

**U.S. Department of Energy**  
Office of Legacy Management

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**ANNUAL SITE ENVIRONMENTAL REPORT  
CALENDAR YEAR 2007**

for the

**LABORATORY FOR ENERGY-RELATED HEALTH RESEARCH  
UNIVERSITY OF CALIFORNIA, DAVIS**

*Submitted to:*

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*Prepared by:*

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September 30, 2008  
Rev. 0

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Approvals Page

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Approved by:  \_\_\_\_\_ Date: September 30, 2008  
Robert O. Devany, P.G., C.E.G., C.Hg.  
Principal Hydrogeologist  
Weiss Associates



Department of Energy  
Office of Legacy Management

September 22, 2008

Dear Sir or Madam:

The 2007 Laboratory for Energy Related Health Research (LEHR) Annual Site Environmental Report (ASER) has been prepared and is available to the public. The ASER summarizes the environmental management performance at LEHR for calendar year 2007. ASERs are prepared annually for all DOE sites conducting significant environmental activities and are distributed to relevant regulatory agencies and other interested parties.

To the best of my knowledge, the 2007 LEHR ASER accurately summarizes results for the 2007 Monitoring Program and Restorations Program at LEHR. This assurance is based upon a thorough review of the data collected at LEHR.

The ASER has limited hard copy distribution and will be available electronically at <http://www.lm.doe.gov/land/sites/ca/lehr/lehr.htm>. Please provide your comments or suggestions for future versions of the report using the enclosed reader survey form. Additionally, your questions or comments on this report may be made directly to me at (304) 285-4579.

Sincerely,

Vijendra Kothari  
LEHR Project Manager

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**CERTIFICATION OF ACCURACY FOR:**

**ANNUAL SITE ENVIRONMENTAL REPORT, CALENDAR YEAR 2007,  
LABORATORY FOR ENERGY-RELATED HEALTH RESEARCH**

I certify that the information submitted herein is true, accurate, and complete, based on my familiarity with the information and my inquiry of those individuals immediately responsible for obtaining the information.



Signature: \_\_\_\_\_

Robert O. Devany, Principal Hydrogeologist

Date: September 30, 2008

## ANNUAL SITE ENVIRONMENTAL REPORT READER SURVEY

To Our Readers:

Each Annual Site Environmental Report publishes the results of environmental monitoring at the former Laboratory for Energy-Related Health Research (LEHR) and documents our compliance with environmental regulations. In providing this information, our goal is to give our readership—whether they are regulators, scientists or the public—a clear accounting of the range of environmental activities we undertake, the methods we employ and the degree of accuracy of our results.

It is important that the information we provide is easily understood, is of interest, and communicates the Department of Energy's effort to protect human health and the environment. We would like to know from you, our readers, whether we are successful in these goals. Your comments are welcome.

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*A business reply envelope has been attached for returning these surveys to Vijendra Kothari, DOE, 610 Collins Ferry Road, Morgantown, WV 26507.*

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## ACRONYMS AND ABBREVIATIONS

µg/L	micrograms per liter
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
D&M	Dames & Moore
DOE	(United States) Department of Energy
E	east
EMS	environmental management system
EPCRA	Emergency Planning and Community Right-to-Know Act
HSU	hydrostratigraphic unit
km	kilometer
LEHR	Laboratory for Energy-Related Health Research
m	meter(s)
mg/L	milligram(s) per liter
mrem	millirem(s)
mrem/yr	millirem(s) per year
MSDS	Material Safety Data Sheet
mSv	milliSievert(s)
N	north
N/A	not applicable
NNE	north by northeast
NNW	north by northwest
No.	number
NW	northwest
PCD	Putah Creek, Downstream
PCU	Putah Creek, Upstream
person-rem/yr	person-Roentgen equivalent man per year

PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to 10 micrometers
rem	Roentgen equivalent man
S	south
SARA	Superfund Amendments and Reauthorization Act
STPO	sewage treatment plant outfall
Sv	Sievert
UC Davis	University of California, Davis
USCB	United States Census Bureau
US EPA	United States Environmental Protection Agency
W	west
Weiss	Weiss Associates

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## EXECUTIVE SUMMARY

This Annual Site Environmental Report for the Laboratory for Energy-Related Health Research (LEHR or the Site) at the University of California, Davis (UC Davis) summarizes the United States Department of Energy's (DOE's) environmental performance at the Site in 2007, including environmental compliance; environmental monitoring data for air, soil, ground water, surface water, storm water and ambient radiation; and environmental management programs. DOE operation of LEHR as a research facility ceased in 1989 after three decades of research on the health effects of low-level radiation exposure using primarily beagles as research subjects. Contamination from prior site use, including research activities, resulted in the addition of the Site to the National Priorities List in 1994. In 1997, DOE and UC Davis reached an agreement on the responsibilities for site cleanup. During Calendar Year 2007, DOE continued activities at the Site in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requirements.

### Progress of Site Environmental Restoration

DOE site restoration activities are conducted in accordance with a 1999 Federal Facility Agreement entered into by DOE and the United States Environmental Protection Agency (US EPA), California Department of Toxic Substances Control, California Department of Health Services and the Central Valley Regional Water Quality Control Board. Under the Federal Facility Agreement, DOE is responsible for remediation of site facilities, including the Radium-226/Strontium-90 Treatment Systems, the DOE Disposal Box, on-site domestic septic systems, DOE disposal trenches and the former Dog Pens (Figure 1-2). Under an Administrative Order on Consent with the US EPA, UC Davis is responsible for remediation of three landfills, disposal trenches located south and east of Landfill Number 2, a disposal trench located south of the Western Dog Pens, an old waste water treatment plant and impacted ground water (Figure 1-2) (US EPA, 2000).

DOE performed maintenance activities at the Site in 2007 including the removal and disposal of concrete curbs and perimeter fencing from the former Eastern Dog Pens, removal of a plastic tarp covering the ground in the Southwest Trenches, installation of a silt fence in the former Western Dog Pens to minimize the migration of sediment from the area, routine storm water sampling and periodic inspections. Having completed all planned removal actions, DOE is in the process of determining a final remedy for the Site that is protective of human health and the environment. The following documents were prepared in 2007:

- Former Western Dog Pens Backfill Risk Assessment: In 2007, DOE developed an update to an earlier risk assessment, to reflect final grading work conducted in the Western Dog Pens area in 2006. The final document was issued in April 2007.
- DOE Order 435.1 Exemption for Disposal of Eastern Dog Pens Concrete at a Commercial Facility: In September 2007, DOE reviewed options for disposal of the



concrete curbs from the Eastern Dog Pens at DOE facilities and commercial disposal site and concluded that disposal at a commercial waste disposal facility, EnergySolutions facility in Clive Utah, was the most viable option.

- DOE Areas Feasibility Study: A draft feasibility study report, which evaluates remedial alternatives for the DOE areas, was developed in 2006, and completed and issued for review to the regulatory agencies in February 2006. The document was revised in response to comments from the agencies in October 2006 and reissued for review. Comments received from regulatory agencies in 2007 were addressed and a final document was issued and approved on March 7, 2008 (Weiss, 2008a).
- Proposed Plan: In late 2007, DOE began to develop a Proposed Plan that identifies the preferred remedial alternatives for residual soil contamination at LEHR and provides the rationale for these preferences. The Plan was issued to the regulatory agencies on March 24, 2008 and it is presently being revised to address comments received. It is expected to be issued to the public in late 2008.

## **Overview of 2007 Water and Air Environmental Monitoring Results**

Per the Memorandum of Agreement with DOE (DOE, 1997), UC Davis is responsible for conducting ground water monitoring at LEHR. A report developed by Brown & Caldwell for UC Davis (Brown & Caldwell, 2008) provides a complete description of the ground water monitoring program and analytical results for 2007. Based on the findings presented by UC Davis, the 2007 ground water monitoring results were consistent with results from previous years.

UC Davis also reported that storm water and surface water samples collected and analyzed in 2007 were consistent with results from previous years, and no new trends or concerns were identified.

## **Radiological Impact Assessment of the LEHR Environmental Restoration Project**

The only ground-disturbing activity conducted by DOE in 2007 that might have released radiological material to the environment was the removal of concrete curbs from the former Eastern Dog Pens. The National Emissions Standards for Hazardous Air Pollutants evaluation which included an evaluation of removal of concrete from the Eastern Dog Pens as well as wind erosion of surface soil, indicated that ambient radionuclide activities were well below all applicable radiation dose standard for members of the public (Weiss, 2008b).

## 1. INTRODUCTION

This Annual Site Environmental Report describes Calendar Year 2007 United States Department of Energy's (DOE's) environmental restoration and waste management activities at the Laboratory for Energy-Related Health Research (LEHR or the Site) at the University of California, Davis (UC Davis) (Figure 1-1). This report was prepared according to the requirements of DOE Order 231.1A, Environmental Safety and Health Reporting. The purpose of this report is to summarize environmental data, confirm compliance with environmental standards and requirements, and highlight significant programs and efforts. This report describes activities conducted by DOE during 2007 in support of site environmental restoration efforts, and provides information about the impact of these activities on the public and the environment. A ground, surface and storm water monitoring program performed by UC Davis includes information important to the overall environmental restoration of the Site and is briefly summarized herein.

### 1.1 Site History

The Atomic Energy Commission first sponsored radiological studies on laboratory animals at UC Davis in the early 1950s. Initially situated on the main campus, the project was relocated to its present location in 1958 (Figure 1-1). Research at LEHR through the late 1980s focused on health effects from chronic exposure to radionuclides, primarily strontium-90 and radium-226, using beagles as research subjects. Other related research was conducted at the Site concurrent with these long-term studies. In the early 1970s, a cobalt-60 irradiation facility was constructed at the Site to study the effects of chronic exposure to gamma radiation on humans, again using beagles.

A campus landfill with two waste burial units that were used from the 1940s until the mid-1960s is located at the Site (Figure 1-2). Several low-level radioactive waste burial areas were also present at the Site, and campus and LEHR research waste was buried in these areas until 1974 in accordance with regulations in effect at the time. The principle environmental threats posed by these radioactive waste burial areas have been mitigated during several removal actions conducted at the Site since 1996.

