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October 27, 2011

US Army Corps of Engineers, Omaha District
Attn: Kirk Engelbart (CENWO-PM-HA)
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Omaha, Nebraska 68102-4901

Subject: Contract W912DR-09-D-0019
Record of Decision
Former Sundance Air Force Station, Wyoming, PM-1 Reactor Site

Dear Mr. Engelbart:

Enclosed please find one copy of the signed Record of Decision for the Former Sundance Air Force Station, PM-1 Reactor Site Off-Site Release, Sundance, Wyoming. A separate CD of the working electronic files of the document is also enclosed. The document is being distributed as noted below. A pdf of the document is included on a CD on the last page of each hard copy.

Sincerely,

AECOM Technical Services, Inc.

Cathy Larson
Project Manager

cc: Mr. Tim Pavsek, USAF, Ellsworth Air Force Base (4 copies and one CD with working electronic files)
Dr. Steven Rademacher, Air Force Safety Center (1 copy)
Ms. Pat Smith, USEPA Region 8 (1 Copy)
Mr. Don Fischer, WYDEQ (1 Copy)
Ms. Melissa Markell, AFCEE (pdf)



Record of Decision

**FORMER SUNDANCE AIR FORCE STATION, PM-1 REACTOR SITE
OFF-SITE RELEASE
SUNDANCE, WYOMING**

ELLSWORTH AIR FORCE BASE, SOUTH DAKOTA

Prepared By

United States Air Force

September 2011

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Acronyms

| | |
|-------------------|--|
| AF | Air Force |
| ALARA | As Low As Reasonably Achievable |
| amsl | above mean sea level |
| CEM | conceptual exposure model |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CERCLIS | Comprehensive Environmental Response, Compensation, and Liability Information System |
| CSM | conceptual site model |
| C/ROPCs | chemicals/radionuclides of potential concern |
| ¹³⁷ Cs | cesium-137 |
| DERP | Defense Environmental Restoration Program |
| DoD | Department of Defense |
| EAFB | Ellsworth Air Force Base |
| EPC | exposure point concentration |
| EU | exposure unit |
| FUDS | Formerly Used Defense Sites |
| GATR | Ground to Air Transmitter Receiver |
| HRA | health risk assessment |
| ISOCs | in-situ object counting system |
| MARSSIM | Multi-Agency Radiation Survey and Site Investigation Manual |
| NCP | National Contingency Plan |
| NFRAP | No Further Response Action Planned |
| NPL | National Priority List |
| NRC | Nuclear Regulatory Commission |
| PA/SI | Preliminary Assessment/Site Inspection |
| pCi/g | picoCuries per gram |
| PM-1 | Portable Medium Power Range Nuclear Power Plant, Number 1 |
| RI | Remedial Investigation |
| RI/FS | Remedial Investigation/Feasibility Study |
| ROC | radionuclide of concern |
| ROD | Record of Decision |
| SARA | Superfund Amendments and Reauthorization Act |
| SF | slope factor |
| ⁹⁰ Sr | strontium-90 |
| UCL | upper confidence level |
| USAGE | United States Army Corps of Engineers |
| USAF | United States Air Force |

| | |
|-------|---|
| USEPA | United States Environmental Protection Agency |
| USFS | United States Forest Service |
| VOCs | volatile organic compounds |
| WDEQ | Wyoming Department of Environmental Quality |

1.0 Declaration

1.1 Site Name and Location

Facility Name: Former Sundance Air Force Station, PM-1 Reactor Site

Site Location: Sundance, Wyoming

(Geographically Separate Unit: Ellsworth Air Force Base (EAFB), Rapid City, South Dakota)

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) ID Number: WY0009177588

Operable Unit/Site: Off-Site Release

1.2 Statement of Basis and Purpose

This decision document presents the Selected Remedy for the Former Sundance Air Force Station, PM-1 Reactor Site Off-Site Release in Sundance, Wyoming, which was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and to the extent practicable, the National Contingency Plan (NCP). This decision is based on the Administrative Record for this site.

This document is issued by the Department of the Air Force (AF), as the lead agency. The AF is managing contamination at the Off-Site Release in accordance with CERCLA as required by the Defense Environmental Restoration Program (DERP).

As the lead agency, the AF has selected the remedy. The U.S. Environmental Protection Agency (USEPA) and the Wyoming Department of Environmental Quality (WDEQ) concur with the Selected Remedy.

1.3 Description of Selected Remedy

The AF has determined that no unacceptable risk or threat to public health or the environment exists from the Former Sundance Air Force Station, PM-1 Reactor Site Off-Site Release. No action is necessary to protect public health or welfare or the environment.

1.4 Statutory Determinations

No remedial action is necessary to ensure protection of human health and the environment.

Because this remedy will not result in hazardous substances, pollutants, or contaminants remaining from the off-site release above levels that allow for unlimited use and unrestricted exposure, a five-year review will not be required for this remedial action.

1.5 Authorizing Signatures

This signature sheet documents the United States Air Force approval of the remedy selected in this Record of Decision for the Former Sundance Air Force Station, PM-1 Reactor Site, Off-Site Release, Sundance, Wyoming.



MARK E. WEATHERINGTON
Colonel, United States Air Force
Commander, 28th Bomb Wing

27 SEP 11

Date

2.0 Decision Summary

The Decision Summary identifies the Selected Remedy, explains how the remedy fulfills statutory and regulatory requirements, and provides a substantive summary of the Administrative Record file that supports the remedy selection decision.

2.1 Site Name, Location, and Description

The area addressed in this Record of Decision (ROD) is the Former Sundance Air Force Station, PM-1 Reactor Site Off-Site Release (Off-Site Release). The site is listed on the CERCLIS list under identification number WY0009177588.

The Off-Site Release is located approximately 7 miles northwest of Sundance, Wyoming, within the Bear Lodge Mountains, as shown on Figure 2-1. The Off-Site Release is located adjacent to the Former Sundance Air Force Station, PM-1 Reactor Site, in Sundance, Wyoming. Both sites are shown on Figure 2-2. This ROD does not address residual radioactive materials within the PM-1 Reactor Site.

The Former Sundance Air Force Station included the Portable Medium Power Range Nuclear Power Plant, Number 1 (PM-1 Reactor). The Off-Site Release is due to a release of radioactive materials from PM-1 Reactor operations. The release was confirmed in 2000 during the Preliminary Assessment/Site Inspection (PA/SI) (USAF 2006). This study indicated the presence of elevated cesium-137 (¹³⁷Cs) concentrations along the drainage ditch adjacent to the United States Forest Service (USFS) Road 838. A Remedial Investigation (RI) Report (USAF 2007) was completed for the Off-Site Release and showed that elevated ¹³⁷Cs concentrations were restricted to three study areas within the Off-Site Release area as shown in Figure 2-2. An exposure unit (EU) of 21 acres was established during the human health risk assessment (HRA) which was conducted during the RI. The EU boundaries are those of the Off-Site Release (Figure 2-2).

As the lead agency, the USAF has conducted investigation activities at the Off-Site Release in accordance with CERCLA under the Defense Environmental Restoration Program (DERP) which was established by Section 211 of the Superfund Amendments and Reauthorization Act (SARA) of 1986.

As the support agencies, the USEPA Region 8 and WDEQ were provided opportunity to review and comment on substantive activities conducted during the investigations. No formal agreement was established between the USAF and the support agencies.

Funding for remedial activities is provided by the Defense Environmental Restoration Account; a funding source approved by Congress to clean up contaminated sites on U.S. Department of Defense (DoD) installations.

2.1.1 Adjacent Land Use

The Off-Site Release is located entirely on property owned by the USFS and is used for open grazing of cattle and, to a lesser extent, recreational purposes. The private property adjoining a small portion of the site opposite the Off-Site Release is also used for cattle grazing.

The adjacent PM-1 Reactor Site has been retained by the USAF due to the presence of entombed reactor components. This 3.8-acre area is now a geographically separate unit of EAFB, Rapid City, South Dakota and is shown on Figure 2-3. This ROD does not address residual radioactive materials within the PM-1 Reactor Site. Annual monitoring of the PM-1 Reactor Site will continue for at least 75 years from decommissioning (until at least 2044) in accordance with a Public Notice of Contamination filed with Crook County (USAF 1969).

The Warren Peaks area has historically been explored for potential mining opportunities, but there are no active mines identified near the Off-Site Release. Mineral exploration is presently occurring in the Warren Peaks area outside of a ½ mile protective radius of the PM-1 Reactor Site. A restrictive easement preventing blasting activities near the PM-1 Reactor Site is in place on surrounding properties to assure the integrity of the waste entombments at the PM-1 Reactor Site (USAF 1969). These restrictions will be in place until 2044, or that date when the buried radioactive materials are projected to be below the maximum allowable levels for unrestricted access estimated at the time of closure. Therefore, development of future mining operations is restricted.

2.1.2 Near-By Populations

Warren Peak is located in Crook County, which is primarily undeveloped and has a population density of 2.1 persons per square mile (US Census, 2009). During the PA/SI, no residences were located within a 4 mile radius of the Off-Site Release. The site is located on a mountain top and is not conducive to building a permanent residence. Further, there is no access to the area in the winter since the only road to the site (USPS Road 838) is not plowed for snow removal and is administratively closed to wheeled vehicles during the winter months.

The nearest community is Vista West. Vista West is the former USAF housing for the Air Force Station, which been turned over to private interests and is located slightly over 4 miles from the Off-Site Release. Based on aerial photographs, Vista West is comprised of approximately 30 permanent residences and 10 mobile homes.

The closest city is Sundance, Wyoming, which is located approximately 7 miles south southeast of the Off-Site Release. Sundance had a population of 1,161 in the 2000 US census (US Census 2009).

2.1.3 General Surface and Groundwater Resources

The region is drained by the Belle Fourche River and its principle tributaries: Inyan Kara, Miller, and Houston Creeks. The Belle Fourche River is a relatively large, perennial stream; the creeks in the area are mostly dry except during the spring and early summer (USAF 2006).

Most of the groundwater moving out of Crook County is in the form of underflow through artesian aquifers. Groundwater flows eastward into South Dakota, northward into Montana, and some westward into the Powder River Basin. The groundwater in Crook County occurs under both unconfined (water table) and confined (artesian) conditions (USAF, 2006).

Groundwater flow in the Bear Lodge Mountains occurs in shallow aquifers consisting of weathered bedrock and the overlying unconsolidated sedimentary deposits, where present. Due to minimal primary porosity, most of the bedrock groundwater flow occurs in secondary porosity features such as fractures, gas voids, and layered planes of rock sills.

The PM-1 Reactor Site and the Off-Site Release have an extremely limited groundwater recharge area, as they are located near the peak of a mountain. The site is also located in a semi-arid area, which further limits groundwater recharge. This results in a seasonally high water table in the spring following the melting of the snow pack. The water table drops significantly by mid spring and monitoring wells associated with the PM-1 Reactor Site become dry, or nearly dry, during the remainder of the year.

2.1.4 Ecological Resources

Potential ecologic impacts due to the Off-Site Release are considered negligible since the radiation emitted from reactor-related material is much lower than the natural terrestrial radiation produced by the local bedrock in the area of the Off-Site Release. Further, no ecologically sensitive areas were identified since the Off-Site Release consists of a ditch adjacent to a roadway and an area that is used for open grazing under permit to the USPS.

2.2 Site History and Enforcement Activities

This section provides background information and summarizes the series of previous site activities and investigations that led to the ROD. It describes the CERCLA response actions undertaken at the Off-Site Release.

The original release to the environment is believed to be from radiologically-contaminated water stored in a 12,000-gallon aboveground storage tank at the PM-1 Reactor Site. Radionuclide contamination was confirmed on the northeastern slope of the PM-1 Reactor Site during decommissioning in 1969. Surveys of the fenced portion of the PM-1 Reactor Site indicated that the contamination followed a path starting at a 12,000-gallon aboveground storage tank and followed the washout of the slope to the eastern fence line and into the drainage ditch. Following remediation of an area of contamination within the fenced area during decommissioning, the USAF concluded that there was no present danger to personnel or the environment either inside or outside the PM-1 fenced area.

The Off-Site Release was investigated during the 2000 PA/SI of the former PM-1 Reactor Site (USAF 2006). Additional field work was also performed in the fall of 2001 to better characterize conditions adjacent to the PM-1 Reactor Site.

The contaminants associated with the Off-Site Release were defined, characterized and assessed during the RI in 2004. The RI included a HRA. The RI concluded that there is no unacceptable risk to current or potential future receptors following USEPA guidance established for CERCLA-regulated sites.

The USAF Safety Center requested that the RI include a recommendation that the removal of soil be assessed following Nuclear Regulatory Commission (NRC) As Low As Reasonably Achievable (ALARA) principles. The analysis was conducted in 2009 and concluded that no action meets ALARA and supports the No Action decision.

A decision document for the PM-1 Reactor Site and the associated Off-Site Release was issued by USEPA on June 23, 2009, with a decision of No Further Response Action Planned (NFRAP). The document was prepared to record USEPA's determination that no further action is warranted at this time under CERCLA and that the Site is not being considered for inclusion on the National Priority List (NPL). "

There have been no other investigations or enforcement actions associated with the Off-Site Release.

2.3 Community Participation

NCP Section 300.430(f)(3) establishes a number of public participation activities that the lead agency must conduct following preparation of the Proposed Plan and review by the support agency. Components of these items and documentation of how each component was satisfied for the Off-Site Release are described in Tables 2-1 and 2-2 below.

