Cal. Due Date:	4/01/16/16

	DETECTOR
Manufacturer:	LUDLUM
Model	43-5
Serial No.:	PA2043 97
Cal. Due Date:	4/16/16

ER6	cte	776	
			_

Source: 74-230 Serial No.: 7132 -10

Activity: AA uCi
Emission Rate: 3,830 cpm/e

Distance to Source CONTHET.

Date	Time	Battery	High Voltage	Source Counts	BKG Counts	Net Counts	Initials	Note(s):
4/21/15	7:53	~	-	1000	0	1000	E	LIGHT LOAK IN DIROCT LIGHT
4/21/15	17:45	V	-	1000	0	1000	6	-
4/22/15	8:00	V	-	1000	0	1000	5	-
4/23/15	8:00	v	-	1000	0	1000	5	·
4/23/15	16:15	V	-	1000	0	1000	5	-
4/24/15	7:45	~	-	1000	0	1000	8	V
4/24/15		V	_	1000	0	1000	8	/
							-	
						+	+	
						-	+	
						-	1	

ERG

Single-Channel Function Check Log

	METER		DETECTOR
Manufacturer:	Ludrum	Manufacturer:	LUBLUM
Model	44-108 5221	Model	44-10
Serial No.	138368	Serial No:	PR 154615
Cal. Due Dute:	1 1	Cal Due Date:	7/19/16

@ BJ/MAC NAAZBHH

Source:	Cs-137	Activity	4-81	иCi	Source Date	6/16/94	Distance to Source	 r	4.5
Serial No.	332-94	Emission Rate	N/4	Cymercusosomis.					

Date	Time	Battery	High Voltage	Threshhold	Source Counts	BKG Counts	Net Counts	Initials	Note(s):
2/5/16	09:30	5.3	1150	100	53686	7185	46397	5	
2/5/16	16:50	5.0	1148	99	52626	6984	45642	6	
12/7/16	10:00	5.2	1148	100	53260	7314	45946	8	
47/16	11 40	5.1	1148	102	52586	7383	45203	8	
7111									
			1					-	
								-	
								-	
								\vdash	

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Single-Channel Function Check Log

	METER
Manufacturer	LUBLUM
Model:	2221
Serial No.:	282961
Cal. Due Date:	7/19/17 11/25/17

DETECTOR Manufacture LUDLUM 44-10 PR150786 Mode Serial No. Cal. Due Dute

ec4 @
₩S
t utke
7

Source:	Cs-137	Activity:	4-81
Serial No.:	332-94	Emission Rate:	N/A

Source Date: 6/16/94

		11
Distance to Source	~	4-5
_		

Date	Time	Battery	High Voltage	Threshold	Source Counts	BKG Counts	Net Counts	Initials	Note(x):
2/5/16	09:30	5.7	1104	100	53866	7325	46541	6	
1 5/6	16:50	5-4	1106	100	53488	7032	46 458	ıF.	
								++	
								\Box	
								+	

ERG

Single-Channel Function Check Log

Environmental Bestinshion Group, Inc. 8800 Washington St. NE, State 150 Alloqueopue, NM 87113 (505) 296-4224

METER				
Manufacturer:	Ludium			
Model:	4410 2221			
Serial No.:	218563			
Cal. Due Date:	5-1-18			

	DETECTOR
Manufacturer	Ludium
Model	440
Serial No.	PR 150851
Cal Due Date:	5-1-18

Comments:		_
		_

Source:	Cs 137	
Serial No	332-94	

Activity	481	uCi
mission Rate	11/0	com/emir

Source Date 6/16/94

Distance to Source: 4.5

Date	Time	Battery	High Voltage	Threshhold	Source Counts	BKG Counts	Net Counts	Initials	Note(s):
/3/17	9.30 am	5.6	1149	98	48937	6838	42099	MN	
	2:55gm		1154	104	48502	7249	41253	MW	
							-		

ERG

Single-Channel Function Check Log

Environmental Restocation George, Inc. 8509 Washington St. NE, Soite 150 Albaquerque, NM 87113 (505) 298-4224

	METER
Manufacturer.	Lydlum
Model:	2221
Scrial No.:	262334
al. Due Date:	09-26-2018

DETECTOR					
Manufacturer:	Ludlum				
Model:	44-10				
Serial No.:	PR321856				
Cal. Due Date:	09-26-2018				

Comments:	A2-4410/2221

Source:	Cs-137	Activity:	uCi
Serial No.:		Emission Rate:	cpm/emissi

	200
urce Date:	Distance to Source

Date	Time	Battery	High Voltage	Threshhold	Source Counts	RKG Counts	Net Counts	Initials	Note(s):
10-09-17	08:30	4.8	1055	101	72738	6512	66,224	av	Function check at Smith Lake
10-09-17	21:15	4.8	1055	100	55811	4461	51350	M	Hotel Room
10-10-17	06:30	4.9	1052	102	59420	4621	54799	DIN	
10-10-17	18:21	5.1	1051	103	61433	464	56819	DN	· Changed batt
10-11-17	06:21	6.3	1053	102	60076	4997	55079	DN	0
10-12-17	0510	6.2	1053	102	59636	5032	54604	DN	II "
10-13-17	0548	6.1	1053	103	60678	4817	55861	ON	11 /1