In 1988, pursuant to the Memorandum of Agreement between DOE and the University of California, DOE's Office of Energy Research initiated activities to close out the research program at LEHR. In 1997, a second Memorandum of Agreement divided the responsibility for environmental remediation between DOE and UC Davis (DOE, 1997).

Under the Federal Facility Agreement effective in December 1999, DOE is responsible for remediation of the Radium/Strontium Treatment Systems, a waste burial area known as the DOE Disposal Box, on-site domestic septic tanks and associated leach fields and dry wells, DOE disposal

trenches and the former Dog Pens (Figure 1-2). UC Davis is responsible for remediation of three landfills, disposal trenches located south and east of Landfill Number (No.) 2, 49 waste holes, an old waste water treatment plant, ground water impacted by the Site, and surface and storm water runoff impacted by UC Davis's activities.

DOE activities at the Site in 2007 were limited to a removal of concrete curbs from the former Eastern Dog Pens, environmental monitoring, and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) document development.

## 1.2 Site Management

Restoration of the Site began in October 1989; through February 1990, it was managed under an interim contract with UC Davis. From 1990 to 1996, Battelle Environmental Management Operations managed the LEHR remediation project. In 1996, the project was transferred to Weiss Associates (Weiss) of Emeryville, California, who managed all aspects of the project. From late 2003 to 2005, site activities were managed by New World Technology. In 2005, management of the environmental restoration of the DOE-impacted areas at the Site was transferred from the DOE Oakland Operations Office to the DOE Office of Legacy Management. The Office of Legacy Management contracted S.M. Stoller Corporation to oversee management of the Site, who subcontracted Weiss to perform environmental engineering and monitoring tasks for the Site. S.M. Stoller Corporation and Weiss continued to support DOE in 2007.

## 1.3 Environmental Restoration

In May 1994, the United States Environmental Protection Agency (US EPA) added the Site to the National Priorities List. A site remedial investigation and feasibility study work plan was developed to ensure that investigation and remediation were conducted in accordance with applicable regulatory requirements. Remedial Project Manager meetings are held every four to six weeks to evaluate the progress of remediation and identify actions needed to facilitate the process.

Primary DOE restoration/remediation activities that have been performed at the Site include: soil and ground water characterization; building assessment; decontamination and decommissioning of above-ground structures; removal of contaminated underground tanks, trench structures and contaminated soil; and waste management. In support of the remediation activities, chemical and radiological risk assessments have been developed and DOE has prepared various CERCLA documents. In 2002, DOE completed all removal actions planned for the Site and, in 2004, shipped the remaining waste generated during these removal actions for disposal. Additional waste was disposed in 2007, which comprised the concrete curbs from the former Eastern Dog Pens generated during maintenance activities at the Eastern Dog Pens.

In 2005, UC Davis issued a revised draft human health risk assessment, which DOE used to develop a risk characterization report for the DOE areas that evaluated the risk estimates and the

associated uncertainties for the DOE areas. The risk characterization was approved by the regulatory agencies and served as the basis for the draft feasibility study for the DOE areas. The feasibility study report evaluates remedial alternatives for the DOE areas. The feasibility study report was developed in 2005, was approved by the regulatory agencies and issued as final on March 7, 2008 (Weiss, 2008a). DOE is presently developing a Proposed Plan, which is expected to be issued to the public in late 2008. The Proposed Plan identifies the preferred remedial alternatives for residual soil contamination at LEHR and provides the rationale for these preferences. The Plan was issued to the regulatory agencies on March 24, 2008 and it is presently being revised to address comments received.

## 1.4 Site Description

The Site is a 15-acre parcel owned by the Regents of the University of California. It is 1.5 miles south of the main UC Davis campus in a rural agricultural area (Figure 1-1), and is presently occupied by the UC Davis Center for Health and the Environment. Research at the Center for Health and the Environment includes toxicology, epidemiology, radiation biology and radiochemistry.

Site facilities currently consist of 15 buildings, including a main administration and office building, two former animal hospitals, a laboratory and support buildings (Figure 1-2). Former facilities include radioactive waste water treatment systems, an indoor/outdoor cobalt-60 irradiator, a radioactive waste burial area and outdoor dog pens. Inactive campus landfill units and numerous inactive campus disposal sites (i.e., trenches and holes) were used to dispose low-level radioactive and chemical waste, and are being evaluated and/or remediated by UC Davis. Figure 1-2 shows areas that have potentially impacted the environment at the Site and those areas where DOE removal actions have been completed.

## 1.5 Population Data

### 1.5.1 Site Population

The UC Davis Center for Health and the Environment conducts ongoing research in toxicology, epidemiology, radiation biology and radiochemistry with a staff of approximately 200 researchers and support personnel. Center for Health and the Environment staff have varying schedules and are not all present at the Site at the same time.

In 2007, the LEHR remediation project had no full-time workers at the Site. S.M. Stoller Corporation contracted no more than ten workers to remove concrete curbs from the Eastern Dog Pens between September and October of 2007. Contract personnel also conducted periodic site inspections and collected storm water samples at LEHR. During these scheduled site activities, DOE contractors deployed up to two workers to conduct and oversee site work.

### *1.5.2 Local Population*

The Site is located in a semi-rural area in northeastern Solano County on the UC Davis South Campus (Figure 1-1). In the Fall 2007, the UC Davis campus reported a student population of 29,796 (University of California, 2008a) and employed approximately 30,086 faculty and staff (includes student staff and medical center staff). The population of the City of Davis is reported at 64,259 residents (California Labor & Workforce Development Agency, 2008), and the population of Yolo and Solano County is 168,660 and 411,680, respectively (United States Census Bureau [USCB], 2000). The more densely populated and metropolitan Sacramento area is approximately 13 miles east of the Site. Approximately 407,018 people live in the City of Sacramento and about 1,223,499 people live in Sacramento County (USCB, 2000).

## **1.6 Environmental Setting**

The Site is located on a relatively flat plain bordered on the south by the Putah Creek Levee. The Site is mostly open, slopes gently to the east. The Site lies outside the Putah Creek 100-year floodplain.

### *1.6.1 Land Use*

The land within a one-mile radius of the Site is owned both privately and by UC Davis. It is used for animal research, agriculture and recreation (e.g., fishing and swimming). Privately-owned lands south and east of the Site are used to produce wheat, tomatoes, corn, barley and oats, and include permanent rural residences. The South Fork of Putah Creek and UC Davis land holdings (Figure 1-1) separate private property to the south of the Site. Private property to the east is adjacent to non-LEHR, UC Davis-owned research facilities and land. The property immediately west, east, north and south of the Site (Putah Creek Reserve) is owned by UC Davis and is currently used for various types of animal, agricultural and health research.

### *1.6.2 Hydrogeology*

Unconsolidated Pliocene and Pleistocene sedimentary deposits are the major ground water sources for public and private water supplies in the Sacramento Valley (State of California Department of Water Resources, 1978), in which the Site is located. Both unconfined and confined fresh water aquifers are present in the uppermost 3,000 feet of the valley subsurface. Ground water generally flows from the valley sides toward the valley axis. In the site vicinity, regional ground water generally flows east from the Coast Ranges toward the Sacramento River (Dames and Moore [D&M], 1993).

At various depths beneath the valley floor, saline water is present as a result of entrapment during the deposition of sediments in a marine environment. The depth to the base of fresh water in

the Sacramento Valley varies from 400 feet to over 3,000 feet, and is 2,600 feet to 3,100 feet below ground surface in the Davis area (State of California Division of Oil and Gas, 1982).

Previous investigations identified five hydrostratigraphic units (HSUs) beneath the Site (D&M, 1999a). These include the vadose (unsaturated) zone and HSUs 1 through 4. The vadose zone extends from the ground surface to the top of ground water, which has historically ranged from 15 feet to 55 feet below ground surface. The vadose zone consists primarily of unsaturated clay and silt with lesser amounts of interbedded sand and gravel. HSU-1 extends from the bottom of the vadose zone to depths of approximately 76 feet to 88 feet below ground surface. This unit is lithologically similar to the vadose zone and consists primarily of silt and clay, with lesser amounts of sand and gravel. HSU-2 extends from the bottom of HSU-1 to depths of approximately 114 feet to 130 feet below ground surface. This unit is composed primarily of sand in the upper portion of the unit and gravel in the middle to lower portions. HSU-3, investigated in off-site areas, extends from the bottom of HSU-2 to a depth of about 250 feet below ground surface and is approximately 120 feet thick. The unit consists primarily of relatively fine-grained sediments varying from very fine-grained sandy silt to clayey silt and silty clay. HSU-4, also investigated in off-site areas, extends from the bottom of HSU-3 to a depth of about 280 feet below ground surface and is approximately 32 feet thick. This unit consists of coarse sand and gravel. Beneath HSU-4, a sharp contact with a bluish, dark gray silt was encountered 282 feet below ground surface in wells UCD4-41 and UCD4-43 (Figure 3-1). The bottom of this unit has not been penetrated in any of the site borings (D&M, 1999a).

Irrigation water, rainfall and Putah Creek recharge ground water in the site vicinity (D&M, 1997). Ground water pumping associated with agriculture is responsible for the great majority of ground water withdrawal. Locally, UC Davis extracts contaminated ground water from HSU-2 and diverts treated ground water to its waste water treatment facility to minimize off-site migration of volatile organic compounds, particularly chloroform.

Generally, there is a 20- to 30-foot seasonal fluctuation in the water table beneath the Site caused predominantly by the lack of surface recharge and nearby agricultural pumping in the summer. Vertical gradients vary both temporally and spatially. The magnitude of the vertical gradient is greatest when ground water elevations are rising or falling sharply. Short-term activities, such as local agricultural pumping, can produce downward vertical gradients during periods of an otherwise rising water table.

The HSU-1 lateral gradient across the Site typically ranges from 0.01 feet/foot to 0.04 feet/foot, and the direction of ground water flow is predominantly northeastern. Representative values of HSU-1 horizontal hydraulic conductivity are between  $1 \times 10^{-4}$  and  $1 \times 10^{-7}$  centimeters per second (D&M, 1999a). The lateral gradient across the Site within HSU-2 typically ranges from 0.005 feet/foot to 0.015 feet/foot. The direction of flow appears to be predominantly to the northeast, although it can occasionally be to the east-southeast. Based on pumping tests, hydraulic conductivity in HSU-2 ranges from 0.26 centimeters per second to 0.43 centimeters per second (D&M, 1997).