Table 2-1
Public Notification of Document Availability

| Requirement: | Satisfied by: |
|---|--|
| Notice of availability of the Proposed Plan and Remedial Investigation/Feasibility Study (RI/FS) must be made in a general circulation major local newspaper. | <p>Notice of a public meeting discussing the no action decision as well as the availability of additional information (including the Proposed Plan and RI) was published in the Sundance Times.</p> <p>A Feasibility Study was not applicable to the Off-Site Release based on results of the HRA.</p> |
| <p>Notice of availability must include a brief abstract of the proposed plan which describes the alternatives evaluated and identifies the preferred alternative (NCP Section 300.430(f)(3)(i)(A))</p> <p>Notice of availability should consist of the following information:</p> <ul style="list-style-type: none"> • Site name and location • Date and location of public meeting • Identification of lead and support agencies • Alternatives evaluated in the detailed analysis • Identification of preferred alternative • Request for public comments • Public participation opportunities including: <ul style="list-style-type: none"> – Location of information repositories and Administrative Record file – Methods by which the public may submit written and oral comments, including a contact person – Dates of public comment period – Contact person | <p>Notice of availability included all of these components, as applicable, and is included for reference as Appendix A to this ROD.</p> <p>Discussion of alternatives evaluated was not required since the HRA concluded there was no unacceptable risk to current or potential future receptors.</p> |

Table 2-2
Public Comment Period Requirements

| Requirement: | Satisfied by: |
|---|---|
| Lead agency should make document available to public for review on same date as newspaper notification. | Document was made available to the public on April 1, 2010. The notification of availability was made on April 1, 2010 and April 8, 2010. |
| Lead agency must ensure that all information that forms the basis for selecting the response action is included as part of the Administrative Record file and made available to the public during the public comment period. | EAFB maintains the Administrative Record file for the Off-Site Release. All data collected and all CERCLA primary documents produced for the Off-Site Release are maintained as part of this file at the Sundance Public Library located at 414 East Main Street and the Crook County Museum located at 309 Cleveland Street in Sundance Wyoming and are available to the public. |
| CERCLA Section 117(a)(2) requires the lead agency to provide the public with a reasonable opportunity to submit written and oral comments on the Proposed Plan. NCP Section 300.430(f)(3)(i) requires the lead agency to allow the public a minimum of 30 days to comment on the RI/FS and the Proposed Plan and other supporting information located in the administrative record and information repository. | The AF provided a public comment period for the RI and the Proposed Plan from April 7, 2010 to May 7, 2010. |
| The lead agency must extend the public comment period by at least 30 additional days upon timely request. | The AF received no requests to extend the public comment period. |
| The lead agency must provide the opportunity for a public meeting to be held at or near the site during the public comment period. A transcript of this meeting must be made available to the public and be maintained in the Administrative Record and information repository for the site (pursuant to NCP Section 300.430(f)(3)(i)(E)). | A public meeting was held on April 14, 2010 at the Crook County Courthouse located at 309 Cleveland Street, Sundance, Wyoming. A transcript of this meeting has been added to the Administrative Record file and information repository. |

AF responses to comments received during the public comment period are included in the Responsiveness Summary, which is provided as Section 3 of the ROD.

2.4 Scope and Role of Operable Unit or Response Action

As with many large sites, the environmental issues at the Former Sundance Air Force Station are complex. At the same time the AF was assessing the PM-1 Reactor Site, the United States Army Corps of Engineers (USACE) was addressing several other areas of the Former Sundance Air Force Station under the Formerly Used Defense Sites (FUDS) program. Environmental activities were organized into individual areas as described below.

| Site Name | Environmental Concern |
|---------------------------------------|---|
| • Off-Site Release | Contamination of surface soils |
| • PM-1 Reactor Site: | Entombed reactor components. |
| • Formerly Used Defense Sites (FUDS): | <p>Sites separately assessed by the USAGE and shown on Figure 2-1 to include:</p> <ul style="list-style-type: none"> ➤ Former Operations Area, area where the radars and support operations were located atop Warren Peak (CERCLIS ID # WY0010161362) ➤ Ground to Air Transmitter Receiver (GATR) site, an inactive site located near Warren Peak. (CERCLIS ID # WY0010161234) ➤ Cantonment Area, which contained the headquarters and support facilities ➤ Waste Annex, which contained the sewage lagoons for base housing (CERCLIS ID # WY0010161244) ➤ Sundance Water Systems Annex, formerly used to supply water to the Operations Area and PM-1 Reactor. Now called USPS Pump Station which is presently used for stock watering (CERCLIS ID# WY0010161352) |

Off-Site Release: This ROD documents the No Action alternative selected for the Off-Site Release. This alternative is supported by the results of the RI that residual radionuclides associated with the Off-Site Release are present at concentrations that do not require a removal action based on the results of a HRA. Further, concentrations at the Off-Site Release will decrease due to the decay of ¹³⁷Cs, which has a half life of approximately 30 years, and was the only radionuclide present at concentrations high enough to be carried forward in the HRA.

PM-1 Reactor Site: Due to the presence of entombed reactor components, long term monitoring is required at the PM-1 Reactor Site. At the time of decommissioning, the AF filed a Notice of Contamination at the Crook County Courthouse which limited transfer of the PM-1 Reactor Site property and established maintenance and environmental monitoring requirements for the site for at least 75 years, that is, at least until 2044 (USAF 1969). Also, due to the presence of buried radioactive material at the PM-1 Reactor Site, the USAF has issued a Special Nuclear Reactor Permit (USAF-P01E) to the 28th Bomb Wing Commander, EAFB, under the provisions of Section 91b of the Atomic Energy Act of 1954 (USAF 2001). It assigns the responsibility for control, maintenance, and environmental monitoring of the PM-1 Reactor Site to EAFB, South Dakota.

As mentioned earlier, the USEPA issued a decision document for the PM-1 Reactor Site and the associated Off-Site Release on June 23, 2009, with a decision of NFRAP. The decision document stated that the Sundance PM-1 Site "is characteristic of other sites regulated by the Nuclear Regulatory Commission, but exempt from their oversight. The Air Force maintains an internal radiation control and compliance program in lieu of the NRC. The Superfund decision will not affect the Air Force's ongoing management of the nuclear legacy issues at the site." The decision recognizes the AF's long term maintenance and monitoring requirements for the PM-1 Site documented by the Notice of Contamination and the Special Nuclear Reactor Permit.

FUDS: USEPA issued a decision document of NFRAP for each of the five FUDS sites. The purpose of the FUDS program is to address environmental issues at properties no longer owned by the DoD. The AF has no direct responsibilities for FUDS sites and the FUDS sites are not addressed in this ROD.

2.5 Site Characteristics

This section describes the physical characteristics of the Off-Site Release and its surrounding environs. Physical characteristics were primarily defined during the PA/SI (USAF 2006).

2.5.1 Physiography and Climate

The Off-Site Release is located near the top of Warren Peak, which is the tallest of a series of peaks commonly referred to as Warren Peaks. Warren Peaks are located in the south central portion of the Bear Lodge Mountains. The elevation of Warren Peak is 6,637 feet above mean sea level (amsl) and is the highest point in the area. The area evaluated as the Off-Site Release is slightly greater than 21 acres and is confined to the northeastern slope of Warren Peak. The Off-Site Release is located approximately seven miles northwest of Sundance, Wyoming,

Average annual precipitation is 17.41 inches. The average annual air temperature is 43.6 °F with highest and lowest recorded temperatures of 105 °F and -42 °F, respectively (USAF 2006). There is no access to the area in the winter since the only road to the site (USPS Road 838) is not plowed for snow removal and is administratively closed to wheeled vehicles during the winter months.

2.5.2 Geology

Phonolite and trachyte make up most of the Tertiary intrusive rocks that are exposed in the southern Bear Lodge Mountains that include Warren Peaks. The intrusive rocks are extensively fractured and altered by hydrothermal solution activity that occurred during the later part of the Tertiary (USGS, 1983).

The geology of the Off-Site Release is based on observations made during subsurface boring and geophysical surveys during the PA/SI.

The borings indicate that the unconsolidated material overlies weathered bedrock. The unconsolidated material is comprised of either fill associated with the construction and/or decommissioning of the PM-1 Reactor or the construction of the adjacent road way. In general, the fill is composed of coarse-grained materials (sand and gravel). Natural unconsolidated material is generally composed of soil derived from the weathering of bedrock.

Weathered/fractured bedrock is generally encountered at depths of less than 20 feet from the surface, with the exception of the borings placed immediately adjacent to the former reactor, where extensive fill is present.

2.5.3 Hydrogeology

The Off-Site Release area has a limited groundwater recharge area as it is located near the peak of a mountain. Warren Peaks are located in a semi-arid area, which further results in limited water recharge. This creates a seasonal water table that is highest in the spring following the melting of the snow pack. The primary source of groundwater is snowmelt infiltrating through the fill and/or natural overburden. Groundwater then infiltrates into the natural unconsolidated soil that is derived from the weathering of bedrock and into the fracture systems in the underlying bedrock (USAF, 2006).

Based on the regional topography, it is anticipated that groundwater discharges to the sedimentary deposits within the Beaver Creek and Lytle Creek valleys. Potential flow pathways include discharge to unconsolidated soil associated with this valleys, discharge directly to the surface as a spring, and/or discharge to a deeper aquifer. Groundwater elevation measurements on the PM-1 Reactor Site indicate a steep groundwater gradient to the east toward Beaver Creek Valley.

No groundwater resources capable of supporting a residential well have been identified at the Off-Site Release.

2.5.4 Surface Water Hydrology

Surface water runoff from the Off-Site Release is directed to either Beaver Creek or Lytle Creek, which are generally dry except in the spring. Beaver Creek is a gaining stream with surface flow originating approximately 2,000 feet east of the Off-Site Release. Beaver Creek receives runoff from the Off-Site Release east of USPS Road 838. The remainder of the Off-Site Release area, including the drainage ditch adjacent to USPS Road 838, flows to Lytle Creek, which is located northwest of the PM-1 Site.

2.5.5 Ecology

Based on the limited magnitude and extent of contamination, a review of sensitive populations and threatened or endangered species was unwarranted.

2.5.6 Previous Site Characterization Activities

- The Off-Site Release was investigated in part during the 2000 PA/SI of the former PM-1 Reactor Site (USAF 2006). Limited soil borings were advanced in the Off-Site Release area and ^{137}Cs was detected in surface soil samples. The highest concentration was located in the drainage ditch just outside the PM-1 Site fence. The PA/SI recommended that further environmental investigation be conducted to characterize the off-site release.
- An Expanded PA/SI was performed in August and September 2001. A Radiologic Scoping Survey following the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) was conducted to define surface soil radiological impacts (USEPA 2000). The investigation included *in-situ* gamma spectroscopy measurements with an In-Situ Object

Counting System (ISOCS ®) high-purity germanium detector, collection and analysis of 20 surface soil samples to define the extent of the ^{137}Cs release, and confirmation surface soil samples to verify results from the PA/SI. The Expanded PA/SI Report concluded that ^{137}Cs was present off site above background concentrations and was generally restricted to a surface drainage flow pathway that follows a ditch and other natural drainage features. ^{137}Cs was also elevated at one location east of USPS Road 838 (USAF 2002).

- Sampling for the RI was conducted in 2004. 177 surface soil samples were collected and analyzed for ^{137}Cs to determine the extent of contamination as well as background concentrations. Samples from 50 surface soil locations were also analyzed for strontium-90 (^{90}Sr). The RI included subsurface sampling at 21 locations with analysis for both ^{137}Cs and ^{90}Sr . Based on the analytical results of the RI, the magnitude and extent of the Off-Site Release were defined. The HRA, performed with the RI, indicated no unacceptable risks to current or potential future human receptors and no action was recommended.

2.5.7 Nature and Extent of Contamination

Information from the PA/SI resulted in the conclusion that ^{137}Cs and ^{90}Sr were the only chemicals/radionuclides of potential concern (C/ROPCs) associated with the Off-Site Release. ^{90}Sr likely was present at the time of release in concentrations similar to ^{137}Cs because both are produced as fission products at similar rates (yield per fission is about 4.5 percent for ^{90}Sr and about 6.3 percent for ^{137}Cs). Therefore, ^{90}Sr was considered a ROPC in the RI. However, because of its much higher environmental mobility in comparison to that of ^{137}Cs , it was expected that ^{90}Sr soil concentrations measured at the time of the RI would be very low or undetectable. The RI indicated that ^{90}Sr was not present at concentrations statistically elevated above background. Thus, only ^{137}Cs was assessed in the HRA.

The ^{137}Cs and ^{90}Sr analytical results from the PA/SI and RI are provided in summary tables included in Appendix B along with figures showing the sample locations. Results were compared to the background threshold values of 3.4 pCi/g for ^{137}Cs and 3.2 pCi/g for ^{90}Sr .

The ^{137}Cs RI surface soil results are summarized below for the three study areas shown in Figure 2-2. The study areas were established to create a systematic sample grid for collection of surface soils during the RI field investigation. The areas were established based on observations in the PA/SI that indicated ^{137}Cs was present, but that the magnitude and extent was not defined. An exposure unit (EU) that included the three study areas was established as the typical exposure area for a rural resident. Guidance from the USEPA stated that a rural residence is up to 35 acres. The EU was established as 21 acres and constitutes the boundaries of the Off-Site Release.

Drainage Ditch (Study Area 1): Thirty-one soil samples were collected systematically in the drainage ditch. The samples were collected from the center of the ditch at intervals of approximately 30 feet. The detections ranged from (0.30 ± 0.10) pCi/g to (92 ± 11) pCi/g. Nineteen biased samples were collected adjacent to the systematic sample locations. Samples collected next to sampling points along USPS Road 838 ranged from (0.28 ± 0.11) pCi/g to (17 ± 2.2) pCi/g. The results indicated that ^{137}Cs was restricted to confined drainage flow pathways from the PM-1 Reactor Site.

Huchins Meadow Hillside (Study Area 2): Forty-two systematic samples were collected on the Huchins Meadow Hillside. The sample results ranged from not detected to (22.1 ± 2.8) pCi/g, with six of the 42 samples exceeding background. The highest concentrations were observed along the drainage pathway from the PM-1 Reactor Site. The ^{137}Cs dissipated to background concentrations within this study area indicating the extent of the impacted area associated with the Off-Site Release.

East Meadow Hillside (Study Area 3): Thirty systematic samples were collected on the East Meadow Hillside downslope of the PM-1 Site. The sample results for ^{137}Cs ranged from not detected to (10.6 ± 1.4) pCi/g, with seven of the sample results exceeding the background value. All results that exceeded background were in the row closest to USPS Road 838 and were generally across the road from where the highest concentrations of ^{137}Cs were observed in the Drainage Ditch. The results showed that the impacts were limited to the area next to USPS Road 838 and did not extend down the hillside.

Residential Exposure Unit: Twenty biased samples were collected in the residential EU outside of the study areas. The ^{137}Cs concentrations ranged from (0.66 ± 0.16) pCi/g to (3.85 ± 0.54) pCi/g. No ^{137}Cs detections were attributed to PM-1 Reactor operations.

All subsurface soil results were less than the surface background threshold value of 3.4 pCi/g and the results were not carried forward into the HRA. A total of 13 subsurface soil samples were collected from seven soil borings during the RI for site characterization and eight were collected for background characterization. Cesium-137 was detected in five of the seven study area borings at concentrations ranging from (0.31 ± 0.13) pCi/g to (1.22 ± 0.22) pCi/g, which are below the background threshold value.

Based on limited magnitude and extent of contamination, no groundwater or surface water samples were collected as part of the Off-Site Release investigations. Both groundwater and surface water are sampled annually due to permit requirements for the PM-1 Reactor Site.

2.5.8 Conceptual Exposure Model

A conceptual exposure model (CEM), referred to as a conceptual site model (CSM) in the original Sundance documentation, was developed to depict the potential relationship or exposure pathway between contaminant sources and receptors. An exposure pathway describes the means by which a receptor can be exposed to contaminants in environmental media. These pathways were developed as part of the RI and are presented in Figure 2-4, based upon current and reasonably likely future land uses and the potential use of groundwater and surface water at the Off-Site Release (USAF 2007).