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Single-Channel Function Check Log

Encuenmental Restoration Group, Inc. 1809 Washington St. NE, State 15t Africaneque, NM 871 (505) 298-422-

METER					
Manufacturer:	Ludlum				
Model:	2221				
Serial No.:	176941				
Cal. Due Date:	Sept 12.2018				

DETECTOR					
Manufacturer: Ludlum					
Model	44-10				
Serial No.:	PR150786				
Cal. Due Date:	09-26-2018				

Comments:	A1-2221/44-10

Distance to Source.

Source: C5-137	Activity:	uCi
Serial No.:	Emission Rate:	cpm/emission

Date	Time	Battery	High Voltage	Threshhold	Source Counts	BKG Counts	Net Counts	Initials	Note(s):
10-03-17	09:22	6.2	1050	99	77178	7548	69.630	DN	
0.03-17	20:41	6.0	1045	99	58854	7729	57,125	DN	changed area of function check to hotel room.
0-04-17	06:13	6.0	1046	99	58131	8032	50,099	DN	
10-04-17	19:30	5.9	1045	99	59188	7884		DN	
0-05-17	0559	5.9	1045	99	56710	6956		ON	
10-0517	2259	5.9	1045	99	57625	7435	50190	ON	2
0-09-17	0813	5.9	1050	101	77268	7308	69960	ON	function there as smith Lake
10-09-17	21:08	5.9	1050	100	54661	4461	50200	M	Function check @ hotel
0-10-17	0657	5.8	1046	100	6/332	4851	56481	DN	
0-1017	18:16	5.7	1047	100	62256	5006	57250	DN	"
0-11-17	06:18	5.7	1047	100	62 230	4908	57,322	DW.	
0-12-17	05:00	5.60n	1046	100	60413	5132	55,281	DW	

ERG

Single-Channel Function Check Log

Environmental Restoration Group, Inc. 2000 Washington St NE, Suite 150 Albuquerque, NM 87113 (505) 298-4224

	METER						
Manufacturer	Ludlum						
Model	2221						
Serial No.	176941						
Cal. Due Date	Sept 12, 2018						

DETECTOR							
Mamufacturer	Ludlum						
Model:	44-10						
Serial No.:	PR150786						
Cal. Due Date:	09-26-2018						

A1-2221/44-10	

Source: Cs 137	Activity:	uCi	Source Date:	Distance to Source:	
Serial No.:	Emission Rate:	cpm/emissions			

Date	Time	Battery	High Voltage	Threshold	Source Counts	BKG Counts	Net Counts	Initials	Note(s):
10-13-17	0550	5.7	1043	100	63622	4997	58625	DN	Hotel Room

Attachment A8 (Instrument Calibration Certificates)



Certificate of Calibration

Environmental Restoration Group, Inc. 8309 Washington St NE, Suite 150 Albuquerque, NM 87113 (505) 298-4224

Mechanical Check F/S Response Check Geotropism Meter Zeroed Source Distance: □Conta Source Geometry: ☑ Side Instrument found within Range/Multiplier Re	☐ Below ☐ O	in 4.4 VDC) ther: Thr	Check (+/- 2.5%): ☑	Serial Number: 500 V 1000 V ch 72-inch 0 Barometric Pressure: Temperature: Relative Humidity:	ther:
✓ F/S Response Check ✓ Geotropism ✓ Meter Zeroed Source Distance: □Conta Source Geometry: ✓ Side Instrument found within	✓ Reset Check ✓ Audio Check ✓ Battery Check (Mater ✓ 6 inches	in 4.4 VDC) ther: Thr	le Length: 39-in	ch 72-inch O Barometric Pressure: Temperature:	24.68 inches Hg 73 °F
☑ Geotropism ☑ Meter Zeroed Source Distance: □Conts Source Geometry: ☑ Side Instrument found within	Audio Check Battery Check (M act 6 inches 0 Below 0	in 4.4 VDC) ther: Thr	eshold: 10 mV	Barometric Pressure:	24.68 inches Hg 73 °F
✓ Meter Zeroed Source Distance: □Conts Source Geometry: ✓ Side Instrument found within	Battery Check (Mact 6 inches 0) Below 0	ther: Thr		Temperature:	73 °F
Source Distance: Conta Source Geometry: Side Instrument found within	act 6 inches 0	ther: Thr		Temperature:	73 °F
Source Geometry: ✓ Side Instrument found within	☐ Below ☐ O	ther: W			
Instrument found within			maow.	Relative Humidity:	20 %
Range/Multiplier Re					
G. complete	eference Setting	"As Found Reading"		Integrated	Total district
x 1000	400		Meter Reading	1-Mill. Cou	nt Log Scale Cour
x 1000	7.000	400	400	399095	400
11.000	100	100	100		100
x 100	400	400	400	39910	400
x 100	100	100	100		100
x 10	400	400	400	3991	400
x 10	100	100	100		100
x 1	400	400	400	399	400
x 1	100	100	100		100
High Voltage	Source Counts	Backgro	ound	Voltage	Plateau
700	33960				100,000
800	56433			80000 T	
900	63914			70000	****
950	65921			50000	
1000	66996			40000 30000	
1050	67216	1002	6	20000	
1150	67753	-	_	10000	
1200	68487 68260	-	_	0 +	
	00200			Ja da 19	to ite ise
Comments: Comments 11	N Diagonal C		-		
Comments: Comments: H	IV Plateau Scaler Cou	nt Time = 1-min. Reco	mmended HV = 1050		