Ground water in HSU-1, HSU-2 and HSU-4 has been impacted by site activities. Based on investigations to date (Weiss, 2003 and UC Davis, 2004), significant ground water impacts appear to

be predominantly associated with releases that have occurred within or near the UC Davis disposal areas.

### *1.6.3 Ground Water Supply and Quality*

Ground water at depths between approximately 100 and 500 feet in the site vicinity is used for agricultural and domestic supply. Shallow ground water quality, at depths above 100 feet, has been impacted by nitrates, probably from agricultural sources, and has insufficient yield that precludes its extraction for domestic or agricultural use.

### *1.6.4 Sanitary Sewer Systems*

The Site discharges its sanitary waste water to the UC Davis Campus Waste Water Treatment Plant. UC Davis operates the plant under the conditions specified in its National Pollutant Discharge Elimination System permit, granted by the Central Valley Regional Water Quality Control Board under agreement with the US EPA.

### *1.6.5 Storm Drainage System*

Storm water runoff from the DOE areas at the Site is mainly collected in an underground drainage system. Storm water from the paved area in the western part of the Site and around the southern buildings in the western area is collected in a storm water drainage system. This system drains to the site storm water lift station (LS-1 shown on Figure 3-1) and then to an outfall along the west side of Old Davis Road. Storm water in the northwestern area of the Site drains into a ditch along Old Davis Road. Storm water in the eastern and non-paved southern portions of the Site percolates into the ground, except for a section of the former Cobalt-60 Field where dog pens were once located and where drainage is connected to the sanitary sewer. During and after heavy rains, storm water runoff forms ponds in some areas of the Site. The re-grading of the Western Dog Pens area conducted in 2006 has reduced ponding in this area of the Site.

### *1.6.6 Biological Resources*

A number of sensitive biological resources were identified in an Ecological Scoping Assessment (Weiss, 1997b) as potentially occurring in the vicinity of the Site. These species include the Giant Garter Snake, the Northern Harrier, the Coopers Hawk, the California Horned Lark, the Great Egret, the Burrowing Owl and the Valley Elderberry Longhorn Beetle, which lives in elderberry bushes. Although elderberry bushes are present at the Site, a focused biological survey (IT Corporation, 1998) found no sensitive species actually present on site and concluded that the on-site elderberry bushes are not currently hosting the Valley Elderberry Longhorn Beetle.

An ecological risk assessment evaluating the impact of residual site contamination on ecological resources was issued by UC Davis and approved by regulatory agencies in August 2006. It concludes that residual contamination at the Site is not a concern for ecological receptors.



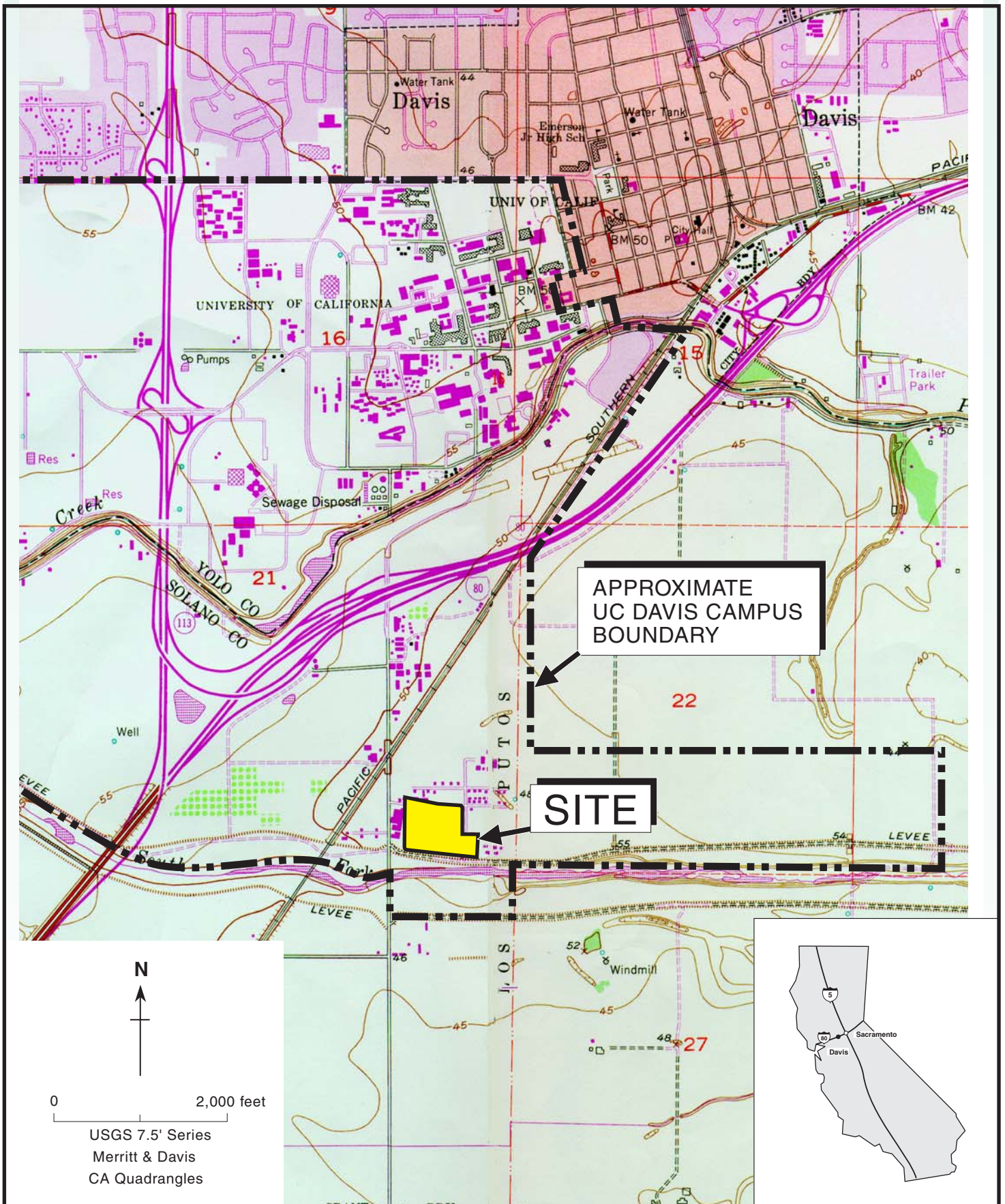


Figure 1-1. Location of the LEHR Site, UC Davis, California

Weiss Associates



Figure 1-2. Site Features and Potential Contaminant Source Areas

Weiss Associates

## 2. COMPLIANCE SUMMARY

This section summarizes LEHR's environmental regulatory compliance status during the environmental restoration and waste management activities conducted in Calendar Year 2007. No violations, fines or penalties were issued for the Site in 2007.

### 2.1 Environmental Restoration and Waste Management

Environmental restoration and waste management activities at LEHR were conducted in compliance with CERCLA and the National Contingency Plan, and include compliance with applicable or relevant and appropriate requirements and DOE Orders, as described below.

#### 2.1.1 *Comprehensive Environmental Response, Compensation and Liability Act as Amended by the Superfund Amendments and Reauthorization Act*

In 1995, a streamlined remediation process was initiated at the Site using the CERCLA non-time critical removal action approach. This approach enables expedited response to contamination problems without requiring the time-consuming investigations and preparation of lengthy documents required otherwise. By 2003, DOE had finished all removal actions planned for the Site.

In 2004, UC Davis developed draft site-wide human health and ecological risk assessments (each comprised of a risk estimate and a risk characterization component). The human health risk estimate was finalized in 2005 and served as a basis for DOE's human health risk characterization of the DOE areas. Also in 2005, separate human health and ecological risk assessments were conducted by DOE to evaluate the potential risks associated with reuse in the Western Dog Pens of soil that had been removed from the Southwest Trenches area. In 2005, DOE issued a risk characterization for the DOE areas based on the site-wide human health risk characterization. The human health risk estimate and characterization for the DOE areas and the human health and ecological risk assessments for the Western Dog Pens formed the basis for selection of contaminants of concern to be evaluated in a feasibility study report.

A site-wide ecological risk assessment was revised by UC Davis in 2005 and 2006, and finalized in August 2006. The assessment concludes that residual contamination at the Site is not a concern for ecological receptors. The results of the site-wide ecological risk assessment were incorporated into the feasibility study report.

A draft feasibility study report, which evaluates remedial alternatives for the DOE areas, was developed in 2006, and completed and issued for review to the regulatory agencies in February 2006. The document was revised in response to comments from the agencies in October 2006 and reissued for review. Comments received from regulatory agencies in 2007 were addressed and a final document was issued and approved by the agencies on March 7, 2008.

In late 2007, DOE began to develop a Proposed Plan that identifies the preferred remedial alternatives for residual soil contamination and provides the rationale for these preferences. For most DOE areas, alternatives including no further action, long-term ground water monitoring, excavation, bioremediation and land-use restrictions are being proposed by DOE. The Plan was issued to the regulatory agencies on March 24, 2008 and it is presently being revised to address comments received. It is expected to be issued for public review and comment in late 2008.

### *2.1.2 Resource Conservation and Recovery Act*

No hazardous waste requiring compliance with the Resource Conservation and Recovery Act was generated, managed, shipped or disposed in 2007.

### *2.1.3 Federal Facilities Compliance Act*

The Federal Facilities Compliance Act amends the Solid Waste Disposal Act and states that all federal agencies are subject to all substantive and procedural requirements of federal, state, and local solid and hazardous waste laws in the same manner as any private party. The act requires that a site treatment plan be prepared for each DOE site that generates or stores mixed radioactive waste. A final site treatment plan for LEHR was approved and issued in October 1995. No revisions have been made to this plan. The Site continues to be in compliance with the Federal Facilities Compliance Act.