2.6 Current and Potential Future Land Use and Resource Uses

A determination has been made that no land use controls are required for the Off-Site Release. This decision is based on the HRA that concluded that there is no unacceptable risk to current or potential future receptors.

The current land use of the Off-Site Release is open grazing of cattle and, to a lesser extent, recreational purposes and is expected to remain the same for the foreseeable future.

2.6.1 Ground and Surface Water Beneficial Uses

Groundwater is seasonally present in the vicinity of the Off-Site Release in weathered and/or fractured bedrock as described in Section 2.5.3. The groundwater is not likely to be affected by site contamination due to limited magnitude and extent of impact and the immobile nature of ¹³⁷Cs. Groundwater likely discharges to colluvium and alluvium deposits in the valley associated with Beaver Creek or Huchins Spring (Lytle Creek), where it is used for stock watering.

The closest surface water to the Off-Site Release is Beaver Creek and Lytle Creek, which are perennial streams as described in Section 2.5.4. Both creeks are included in the annual monitoring of the PM-1 Reactor Site and no impacts have been observed which were attributed to either the PM-1 Reactor operations, which would include the Off-Site Release.

2.7 Summary of Site Risks

This section provides the primary basis for the No Action decision. This decision is based on the HRA performed at the Off-Site Release which concluded that unacceptable exposures to hazardous substances will not occur.

Due to the limited magnitude and extent of impacts, no ecological risk assessment was conducted for the Off-Site Release.

2.7.1 Summary of Human Health Risk Assessment

The baseline risk assessment estimates what risks the site poses if no action were taken. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action. This section of the ROD summarizes the approaches used and the results of the baseline risk assessment for this site. The HRA is divided into the following sections: identification of the radionuclide of concern (ROC) (hazard assessment), exposure assessment, toxicity assessment, and risk characterization. Potential risks for both current and future site occupants are discussed. Key assumptions and uncertainties associated with the HRA are also identified.

2.7.1.1 Identification of Chemicals of Concern

This section describes the process for identifying the single ROC selected for evaluation in the HRA. Although other chemicals and radionuclides were detected at the site, only ¹³⁷Cs was present at concentrations that required further evaluation. The data used in this risk assessment was deemed to be of sufficient quality and quantity for its intended use. The detection frequency (number of samples in which the chemical was detected divided by the total number of samples analyzed), range of detected concentrations (maximum and minimum concentrations detected), the exposure point concentrations (EPC) (the calculated or assumed concentration of the chemical at the assumed location of exposure), and the screening concentration (concentration above which the chemical is believed to possibly present a risk to human health or the environment and thus require further evaluation) for chemicals and media of concern are presented in Table 2.3.

Table 2-3
Summary of Chemicals of Concern and Medium-Specific Exposure Point Concentrations

| Area Sampled (Surface Soil) | Radionuclide of Concern | Concentration Detected | | Units | Frequency Of Detection | Exposure Point Concentration | Screening Concentration |
|--|----------------------------|---------------------------|------|-------|---------------------------|---------------------------------|----------------------------|
| | | Min | Max | | | | |
| Background | ¹³⁷ Cs | 0.61 | 3.9 | pCi/g | 30/30 | | |
| Drainage Ditch (Area 1) | ¹³⁷ Cs | 0.44 | 38.4 | pCi/g | 23/23 | 18 | Not established |
| Huchins Meadow (Area 2) | ¹³⁷ Cs | 0.57 | 66.7 | pCi/g | 42/43 | 20.6 | Not established |
| East Meadow (Area 3) | ¹³⁷ Cs | 0.42 | 64.9 | pCi/g | 33/34 | 6.3 | Not established |
| Remainder of EU | ¹³⁷ Cs | 0.18 | 3.8 | pCi/g | 32/33 | 2.1 | Not established |
| Entire EU ¹ | ¹³⁷ Cs | 0.18 | 66.7 | pCi/g | 130/133 | 2.87 | Not established |
| Key ¹³⁷ Cs Cesium-137 EU Exposure unit pCi/g picocuries per gram ¹ An area weighted EPC of 2.87 pCi/g was established for the entire EU using the EPCs calculated for the individual study areas. | | | | | | | |

A screening risk analysis was performed to select C/RPOCs. This was conducted during the PA/SI by reviewing state and federal screening criteria for the analytes detected and known reactor operations. During this analysis, the analytical data associated with the annual monitoring associated with the Special Nuclear Reactor Permit of groundwater and surface water was also reviewed. Based on the screening risk analysis the PA/SI concluded:

- No volatile organic compounds (VOCs) exceeded state or federal screening values and were omitted for further consideration in all media sampled (soil, sediment, groundwater and surface water).
- The PA/SI results indicated elevated levels of ¹³⁷Cs and ⁹⁰Sr in the soil and in the road ditch adjacent to the USPS Road and were therefore identified as ROPC in soil and sediment. Carbon-14, nickel-63, and tritium were also sampled in soil and sediment, but were not sufficiently elevated to be carried forward as ROPC.
- The annual monitoring results for radionuclides in groundwater and surface water did not suggest a release to these media from the off-site release.

Cesium-137 and ⁹⁰Sr were assessed in soil and subsurface soil in the RI. The RI results indicated that the only statistically elevated radionuclide was ¹³⁷Cs in surface soil. In conclusion, ¹³⁷Cs is the only radionuclide of concern and no chemicals of concern were present.

An area weighted approach was used to calculate the EPC for the entire EU. The upper confidence level (UCL) on the mean concentration is the recommended EPC for a site (USEPA 2004). The UCL was calculated separately for Study Areas 1, 2, and 3 and the remainder of the EU. A single value for the entire EU was then calculated as a weighted-average concentration based on the size of each of these study areas to the entire EU. This approach assumes equal access to the entire EU. An area weighted exposure point concentration of 2.87 pCi/g was established for the EU to evaluate the human health risk for all receptors to the Off-Site Release.

2.7.1.2 Exposure Assessment

This section documents the populations and exposure pathways that were quantitatively evaluated in the risk assessment. A CEM was developed to aid in determining reasonable exposure scenarios and pathways of concern; this CEM is shown in Figure 2-4. As described in this section, both current and future populations have been evaluated based on current and reasonably anticipated future land use. The contaminated media to which people may be exposed is also discussed.

Only complete exposure pathways are evaluated in risk assessments. The CEM identified three complete exposure pathways:

- Incidental ingestion of ^{137}Cs in surface soil.
- Inhalation of re-suspended ^{137}Cs in fugitive dusts.
- External exposure to gamma radiation from ^{137}Cs in surface soil.

The current exposure source is residual off-site soil contamination that likely resulted from a release that occurred during operations or during decommissioning of the PM-1 Reactor. The present release mechanism to the environment is runoff and infiltration of surface water and/or groundwater in contact with the impacted soil. Environmental media potentially affected by this mechanism include surface soil, subsurface soil and groundwater. No other primary release mechanisms were identified. Two secondary release mechanisms were identified: the release of fugitive dust from impacted surface soil and recharge of groundwater to surface water and sediment. All food ingestion pathways (consumption of produce, livestock, and game) were identified as secondary pathways.

Three potential receptors were identified: (1) a recreational user who camps within the site, (2) a rancher who repairs water lines or fences within the site, and (3) a resident who builds a home within the site. The recreational user and the rancher were selected to represent the most likely exposure based on current and likely future use of the site. Presently, no residents are located near the impacted area and the property is owned by the USPS. Therefore, development of the impacted area for residential use in the near future is unlikely. However, a future resident was used as a maximally exposed receptor. The resident was evaluated for future use only since there are currently no residents within the EU. The future resident was assessed for both an adult and child living within the EU. In the exposure assessment, the risks of the child and adult residents were summed to estimate the total incremental lifetime cancer risk to this receptor from exposure to contaminants while living within the EU.

The Off-Site Release, or EU, is located near a mountaintop in a semi-arid region which makes many potential exposure pathways insignificant or incomplete. Due to the high elevation, short growing season, poor quality soil, and dry climate, the raising of produce for consumption was considered as a complete but not significant pathway. Ingestion of livestock and game is possible, but the impacted area of the Off-Site Release is not extensive enough to comprise a significant portion of the animal's diet so these pathways were considered not significant. The streams near Warren Peaks are intermittent and cannot support a fish population.

Water for the PM-1 operational site was piped from another source approximately two miles away. No groundwater resources capable of supporting a residential well have been identified at the Off-Site Release. Therefore, the groundwater pathway was considered incomplete.

Ingestion of surface water and sediment were considered potentially complete pathways but not significant. Surface water located as close as ½ mile from the site has been monitored annually in association with the requirements of the Special Nuclear Reactor Permit since the decommissioning of the reactor and has shown no impacts from PM-1 Reactor operations including the Off-Site Release.

Incidental ingestion of subsurface soil was considered a complete pathway, but not significant for residential exposure because sampling showed contaminant concentrations in subsurface soil are negligible.

An individual's radiation exposure dose is dependent upon:

- The concentration of the radionuclide at the point of exposure
- The extent of contact that the individual has with the contaminated medium
- The frequency with which the individual comes into contact with the contaminated medium
- The duration of exposure

For this assessment, default values incorporated into USEPA *Radionuclide Preliminary Remediation Goals (PRGs)* (EPA 2002) were used for the mral resident. Default as well as site-specific parameters were used for the ranching and recreational scenarios. Site-specific parameters were chosen by consensus at a June 2003 Project Managers' meeting that included representatives from the USACE, USAF, USEPA and the WDEQ.

No sensitive subpopulations (highly exposed and/or more susceptible receptors) that may be exposed were identified.

2.7.1.3 Toxicity Assessment

This section describes the toxicity criteria used to calculate the potential risk for the single ROC, ¹³⁷Cs at the Off-Site Release. The EPA classified all radionuclides as Group A (known human) carcinogens, based on their property of emitting ionizing radiation and on the extensive weight of evidence provided by studies of radiogenic cancers in humans. Toxicity data for ¹³⁷Cs is presented in Table 2.4. Separate toxicity criteria are listed for ingestion (oral intake, swallowing), inhalation (breathing into the lungs), and external (gamma radiation emitted by ¹³⁷Cs in surface soils) routes of exposure. For carcinogenic ROCs, the toxicity criteria is the slope factor, which is an estimate of the probability of radiogenic cancer mortality (fatal cancers) or morbidity (fatal plus nonfatal cancers) per unit activity of a given radionuclide inhaled or ingested, for internal exposure, or per unit time-integrated activity concentration in air or soil, for external exposure (USEPA 2001a). The weight of evidence/cancer guideline description is a descriptor, provided by the USEPA classifying the degree of confidence that the chemical is a human carcinogen. Slope factors and weight of evidence/cancer guideline descriptions are listed in Table 2.4 along with the source of each slope factor and date of its publication.

The isotope ¹³⁷Cs is a fission product produced by nuclear reactors and nuclear weapons detonations. It is rapidly absorbed into the blood stream and distributes fairly uniformly throughout the body's soft tissues.

Table 2-4
Cancer Toxicity Data Summary for ¹³⁷Cs

| Exposure Pathway | Slope Factor ¹ | Units | Weight of Evidence/Cancer Guideline Description | Source ² | Date |
|---------------------------------|---------------------------|---------------------|---|---------------------|----------------|
| Soil ingestion (residential) | 4.33E-11 | Risk/pCi | Group A | HEAST | April 16, 2001 |
| Soil ingestion (camper/rancher) | 3.17E-11 ³ | Risk/pCi | Group A | PRG | 2002 |
| Inhalation of particulates | 1.19E-11 | Risk/pCi | Group A | HEAST | April 16, 2001 |
| External exposure | 2.55E-06 | Risk/year per pCi/g | Group A | HEAST | April 16, 2001 |

Notes:

¹ Lifetime excess total cancer risk per unit of intake or exposure.

² HEAST is *Health Effects Assessment Summary Tables for Radionuclides* (USEPA, 2001b). PRG is the Radionuclide Preliminary Remediation Goal Calculator website (USEPA, 2002).

2.7.1.4 Risk Characterization

This section of the risk assessment combines the results of the exposure assessment with the toxicity criteria identified for the ROCs and pathways. Carcinogenic risks for ¹³⁷Cs are presented for all populations and media of interest, including both current and future land use settings. Cumulative risks, including all ROCs and pathways, for all relevant pathways and populations are also described. These risk estimates are summarized in Tables 2-5. The results of the human health risk assessment are interpreted within the context of the CERCLA acceptable risk range.

The major uncertainties affecting the risk assessment are also presented in this section.

For carcinogens, risks are generally expressed as the incremental probability of an individual's likelihood of developing cancer over a lifetime as a result of exposure to the carcinogen. The following equations were used to obtain numerical estimates of incremental lifetime cancer risks.

For the ingestion and fugitive dust inhalation pathways:

$$\text{Risk} = \text{Intake (pCi)} \times \text{SF (pCi)}^{-1}$$

For the external radiation exposure pathway:

$$\text{Risk} = \text{Exposure (pCi-yr/g)} \times \text{SF (risk/year per pCi/g)}$$

Where:

Risk = a unitless probability (e.g., 2×10^{-5}) of an individual's likelihood of developing cancer

Intake = Radionuclide intake

Exposure = External radiation exposure

SF = slope factor

These risks are probabilities that usually are expressed in scientific notation (e.g., 1×10^{-6}). An excess lifetime cancer risk of 1×10^{-6} indicates that an individual experiencing the reasonable

maximum exposure estimate has a 1 in 1,000,000 chance of developing cancer as a result of site-related exposure. This is referred to as an "excess lifetime cancer risk" because it would be in addition to the risks of cancer individuals face from other causes such as smoking or exposure to too much sun. The chance of an individual's developing cancer from all other causes has been estimated to be as high as one in three. EPA's generally acceptable risk range for site-related exposure is 10^{-4} to 10^{-6} (1 in 10,000 to 1 in 1,000,000).

A summary of receptor-specific cancer risks from exposure to ^{137}Cs in surface soils is provided in Table 2-5. The risks for each evaluated receptor are discussed below:

Current and Future Rancher - The total excess cancer risk to the current and future rancher was 1.5×10^{-7} , which is less than 10^{-6} , the USEPA's cancer risk level of no concern. External radiation exposure accounts for 99.7 percent of this receptor's total risk.

Current and Future Recreational User - The total excess cancer risk to the current and future recreational users was 4.1×10^{-6} , which is within USEPA's acceptable cancer risk range of 10^{-6} to 10^{-4} . External radiation exposure also accounts for most of the risk to this receptor (99.9 percent).