Mg_	, INC
Customer ERG	30 IA
Milg.	CERT # 4084.01
Mig.	318445/454100
Mode	
Cal. Date	
Comments Spites to applicable instr. and/or detector IAV mfg. spec. T. 72	10.70.0
New Instrument	
Meter Zeroed	
Agilo ok.	
Calibrated in accordance with LMI SOP 14.8	
MY Readout (2 points) Ref./Inst. 10 mV Det Oper. V at mV Disal Ratio 100	
MV Readout (2 points) Ref./Inst. 10 mV Det. Oper. V st mV Dial Ratio 100	
Comments	00 = 10 mV
Calibrated with 39" cable	00v
Calibrated with Win in "OUT" position Firmulate 261027 2	
REFERENCE INSTRUMENT REC'D INSTRUMENT REC'D INSTRUMENT REC'D INSTRUMENT REC'D INSTRUMENT INSTRU	
REFERENCE INSTRUMENT REC'D INSTRUMENT REC'D INSTRUMENT REC'D INSTRUMENT REC'D INSTRUMENT INSTRU	
RANGE/MULTIPLIER	T
X 1000	The state of the s
X 100	
X 100	
X 100	
X 10	
X1	
#Uncertainty within ± 10%	
Urcertainty within ± 10% C.F. within a 20% REFERENCE INSTRUMENT INSTRUMENT CAL POINT RECEIVED METER READING Log CAL POINT RECEIVED METER READING* AU Kopm	
REFERENCE INSTRUMENT INSTRUMENT CAL POINT RECEIVED METER READING* CAL POINT RECEIVED METER RECEIVED ME	
REFERENCE INSTRUMENT INSTRUMENT CAL POINT RECEIVED METER READING* CAL POINT RECEIVED METER RECE	
CAL POINT RECEIVED METER READING* CAL POINT RECEIVED M A COSI COSI COSI COSI COSI COSI COSI COSI	ed Electronically
Alpha S/N Beta S/N College Colle	INSTRUMENT
40 Kcpm	METER READING*
40 Kcpm	Sen Keem
4 Kcpm 400 cpm 40 cpm 4	50
400 cpm 40 cpm 50 cpm 5	5
udlum Neasurements, Inc. certifies that the above instrument has been calibrated by standards traceable to the Antional Institute of Standards and Technology, or to the calibration for International Standards and Technology, or to the calibration standards Chapmidation members, or have been derived from ecoepted values of natural physical constants or have seen derived by the rable type of calibration inchings the calibration system conforms to the requirements of ANSINGCSB, 2540-1-1998 and ANSING25-1976 [SO.]E 17026-2005(E) Reference Instruments and/or Sources; Ce-137 SWE 009 2171CP 22169CP 720 724 781 1131 1516 1566 1596 1509 1576C 6717CO 6719CO 60546 70987 77410 6552 0112 2189CP 5-394 5-1064 110081 110082 Neutron Am-241 Be 7-4 Alpha S/N 6719CO 60546 70987 85410 6552 0112 2189CP 5-394 6710 7410 7410 7410 7410 7410 7410 7410 7	500 cpm
The Historiatorius Standards Organization members, or have been desired from accepted values of natural physical constants or have been desired by the region pays of calibration inchristy.	50
Reference Instruments and/or Sources: Ca-137 SN:	Pies of
571700 571900 60846 70887 73410 E552 G112 21690P 8-364 S-1064 T10081 T10082 Neutron Am-241 Be T-	ques.
571700 571900 60846 70887 77410 E552 G112 21690P 8-364 5-1064 T10081 T10082 Neutron Am-241 Be T-	CP 2334/2521
	T-334 Ra-226 T Y982
	92780460
Calibrator Josia Ruiz Conic. Rusy Title Technician Date 12	Sept 17
QC'd By Title Service Dept QC Date 13 5-	epin
This certificate shall not be reproduced except in full, without the written approval of Ludium Measurements, Inc. AC Inst. Passed Dislectric (Hi-Pot) and Only Passed Only Passed Dislectric (Hi-Pot) and Only P	nd Continuity Test