### *2.1.4 National Environmental Policy Act*

Consistent with DOE policy and guidance, environmental considerations of proposed actions are evaluated concurrent with CERCLA studies, such as feasibility studies. The integration of National Environmental Policy Act requirements with the CERCLA process eliminates the need for a separate National Environmental Policy Act analysis and streamlines the cleanup process. The feasibility study report for the DOE areas issued and approved in March 2008 includes an environmental assessment in compliance with the National Environmental Policy Act.

### *2.1.5 Toxic Substances Control Act*

Concern over the toxicity and persistence in the environment of polychlorinated biphenyls led Congress in 1976 to enact Section 6(e) of the Toxic Substances Control Act that included, among

other things, prohibitions on the manufacture, processing, and distribution in commerce of polychlorinated biphenyls. The Toxic Substances Control Act legislates management of polychlorinated biphenyls from manufacture to disposal. No polychlorinated biphenyl-containing material or waste was generated, managed or disposed in 2007.

### *2.1.6 Federal Insecticide, Fungicide and Rodenticide Act*

The US EPA, under the Federal Insecticide, Fungicide and Rodenticide Act, regulates the sales, distribution, and use of pesticides by requiring their registration. Registration includes approval by the US EPA of the pesticide's label, which must give detailed instructions for its safe use. The US EPA must classify each pesticide as either "general use," "restricted use," or both. Only registered general use herbicides are applied at the Site by the UC Davis Agricultural Services Department to control weeds. The herbicides are used in accordance with the safe use instructions and in compliance with UC Davis campus requirements, and local, state and federal laws.

## **2.2 Radiation Protection**

Under the Atomic Energy Act of 1954, as amended, DOE has the responsibility of controlling the activities of its contractors and operations in a manner that protects the public and the environment from radiation hazards associated with its operations. Title 10 Code of Federal Regulations (CFR) Part 835, Occupational Radiation Protection provides implementing regulations applicable to DOE.

During the 2007 maintenance actions, all site workers who performed concrete curb and fence post removal activities at the Eastern Dog Pens received 16-hours of Radiation Worker II training provided by S.M. Stoller. Applicable training records and certifications were approved and retained by S.M. Stoller.

### *2.2.1 Occupational Radiation Protection (10 CFR Part 835)*

All work at LEHR is performed in compliance with Title 10 CFR Part 835. The *Final Quality Assurance Project Plan* (Weiss, 2000b) requires that environmental monitoring aspects of all operations and activities at LEHR be addressed in the work plans developed for specific activities. All activities at LEHR complied with the *Final Quality Assurance Project Plan* in 2007.

### *2.2.2 DOE Order 5400.5, Radiation Protection of the Public and the Environment*

The *Final Report on the Radiation Protection of the Public and the Environment* (Weiss, 2001g) was developed in 2001. The purpose of this report was to evaluate LEHR operations

and document their compliance with DOE Order 5400.5, Radiation Protection of the Public and the Environment. LEHR operations continued to be in compliance with DOE Order 5400.5 in 2007.

### 2.2.3 DOE Order 450.1A, Environmental Protection Program

In 2001, the *Final Environmental Protection Program* (Weiss, 2001e) was developed, which defines environmental protection activities and monitoring conducted at LEHR, including radiological controls and monitoring requirements. This program complies with DOE Order 5400.1, which was subsequently replaced by DOE Order 450.1, Environmental Protection Program. Activities conducted at LEHR in 2007 were in compliance with DOE Order 450.1A, Environmental Protection Program (DOE, 2008b) as discussed in Section 3.

### 2.2.4 DOE Order 435.1, Radioactive Waste Management

The comprehensive *Final Radioactive Waste Management Basis* (Weiss, 2001f) and *Radioactive Waste Management Plan and Standard Operating Procedures* (Weiss, 2001d) were developed and approved in 2001, and at that time existing standard operating procedures for waste management were updated to meet the requirements of DOE Order 435.1. By 2005, all legacy radioactive waste had been removed from the Site.

In 2007, approximately 330 tons of low-level waste consisting of concrete, steel fence posts, chain link fencing and tree limbs removed from the Eastern Dog Pens area were shipped to EnergySolutions LLC, a low-level radioactive waste disposal facility in Clive Utah. The waste was packaged and shipped in accordance with the S.M. Stoller Environmental Protection Manual, as revised (Document Number SO432900), Chapters 9.0 Waste Management Program and 10.0 Transportation Programs for Hazardous and Radioactive Materials and Wastes, and in accordance with the receiving facility's waste acceptance criteria and was classified for shipment as non-regulated radioactive material according to the United States Department of Transportation.

## 2.3 Air Quality and Protection

### 2.3.1 Clean Air Act

Under the Clean Air Act, the US EPA defined six criteria pollutants: carbon monoxide, nitrogen dioxide, lead, ozone, particulate matter and sulfur dioxide, and set National Ambient Air Quality Standards for these pollutants. Of these, the only air pollutant emitted at the Site is particulate matter with aerodynamic size less than or equal to 10 micrometers from uncovered soils in the Eastern and Western Dog Pens. The Site is not a major source of air emissions.

In 2007, the Site was in compliance with all Clean Air Act requirements administered by the Yolo-Solano Air Quality Management District. Ambient air monitoring was routinely conducted between 1995 and 2001 by DOE. This prior data and current post-removal action site conditions indicate that surface soil contamination does not impact air quality at the Site.

Air monitoring was conducted from September 18, 2007 to October 23, 2007 during the curb removal activities in the Eastern Dog Pens. Dust monitors were placed at two locations to measure particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>) during the concrete removal and concrete crushing activities. The highest daily average dust concentration recorded was 0.011 milligrams per cubic meter (mg/m<sup>3</sup>) on September 19, 2007. The average PM<sub>10</sub> concentration over the entire monitoring period was 0.005 mg/m<sup>3</sup>. On September 25, 2007, the maximum PM<sub>10</sub> measurement was 0.043 mg/m<sup>3</sup>, but the daily average concentration was 0.002 mg/m<sup>3</sup>. Measured dust concentrations were well below the California Division of Occupational Safety and Health's permissible exposure level for respirable dust of 5.00 mg/m<sup>3</sup> throughout the monitoring period. Additionally, concrete curb material was analyzed prior to commencement of removal activities to determine the presence or absence of asbestos-containing material (ACM) that could potentially be released during curb crushing activities. The analysis indicated the absence of ACM. The Yolo-Solano Air Quality Management District (District) was notified of the sample results to ensure compliance with rules applicable to asbestos demolition activities conducted within the District.

### 2.3.2 National Emission Standards for Hazardous Air Pollutants

Subpart H of Title 40 CFR Part 61 protects the public and the environment from the hazards of radionuclide emissions, other than radon, from DOE facilities. It sets a limit on the emission of radionuclides that ensures that no member of the public in any year receives an effective dose equivalent of more than 10 millirem per year (mrem/yr).

The National Emission Standards for Hazardous Air Pollutants requirements primarily target point-source/stack emissions. There are currently no point sources of radionuclide emissions at the Site. However, the Memorandum of Understanding between DOE and the US EPA (DOE, 1995) applies the point-source criteria to potential diffuse area sources at the Site.

The 2007 estimated dose to the public from the Site's diffuse area sources was calculated using available surface soil concentrations and assuming that wind-blown fugitive dust from the Western and Eastern Dog Pens, including re-entrainment and dispersion of surface soil dust, was the only potential sources of emissions. The analysis of potential diffuse airborne radiological effluent sources at the Site is included in the *Final Radionuclide Air Emission Annual Report (Subpart H of 40 CFR 61) Calendar Year 2007* (Weiss, 2008b). Emissions modeling indicated that the total contribution to the maximum effective dose equivalent to a member of the public from diffuse-source emissions for reporting year 2007 is estimated to be 8.1E-2 mrem/yr (about 0.8% of the 10 mrem/yr standard). This result is approximately 2E-2 mrem/yr higher than the result from the previous year, which was between one and two orders of magnitude greater than the results of the previous seven years. The higher contribution to the effective dose equivalent during the past two years were due to

emissions from short-term grading events conducted during the fall of 2006 and the fall of 2007. This analysis is discussed in more detail in Section 4 of this report.

## 2.4 Water Quality and Protection

### 2.4.1 Clean Water Act

As authorized by the Clean Water Act, the National Pollutant Discharge Elimination System permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States. The Site discharges its sanitary waste to the UC Davis Waste Water Treatment Plant, which is subject to the conditions in National Pollutant Discharge Elimination System Permit CA0077895, issued to UC Davis, and Waste Discharge Requirement Order No. 92-040, granted by the Central Valley Regional Water Quality Control Board. No waste water, other than sanitary waste, was discharged from LEHR to the waste water treatment plant in 2007.

Under the Clean Water Act, the US EPA also controls polluted storm water runoff. In California, this function is delegated to the California Regional Water Quality Control Board, under state-wide National Pollutant Discharge Elimination System General Permits for Storm Water Discharges Associated with Industrial and Construction Activities. A storm water sampling program described in the *Final Revised Field Sampling Plan* (D&M, 1998) is implemented at the Site and meets the state General Permit requirements. Best management practices are used at the Site to mitigate any potential contamination in storm water runoff. In 2007, DOE installed a silt fence around the former Western Dog Pens area to minimize the migration of sediment from the area.

Under the *Final Revised Field Sampling Plan* (D&M, 1998), storm water samples are usually collected twice a year, once near the beginning of the rainy season, after the first significant storm of the season, and once near the end of the rainy season. Surface water samples are also collected and analyzed in accordance with the *Final Revised Field Sampling Plan* (D&M, 1998). Details of the sampling and analyses are provided in the *Final 2007 Comprehensive Annual Water Monitoring Report* (Brown & Caldwell, 2008) and are summarized herein in Section 3.

### 2.4.2 Drinking Water Requirements

Under the Safe Drinking Water Act, the US EPA sets standards to protect drinking water quality and drinking water sources, including rivers, lakes, reservoirs, springs and ground water wells. The California Porter-Cologne Water Quality Act authorizes the State Water Resources Control Board and Regional Water Quality Control Board to coordinate and control water quality in the state. The regional boards establish and enforce water quality standards for both surface and ground water by issuing permits for discharges of waste water into state water bodies. The Safe Drinking Water and Toxics Enforcement Act prohibits discharge or release of chemicals known to



the State of California to cause cancer or reproductive toxicity into water, or onto or into land where such chemicals pass, or probably will pass, into any source of drinking water.