Future Resident - The total excess cancer risk to the future resident (childhood and adult risks combined) was 5.3×10^{-5} , which is within USEPA's acceptable cancer risk range of 10^{-6} to 10^{-4} . External radiation exposure accounts for 99.8 percent of this risk.

The total incremental lifetime cancer risks for all receptors evaluated in this risk assessment are below or within the USEPA Region 8's acceptable risk range of 10^{-6} to 10^{-4} . These results indicate that ^{137}Cs concentrations in surface soils at the EU do not pose an unacceptable risk to current or potential future receptors.

In addition to the quantitative assessment discussed above, a qualitative assessment was also conducted. A quantitative assessment yields a numeric value based on mathematical formulas; whereas, a qualitative assessment is based on scientific judgment and other factors not expressed as mathematical formulas. A qualitative assessment is performed since uncertainties are inherent in the quantitative risk assessment process which is conditional upon the quality of data and models used to identify C/ROPCs and estimate exposure concentrations, the assumptions made in estimating the exposure conditions, and the methods used to develop toxicity factors. Uncertainties could result in an overestimation or underestimation of risk.

Uncertainties that were considered to potentially have a high magnitude of effect include:

- All receptors were assumed to have equal access to the entire EU. However, the highest concentrations of the ROPCs were confined to relatively small areas. The weighted-average approach takes this into account. Receptors may, in fact, not access the entire site, but only certain areas, which may result in higher or lower EPCs than the one used in this risk assessment.

- The USEPA stated that the typical exposure area for a rural resident is up to 35 acres, compared to the 21 acres of the EU. The smaller total acreage results in a higher total weighted-average concentration.
- Although the USPS allows a camping frequency of 14 days/year in the general area, no signs of camping, such as fire rings, have been observed in or near the EU. Risks to current or hypothetical future campers are likely overestimated.
- Since the EU is open for grazing, a rancher could visit the site more often to check herds or repair fences, making the risk potentially underestimated for this receptor. However, it is unlikely that a single rancher would perform these activities for 30 years, which indicates the risk could be overestimated.
- The residential scenario is the most conservative of the three scenarios evaluated. There are presently no residents living near the EU. The property is currently owned by the USPS, so residents are not likely to be exposed to any contamination at the EU in the near future.

The risk assessment indicates that for all receptors, over 99 percent of the estimated total excess lifetime cancer risk from the EU is external radiation (See Table 2-5). The source of the external radiation exposure is the emission of gamma and high-energy beta radiation emitted from the ground surface. This is the same type of radiation that can be measured using hand held field equipment. These surveys are sensitive to both the gamma-emitting reactor-related isotopes, primarily ^{137}Cs , and naturally occurring isotopes in the soil and bedrock and are direct indicators of the radiation received by an individual from external radiation.

Site surveys conducted as part of the PA/SI and RI were more influenced by the geologic conditions than the release pathway. This indicates that the primary source of the external radiation to a receptor in this area is from natural geologic materials. Also, the geologic conditions contributing to the elevated external radiation extend over an area of approximately 10 square miles, and the EU is 21 acres. Based on these observations, it is reasonable to conclude that only a very small percentage of the total dose of radiation received by individuals in the EU would be related to the Off-Site Release.

Table 2-5
Risk Characterization Summary from Exposure to ¹³⁷Cs in Surface Soils

| Exposure Pathway | Exposure Dose (pCi) ¹ | Slope Factor (Risk/pCi) ¹ | Pathway-Specific Cancer Risk ² | Pathway-Specific Percent of Total Risk |
|---|----------------------------------|--------------------------------------|---|--|
| Current and Future Rancher⁴ | | | | |
| Incidental Ingestion of Soil | 12.5 | 3.17E-11 | 4.0E-10 | < 1 |
| Inhalation of Fugitive Dusts | 0.008 | 1.19E-11 | 9.5E-14 | < 1 |
| External Radiation Exposure | 0.057 | 2.55E-06 | 1.5E-07 | 99.7 |
| Total Receptor Cancer Risk | | | 1.5E-07 | |
| Current and Future Recreational User⁴ | | | | |
| Incidental Ingestion of Soil | 87.3 | 3.17E-11 | 2.8E-09 | < 1 |
| Inhalation of Fugitive Dusts | 0.218 | 1.19E-11 | 2.6E-12 | < 1 |
| External Radiation Exposure | 1.60 | 2.55E-06 | 4.1E-06 | 99.9 |
| Total Receptor Cancer Risk | | | 4.1E-06 | |
| Future Resident^{3,4} | | | | |
| Incidental Ingestion of Soil | 2620 | 4.33E-11 | 1.1E-07 | < 1 |
| Inhalation of Fugitive Dusts | 0.845 | 1.19E-11 | 1.0E-11 | < 1 |
| External Radiation Exposure | 20.7 | 2.55E-06 | 5.3E-05 | 99.8 |
| Total Receptor Cancer Risk | | | 5.3E-05 | |

Notes:

- ¹ The units of the exposure dose for external radiation exposure are pCi-yr/g, and the units for the external radiation slope factor are risk/yr per pCi/g.
- ² The pathway-specific cancer risk is the product of the exposure dose and the slope factor.
- ³ The exposure doses for the future resident are the sum of the child and adult exposure doses.
- ⁴ The total time of exposure was 30 years.

2.7.2 Summary of Ecological Risk Assessment

Due to the limited magnitude and extent of impacts, no ecological risk assessment was conducted for the Off-Site Release.

2.8 Documentation of Significant Changes

No changes were made to the selected remedy.

3.0 Responsiveness Summary

This section provides a summary of the public comments regarding the Proposed Plan for remedial action at the Off-Site Release, EAFB and the Air Force response to comments. At the time of the public review period, the AF had selected No Action as the preferred alternative for the site.

No written comments were received during the public comment period

3.1 Stakeholder Comments and Lead Agency Responses

One Stakeholder comment was received during the comment period. No response or change to the Proposed Plan was required. The comment received was from the USPS as follows:

Thank you for the opportunity to review and comment on your proposed plan for Former Sundance Air Force Station, PM-1 Off-Site Release. After review by staff from the Bearlodge Ranger District in Sundance, WY and the Supervisor's Officer in Custer, SD, we are in full support of the project and proposed actions.

Claudia C. Hill, P.E.
Physical Resources Staff Officer
Black Hills National Forest
605-673-9204

3.2 Technical and Legal Issues

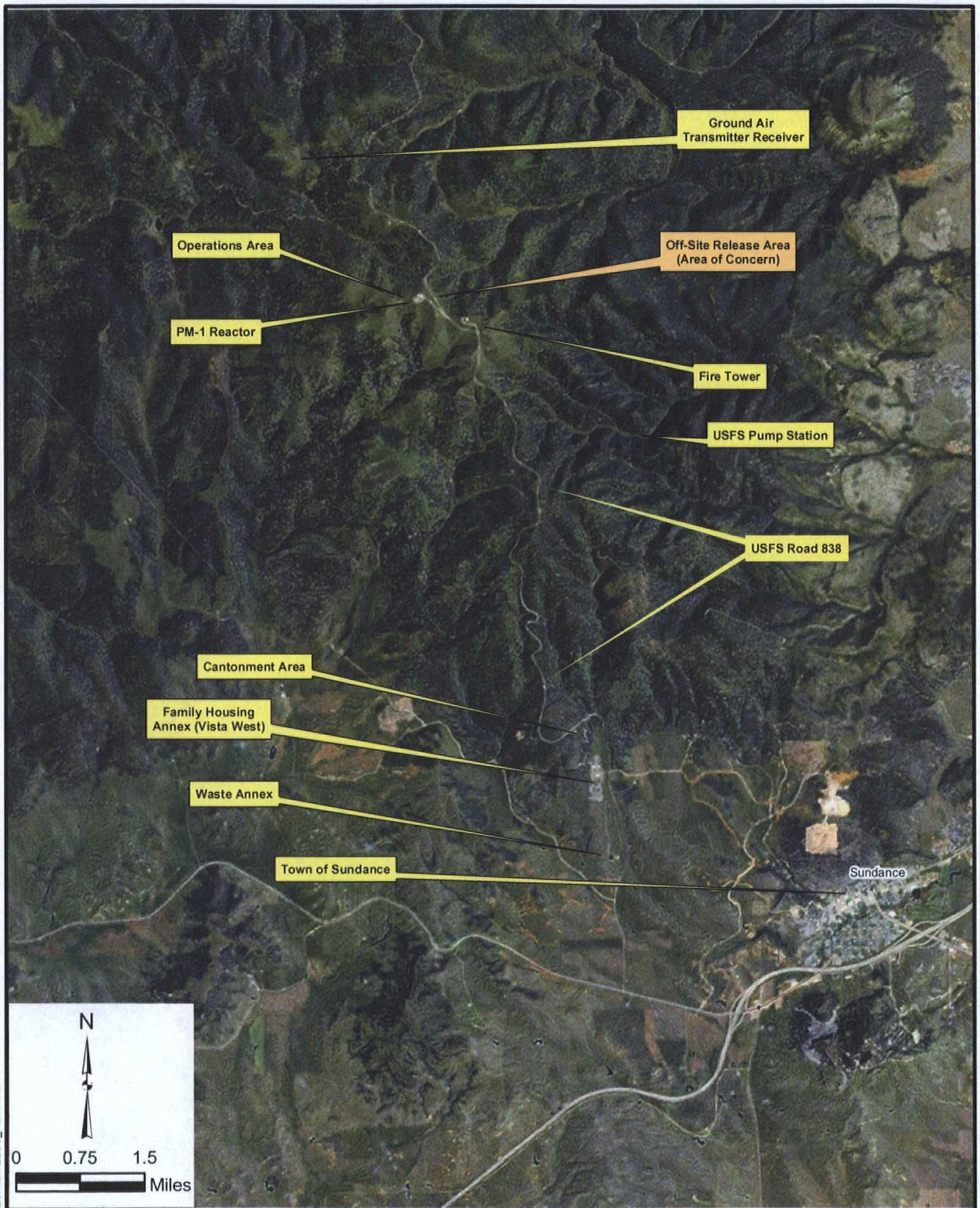
No technical or legal issues were identified during the public review period of the Proposed Plan.

4.0 References

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United States Geological Survey (USGS). 1983. *Geology and Description of Thorium and Rare-Earth Deposits in the Southern Bear Lodge Mountains, Northeastern, Wyoming Geological Survey Professional Paper 1049-D*. United States Government Printing Office, Washington D.C.

Figures



Source: Figure adapted from Wyoming Natural Resource Clearinghouse data.