RG		ite of Calibi		Environmental F 8809 Washingto Albaquerque, N (505) 298-4224 www.ERGoffice	
Meter: Manui	facturer: Ludlum	Model Number:	2221r	Serial Number:	176941
Detector: Manuf	facturer: Ludlum	Model Number:	44-10	Serial Number:	PR150786
Source Geometry:	heck Reset Check Audio Check Battery Check (Contact 6 inches	Cable Min 4.4 VDC) Other: Thre Other: Win		Barometric Press Temperatu Relative Humidi	Other: 15' ore: 24.51 inches Fre: 70 °F
Range/Multiplier	Reference Setting	"As Found Reading"	Mater Davi	Integr	
x 1000	400	Tomas recorning	Meter Read	aing 1-Min.	Count Log Scale C
x 1000					
x 100	100	How	-		
x 100	100	se Lud Sheet			
x 10	400	()	-		-
x 10	100				
x 1	400	-	-	-	
x 1	100		-	_	
High Voltage	Source Counts	Backgrou			
700	23250	Dackgrou	7	Volt	age Plateau
800	46999		=	80000	
900	62283	-	=	70000	
950	65086	79000	=	60000	-
1000	THE RESERVE OF THE PARTY OF THE	-	=	50000	
1050	66980		1	30000	
The second second	68814	10050	_	20000	
1100	70904	-	1	10000	
1150	71336			0 + , ,	
1200	71851			40 40	1900 1,000 1,200
Reference Instrume	ents: HV Plateau Scaler Co	1932 dpm/6.520 cpm (1/4/12)	Fluke multimete	er serial number: 8 tree Cs-137 @ 5.2 uCi	7490128 (1/4/12) sn: 4097-03
Alpha Source: T	c-99 sn: 4099-03@17,700d	pm/11,100cpm(1/4/12)	Other Source	E	
Alpha Source: T	c-99 sn: 4099-03@17,700d	pm/11,100cpm(1/4/12)	Other Source		ис: 9-26-18

This calibration conforms to the requirements and acceptable calibration conditions of ANSI N323.4 100

Meter: Manufact	urer: Ludlum	Model Number:	2221r	Serial Number:	176941
Detector: Manufact	urer: Ludlum	Model Number:	44-2	Serial Number:	PR188288
Mechanical Check F/S Response Chec			HV Check (+/- 2.5°	%):	V □ 1500 V
urce Geometry: 2	☐ Audio Check ☐ Battery Check (N Contact ☑ 6 inches ☐ C Side ☐ Below ☐ C	Other:	Threshold: Window:	Barometric Press Temperatu Relative Humid	re: 70 °F
nge/Multiplier	Reference Setting	"As Found Readi	ng" Meter R	leading Integr	
x 1000	400		-	i-willi.	Count 25g sent Cou
x 1000	100				
x 100	400	no Ludi	jw,		
x 100	100	- no Luc	1017	-	
x 10	400	34,13	h.		
x 10	100				
x 1	400				-
x 1	100				
ligh Voltage	Source Counts	Bac	kground	Volt	tage Plateau
500	8297				
600	12567			18000	
650	13387			14000	
700	13512		2086	12000	
750	13826			10000	
800	14143			8000	
850	16377			4000	
		-		2000	
				500 600	650 700 750 800 850
omments: Commen	ts: HV Plateau Scaler Co	unt Time = 1-min. F			

ental Restoration Group, Inc.

Calibration Due 4-16-16

8809 Washington St NE, Suite 150 Albuquerque, NM 87113 (505) 298-4224 Certificate of Calibration Calibration and Voltage Plateau www.FRGofffoe.com Serial Number: 218564 22211 Model Number: Manufacturer Ludlum Meter: PR288465 44-10 Serial Number: Model Number: Detector: Manufacturer: Lastlern HV Check (1/- 2.5%): ▼ 500 V ▼ 1000 V ▼ 1500 V ✓ Mechanical Check ▼ THR/WIN Operation Cable Length: 39-inch 72-inch Other: ¥ F/S Response Check Reset Check Audio Check ✓ Geotropism Barometric Pressure: 24.33 Inches Hg ✓ Battery Check (Min 4.4 VDC) ✓ Meter Zeroed Temperature: 74 Threshold: 10 mV Relative Humidity: 20 Window: Below Other: Source Geometry & Side Instrument found within tolerance: Yes No Integrated Log Scale Count Meter Reading "As Found Reading" 1-Min. Count Range/Multiplier Reference Setting 398892 400 400 400 x 1000 400 100 100 100 100 x 1000 39888 400 400 400 400 x 100 100 100 100 100 x 100 3986 400 400 400 400 x 10 100 100 100 100 x 10 400 398 400 400 400 x 1 100 100 100 100 x 1 Voltage Plateau Background Source Counts High Voltage 59599 80000 69486 800 70000 71679 900 60000 72244 50000 950 40000 9432 72475 1000 30000 72877 1050 20000 10000 73119 1100 1150 73031 100 1200 73241 Comments: HV Plateau Scaler Count Time = 1-min. Recommended HV =1000 Reference Instruments and/or Sources: Fluke multimeter serial number: 8749012 Ludlum pulser serial number: ☐ 97743 🗷 201932 ✓ Gamma Source Cs-137 @ 5.2 uCi (1/4/12) sn: 4097-03 ☐ Alpha Source: Th-230 @ 12,800 dpm (1/4/12) sn: 4098-03 Tc-99 @ 17,700 dpm (1/4/12) sn: 4099-03 Other Source: Beta Source:

ERG Form ITC. 101.A

This calibration conforms to the requirements and acceptable calibration conditions of ANSI/N323.4 - 1997.