Historically, contaminated liquid waste was discharged from DOE research activities to the Imhoff Treatment Facility, the Domestic Septic Systems and the Radium/Strontium Treatment Systems and associated leach fields, which resulted in hazardous releases to site soils. These structures and associated contaminated soils have been removed and shipped off site for disposal, with the final shipment of pipe joints shipped in 2003. Current DOE activities at LEHR do not discharge contaminants to any drinking water sources.

According to the Memorandum of Agreement between UC Davis and DOE (DOE, 1997), potential impacts to ground water from past site activities are to be addressed by UC Davis. UC Davis is conducting a ground water interim remedial action consisting of ground water extraction from HSU-2, air stripping of volatile organic compounds, primarily chloroform, and discharging the treated ground water to the UC Davis Campus Waste Water Treatment Plant. Ground water and surface water monitoring has been conducted since November 1990. Monitoring activities conducted in 2007 are summarized in Sections 4, 5 and 6.

## 2.5 Other Environmental Statutes

### 2.5.1 Endangered Species Act

In 1997, an ecological scoping assessment (Weiss, 1997b) was conducted to support the *Draft Final Determination of Risk-Based Action Standards for DOE Areas* (Weiss, 1997a). The ecological scoping assessment identified special status species that have a high potential to exist in or near Putah Creek, including two plant species, five invertebrates, nineteen birds, two reptiles, one amphibian and four mammals. Habitat for the Valley Elderberry Longhorn Beetle, a threatened species under the Endangered Species Act, was identified in the Western Dog Pens, Eastern Dog Pens and the former Cobalt-60 Field. As discussed in Section 2.1.1, a draft ecological risk assessment was developed by UC Davis in 2004, revised in 2005, and a final assessment was issued by UC Davis and approved by regulatory agencies in August 2006. It concludes that residual contamination at the Site is not a concern for ecological receptors.

In 2007, prior to the maintenance activities in the Eastern Dog Pens, Weiss contacted the United States Fish and Wildlife Service and the National Oceanic and Atmospheric Administration on behalf of DOE for consultation under the Endangered Species Act. Both agencies concurred with Weiss's assessment that no adverse effects to listed species would result from the curb and fence removal in the area. The project was implemented with oversight from a qualified biologist and resulted in no habitat modifications or adverse effects on any listed species. No other habitat modifications or adverse effects on listed species resulted from any of the 2007 site activities.

### 2.5.2 *National Historic Preservation Act*

An archeological evaluation was conducted during the Phase II soil and ground water characterization of the Site (D&M, 1992). No evidence of cultural resources, historical or archeologically sensitive areas was encountered in 2007.

### 2.5.3 *Migratory Bird Treaty Act*

The Migratory Bird Treaty Act governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts and nests. No activities resulting in taking of any migratory birds, their eggs, parts or nests occurred at the Site in 2007.

## 2.6 **Executive Orders**

### 2.6.1 *Executive Order 13148, "Greening the Government through Leadership in Environmental Management" replaced by Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management"*

Executive Order 13423 (EO, 2007a), sections 2(e)(i) and 3(a)(vi) require compliance with the Emergency Planning and Community Right-to-Know Act (EPCRA), also known as the Superfund Amendments and Reauthorization Act (SARA) Title III. SARA Title III requires facilities to provide information on the presence of hazardous chemicals and on the releases, both accidental and routine, of such chemicals into the environment. This information is used by state and local emergency agencies, hospitals, police and fire departments and emergency response teams in responding to chemical emergencies, and is also available to the public to inform them of chemical hazards present in their neighborhood. The toxic release inventory requirements of SARA apply to facilities that use large amounts of certain chemicals. All hazardous materials stored at the Site were transferred to UC Davis's control on April 14, 2005 and no chemicals were stored and used at LEHR in 2007; therefore, the SARA Title III planning and notification requirements and TRI reporting requirements were not applicable to the operation in 2007.

### 2.6.2 *Executive Order 11988, "Floodplain Management"*

The Site is not on a 100-year floodplain, as defined by the Federal Emergency Management Agency.

### 2.6.3 *Executive Order 11990, "Protection of Wetlands"*

No portion of the Site is designated as a wetland.

## 2.7 **Other Major Environmental Issues and Actions**

No violations, compliance orders or negative audit findings were issued to LEHR in 2007.

No new environmental programs and procedures were developed, approved or implemented in 2007.

## 2.8 **Continuous Release Reporting**

In accordance with CERCLA, non-permitted hazardous substance releases in quantities exceeding the CERCLA reportable quantity must be reported to the National Response Center. No such releases occurred at the Site in 2007.

## 2.9 **Unplanned Releases**

No unplanned releases occurred at the Site in 2007. No reports of unusual or off-normal occurrences under DOE Order 232.1A, the governing DOE Order for occurrence reporting under S.M. Stoller Corporation's contract with DOE, were made in 2007.

## 2.10 **Summary of Permits**

DOE is not required to obtain any environmental permits for remediation and waste management activities conducted under CERCLA at LEHR.

### 3. ENVIRONMENTAL MANAGEMENT SYSTEM

According to the objectives of DOE Order 450.1A (DOE, 2008b), DOE sites should implement sound stewardship practices protective of the air, water, land and other natural and cultural resources potentially impacted by their operations. Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* (EO, 2007a), Instructions for Implementing EO 13423 (EO, 2007b), and DOE Order 450.1A (DOE, 2008b) require DOE sites to have an environmental management system (EMS) in place and audited by June 2009. DOE Office of Legacy Management and S.M. Stoller developed a joint EMS, which based on the new requirements defined in the orders is scheduled for an independent audit in March of 2009. Full conformance with these orders and DOE Order 430.2B, *Departmental Energy, Renewable Energy, and Transportation Management* (DOE, 2008a) is required by June 30, 2009.

The EMS defines a systematic approach for minimizing the environmental impacts associated with work activities and services performed by, and products developed or procured by the DOE Office of Legacy Management and DOE's contractors. The joint EMS implementation strategy is documented in three manuals, which include the Environmental Management Description (DOE, 2008c), the Environmental Management Systems Programs Manual (DOE, 2008d), and the Environmental Protection Manual (DOE, 2008e). The DOE LM/Stoller EMS adheres to the "Plan-Do-Check-Act" principles; mandates environmental compliance; and integrates green initiatives into all phases of work, including: scoping, planning, construction, subcontracts, and operations. The EMS provides specific procedures for planning and mitigating negative impacts of proposed projects or actions on the environment by promoting utilization of recycled materials, recycling to the extent practicable, conserving fuel, energy, and natural resources, minimizing the generation of green house gases, and the minimization of toxic chemicals and the generation of hazardous wastes.

Environmental management at the Site is conducted under the umbrella of the joint EMS and ensures protection of air, water, land and other natural and cultural resources potentially impacted by site operations. Each year, DOE collects and evaluates environmental samples to monitor the air, water and soil conditions at the Site and evaluates relevant sample data obtained from UC Davis. This section describes the LEHR environmental monitoring program and summarizes the environmental monitoring activities conducted in 2007. The analytical results generated by this monitoring program are discussed in Sections 4, 5 and 6.

#### 3.1 Environmental Management Policy and System Elements

The *Final Quality Assurance Project Plan* (Weiss, 2000b) defines the management and program approach and explicitly incorporates the protection of the environment into site activities. In 2007, environmental management was integrated into the overall management framework for site

environmental restoration by integrating the evaluation of applicable environmental requirements and objectives into the CERCLA process and ongoing environmental compliance monitoring activities.

### 3.1.1.1 Environmental Management System Elements

All legal and regulatory requirements are evaluated for all proposed actions undertaken at the Site as part of the applicable, relevant and appropriate requirements development process. Environmental objectives and targets for remediation of the Site are set in CERCLA documents such as risk assessments, feasibility studies and others. Waste minimization and source reduction are included in waste management activities, as discussed in Section 3.2. The quality assurance program plan defines roles, responsibilities, authorities and resources of site staff, operational controls, training requirements (Section 3.5), document control and retention, compliance evaluation, nonconformity, preventive and corrective actions, and internal surveillance and management audit requirements. The Contingency Plan and General Emergency Response Plan provide emergency preparedness and response procedures. The *Final Environmental Protection Program* defines the monitoring and measurement activities for the Site (Weiss, 2001e). The monitoring results are discussed in Section 3.3. Other programs with requirements related to the Site's environmental activities and performance include:

- *Final Report on the Radiation Protection of the Public and the Environment* (Weiss, 2001g);
- *Final Radiation Protection Program* (Weiss, 1999b);
- *Final As-Low-As-Reasonably-Achievable Plan* (Weiss, 2001a);
- *Radioactive Waste Management Program and Standard Operating Procedures* (Weiss, 2001d);
- *Hazard Category Evaluation* (safety basis documentation) (Weiss, 2001c);
- *Final Standard Operating Procedures*, Standard Operating Procedure 42.1, Environment, Safety and Health Reporting (Weiss, 2001h);
- *Draft Final Occurrence Reporting Plan* (Weiss, 2000a);
- National Environmental Policy Act Environmental Assessments (D&M, 1997, Weiss, 1998, D&M, 1999b, Weiss, 2001b, and Weiss, 2006); and
- *Final Revised Field Sampling Plan* (D&M, 1998) implemented by UC Davis for ground water, surface water, soil, sediment, air and biota monitoring.

With the decrease in scope of site activities and the transition of site management to a small business, the scope of environmental and other compliance programs implemented at the Site has been scaled back proportionately.

## 3.2 Pollution Prevention and Waste Minimization

The LEHR waste management program is committed to minimizing waste volumes by giving preference to source reduction, material substitution, decontamination and recycling. Applicable pollution prevention and waste minimization activities include:

- Avoiding the use of porous materials that cannot be decontaminated;
- Minimizing personal protective equipment waste through effective planning;
- Using real-time analyses to delineate the extent of contamination;
- Optimizing waste container utilization and recycling;
- Removing surface contamination from subsurface structures and pipes; and
- Reusing uncontaminated soil and materials on site.

Waste minimization was considered in the development of remedial alternatives in the feasibility study for the DOE areas and during Site maintenance activities, including the concrete curb and fence removal from the Eastern Dog Pens, conducted in 2007.