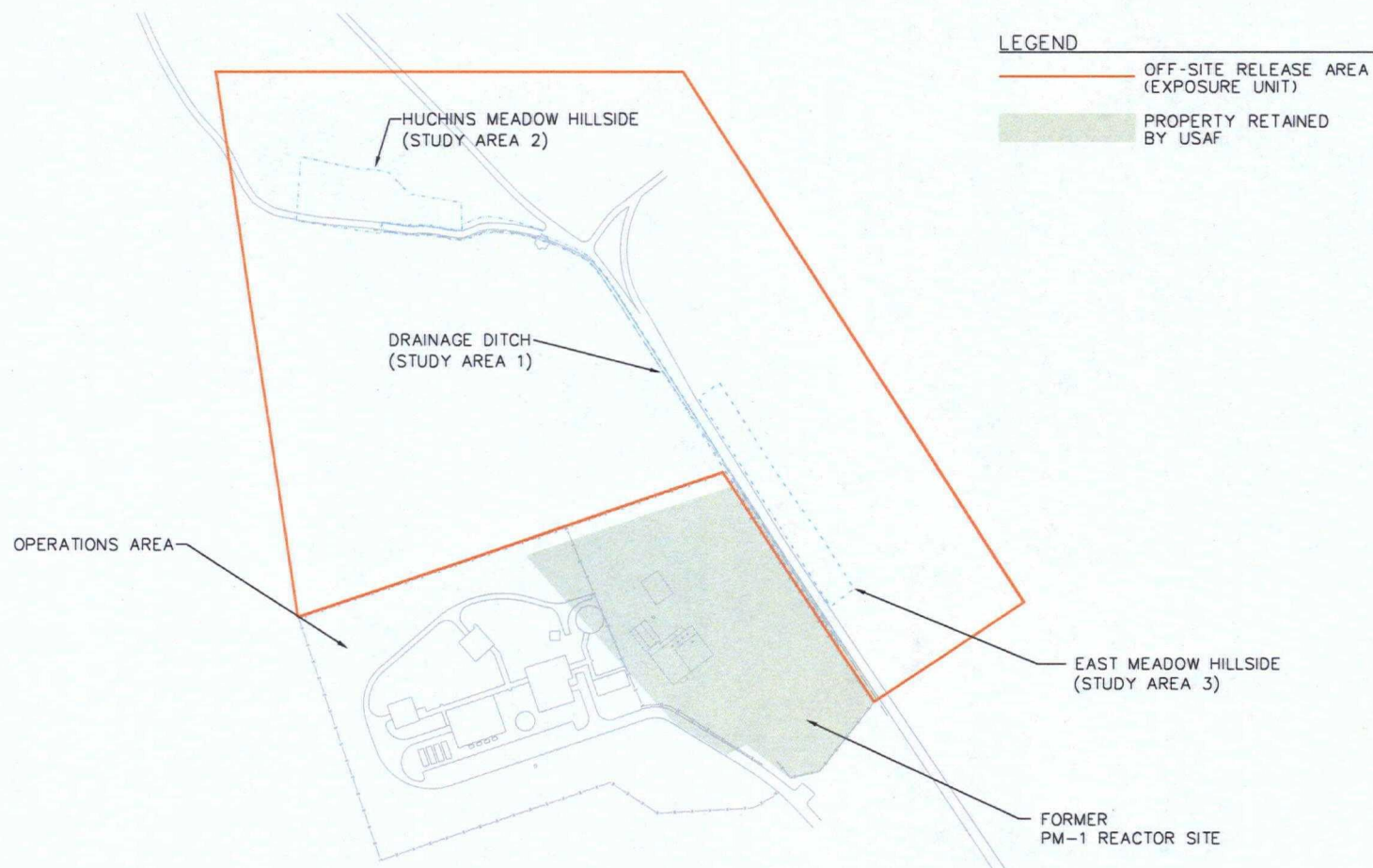
EARTH TECH | **AECOM**

FIGURE 2-1 SITE LOCATION MAP

FORMER SUNDANCE AIR FORCE STATION
SUNDANCE, WYOMING

OCTOBER 2010

60135669



EARTH TECH

AECOM

FIGURE 2-2
OFF-SITE RELEASE
(EXPOSURE UNIT)
FORMER SUNDANCE AIR FORCE STATION
SUNDANCE, WYOMING
OCTOBER 2010 60135669

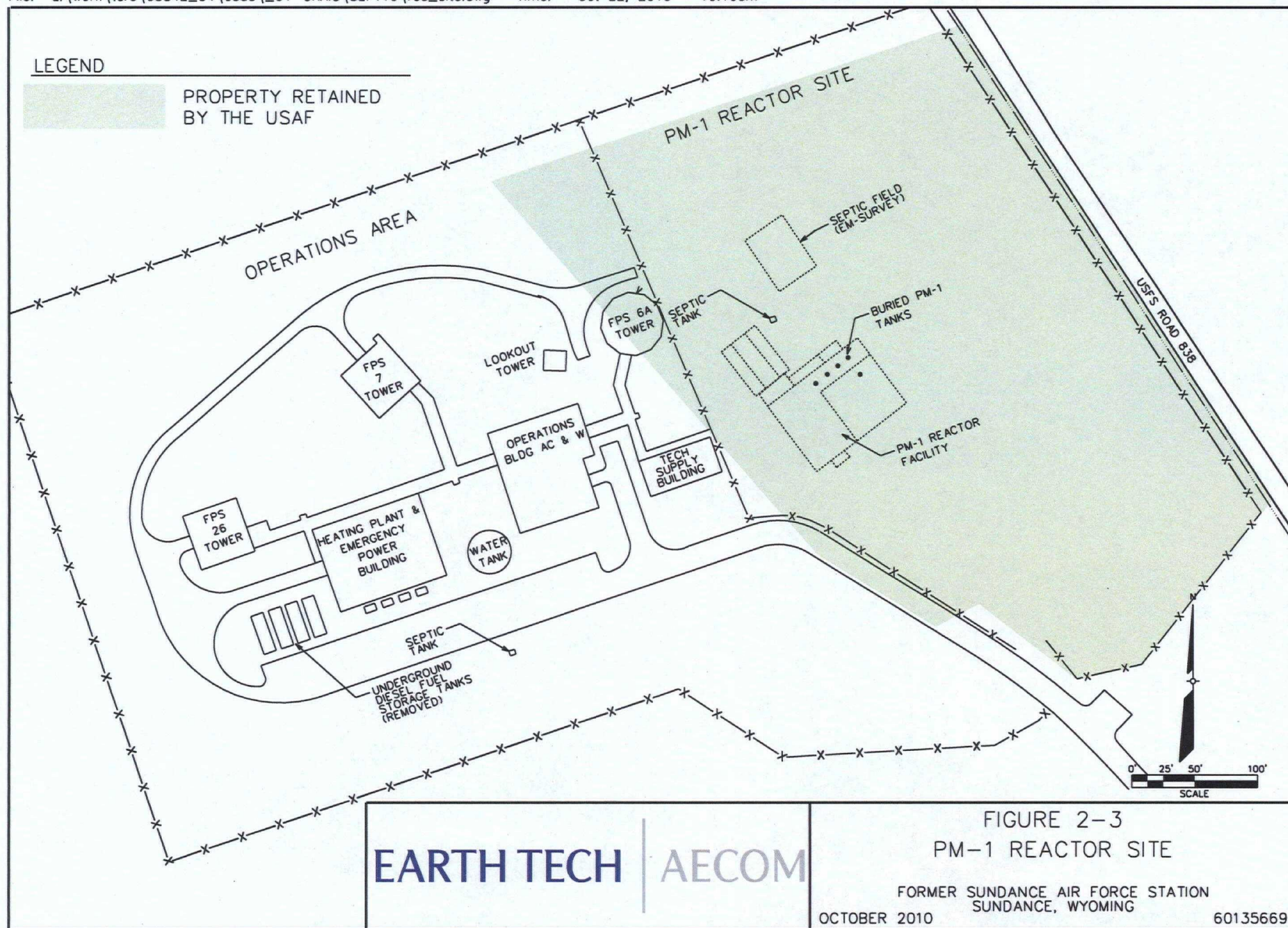
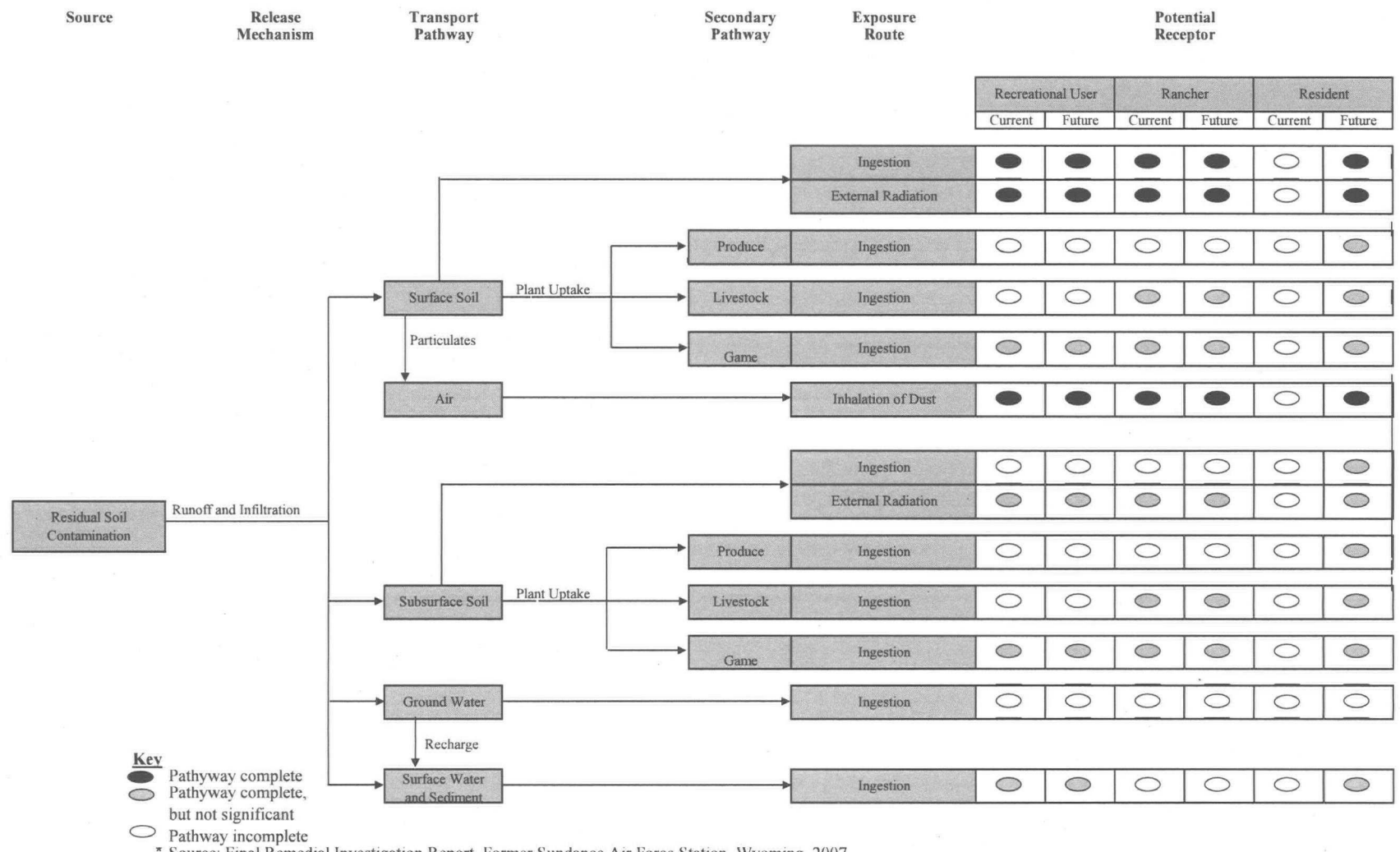


Figure 2-4
Conceptual Exposure Model*
Off-Site Release



* Source: Final Remedial Investigation Report, Former Sundance Air Force Station, Wyoming, 2007

Appendix A

Advertisement for the Public Meeting

Ellsworth Air Force Base, South Dakota invites its Sundance, Wyoming Neighbors to attend a

Public Meeting

Wednesday/April 14/7:00 PM
Community Room located in the basement of
the Crook County Courthouse
309 Cleveland Street, Sundance, Wyoming

Ellsworth Air Force Base is holding a public meeting to discuss the environmental activities at the former Sundance Air Force Station PM-1 Site located on Warren Peak in the Bearlodge Mountains. Several years ago, the Air Force began an effort to update the annual monitoring plan and investigate a historical release of contaminants from the site. The Air Force has completed investigation of the release and has determined that no further action is needed. The public is invited to comment on this proposed decision. The Air Force will continue to monitor the site through at least 2044.

A 30-day public comment period has been established beginning April 7, 2010. Please submit any comments by May 7, 2010. Additional information is available at the Information Repository at the Sundance Public Library located at 414 East Main Street and the Crook County Museum located at 309 Cleveland Street.

For more information, or to submit comments, please contact Tech. Sgt. Steven Wilson by mail at 28th Bomb Wing Public Affairs, 1958 Scott Drive, Suite 4, Ellsworth AFB, SD 57706-4711, telephone 605-385-5056, fax 605-385-4668, or email steven.wilson2@acc.afmil.

Appendix B

Analytical Results

- Table B-1: RI Analytical Results
- Table B-2: Previous EU Sample Results
- Figure B-1: Figure Location Key (Figures B-2 and B-3)
- Figure B-2: Expanded PA/SI Soil Sample Locations (PM-1 Area)
- Figure B-3: Expanded PA/SI Soil Sample Locations (North Area)
- Figure B-4: RI Surface Soil Sample ^{137}Cs Results

TABLE B-1

RI ANALYTICAL RESULTS
Former Sundance Air Force Station, Wyoming

| Sample No. | Date | Cs-137 (pCi/g) | | | | Sr-90 (pCi/g) | | | |
|-------------------------------|-----------|----------------|------------------|------|--------|---------------|------------------|------|--------|
| | | Value | Uncertainty (2s) | Code | MDC | Value | Uncertainty (2s) | Code | MDC |
| Reference Area | | | | | | | | | |
| SS04RFA1 | 29-Sep-04 | 1.09 | 0.21 | J | 0.14 | | | | |
| SS04RFA2 | 29-Sep-04 | 1.72 | 0.32 | J | 0.147 | 2.19 | 0.58 | J | 0.0292 |
| SS04RFA2QC | 29-Sep-04 | 1.45 | 0.26 | J | 0.158 | | | | |
| SS04RFA3 | 29-Sep-04 | 1.16 | 0.22 | J | 0.15 | | | | |
| SS04RFA4 | 29-Sep-04 | 1.42 | 0.27 | J | 0.177 | | | | |
| SS04RFA5 | 29-Sep-04 | 1.02 | 0.21 | J | 0.171 | 1.07 | 0.28 | J | 0.0322 |
| SS04RFA6 | 29-Sep-04 | 1.48 | 0.26 | J | 0.14 | | | | |
| SS04RFB1 | 29-Sep-04 | 3.13 | 0.46 | J | 0.219 | | | | |
| SS04RFB2 | 29-Sep-04 | 1.36 | 0.24 | J | 0.142 | | | | |
| SS04RFB3 | 29-Sep-04 | 0.691 | 0.19 | J | 0.185 | 1.46 | 0.38 | J | 0.0263 |
| SS04RFB4 | 29-Sep-04 | 0.886 | 0.23 | J | 0.179 | | | | |
| SS04RFB5 | 29-Sep-04 | 3.07 | 0.45 | J | 0.185 | | | | |
| SS04RFB6 | 29-Sep-04 | 3.79 | 0.56 | J | 0.185 | 3.35 | 0.88 | J | 0.0266 |
| SS04RFC1 | 29-Sep-04 | 1.64 | 0.26 | J | 0.134 | | | | |
| SS04RFC2 | 29-Sep-04 | 0.898 | 0.22 | J | 0.176 | 1.14 | 0.3 | J | 0.0254 |
| SS04RFC2QC | 29-Sep-04 | 1.03 | 0.24 | J | 0.178 | 3.15 | 0.84 | J | 0.0271 |
| SS04RFC3 | 29-Sep-04 | 1.2 | 0.25 | | 0.178 | | | | |
| SS04RFC4 | 29-Sep-04 | 1.32 | 0.24 | | 0.159 | | | | |
| SS04RFC5 | 29-Sep-04 | 1.46 | 0.42 | | 0.318 | 0.776 | 0.21 | | 0.049 |
| SS04RFC6 | 29-Sep-04 | 0.631 | 0.25 | | 0.278 | | | | |
| SS04RFC6QC | 29-Sep-04 | 0.585 | 0.22 | | 0.224 | | | | |
| SS04RFD1 | 29-Sep-04 | 1.29 | 0.44 | | 0.266 | 1.34 | 0.36 | | 0.0441 |
| SS04RFD2 | 29-Sep-04 | 2.43 | 0.54 | | 0.254 | | | | |
| SS04RFD3 | 29-Sep-04 | 1.34 | 0.36 | | 0.3 | | | | |
| SS04RFD4 | 29-Sep-04 | 3.9 | 0.83 | | 0.446 | 2.13 | 0.57 | | 0.0573 |
| SS04RFD5 | 29-Sep-04 | 2.24 | 0.46 | | 0.231 | | | | |
| SS04RFD6 | 29-Sep-04 | 1.25 | 0.39 | | 0.248 | | | | |
| SS04RFE1 | 29-Sep-04 | 2 | 0.41 | | 0.31 | 1.43 | 0.38 | | 0.0382 |
| SS04RFE2 | 29-Sep-04 | 1.01 | 0.47 | | 0.374 | | | | |
| SS04RFE3 | 29-Sep-04 | 1.62 | 0.38 | | 0.269 | | | | |
| SS04RFE4 | 29-Sep-04 | 2.7 | 0.58 | | 0.369 | 1.55 | 0.41 | | 0.0381 |
| SS04RFE5 | 29-Sep-04 | 1.09 | 0.31 | | 0.351 | | | | |
| SS04RFE6 | 29-Sep-04 | 1.4 | 0.44 | | 0.339 | | | | |
| Ditch Background | | | | | | | | | |
| SS04DBK1 | 2-Oct-04 | 0.317 | 0.13 | U | 0.234 | | | | |
| SS04DBK2 | 2-Oct-04 | -0.0073 | 0.12 | U | 0.208 | | | | |
| SS04DBK3 | 2-Oct-04 | 0.0757 | 0.13 | U | 0.231 | | | | |
| SS04DBK4 | 2-Oct-04 | 0.0326 | 0.11 | U | 0.196 | | | | |
| SS04DBK4QC | 2-Oct-04 | 0.0081 | 0.12 | U | 0.201 | | | | |
| SS04DBK5 | 2-Oct-04 | 0.158 | 0.1 | U | 0.184 | | | | |
| Drainage Ditch (Study Area 1) | | | | | | | | | |
| SS04DDA1 | 28-Sep-04 | -0.0062 | 0.15 | U | 0.251 | 1.86 | 0.51 | | 0.0345 |
| SS04DDA2 | 28-Sep-04 | -0.0691 | 0.095 | U | 0.155 | | | | |
| SS04DDA3 | 28-Sep-04 | 0.0901 | 0.14 | U | 0.241 | | | | |
| SS04DDA4 | 28-Sep-04 | 0.171 | 0.087 | U | 0.155 | 0.515 | 0.14 | | 0.0285 |
| SS04DDA5 | 28-Sep-04 | 5.17 | 0.76 | | 0.216 | | | | |
| SS04DDA6 | 28-Sep-04 | 2.31 | 0.4 | | 0.205 | | | | |
| SS04DDA7 | 28-Sep-04 | 0.299 | 0.11 | | 0.0984 | 0.1 | 0.035 | | 0.0332 |
| SS04DDA8 | 28-Sep-04 | 2.94 | 0.5 | | 0.249 | | | | |
| SS04DDA9 | 28-Sep-04 | 47.5 | 5.8 | | 0.427 | | | | |
| SS04DDA10 | 28-Sep-04 | 22 | 2.7 | | 0.23 | 0.28 | 0.078 | | 0.0347 |
| SS04DDA10QC | 28-Sep-04 | 22.6 | 2.9 | | 0.263 | 0.275 | 0.076 | | 0.0278 |
| SS04DDA11 | 28-Sep-04 | 92.1 | 11 | | 0.331 | | | | |
| SS04DDA12 | 28-Sep-04 | 12.5 | 1.7 | | 0.364 | | | | |
| SS04DDA13 | 28-Sep-04 | 1.69 | 0.4 | | 0.313 | 0.615 | 0.16 | | 0.0295 |
| SS04DDA14 | 28-Sep-04 | 1.66 | 0.48 | | 0.241 | | | | |
| SS04DDA15 | 28-Sep-04 | 0.928 | 0.28 | | 0.219 | | | | |
| SS04DDA16 | 28-Sep-04 | 1.34 | 0.28 | | 0.188 | 0.413 | 0.11 | | 0.0274 |
| SS04DDA17 | 28-Sep-04 | 0.517 | 0.29 | | 0.316 | | | | |
| SS04DDA18 | 28-Sep-04 | 3.66 | 0.62 | | 0.291 | | | | |
| SS04DDA19 | 28-Sep-04 | 0.367 | 0.15 | | 0.149 | 0.633 | 0.17 | | 0.0269 |