Calibration Date: 4-16-15

4/16/15

Calibrated By:

Reviewed By:

Certificate of Calibration

Calibration and Voltage Plateau

Environmental Restoration Group, Inc. 8809 Washington St NE, Suite 150 Albuquerque, NM 87113 (505) 298-4224 www.LRGoffice.com

Meter: Manufact	urer: Ludlum	Model Number:	2221r	Ser	rial Number:	282973
Detector: Manufact	urer: Ludlum	Model Number:	44-10	Set	rial Number:	PR118986
✓ Mechanical Check ✓ F/S Response Che ✓ Geotropism ✓ Meter Zeroed Source Distance: Source Geometry ✓	ck 😾 Reset Check Audio Check Battery Check (Contact 🛂 6 inches Side Below	Min 4.4 VDC) Other: Other:	Cable Length:	39-inch	500 V ☑ 1000 V ☑ 72-inch ☐ Other construction of the personner of the p	24.69 inches Hg 77 °F 20 %
Instrument found	within tolerance: Y	s _ No			Integrated	
Range/Multiplier	Reference Setting	"As Found Read	ting" Me	eter Reading	1-Min. Cou	t Log Scale Count
x 1000	400	400		400	399626	400
	100	100		100		100
x 1000	100	400		400	39985	400
x 100	400				2.00	100
x 100	100	100		100	****	400
x 10	400	400		400	3998	
x 10	100	100		100		100
x 1	400	400		400	399	400
x i	100	100		100		100
High Voltage	Source Coun	its E	Background		Voltage	Plateau
700	36064				80000	
800	58303				70000	
900	67676				60000	
950	68787				10000	
1000	71543				30000	
1050	73189				20000	
1100	73675		11545		10000	
1150	74374				18° 18°	B 188 188
1200	74783				do do	14 14

Comments: HV Plateau Scaler Count Time = 1-min. Recommended HV = 1100

Reference	Instruments	and/or	Sources
-----------	-------------	--------	---------

Ludlum pulser serial number: ☐ 97743 🗷 201932

☐ Alpha Source: Th-230 @ 12,800 dpm (1/4/12) sn: 4098-03 ☐ Beta Source: Tq-99 @ 17,700 dpm (1/4/12) sn: 4099-03

Fluke multimeter serial number: 8749012

☑ Gamma Source Cs-137 @ 5.2 uCi (1/4/12) sn: 4097-03

Other Source:

Calibrated By:

Calibration Date: ルンユー・4

Calibration Due 10-22-15

Reviewed By:

ERG Form ITC. 101A 10/23/47
atton conforms to the requirements and acceptable calibration conditions of ANSI

Certificate of Calibration

Calibration and Voltage Plateau

Environmental Restoration Group, Inc. 8809 Washington St NE, Suite 150 Albuquerque, NM 87113 1505) 298-4224 www.FRGodToe.com

Meter:	Manufacturer:	Ludlum	Model Number:	2221r	Se	rial Number;	86306
Detector:	Manufacturer.	Ludlum	Model Number:	44-10	Se	rial Number:	PR090262
-	sponse Check	▼ THR/WIN Operation ✓ Reset Check	ion			500 V ☑ 1000 V h ☑ 72-inch ☐ O	
✓ Geotrop		✓ Audio Check ✓ Battery Check (M	in 4.4 VDC)		-	Barometric Pressure:	24.69 inches Hg
Meter 2		set 2 6 inches 1 Ot		Threshold:	10 mV	Temperature:	76 °F
	ometry V Side			Window:		Relative Humidity:	20 %
		n tolerance: Yes		10,000			
Instrume	nt loung withii	i tolerance: 💇 i es	_ 140			200	
Range/Mu	ltiplier Re	eference Setting	"As Found Read	ting" N	leter Reading	Integrated 1-Min. Cou	
x 100	00	400	400		400	399609	400
x 100	00	100	100		100		100
x 10	0	400	400		400	39962	400
x 10	7	100	100		100		100
x 10		400	400		400	3995	400
x 10		100	100		100		100
x I		400	400		400	400	400
			100		100		100
x 1		100	100		100		100
High Vo	oltage	Source Counts	В	ackground		Voltage	Plateau
105	0	70926					
110	0	73928				70000	
115	0	73946		11361		60000	
120	0	74343				50000	
700	0	25330				30000	
800	0	49292				20000	
900	0	63873				10000	
950	0	67039				0 +	2 2 2
100	00	69580				100 000	1900 180 120