### 3.2.1 Recycling

A recycling program instituted in 2001 continued at LEHR in 2007 to the extent that personnel were present at the Site. To the extent practicable, all paper, plastic and cardboard wastes generated by the project are recycled and volumes are reported through the Stoller EMS Waste Minimization, Pollution Prevention Program.

## 3.3 Environmental Monitoring and Surveillance

In accordance with Section 7 of the *Final Environmental Protection Program* (Weiss, 2001e<sup>1</sup>), environmental monitoring was performed by S.M. Stoller Corporation, Weiss and/or their subcontractors, with the exception of ground and surface water monitoring, which was performed by UC Davis.

Environmental monitoring at LEHR is composed of two activities: effluent monitoring and environmental surveillance. Effluent monitoring involves the collection and analysis of liquid and gaseous effluent samples to characterize and quantify contaminants released to the environment. These data are used to assess the exposure of and risk to the public, and to demonstrate compliance with applicable regulations. Environmental surveillance involves the collection and analysis of air, water, soil, terrestrial foodstuffs, biota and other media on or near DOE sites, and the measurement of external radiation. These data are used to assess potential exposure to the public, evaluate impacts

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<sup>1</sup> A program developed under DOE Order 5400.1.

on the environment and demonstrate compliance with applicable regulations. Because activities at the Site are conducted under Superfund requirements, water, soil and biota monitoring is integrated into the Superfund process, as discussed in the following sections.

### 3.3.1 *Pre-Operational Monitoring*

In accordance with the *Final Environmental Protection Program* (Weiss, 2001e), an environmental study must be conducted prior to start of any new process that has the potential for significant adverse environmental impact. The study should be not less than one year, and preferably two years, before the start of any new process to evaluate seasonal changes and be consistent with National Environmental Policy Act requirements. The study shall:

- Characterize existing physical, chemical and biological conditions that could be affected;
- Establish background levels of radioactive and chemical components;
- Characterize pertinent environmental and ecological parameters;
- Identify potential pathways for human exposure or environmental impact; and
- Provide a basis for developing routine operational and emergency effluent monitoring and environmental surveillance programs.

No activities with potential for significant adverse environmental impacts were conducted at the Site in 2007. Proposed remedial activities were evaluated in the feasibility study in compliance with National Environmental Policy Act requirements. The maintenance activities conducted in the Eastern Dog Pens (concrete curb and fence removal) were determined to have no adverse effects on protected species (Cross, P. A., 2007), (McInnis, R. R., 2007), (Weiss, 2007).

### 3.3.2 *Surface and Storm Water Monitoring*

There are currently no active process-based effluent discharges from LEHR facilities to the environment that would require effluent stream monitoring. Surface and storm water runoff are the only potential liquid effluent sources of contamination.

Certain storm drains at LEHR are directed into the UC Davis combined storm and sanitary sewer system and subsequently treated by the UC Davis Waste Water Treatment Plant. The plant operates under National Pollutant Discharge Elimination System Permit No. CA0077895, which contains the waste water discharge requirements for the facility. Environmental monitoring and surveillance of the UC Davis Waste Water Treatment Plant is conducted by UC Davis, and is discussed in Sections 4.3 and 5.3 of this report.

Surface water monitoring is conducted by UC Davis in accordance with the *Final Revised Field Sampling Plan* (D&M, 1998) developed to comply with US EPA and DOE requirements for

chemical and radiological analyses, respectively. Samples are collected at three locations along the South Fork of Putah Creek (Figure 3-1). The Putah Creek Upstream (PCU) monitoring point is located upstream of the Site. The Putah Creek Downstream (PCD) monitoring point is located downstream of the Site and UC Davis property. The sewage treatment plant outfall (STPO) monitoring station is located at the outfall of the UC Davis Waste Water Treatment Plant, which discharges into the South Fork of Putah Creek between PCU and PCD (Figure 3-1).

Surface water runoff samples are collected quarterly and are analyzed for radioactive and hazardous materials. The types of analyses are based upon those contaminants historically present at the Site and are monitored as part of ongoing LEHR activities.

In accordance with the Memorandum of Agreement between DOE and UC Davis (DOE, 1997), DOE collects storm water samples from a lift station located on the western border of the Site (LS-1 on Figure 3-1), and UC Davis collects samples from the UC Davis areas of the Site (LF-1 and LF-3 on Figure 3-1). The LS-1 collection point is a lift station located on the western side of the Site, which pumps runoff to a ditch along the west side of Old Davis Road. All the storm water monitoring data collected by UC Davis and DOE are included in an annual report prepared by UC Davis. In accordance with the *Final Revised Field Sampling Plan* (D&M, 1998), sampling is conducted for two separate rainfall events: (1) the first significant storm event of the rainy season to sample runoff that may carry material that accumulated on the ground surface during the summer months; and (2) a large storm event late in the rainy season. Storm water samples are analyzed for the following possible contaminants: selected radionuclides (tritium, carbon-14, strontium-90, radium-226), metals, chromium, nitrate, acute aquatic toxicity, alkalinity, other cations and anions, volatile organic compounds, chloroform, semi-volatile organic compounds, pesticides, polychlorinated biphenyls, total oil and grease, suspended and dissolved solids, and total organic carbon.

In 2007, UC Davis performed all surface water monitoring and monitored storm water runoff from the UC Davis areas of the Site. DOE monitored storm water runoff from the DOE areas only. The surface water monitoring results are discussed in detail in Sections 4.3.1 (radiological) and 5.3.1 (non-radiological).

### **3.3.2.1 Surface Water Protection**

Surface water protection in 2007 was achieved through prevention measures, such as dust suppression during concrete crushing and earth disturbing activities in the Eastern Dog Pens and installation of a temporary silt fence in the Eastern Dog Pens for the duration of the maintenance activities. The disturbed area was graded and uneven surfaces left by the removal activities were filled to prevent ponding in the area. DOE also completed an installation of a silt fence surrounding the north and west sides of the former Western Dog Pens area and the north side of the former Southwest Trenches area to minimize sediment migration for the area.



### 3.3.3 Ground Water Monitoring

DOE and UC Davis signed a Memorandum of Agreement (DOE, 1997) to divide responsibility for site areas of contamination according to historical site use and operation. UC Davis has assumed responsibility for ground water monitoring and remediation activities. The locations of ground water monitoring wells are shown on Figure 3-1.

In 2007, UC Davis performed all site ground water monitoring. The ground water monitoring results are discussed in Section 6.

### 3.3.4 Air Monitoring

There are currently no point sources of radionuclide or chemical emissions at LEHR. The only potential sources of air emissions in 2007 were concrete removal and crushing activities and areas with exposed soil, such as the Eastern Dog Pens. Under realistic conditions, airborne effluent from these sources does not require sampling for hazardous materials, because there are no appreciable quantities of uncontained hazardous materials in the surface soil (D&M, 1992; Bechtel Environmental, Inc., 1991).

Radioactive and non-radioactive materials in air were monitored at a number of locations at and near the Site from August 1995 through 2002, during site remediation activities. The majority of radionuclide analytical results for samples collected during this period were close to or below the minimum detectable activity for the laboratory analysis methods. Due to the completion of remediation activities, DOE discontinued surveillance air monitoring at the Site at the end of 2002. Limited air monitoring for airborne particulates was conducted during the concrete curb removal work in the Eastern Dog Pens in 2007 to ensure compliance with occupational health requirements. The average concentration of PM<sub>10</sub> over the entire monitoring period was 0.005 mg/m<sup>3</sup>. The maximum PM<sub>10</sub> measurement was 0.043 mg/m<sup>3</sup>, with a corresponding daily average concentration of 0.002 mg/m<sup>3</sup>. Measured dust concentrations were well below the California Division of Occupational Safety and Health's permissible exposure level for respirable dust of five mg/m<sup>3</sup>.

Airborne emissions of radioactive and hazardous materials from DOE-controlled facilities are subject to US EPA regulations. The primary regulatory driver for air monitoring programs at DOE facilities is Title 40 CFR Part 61, Subpart H, National Emission Standards for Hazardous Air Pollutants for Emissions of Radionuclides from DOE Facilities. Subpart H of the National Emission Standards for Hazardous Air Pollutants requirements primarily targets point-source/stack emissions. However, a Memorandum of Understanding between the DOE and the US EPA (DOE, 1995) applies the same criteria to potential diffuse area sources as are required of point sources. The National Emission Standards for Hazardous Air Pollutants regulations require that radionuclide emissions not exceed levels that would result in an effective dose equivalent of 10 mrem/yr. Measurement of emission rates is required for all release points with the potential to release radionuclides into the air that would cause an effective dose equivalent in excess of one percent of the standard (i.e., an effective dose equivalent greater than 0.1 mrem/yr) and all radionuclides which could contribute to greater than 10 percent of the potential effective dose equivalent for a release point. A discussion of

compliance with Subpart H of the National Emission Standards for Hazardous Air Pollutants is provided in Section 4.1.1.

### 3.3.5 *Environmental Dosimetry*

The thermoluminescent dosimetry program used to quantify the exposure of on- and off-site personnel to penetrating gamma radiation was discontinued at the end of 2004 after completion of site removal actions.

## 3.4 **Protection of Biota**

Order 5400.5 (1991) requires that populations of aquatic organisms be protected to a dose limit of one rad per day. Recommended dose limits of one rad per day for terrestrial plants and 0.1 rad per day for terrestrial animals are to be applied in the evaluation of terrestrial systems. The DOE Technical Standard, A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota (DOE-STD-1153-2002), is available for use in the evaluation and reporting of compliance with both aquatic and terrestrial biota dose limits.

As discussed in Section 2.1.1, an ecological risk assessment evaluating the impact of residual site contamination on ecological resources, including aquatic and terrestrials species, was approved by regulatory agencies in August 2006. It concludes that residual contamination at the Site is not a concern for ecological receptors.

## 3.5 **Training**

Due to completion of site removal action and waste management activities, on-going site training has been reduced to the minimum required for conducting routine site inspections and collection of samples.