TABLE B-1

RI ANALYTICAL RESULTS
Former Sundance Air Force Station, Wyoming

| Sample No. | Date | Cs-137 (pCi/g) | | | | Sr-90 (pCi/g) | | | |
|---|-----------|----------------|------------------|------|-------|---------------|------------------|------|--------|
| | | Value | Uncertainty (2s) | Code | MDC | Value | Uncertainty (2s) | Code | MDC |
| SS04DDA20 | 28-Sep-04 | 2.53 | 0.46 | | 0.263 | | | | |
| SS04DDA20QC | 28-Sep-04 | 2.49 | 0.45 | | 0.259 | | | | |
| SS04DDA21 | 28-Sep-04 | 3.81 | 0.65 | | 0.323 | | | | |
| SS04DDA22 | 28-Sep-04 | 0.594 | 0.25 | | 0.287 | 0.777 | 0.21 | | 0.0262 |
| SS04DDA23 | 28-Sep-04 | 0.835 | 0.29 | | 0.268 | | | | |
| SS04DDA24 | 28-Sep-04 | 1.81 | 0.46 | | 0.324 | | | | |
| SS04DDA25 | 28-Sep-04 | 2.54 | 0.53 | | 0.26 | 0.778 | 0.21 | | 0.0271 |
| SS04DDA26 | 28-Sep-04 | 15.3 | 2 | | 0.274 | | | | |
| SS04DDA27 | 28-Sep-04 | 0.737 | 0.3 | | 0.177 | | | | |
| SS04DDA28 | 28-Sep-04 | 2.89 | 0.54 | | 0.36 | 0.762 | 0.2 | | 0.0305 |
| SS04DDA29 | 28-Sep-04 | 1.31 | 0.37 | | 0.259 | | | | |
| SS04DDA30 | 28-Sep-04 | 3.11 | 0.59 | | 0.317 | | | | |
| SS04DDA30QC | 28-Sep-04 | 3 | 0.56 | | 0.321 | | | | |
| SS04DDA31 | 28-Sep-04 | 10 | 1.3 | | 0.158 | | | | |
| Biased Ditch (Study Area 1) | | | | | | | | | |
| SS04BD1 | 4-Oct-04 | 14.3 | 1.9 | | 0.344 | 3.47 | 0.91 | J | 0.0189 |
| SS04BD2 | 4-Oct-04 | 2.8 | 0.56 | | 0.356 | 0.076 | 0.024 | J | 0.0192 |
| SS04BD3 | 4-Oct-04 | 16.8 | 2.1 | | 0.278 | 2 | 0.53 | J | 0.0154 |
| SS04BD4 | 4-Oct-04 | 1.05 | 0.3 | | 0.315 | 4.06 | 1.1 | J | 0.0316 |
| SS04BD5 | 4-Oct-04 | 17 | 2.2 | | 0.36 | | | | |
| SS04BD6 | 4-Oct-04 | 1.76 | 0.32 | | 0.181 | | | | |
| SS04BD7 | 4-Oct-04 | 0.621 | 0.19 | | 0.148 | | | | |
| SS04BD8 | 4-Oct-04 | 0.283 | 0.11 | | 0.109 | | | | |
| SS04BD9 | 4-Oct-04 | 1.49 | 0.4 | | 0.331 | | | | |
| SS04BD10 | 4-Oct-04 | 0.944 | 0.36 | | 0.297 | | | | |
| SS04BD11 | 4-Oct-04 | 1.78 | 0.35 | | 0.19 | 0.719 | 0.19 | J | 0.0234 |
| SS04BD12 | 4-Oct-04 | 2.25 | 0.55 | | 0.312 | | | | |
| SS04BD13 | 4-Oct-04 | 8.61 | 1.2 | | 0.244 | | | | |
| SS04BD14 | 4-Oct-04 | 0.911 | 0.23 | | 0.212 | | | | |
| SS04BD15 | 4-Oct-04 | 10.9 | 1.4 | | 0.206 | 0.767 | 0.2 | J | 0.0165 |
| SS04BD15QC | 4-Oct-04 | 10.4 | 1.4 | | 0.207 | 0.825 | 0.22 | J | 0.0175 |
| SS04BD16 | 4-Oct-04 | 6.39 | 0.93 | | 0.269 | | | | |
| SS04BD17 | 4-Oct-04 | 0.44 | 0.15 | | 0.134 | | | | |
| SS04BD18 | 4-Oct-04 | 11.6 | 1.5 | | 0.131 | | | | |
| SS04BD18QC | 4-Oct-04 | 11 | 1.5 | | 0.283 | | | | |
| SS04BD19 | 4-Oct-04 | 1.36 | 0.27 | | 0.206 | | | | |
| Huchins Meadow Hillside (Study Area 2) | | | | | | | | | |
| SS04HMA1 | 30-Sep-04 | 2.02 | 0.42 | | 0.23 | 0.278 | 0.079 | | 0.0385 |
| SS04HMA1 QC | 30-Sep-04 | 1.94 | 0.48 | | 0.323 | 0.33 | 0.09 | | 0.0263 |
| SS04HMA2 | 2-Oct-04 | 0.304 | 0.094 | U | 0.173 | | | | |
| SS04HMA3 | 2-Oct-04 | 1.78 | 0.35 | | 0.194 | | | | |
| SS04HMA4 | 2-Oct-04 | 9.28 | 1.3 | | 0.276 | 0.365 | 0.099 | | 0.0243 |
| SS04HMA5 | 2-Oct-04 | 10.7 | 1.5 | | 0.205 | | | | |
| SS04HMA6 | 2-Oct-04 | 1.19 | 0.28 | | 0.221 | | | | |
| SS04HMB1 | 2-Oct-04 | 1.04 | 0.32 | | 0.243 | 0.571 | 0.16 | | 0.0309 |
| SS04HMB2 | 2-Oct-04 | 1.03 | 0.34 | | 0.214 | | | | |
| SS04HMB3 | 2-Oct-04 | 2.45 | 0.5 | | 0.319 | | | | |
| SS04HMB4 | 2-Oct-04 | 22.1 | 2.8 | | 0.369 | | | | |
| SS04HMB5 | 2-Oct-04 | 1.03 | 0.38 | | 0.307 | 0.36 | 0.099 | | 0.0328 |
| SS04HMB6 | 2-Oct-04 | 0.948 | 0.34 | | 0.24 | | | | |
| SS04HMB7 | 4-Oct-04 | 1.69 | 0.27 | | 0.14 | | | | |
| SS04HMB8 | 4-Oct-04 | 16.8 | 2 | | 0.154 | | | | |
| SS04HMB9 | 4-Oct-04 | 2.51 | 0.38 | | 0.14 | 1.44 | 0.39 | | 0.0277 |
| SS04HMC1 | 2-Oct-04 | 2.11 | 0.54 | | 0.349 | 0.649 | 0.17 | | 0.0336 |
| SS04HMC2 | 2-Oct-04 | 1.51 | 0.27 | | 0.109 | | | | |
| SS04HMC3 | 2-Oct-04 | 1.12 | 0.28 | | 0.244 | | | | |
| SS04HMC4 | 2-Oct-04 | 7.82 | 1.2 | | 0.342 | 0.763 | 0.2 | | 0.0318 |
| SS04HMC4 QC | 2-Oct-04 | 6.4 | 0.99 | | 0.204 | | | | |
| SS04HMC5 | 2-Oct-04 | 1.37 | 0.33 | | 0.211 | | | | |
| SS04HMC6 | 2-Oct-04 | 1.24 | 0.32 | | 0.247 | | | | |
| SS04HMC7 | 4-Oct-04 | 0.573 | 0.16 | | 0.132 | | | | |
| SS04HMC8 | 4-Oct-04 | 0.696 | 0.16 | | 0.1 | | | | |

TABLE B-1

RI ANALYTICAL RESULTS
Former Sundance Air Force Station, Wyoming

| Sample No. | Date | Cs-137 (pCi/g) | | | | Sr-90 (pCi/g) | | | |
|--|-----------|----------------|------------------|------|-------|---------------|------------------|------|--------|
| | | Value | Uncertainty (2s) | Code | MDC | Value | Uncertainty (2s) | Code | MDC |
| SS04HMC9 | 4-Oct-04 | 2.65 | 0.38 | | 0.101 | 1.47 | 0.39 | | 0.0286 |
| SS04HMC10 | 4-Oct-04 | 1.26 | 0.24 | | 0.139 | | | | |
| SS04HMC11QC | 4-Oct-04 | 6.85 | 0.87 | | 0.135 | | | | |
| SS04HMC11 | 4-Oct-04 | 7.4 | 0.94 | | 0.143 | 1.27 | 0.33 | | 0.0248 |
| SS04HMD1 | 2-Oct-04 | 0.597 | 0.26 | | 0.239 | | | | |
| SS04HMD2 | 2-Oct-04 | 2.04 | 0.43 | | 0.254 | 1.02 | 0.27 | | 0.0413 |
| SS04HMD3 | 2-Oct-04 | 1.03 | 0.36 | | 0.314 | | | | |
| SS04HMD4 | 2-Oct-04 | 0.879 | 0.34 | | 0.264 | | | | |
| SS04HMD5 | 2-Oct-04 | 1.41 | 0.33 | | 0.3 | 0.724 | 0.19 | | 0.0308 |
| SS04HMD6 | 2-Oct-04 | 1.37 | 0.33 | | 0.259 | | | | |
| SS04HMD7 | 4-Oct-04 | 0.668 | 0.16 | | 0.102 | | | | |
| SS04HMD8 | 4-Oct-04 | 1.81 | 0.28 | | 0.1 | | | | |
| SS04HMD9 | 4-Oct-04 | 1.33 | 0.23 | | 0.153 | | | | |
| SS04HMD10 | 4-Oct-04 | 2.88 | 0.42 | | 0.149 | 1.37 | 0.36 | | 0.0266 |
| SS04HME1 | 2-Oct-04 | 1.34 | 0.34 | | 0.251 | | | | |
| SS04HME2 | 2-Oct-04 | 0.792 | 0.28 | | 0.184 | | | | |
| SS04HME3 | 2-Oct-04 | 1.12 | 0.36 | | 0.239 | 0.569 | 0.15 | | 0.0314 |
| SS04HME4 | 2-Oct-04 | 0.926 | 0.25 | | 0.184 | | | | |
| SS04HME5 | 2-Oct-04 | 1.12 | 0.28 | | 0.173 | 0.502 | 0.14 | | 0.0301 |
| SS04HME6 | 2-Oct-04 | 1.3 | 0.31 | | 0.221 | | | | |
| SS04HME6 QC | 2-Oct-04 | 1.17 | 0.47 | | 0.283 | | | | |
| Meadow East Hillside (Study Area 3) | | | | | | | | | |
| SS04MEA1 | 29-Sep-04 | 1.42 | 0.49 | | 0.429 | 0.325 | 0.089 | | 0.0308 |
| SS04MEA2 | 29-Sep-04 | 1.2 | 0.44 | | 0.388 | | | | |
| SS04MEA3 | 29-Sep-04 | 3.27 | 0.72 | | 0.461 | | | | |
| SS04MEA4 | 29-Sep-04 | 6.04 | 0.93 | | 0.29 | 0.47 | 0.13 | | 0.0288 |
| SS04MEA5 | 29-Sep-04 | 9.46 | 1.2 | | 0.214 | | | | |
| SS04MEA5 QC | 29-Sep-04 | 8.38 | 1.1 | | 0.24 | | | | |
| SS04MEA6 | 29-Sep-04 | 5.05 | 0.84 | | 0.399 | 0.19 | 0.054 | | 0.0285 |
| SS04MEA7 | 29-Sep-04 | 6.24 | 0.98 | | 0.335 | | | | |
| SS04MEA8 | 29-Sep-04 | 10.1 | 1.4 | | 0.262 | | | | |
| SS04MEA9 | 29-Sep-04 | 7.89 | 1.2 | | 0.317 | | | | |
| SS04MEA10 | 29-Sep-04 | 10.6 | 1.4 | | 0.227 | | | | |
| SS04MEB1 | 29-Sep-04 | 1.13 | 0.32 | | 0.201 | | | | |
| SS04MEB2 | 29-Sep-04 | 0.883 | 0.29 | U | 0.577 | | | | |
| SS04MEB3 | 29-Sep-04 | 2.75 | 0.52 | | 0.315 | 0.833 | 0.22 | | 0.0327 |
| SS04MEB4 | 29-Sep-04 | 3.12 | 0.54 | | 0.262 | | | | |
| SS04MEB5 | 29-Sep-04 | 1.62 | 0.4 | | 0.272 | | | | |
| SS04MEB6 | 29-Sep-04 | 1.29 | 0.25 | | 0.161 | 0.335 | 0.094 | | 0.0457 |
| SS04MEB7 | 29-Sep-04 | 1.91 | 0.34 | | 0.139 | | | | |
| SS04MEB8 | 29-Sep-04 | 2.93 | 0.4 | | 0.108 | | | | |
| SS04MEB9 | 29-Sep-04 | 2.7 | 0.4 | | 0.139 | | | | |
| SS04MEB10 | 29-Sep-04 | 2 | 0.29 | | 0.116 | 0.374 | 0.1 | | 0.0363 |
| SS04MEC1 | 29-Sep-04 | 1.27 | 0.21 | | 0.116 | 0.769 | 0.2 | | 0.0269 |
| SS04MEC1 QC | 29-Sep-04 | 1.63 | 0.27 | | 0.173 | | | | |
| SS04MEC2 | 29-Sep-04 | 0.754 | 0.19 | | 0.15 | | | | |
| SS04MEC3 | 29-Sep-04 | 0.623 | 0.16 | | 0.144 | | | | |
| SS04MEC4 | 29-Sep-04 | 2.4 | 0.34 | | 0.122 | 0.728 | 0.19 | | 0.0305 |
| SS04MEC5 | 29-Sep-04 | 1.43 | 0.24 | | 0.115 | | | | |
| SS04MEC6 | 29-Sep-04 | 0.946 | 0.17 | | 0.131 | | | | |
| SS04MEC7 | 29-Sep-04 | 1.57 | 0.25 | | 0.103 | 0.48 | 0.13 | | 0.0313 |
| SS04MEC8 | 29-Sep-04 | 1.53 | 0.28 | | 0.151 | | | | |
| SS04MEC9 | 29-Sep-04 | 2.27 | 0.35 | | 0.171 | | | | |
| SS04MEC10 | 29-Sep-04 | 2.77 | 0.41 | | 0.145 | 0.768 | 0.2 | | 0.0301 |
| SS04MEC10QC | 29-Sep-04 | 2.76 | 0.4 | | 0.139 | 0.867 | 0.23 | J | 0.024 |
| Exposure Unit (located within EU, but not within specific study Area) | | | | | | | | | |
| SS04EU1 | 2-Oct-04 | 0.658 | 0.16 | | 0.145 | | | | |
| SS04EU2 | 2-Oct-04 | 1.7 | 0.29 | | 0.151 | | | | |
| SS04EU3 | 4-Oct-04 | 1.3 | 0.2 | | 0.106 | | | | |
| SS04EU4 | 2-Oct-04 | 1.79 | 0.31 | | 0.166 | | | | |
| SS04EU5 | 2-Oct-04 | 1.51 | 0.24 | | 0.15 | | | | |
| SS04EU6 | 4-Oct-04 | 1.83 | 0.3 | | 0.141 | | | | |