Comments: HV Plateau Scaler Count Time - 1-min. Recommended HV = 1150

Reference	Instruments	and	/or	Sources:
-----------	-------------	-----	-----	----------

Ludlum pulser serial number: ☐ 97743 🗹 201932

☐ Alpha Source: Th-230 @ 12,800 dpm (1/4/12) sn; 4098-03

☐ Beta Source: Tc-49 @ 17,700 dpm (1/4/12) sn: 4099-03

Fluke multimeter serial number: 3749012

✓ Gamma Source Cs-137 @ 5.2 uCi (1/4/12) sn: 4097-03

Other Source:

Calibrated By:

Calibration Date: 10-22-14

Calibration Due 10-22-15

Reviewed By:

Date:

ERG Form ITC. 101.A

10/05/14

This calibration conforms to the requirements and acceptable calibration conditions of ANSI N323A - 1997.

Certificate of Calibration Calibration and Voltage Plateau

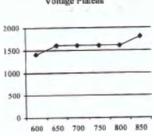
Environmental Restoration Group, Inc. 4809 Washington St NE, Suite 150 Albuquerque, NM 87113 [365] 298-4224 www.ERGoffice.com

		4.341161	mercer mare					
Meter:	Manufacturer:	Ludlum	Model Number:	12		Serial Number:	27408	17
Detector:	Manufacturer:	Ludlum	Model Number:	43-5		Serial Number:	PR204	397
✓ Mechan		▼ THR/WIN Op ▼ Reset Check	A. a. iou			✓ 500 V ✓ 1000 V inch ☐ 72-inch O	☑ 1500 ther:	V
	Leroed	✓ Audio Check ✓ Battery Check act ☐ 6 inches ☐ ✓ Below	k (Min 4.4 VDC)	Threshold: Window:	10 mV	Barometric Pressure: Temperature: Relative Humidity:	24.39 70 20	inches Hg °F %

Instrument found within tolerance: 🗹 Yes 🗌 No

Range/Multiplier	Reference Setting	*As Found Reading"	Meter Reading	Integrated 1-Min. Count	Log Scale Count
x 1000	400	400	400		
x 1000	100	100	100		
x 100	400	400	400		
x 100	100	100	100		2
x 10	400	400	400		
x 10	100	100	100		
x 1	400	400	400		
x 1	100	100	100		
High Voltage	Source Count	s Backgrou	ind	Voltage Pl	ateau

x 1	100	100
High Voltage	Source Counts	Background
600	1400	
650	1600	
700	1600	2
750	1600	
800	1600	
850	1800	



Comments: HV Plateau Scaler Count Time = 1-min. Recommended HV = 700

Reference	Instruments	and/or	Sources:
vener ence	WHEN PROPERTY	Marie Con	Com eron

Ludlum pulser serial number: ☐ 97743 🗷 201932

☑ Alpha Source: Th-230 @ 12,800 dpm (1/4/12) sn: 4098-03 ☐ Beta Source: Tc-99 @ 17,700 dpm (1/4/12) sn: 4099-03

Fluke multimeter serial number: 8749012

☐ Gamma Source Cs-137 @ 5.2 uCi (1/4/12) sn: 4097-03

Other Source:

Calibrated By: Reviewed By:

Calibration Date: 4/6 15

Calibration Due 4-16-16

4/16/15 Date:

ERG Form ITC. 101.A

This calibration conforms to the requirements and acceptable calibration conditions of ANSI N323A - 1997



Certificate of Calibration

Environmental Restoration Group, Inc. 8809 Washington St NE, Suite 150 Albuquerque, NM 87113 (505) 298-4224

Calibration and Voltage Plateau

Meter:	Manufacturer:	Ludlum	Model Number:	2221r		Serial Number:	2829	961
Detector:	Manufacturer:	Ludlum	Model Number:	44-10		Serial Number:	PR15	0786
✓ Mechani	cal Check	THR/WIN Opera	tion	HV Check (+	/- 2.5%): V	500 V ▼ 1000 V	₹ 150	0 V
F/S Resp		Reset Check		Cable Length	: 39-in	ch _ 72-inch 🗹 O	ther: C	unly
✓ Geotropi	ism 3	Audio Check						,
✓ Meter Ze	eroed 3	Battery Check (M	lin 4.4 VDC)			Barometric Pressure:	24.89	inches Hg
Source Dist		6 inches O		Threshold:	10 mV	Temperature:	70	°F
Source Geo	metry: V Side	☐ Below ☐ O	ther:	Window:		Relative Humidity:	20	%
Instrumen	t found within t	olerance: 🗹 Yes	□ No					
Range/Mult	iplier Refe	erence Setting	"As Found Read	ling" M	eter Reading	Integrated I-Min. Cou		og Scale Coun
x 1000)	400	400		400	398910		400
x 1000)	100	100		100			100
x 100		400	400		400	39893		400
x 100		100	100		100			100
x 10		400	400		400	3988		400
x 10		100	100		100			100
x 1		400	400		400	397		400
x 1		100	100		100			100
High Volt	age	Source Counts	Ba	ckground		Voltage	Plateau	
700		31039						
800		54820				80000		
900		65946				70000	-	
950		67927				50000		
1000		70337				40000		
1050		71980				30000		
1100		73095		9770		10000		
1150		73716				0 1		
1200		73648				नक वक का	100	1500
1250		74225					,	