In 2007, project-specific training was conducted prior to conducting concrete curb and fence removal activities in the Eastern Dog Pens. Workers who performed concrete curb and fence post removal activities received 16-hour Radiological Worker II training provided by S.M. Stoller. Training records and certifications were submitted to S.M. Stoller Occupational Medicine for review and approval. Supplemental safety training was provided throughout the project at daily safety meetings. When additional safety precautions were required, pre-task meetings were held to discuss the hazards and their controls. The site supervisors held daily activity planning meetings during the maintenance activities in the Eastern Dog Pens.

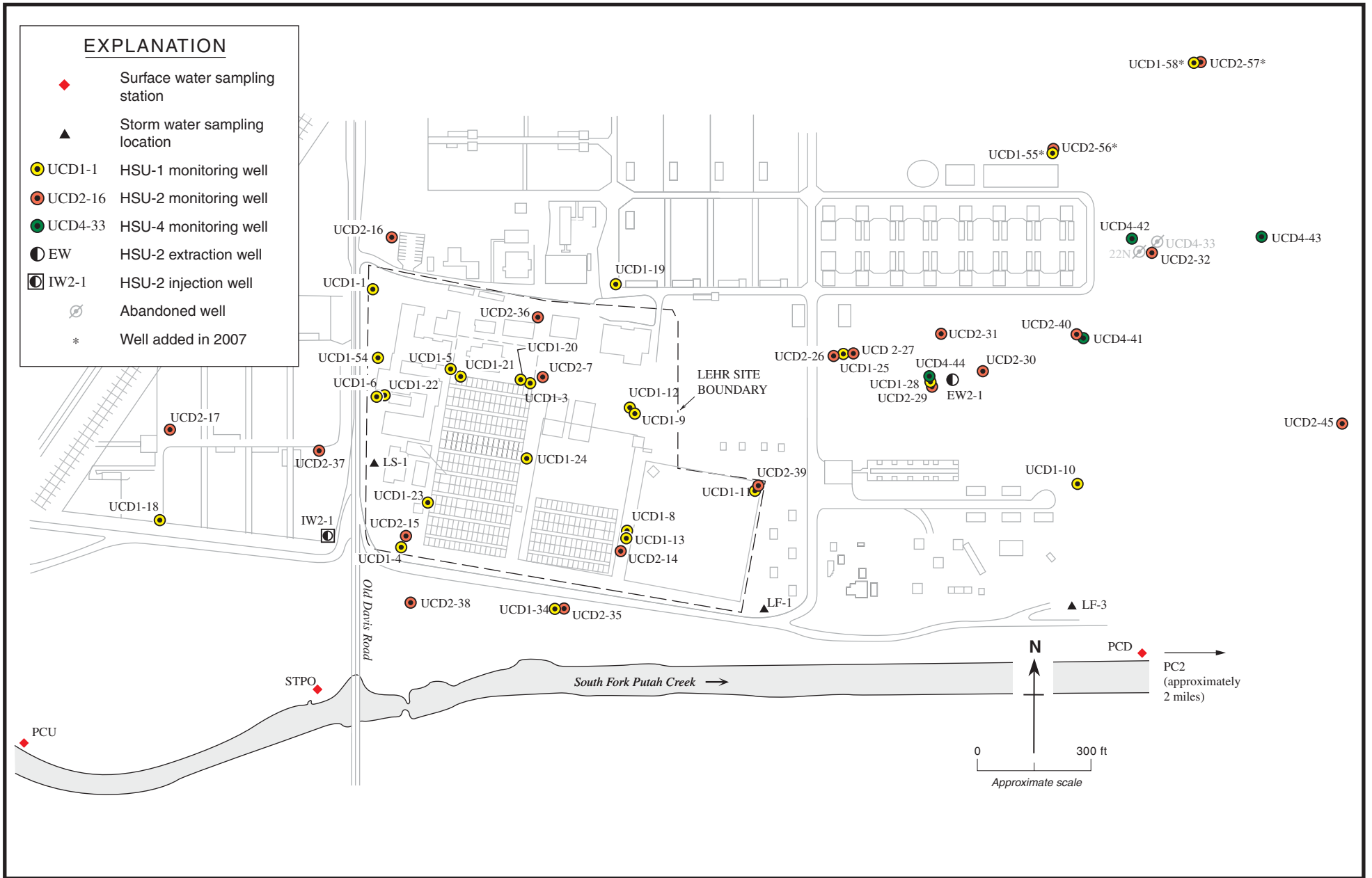


Figure 3-1. Ground Water, Storm Water and Surface Water Monitoring Locations

Weiss Associates

## 4. ENVIRONMENTAL RADIOLOGICAL PROTECTION PROGRAM INFORMATION

This section summarizes significant results and trends in radiological air, soil and water monitoring data for 2007. The majority of radionuclide sample results for samples collected at the Site in 2007 were close to or below the minimum detectable activity for the laboratory analysis methods. Table 4-1 provides a summary of calculated public radiological dose exposure from DOE activities at the Site.

### 4.1 Radiological Discharges and Doses

Inhalation of site air emissions constitutes the only major exposure pathway for radiological dose at LEHR. There is no exposure to drinking water at the Site and occupational exposures to contaminated soil are managed in accordance with the CERCLA process and DOE Orders discussed in Section 2.

Radioactive and non-radioactive materials in air have been monitored at a number of locations at and around the Site from August 1995 through 2002 during remediation activities. This monitoring indicated that all of the maximum concentrations of air contaminants of concern were well below their respective derived concentration guide values and did not pose any health risks to site workers or laboratory personnel at LEHR. The concentrations only marginally exceeded the concentrations at the background monitoring station. Since the completion of removal actions in 2002, surveillance air monitoring at the Site was discontinued.

#### 4.1.1 *National Emission Standards for Hazardous Air Pollutants Dose Estimation Calculations*

Calculations were performed to determine the estimated radiation dose from site sources to the public. During 2005, the Western and Eastern Dog Pens were identified as the only remaining potential sources of non-point, diffuse radionuclide emissions. Radionuclide air emissions could potentially be generated by wind-blown, fugitive dust-containing residual radioactivity above the site background concentrations.

Compliance with the National Emission Standards for Hazardous Air Pollutants requirements for diffuse, non-point source emissions was assessed using the US EPA atmospheric dispersion/radiation dose calculation computer code, CAP88-PC Version 1.0. This code was used to calculate the effective dose equivalent to individual receptors at various distances from the only

source of radionuclide air emissions at the Site in 2007, the Eastern Dog Pens area. In recent years, the Western Dog Pens area has also been a source of diffuse emissions, but ceased to be a source of emissions in September 2006, when the area was capped with a layer of clean imported soil.

CAP88-PC computer code was used to calculate the effective dose equivalent to individual receptors at various distances from the Eastern Dog Pens. A total of three “individual receptor” CAP88-PC runs were executed to model the non-point source fugitive-dust emissions: one for wind entrainment of soil during the normal course of the year, one for the disturbance of the Eastern Dog Pens soil during the grading operations, and one for the concrete-crushing operations. A human receptor was identified in each of the north, south, east and west quadrants relative to the potential source. Additionally, a short-term dose was calculated for a construction-worker receptor located in the center of the Eastern Dog Pens during the short-term concrete-removal operation.

Doses were calculated for potential receptors in buildings at LEHR, receptors immediately outside of LEHR, and construction workers during the grading operations at the Eastern Dog Pens. Based on the CAP88-PC model output, the maximally exposed individual (MEI) at the LEHR facility is the construction worker during concrete-removal and concrete-crushing operations at the Eastern Dog Pens with a effective dose equivalent of 8.1E-02 mrem per year. The results are presented in Table 4-2.

The CAP88-PC computer model was also used to calculate the collective population dose as required by DOE Order 5400.5. The estimated collective population dose for 2007 was 2.7E-04 person – roentgen(s) equivalent man per year (person-rem/year) (Table 4-3). The calculated effective dose equivalent for the off-site, maximally exposed individual is several orders of magnitude below the 10 mrem/yr standard codified in Title 40 CFR Part 61, Subpart H.

## 4.2 Radiological Soil Measurements

No soil sampling for radiological analyses was performed in 2007.

## 4.3 Radiological Surface and Storm Water Monitoring

Quarterly surface water sampling has been conducted at the Site since 1990 for an extensive list of analytes. In 1997, in accordance with the Memorandum of Agreement (DOE, 1997), responsibility for surface water sampling was transferred to UC Davis. DOE retained responsibility for storm water runoff sampling in the DOE areas of the Site. Trends and conclusions drawn from the surface and storm water monitoring results are briefly discussed below. A detailed discussion of results, including tables summarizing the analytic data, can be found in the *Final 2007 Comprehensive Annual Water Monitoring Report* (Brown & Caldwell, 2008).

#### *4.3.1 Surface Water Monitoring*

The surface water monitoring program consists of collecting samples from three locations (see Section 3.3.2) along the South Fork of Putah Creek which flows west to east just south of the Site. During the first half of 2007, surface water samples were collected on February 27, 2007. Surface water samples were not collected during the second half of 2007, since no storm water flow was observed (Brown & Caldwell, 2008).

The samples collected were analyzed for carbon-14, radium-226, strontium-90 and tritium. Only tritium was detected above the contract-required detection limit at a concentration of 1120 +/- 162 pCi/L in a sample collected from the STOP sampling location (Brown & Caldwell, 2008).

#### *4.3.2 Storm Water Monitoring*

UC Davis collected storm water samples from LF-1 location on February 26, 2007. Storm water samples were collected at LS-1 by DOE on April 11, 2007 and December 7, 2007. (Figure 3-1). Sample locations LF-1 and LF-3 were monitored for potential discharge during 2007, but no discharge was present for sampling at LF-1 during Fall 2007 or at LF-3 during all of 2007. LF-1 was subsequently sampled twice during storms that occurred in early 2008; the data from these sampling events will be presented in the First Half 2008 Semi-Annual Report.

The samples were analyzed for carbon-14, radium-226, strontium-90 and tritium. All of the sample results were below the contract-required detection limits and within historical values. (Brown & Caldwell, 2008).

### **4.4 Ambient Radiation Monitoring Program**

An ambient radiation monitoring program using passive thermoluminescent dosimeters to monitor gamma radiation was maintained at the Site through the end of 2004. The total dose measurements from all locations monitored were always well below the DOE limit of 100 mrem/yr for public exposure. The program was discontinued in 2005 due to completion of all site activities.