TABLE B-1

RI ANALYTICAL RESULTS
Former Sundance Air Force Station, Wyoming

| Sample No. | Date | Cs-137 (pCi/g) | | | | Sr-90 (pCi/g) | | | |
|---|-----------|----------------|------------------|------|-------|---------------|------------------|------|--------|
| | | Value | Uncertainty (2s) | Code | MDC | Value | Uncertainty (2s) | Code | MDC |
| SS04EU7 | 4-Oct-04 | 2.05 | 0.3 | | 0.112 | | | | |
| SS04EU8 | 2-Oct-04 | 1.25 | 0.22 | | 0.105 | | | | |
| SS04EU9 | 2-Oct-04 | 1.56 | 0.25 | | 0.111 | | | | |
| SS04EU10 | 1-Oct-04 | 3.85 | 0.54 | | 0.195 | | | | |
| SS04EU11 | 1-Oct-04 | 1.14 | 0.23 | | 0.161 | | | | |
| SS04EU12 | 1-Oct-04 | 1.11 | 0.27 | | 0.18 | | | | |
| SS04EU13 | 1-Oct-04 | 1.77 | 0.33 | | 0.155 | | | | |
| SS04EU14 | 1-Oct-04 | 0.961 | 0.21 | | 0.138 | | | | |
| SS04EU14QC | 1-Oct-04 | 1.15 | 0.24 | | 0.162 | | | | |
| SS04EU15 | 1-Oct-04 | 1.18 | 0.27 | | 0.164 | | | | |
| SS04EU16 | 1-Oct-04 | 2.1 | 0.31 | | 0.118 | | | | |
| SS04EU16QC | 1-Oct-04 | 2.9 | 0.44 | | 0.193 | | | | |
| SS04EU17 | 1-Oct-04 | 1.82 | 0.3 | | 0.15 | | | | |
| SS04EU18 | 1-Oct-04 | 1.13 | 0.24 | | 0.188 | | | | |
| SS04EU19 | 1-Oct-04 | 1.61 | 0.29 | | 0.201 | | | | |
| SS04EU20 | 1-Oct-04 | 1.43 | 0.3 | | 0.23 | | | | |
| Subsurface Sample - Reference Area | | | | | | | | | |
| DP04RFA4(1-4') | 1-Oct-04 | -0.186 | 0.1 | U | 0.162 | 0.167 | 0.05 | J | 0.0327 |
| DP04RFA4(4-8') | 1-Oct-04 | -0.09 | 0.14 | U | 0.239 | 0.829 | 0.22 | J | 0.0243 |
| DP04RFA4(4-8')QC | 1-Oct-04 | -0.0485 | 0.14 | U | 0.24 | 0.337 | 0.092 | J | 0.0271 |
| DP04RFB1(1-4') | 1-Oct-04 | -0.105 | 0.11 | U | 0.176 | 0.36 | 0.099 | J | 0.0267 |
| DP04RFB1(4-8') | 1-Oct-04 | 0.0321 | 0.11 | U | 0.192 | 1.21 | 0.32 | J | 0.0243 |
| DP04RFD6(1-4') | 1-Oct-04 | -0.0509 | 0.12 | U | 0.196 | 0.76 | 0.2 | J | 0.032 |
| DP04RFD6(1-4')QC | 1-Oct-04 | -0.0449 | 0.12 | U | 0.203 | 0.303 | 0.085 | J | 0.0336 |
| DP04RFD6(4-8') | 1-Oct-04 | -0.162 | 0.12 | U | 0.189 | 0.993 | 0.26 | J | 0.0313 |
| DP04RFE2(1-4') | 1-Oct-04 | -0.0698 | 0.12 | U | 0.195 | 0.421 | 0.11 | J | 0.029 |
| DP04RFE2(4-8') | 1-Oct-04 | -0.16 | 0.19 | U | 0.303 | 0.377 | 0.1 | J | 0.0278 |
| Subsurface Sample - Exposure Unit | | | | | | | | | |
| DP04PM01(1-4') | 30-Sep-04 | 0.759 | 0.2 | | 0.272 | 1.34 | 0.35 | J | 0.0238 |
| DP04PM01(4-8') | 30-Sep-04 | -0.141 | 0.21 | U | 0.339 | 0.889 | 0.24 | J | 0.029 |
| DP04PM02(1-4') | 30-Sep-04 | 0.367 | 0.14 | | 0.193 | 0.315 | 0.086 | J | 0.0243 |
| DP04PM02(4-8') | 30-Sep-04 | -0.0686 | 0.1 | U | 0.172 | 0.488 | 0.13 | J | 0.025 |
| DP04PM03(1-4') | 1-Oct-04 | 0.311 | 0.13 | | 0.143 | 0.394 | 0.11 | J | 0.0349 |
| DP04PM04(1-4') | 1-Oct-04 | -0.052 | 0.078 | U | 0.128 | 0.154 | 0.047 | J | 0.0313 |
| DP04PM04(4-8') | 1-Oct-04 | -0.165 | 0.1 | U | 0.156 | 0.78 | 0.21 | J | 0.0356 |
| DP04PM05(1-3') | 30-Sep-04 | 1.22 | 0.22 | | 0.159 | 0.356 | 0.099 | J | 0.0346 |
| DP04PM05(4-8') | 30-Sep-04 | -0.0226 | 0.076 | U | 0.131 | 0.162 | 0.05 | J | 0.0319 |
| DP04PM07(1-4') | 30-Sep-04 | -0.0642 | 0.083 | U | 0.137 | 0.197 | 0.059 | J | 0.0348 |
| DP04PM07(4-8') | 30-Sep-04 | -0.099 | 0.099 | U | 0.159 | 0.323 | 0.09 | J | 0.0279 |
| DP04PM08(1-3') | 30-Sep-04 | 0.441 | 0.16 | | 0.16 | 2.37 | 0.63 | J | 0.0267 |
| DP04PM08(4-8') | 30-Sep-04 | -0.0508 | 0.1 | U | 0.167 | 1.38 | 0.36 | J | 0.0265 |

Notes:

J = Estimated Value.

MDC = Minimum Detection Concentration.

pCi/g = picoCurie per gram.

U = Not detected.

2s = Uncertainty (2 sigma).

All results inclusive of background.

Source: Table 2-2 of the Final Remedial Investigation Report, October 2007.

TABLE B-2

PREVIOUS EU SAMPLE RESULTS
Former Sundance Radar Station, Wyoming

| Sample No. | QC | Sample Date | Soil Type ¹ | Units | Cesium-137 | | | | Strontium-90 | | | |
|--|----|-------------|------------------------|-------|------------|------------------|------|-------|--------------|------------------|------|-------|
| | | | | | Value | Uncertainty (2s) | Code | MDC | Value | Uncertainty (2s) | Code | MDC |
| Drainage Ditch (Study Area 1) ² | | | | | | | | | | | | |
| DP01PM11 (0-0.5) | | 08/31/01 | GVL | pCi/g | 44.60 | 5.30 | | 0.079 | 1.61 | 0.43 | | 0.067 |
| DP01PM13 (0-0.5) | | 08/31/01 | GVL | pCi/g | 3.76 | 0.45 | | 0.047 | | | | |
| DP01PM18 (0-5) | | 09/01/01 | GVL | pCi/g | 15.20 | 1.80 | | 0.045 | | | | |
| DP01PM19 (0-0.5) | | 09/03/01 | GVL | pCi/g | 4.68 | 0.56 | | 0.033 | | | | |
| OAISOCS44 (OA44) | | 09/01/01 | GVL | pCi/g | 3.42 | 0.41 | | 0.039 | | | | |
| PMISOCS44B | | 09/01/01 | ORG | pCi/g | 38.90 | 4.60 | | 0.046 | | | | |
| PMISOCS44B dup | FD | 09/01/01 | ORG | pCi/g | 37.90 | 4.50 | | 0.037 | | | | |
| PMISOCS44D | | 09/02/01 | ORG | pCi/g | 7.59 | 0.90 | | 0.038 | | | | |
| PMISOCS53 | | 09/03/01 | GVL | pCi/g | 4.67 | 0.55 | | 0.037 | | | | |
| PMISOCS55 | | 09/03/01 | ORG | pCi/g | 23.60 | 2.80 | | 0.039 | | | | |
| PMISOCS55 dup | FD | 09/03/01 | ORG | pCi/g | 22.90 | 2.70 | | 0.036 | | | | |
| SB01PM14 | | 09/01/01 | GVL | pCi/g | 0.33 | 0.06 | | 0.062 | | | | |
| Huchins Meadow Hillside (Study Area 2) | | | | | | | | | | | | |
| PMISOCS74 | | 09/06/01 | ORG | pCi/g | 66.70 | 7.90 | | 0.061 | | | | |
| East Meadow Hillside (Study Area 3) | | | | | | | | | | | | |
| DP01PM10 (0-0.5) | | 08/31/01 | ORG | pCi/g | 1.78 | 0.22 | | 0.048 | 0.30 | 0.10 | | 0.099 |
| DP01PM10 (0-0.5) dup | FD | 08/31/01 | ORG | pCi/g | 1.67 | 0.20 | | 0.045 | 1.50 | 0.40 | | 0.077 |
| DP01PM21 (0-0.5) | | 09/04/01 | ORG | pCi/g | 64.90 | 7.60 | | 0.046 | | | | |
| SB00PM09 | | 10/15/00 | ORG | pCi/g | 2.30 | 0.04 | | 0.207 | 0.65 | 0.26 | | 0.293 |
| SB00PM10 | | 10/15/00 | ORG | pCi/g | 0.42 | 0.23 | | 0.263 | 0.37 | 0.21 | | 0.310 |
| Exposure Unit (located within EU but not within a specific study area) | | | | | | | | | | | | |
| OAISOCS45 (OA45) | | 09/01/01 | ORG | pCi/g | 1.15 | 0.21 | | 0.107 | | | | |
| PMISOCS07 | | 09/01/01 | ORG | pCi/g | 0.18 | 0.04 | | 0.037 | | | | |
| PMISOCS08 | | 09/01/01 | ORG | pCi/g | 0.36 | 0.07 | | 0.077 | | | | |
| PMISOCS09 | | 09/01/01 | ORG | pCi/g | 0.60 | 0.09 | | 0.054 | | | | |
| PMISOCS26 | | 09/03/01 | ORG | pCi/g | 1.46 | 0.18 | | 0.054 | | | | |
| PMISOCS27 | | 09/01/01 | ORG | pCi/g | 0.72 | 0.10 | | 0.044 | | | | |
| PMISOCS28 | | 09/01/01 | ORG | pCi/g | 0.00 | 0.04 | U | 0.058 | | | | |
| PMISOCS40 | | 09/01/01 | ORG | pCi/g | 1.98 | 0.24 | | 0.066 | | | | |
| PMISOCS44C | | 09/02/01 | ORG | pCi/g | 2.31 | 0.28 | | 0.046 | | | | |
| PMISOCS44E | | 09/02/01 | ORG | pCi/g | 1.88 | 0.23 | | 0.035 | | | | |
| PMISOCS51 | | 09/02/01 | ORG | pCi/g | 3.77 | 0.45 | | 0.031 | | | | |
| PMISOCS78 | | 09/06/01 | ORG | pCi/g | 0.67 | 0.09 | | 0.026 | | | | |
| PMISOCS80 | | 09/06/01 | ORG | pCi/g | 0.69 | 0.09 | | 0.036 | | | | |

Notes:

¹ - Site soil classification developed for background comparison.

² - Samples collected during PA/SI omitted from sample set due to grading of ditch after sample collection.

FD - Field Duplicate.

GVL - (gravel) denotes soils comprised primarily of bedrock-derived gravel with a low percentage of organically-derived soil.