Comments: HV Plateau Scaler Count Time = 1-min. Recommended HV =1100

Reference Instruments and/or Sources:

Ludium pulser serial number: ☐ 97743 🗹 201932 Fluke multimeter serial number: 87490128

☐ Alpha Source: Th-230 @ 12,800 dpm (1/4/12) sn: 4098-03
☐ Beta Source: Tc-99 @ 17,700 dpm (1/4/12) sn: 4099-03 ✓ Gamma Source Cs-137 @ 5.2 uCi (1/4/12) sn: 4097-03

Other Source:

Calibration Date: 25 Nov/6 Calibration Due: 25 No- 17 Calibrated By: Reviewed By: Date:

ERG Form ITC. 191.A

This calibration conforms to the requirements and acceptable calibration conditions of ANSI N323.4 - 1997

ERG

Certificate of Calibration

Calibration and Voltage Plateau

Environmental Restoration Group, Inc. 8809 Washington St NE, Suite 150 Albuquerque, NM 87113 (505) 298-4224 www.FRGuffice.com

Meter:	Manufacturer:		Ludlum	Model Number:	2221r		Serial Number:	1383	68
Detector:	Manufacturer:		1.udlum	Model Number:	44-10		Sorial Number:	PR154	615
✓ Mechan			THR/WIN Op Reset Check	peration			▼ 500 V ▼ 1000 V -inch ▼ 72-inch □ C		v
✓ Geotrop		_	Audio Check		Cable Deliga				
Meter Z	eroed	~	Battery Check	(Min 4.4 VDC)			Barometric Pressure:	24.78	inches Hg
Source Dis	tance: Conta	ct	₹ 6 inches	Other:	Threshold:	10 mV	Temperature:	74	°F
Source Ge	ometry: V Side		Below	Other:	Window:		Relative Humidity:	20	%

Instrument found within tolerance: Ves No

Range/Multiplier	Reference Setting	"As Found Reading"	Meter Reading	Integrated I-Min. Count	Log Scale Count
x 1000	400	400	400	398436	400
x 1000	100	100	100		100
x 100	400	400	400	39845	400
x 100	100	100	100		100
x 10	400	400	400	3984	400
x 10	100	100	100		100
x 1	400	400	400	399	400
x 1	100	100	100		100

High Voltage Source Counts Background 700 26998 800 51037 900 63340 950 65550 1000 67410 1050 70113 1100 72217 1150 72561 9216 1200 72337

Comments: HV Plateau Scaler Count Time = 1-min. Recommended HV = 1150

Reference Instruments and/or Sources:

Ludlum pulser serial number: 97743 ₹ 201932

☐ Alpha Source: Th-230 @ 12,800 dpm (1/4/12) sn: 4098-03
☐ Beta Source: 76-99 @ 17,700 dpm (1/4/12) sn: 4099-03

Fluke multimeter serial number: 287490128

Gamma Source Cs-137 @ 5.2 uCi (1/4/12) sn: 4097-03

Other Source:

Calibrated By:

Calibration Date: 7-16-11

Calibration Due: 7-K -/)

Reviewed By:

Date: 7/20/

ERG Form ITC. 101.A.

This calibration conforms to the requirements and acceptable calibration conditions of ANSI N323A - 1997



Certificate of Calibration

Environmental Restoration Group, Inc. 8809 Washington St NE, Suite 150 Albaquerque, NM 87113 (505) 298-4224 www.FRGoffice.com

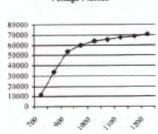
Calibration and Voltage Plateau

Meter: Manufacturer:	Ludlum	Model Number:	2221r		Serial Number:	2185	63
Detector: Manufacturer:	Ludlum	Model Number:	44-10		Serial Number.	PR150	851
✓ Mechanical Check	THR/WIN Op	eration	HV Check (4	/- 2.5%):	₹ 500 V ₹ 1000 V	Z 1500	v
	✓ Reset Check		Cable Length	: 39-	inch v 72-inch O	ther:	
→ Geotropism	✓ Audio Check						
✓ Meter Zeroed	✓ Battery Check	(Min 4.4 VDC)			Barometric Pressure:	24.51	inches Hg
Source Distance: Conta	ict 🗸 6 inches	Other:	Threshold:	10 mV	Temperature:	74	°F
Source Geometry: ✓ Side	Below	Other:	Window:		Relative Humidity:	20	96
Indiana de la fabilita	**************************************						

Instrument found within tolerance: 🗹 Yes 🗌 No

Range/Multiplier	Reference Setting	"As Found Reading"	Meter Reading	Integrated 1-Min. Count	Log Scale Count
x 1000	400	400	400	399802	400
x 1000	100	100	100		100
x 100	400	400	400	39987	400
x 100	100	100	100		100
x 10	400	400	400	3998	400
x 10	100	100	100		100
x 1	400	400	400	400	400
x 1	100	100	100		100
High Voltage	Source Counts	Backgroun	nd	Voltage Pla	iteau

High Voltage	Source Counts	Background
700	11246	
800	33904	
900	53843	
950	59637	
1000	63641	
1050	65147	
1100	66831	
1150	68228	9797
1200	70822	



Comments: HV Plateau Scaler Count Time = 1-min. Recommended HV = 1150

Reference Instruments and/or Sour

Ludlum pulser serial number: 97743 ✓ 201932 Fluke multimeter serial number: 87490128

Beta Source 99 sn: 4099-03@17,700dpm/11,100cpm(1/4/12) Other Source:

Other Source:

Calibrated By:

Reviewed By:

Machael 1

Calibration Date: 5777

Calibration Due: 5-1-18

Date: 5/1/17

ERG Form ITC. 101.A

This ealthration conforms to the requirements and acceptable calibration conditions of ANSI/N328.4 - 190°

IVA	Cesigner and wanus				LUDLUM MEA	ASURE	
	Scientific and Indu		ERTIFICATE OF C	ALIBRATION	501 Oak Street 325-235-5494		10744 Dutohtown Road 865-392-4601
					Sweetwater, TX 79556	B. U.S.A.	Knowille, TN 37932, U.S.A.
CUSTO	MER ERG					RDER NO.	
wifg	Ludium Measure	amonte ise	Model	19			
Afg.	Editorial Heritage					lo. 2215	, 1
			Model		Serial N	10	
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eck mai	rk pplies to applica	able instr. and/or dete	ctor IAW mfg. spec.	T. 73	"F RH	29 %	Alt 698.0 mm Hg
New	Instrument Instru	ment Received	Within Toler. +-10%	10-20% Out o	f Tol Requiring	Ronair (Other-See comments
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	Resp. ck	Reset ck.	90	Background Subtr Window Operation			ut Sens. Linearity otropism
Audi		Alarm Setti	no ck	Batt. ck. (Min. Vol.		A cer	ar opisini
	rated in accordance wil				dence with LMI SOP	14.9	
	Volt Set 525	V Input Sens				Thresh	
COUNCIA	VOIL 361 323	v input sens	27 mV Det Oper	v	atm\	/ Dial Ra	60 =
V	HV Readout (2 points)	Ref./net	500 / 500	V	Ref./inst. 10	000	1984 V
01111	ENTS:						
mma Cal	libration: GM detectors por	sitioned perpendicular to	source except for M 44-9 in w	hich the front of probe	faces source		
		R	EFERENCE		MENT REC'D	INSTE	RUMENT
	RANGE/MULTIF	LIER C	AL POINT	"AS FOU!	ND READING"	METE	ER READING*
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	5000 1000 μR/hr			1000		1000	
	500		R/hr = 72000 apm	400		400	
	500		µR/hr	100	-	100	
	250 200 µR/hr = 36,000 cpn 250 100 µR/hr			105		200	
	50	7200		40		40	
	50	1800		10		10	
	25	3600		20		20	
	25		cpm	5		5	
	*Uncertainty within ± 10%	C.F. within + 20%			50. 25	Rangels	Calibrated Electronically
	REFERENCE	INSTRUMENT	INSTRUMENT	REFER			
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ital	0.0.1	11000100	ME I EN NENDING	Log	Just Her	LIVED	WE LEW MENDING
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ir internati	onal Standards Organization n	nembers, or have been deriv	ed from accepted values of natura	I physical constants or ha	ive been derived by the rate	o type of calibr	ration techniques.
			3-1-1994 and ANSI N323-1978			_	alibration License No. LQ-1963
	e Instruments and/or Sou				the last the last	1996 190	the state of the s
30110	D Daylecd Decese	70687 73410 L	E202 C112 S169Cb	S-394 S-1064	T10001 T10082 F	Neutron Am-24	41 Be T-304 Ra-226 Y96
Alp	ha S/N	[Beta S/N		Other	-	
√ m s	500 S/N 251	106	Oscilloscope S/N		Multime	ter S/N	15060230
alibrato	James Messell		Title	Calibrator		Date	Z9NOVI6
C'd By	Make	7.	Title	Service	Dept of		ZS NOUL
, Je by	1.00		1100			Date	1.000
This certific FORM C22	ate shall not be recrodubed as A 07/25/2016 Page	out the authorise and	er approval of Euroum Measureme	ints inc	AC Inst Passe Only Failed		Mi-Poti and Continuity Test

APPENDIX B

Attachment B1 (Analytical Laboratory Data Reports on CD)



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