MDC - Minimum detection concentration.

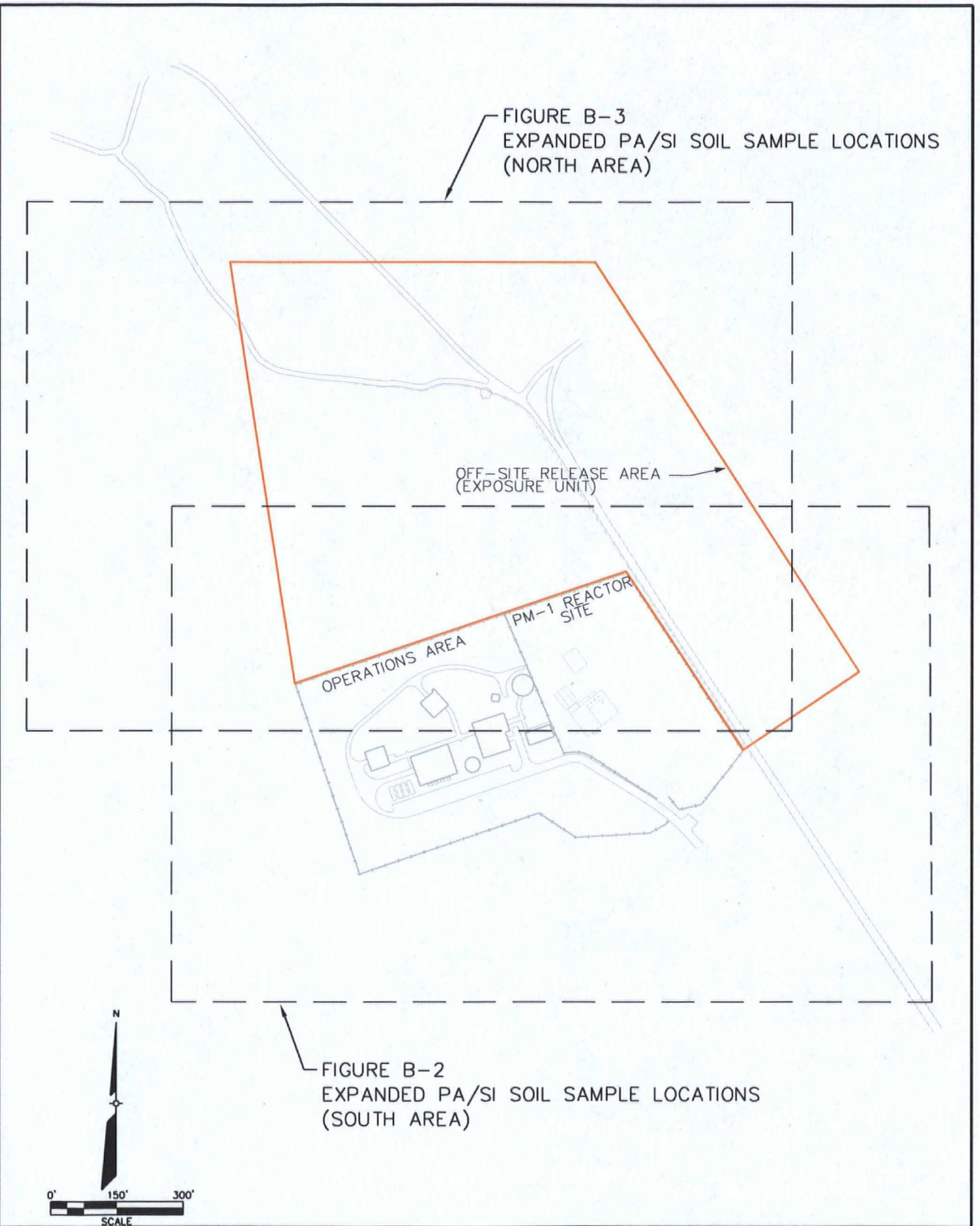
ORG - (organic) denotes soils with a relatively high percentage of organically-derived soil.

U - Not detected.

2s - Uncertainty (2 sigma).

Source: Table 6-2 of the Final Remedial Investigation Report, October 2007.

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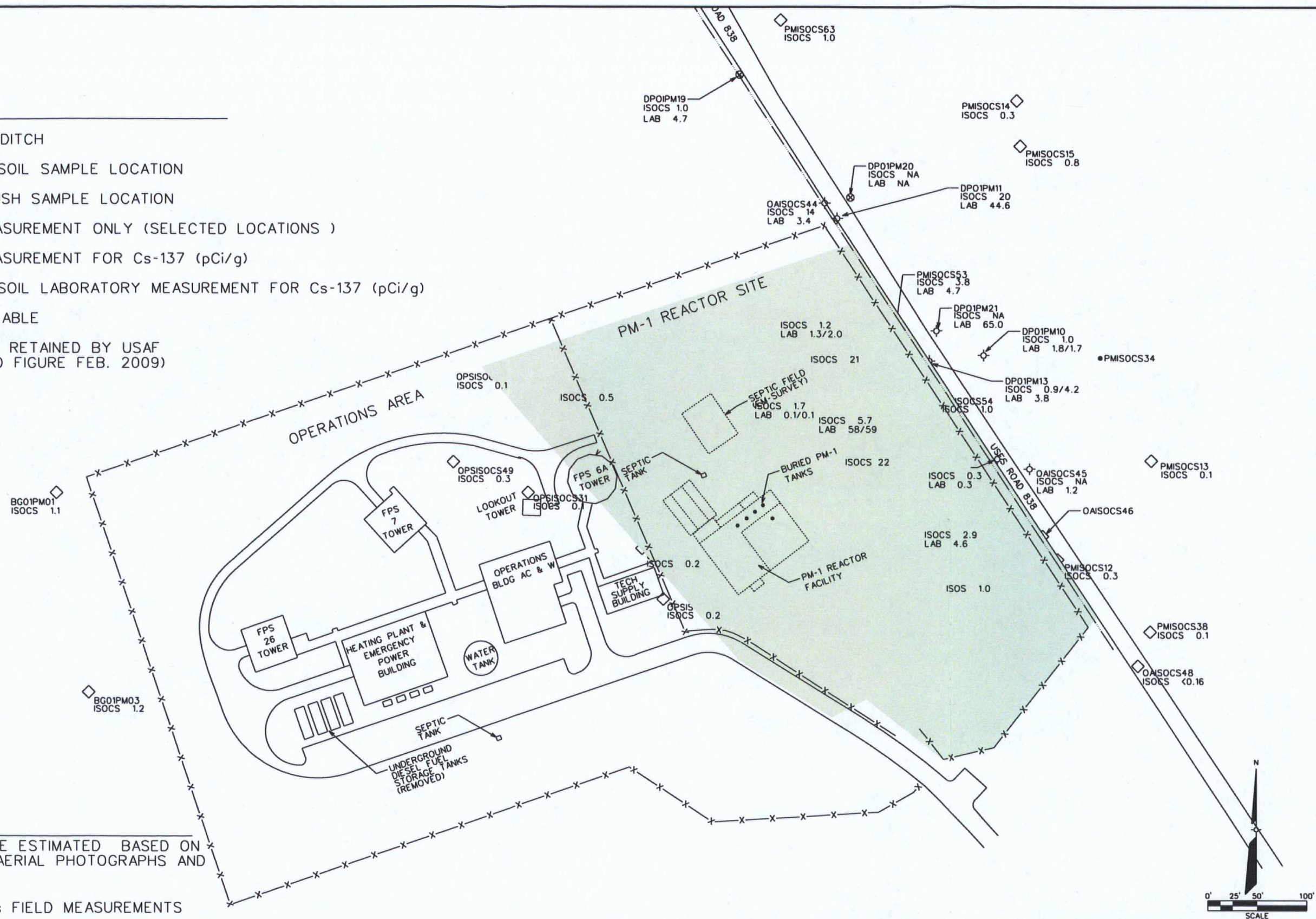
EARTH TECH | AECOM

FIGURE B-1
FIGURE LOCATION KEY
(FIG. B-2 AND B-3)
FORMER SUNDANCE AIR FORCE STATION
SUNDANCE, WYOMING
OCTOBER 2010 60135669

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LEGEND

- DRAINAGE DITCH
- ⊕ SURFACE SOIL SAMPLE LOCATION
- ⊗ DIRECT PUSH SAMPLE LOCATION
- ◇ ISOCS MEASUREMENT ONLY (SELECTED LOCATIONS)
- ISOCS 1.3 ISOCS MEASUREMENT FOR Cs-137 (pCi/g)
- LAB 4.7 SURFACE SOIL LABORATORY MEASUREMENT FOR Cs-137 (pCi/g)
- NA NOT AVAILABLE
- PROPERTY RETAINED BY USAF
(ADDED TO FIGURE FEB. 2009)



NOTES

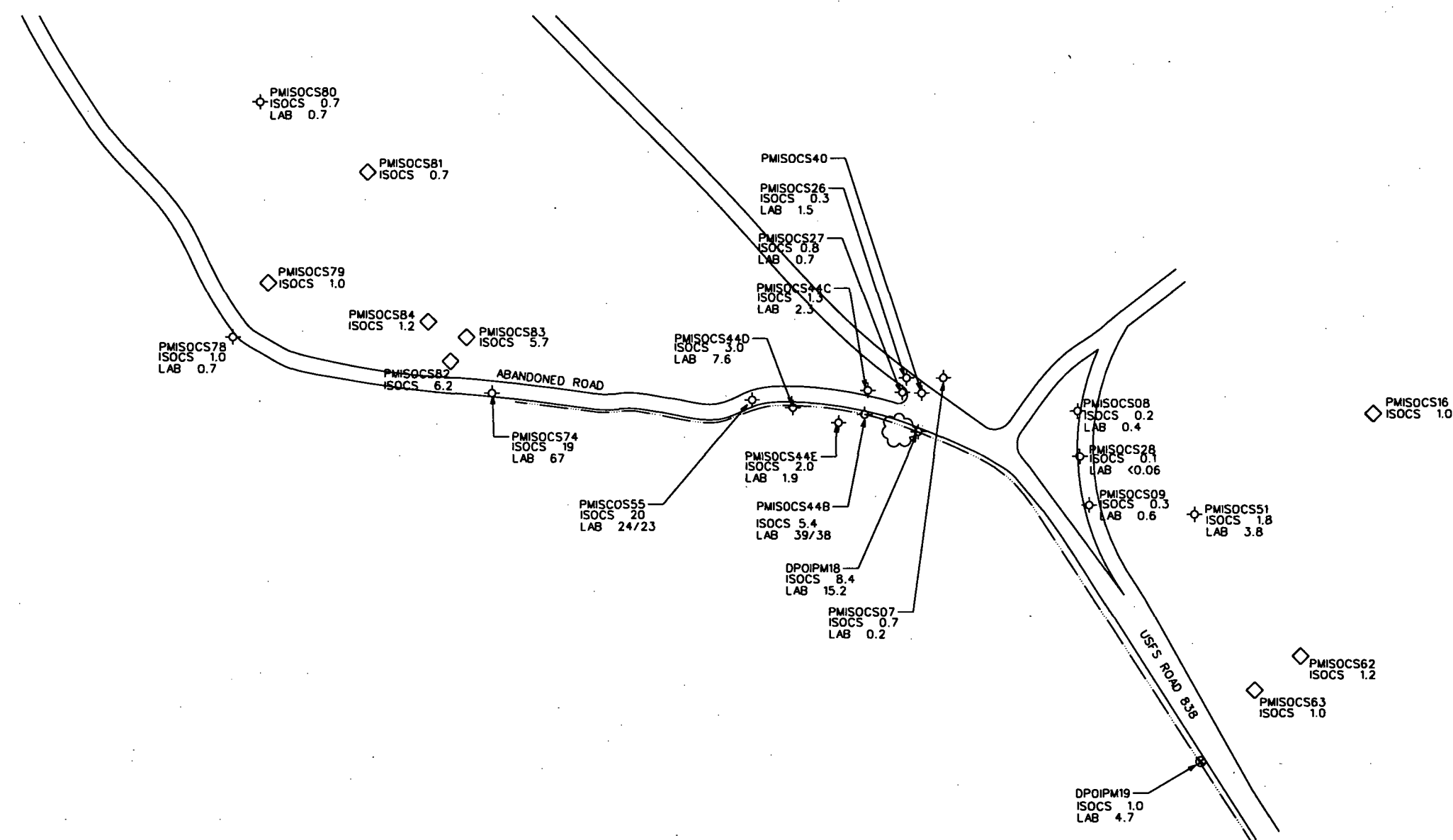
1. ROAD LOCATIONS ARE ESTIMATED BASED ON GPS COORDINATES, AERIAL PHOTOGRAPHS AND REGIONAL MAPPING.
2. ONLY SELECT ISOC's FIELD MEASUREMENTS INCLUDED ON FIGURE.
3. SOURCE: FIGURE 1-9 OF THE FINAL REMEDIAL INVESTIGATION REPORT, OCTOBER 2007

EARTH TECH | AECOM

FIGURE B-2
EXPANDED PA/SI SOIL SAMPLE
LOCATIONS (PM-1 AREA)
FORMER SUNDANCE AIR FORCE STATION
SUNDANCE WYOMING

OCTOBER 2010

60135669

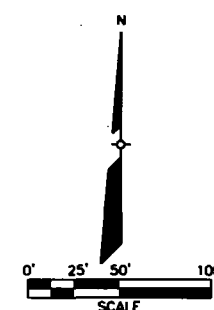


NOTES

1. ROAD LOCATIONS ARE ESTIMATED BASED ON GPS COORDINATES, AERIAL PHOTOGRAPHS AND REGIONAL MAPPING.
2. ONLY SELECT ISOC's FIELD MEASUREMENTS INCLUDED ON FIGURE.
3. SOURCE: FIGURE 1-10 OF THE FINAL REMEDIAL INVESTIGATION REPORT, OCTOBER 2007

LEGEND

- DRAINAGE DITCH
- ◆ SURFACE SOIL SAMPLE LOCATION
- ◇ ISOCs MEASUREMENT ONLY (SELECTED LOCATIONS)
- ISOCs 1.3 ISOCs MEASUREMENT FOR Cs-137 (pCi/g)
- LAB 4.7 SURFACE SOIL LABORATORY MEASUREMENT FOR Cs-137 (pCi/g)



EARTH TECH | AECOM

FIGURE B-3
EXPANDED PA/SI SOIL SAMPLE
LOCATIONS (NORTH END)
FORMER SUNDANCE AIR FORCE STATION
SUNDANCE WYOMING

OCTOBER 2010

60135669

File: L:\work\terc\63B42_54\cadd\01-CRAIG\AREASAMP_LOC_REV.dwg Time: Oct 22, 2010 - 10:16am