Table 4-1. LEHR Radiological Dose Reporting Table for Calendar Year 2007

Pathway	Dose to Maximally Exposed Individual <sup>1</sup>		% of DOE 100-mrem/yr Limit	Collective Population Dose <sup>2</sup>		Estimated Population within 80 km
	(mrem)	(mSv)	%	(person-rem)	(person-Sv)	
Air	8.14E-02	8.14E-04	0.0008	2.7E-04	2.7E-06	3,629,777
Water <sup>3</sup>	-	-	-	-	-	-
Other Pathways <sup>4</sup>	N/A	N/A	N/A	N/A	N/A	N/A
All Pathways	8.14E-02	8.14E-04	0.0008	2.7E-04	2.7E-06	3,629,777

**Notes**

<sup>1</sup> The maximum total dose is the sum of effective dose equivalents modeled for each maximally exposed individual member of the public from potential radionuclide fugitive dust emission non-point sources. The location of the receptor modeled is 132 meters west of the Eastern, which is the approximate location of UC Davis research facilities. Additional information may be found in the 2007 National Emission Standards for Hazardous Air Pollutants Report (Weiss, 2008b).

<sup>2</sup> The collective population dose is for a population within 80 km of the Site.

<sup>3</sup> The water pathway dose was not estimated, but is assumed to be negligible.

<sup>4</sup> There are no other exposure pathways contributing to a radiological dose at LEHR.

**Abbreviations**

DOE	(United States) Department of Energy
km	kilometer
LEHR	Laboratory for Energy-Related Health Research
mrem	millirem
mrem/yr	millirem per year
mSv	milliSievert
N/A	not applicable
rem	Roentgen equivalent man
Sv	Sievert
UC Davis	University of California, Davis

Table 4-2. Effective Dose Equivalent to Maximally Exposed On-Site Individual Resulting from Radionuclide Emissions from Each Potential Non-Point Source of Fugitive Dust Emissions

Receptor Location		Effective dose equivalent <sup>1</sup> due to emissions (mrem/yr)			
Description	Distance and direction from Eastern Dog Pens <sup>2</sup>	Entrainment by wind	Excavations and grading	Concrete crushing	Total dose to MEI <sup>3</sup>
Equipment Operator (center of Eastern Dog Pens area)	1 m <sup>4</sup>	1.64E-03 <sup>5</sup>	7.50E-02	4.80E-03	<b>8.14E-02</b>
Specimen Storage Building (Building H-216)	132 m W	4.90E-04	1.90E-03	2.90E-04	2.68E-03
UC Davis Building E of LEHR Site	180 m E	8.20E-05	3.10E-04	2.00E-04	5.92E-04
Off-Site Receptor S of Putah Creek	1,000 m S	1.50E-05	5.50E-05	1.80E-04	2.50E-04
Off-Site Receptor W of LEHR Site	500 m W	4.30E-05	1.60E-04	1.90E-04	3.93E-04
Animal Hospital Building No. 1 (Building H-219)	165 m W	3.20E-04	1.20E-03	2.50E-04	1.77E-03
Inter-Regional Project No. 4 Building (Building H-217)	143 m W	4.20E-04	1.60E-03	2.80E-04	2.30E-03
Animal Hospital Building No. 2 (Building H-218)	165 m W	3.20E-04	1.20E-03	2.50E-04	1.77E-03
Cellular Biology Laboratory (Building H-294)	150 m NNE	5.70E-04	2.20E-03	3.20E-04	3.09E-03
Clinical Pathology (H-215)	150 m W	3.80E-04	1.50E-03	2.70E-04	2.15E-03
Main Office (H-213)	187 m NW	3.30E-04	1.20E-03	2.60E-04	1.79E-03

**Notes**

<sup>1</sup>The effective dose equivalent to the maximally exposed individual is taken as the maximum modeled dose within a 45° sector in the direction and at the distance indicated. For example, the dose 65 m north of the Eastern Dog Pens area would be the maximum modeled dose within the sector bounded by 65 m NNE and 65 m NNW.

<sup>2</sup>The distance from an area source to a receptor is defined by CAP88-PC as the distance from the centroid of the area source to the receptor (US EPA, 1992). For the LEHR facility CAP88-PC modeling, the distance from an area diffuse source to a receptor is measured as the approximate distance from the centroid of the diffuse source to the centroid of the building assumed to house the receptor.

<sup>3</sup>The total dose is the sum of the Effective Dose Equivalents modeled for each MEI receptor from the all potential radionuclide fugitive-dust-emission diffuse sources. Value in **bold face** is the maximum total dose to the MEI.

<sup>4</sup>One meter is the shortest distance available in CAP88-PC.

<sup>5</sup>The dose due to entrainment by wind for the equipment operator was reduced from that reported in the original model results, because the operator was exposed during working days for only 6 weeks of the year (30 days/365 days per year) instead of 52 weeks assumed by the model.

**Abbreviations**

°	degrees
E	east
LEHR	Laboratory for Energy-Related Health Research
m	meters
MEI	maximally exposed individual
mrem/yr	millirem(s) per year
NNE	north by northeast
No.	number
NW	northwest
S	south
UC Davis	University of California, Davis
W	west



Table 4-3. Summary of Estimated Collective Population Dose Resulting from Radionuclide Emissions from Each Fugitive Dust Emission Non-Point Source

Potential Source	Collective Population Dose <sup>1</sup> (person-rem/yr)
EDPs, soil particles entrained by wind	5.22E-05
EDPs, excavations and grading of soil	1.99E-04
EDPs, particulates released due to concrete crushing	2.06E-05
<b>Total</b>	<b>2.7E-04</b>

**Notes**

Source of data: CAP88-PC, Version 1.0 modeling output files.

<sup>1</sup>The collective population dose is for receptors within an 80-km radius.

**Abbreviations**

EDPs Eastern Dog Pens area  
km kilometer(s)  
mrem/yr millirem per year  
person-rem/yr person-roentgen equivalent man per year

## 5. ENVIRONMENTAL NON-RADIOLOGICAL PROGRAM INFORMATION

This section summarizes significant results and trends in 2007 non-radiological LEHR air, soil and water monitoring.

### 5.1 Non-Radiological Air Monitoring

Air monitoring for occupational exposure to airborne dust was performed during the concrete removal activities conducted in the Eastern Dog Pens in 2007. The monitoring indicated that dust levels were below Occupational Health and Safety Administration exposure limits.

### 5.2 Non-Radiological Soil Monitoring

No soil monitoring for non-radiological constituents was performed in 2007.

### 5.3 Non-Radiological Surface and Storm Water Monitoring

In 2007 surface water sampling was conducted and reported by UC Davis. Trends and conclusions drawn from the surface and storm water monitoring results are discussed briefly below. A detailed discussion of results and tables summarizing the analytical data can be found in the *Final 2007 Comprehensive Annual Water Monitoring Report* (Brown & Caldwell, 2008)

#### 5.3.1 Surface Water Monitoring

In the first half of 2007 UC Davis collected surface water samples from three locations, PCU, STPO and PCD, on February 27, 2007. Surface water samples were not collected during the second half of 2007, since no flow was observed at the sampling locations (Figure 3-1). field parameters, nitrate, total dissolved solids, volatile organic compounds, pesticides and polychlorinated biphenyls, radionuclides, and metals. Of these constituents, a pesticide, nitrate, total dissolved solids, and eight metals were detected above the contract-required detection limits. Specifically:

- Lindane was detected in STPO at a concentration of 0.0111 µg/L.
- Nitrate was detected ranging from 3.24 mg/L at PCU to 8.49 mg/L at STPO.

- total dissolved solids were detected ranging from 290 mg/L at PCU to 704 mg/L at STPO.
- Metals were detected as follows:
  - arsenic (8.81 µg/L at STPO),
  - barium (ranging from 60.5 µg/L at STPO to 123 µg/L at PCU),
  - boron (374 µg/L at PCU to 772 µg/L at STPO),
  - iron (ranging from 186 µg/L at STPO to 604 µg/L at PCD),
  - manganese (ranging from 17 µg/L at PCD to 19.7 µg/L at PCU),
  - molybdenum (11.3 µg/L at STPO),
  - selenium (15.5 µg/L at STPO),
  - vanadium (10 µg/L at STPO), and
  - zinc (ranging from 20.5 µg/L to 57.6 µg/L at STPO).

Samples for chronic aquatic toxicity were collected on February 27, 2007 at the PCU and PCD locations. The sample results indicated no toxicity at either location with no observed effect concentration at 100% sample concentration for all analysis.

### 5.3.2 Storm Water Monitoring

All storm water samples were collected at three monitoring locations, LF-1, LF-3 and LS-1 (Figure 3-1), during or following storm events throughout the rainy season in 2007. Storm water samples were collected by UC Davis from LF-01 on February 26, 2007 and by DOE from LS-01 on April 11, 2007 and December 7, 2007. Sample locations LF-1 and LF-3 were monitored for potential discharge during 2007, but no discharge was present for sampling at LF-1 during Fall 2007 or at LF-3 during all of 2007. LF-1 was subsequently sampled twice during storms that occurred in early 2008; the data from these sampling events will be presented in the First Half 2008 Semi-Annual Report.

The LF-1 and LS-1 samples were analyzed for field parameters, nitrate, total dissolved solids, total organic carbon, total suspended solids, oil and grease (LF-1 only), volatile organic compounds, pesticides and polychlorinated biphenyls, radionuclides (discussed in Section 4), acute aquatic toxicity (LS-1 only), and metals. LF-1 did not have detections of volatile organic compounds, pesticides, polychlorinated biphenyls, oil and grease, or radionuclides. LS-1 did not have detections of nitrate, or polychlorinated biphenyls. LF-1 and LS-1 had detections above the contract-required detection limits for the following constituents:

- Nitrate (LF-1: 1.49 mg/L)
- Total dissolved solids (LF-1: 52 mg/L and LS-1: 380 mg/L)

- Total organic carbon (LF-1: 6.54 mg/L and LS-1: 65 mg/L)
- Volatile organic compounds detected in LS-1: acetone (224 µg/L), methyl ethyl ketone (4.73 µg/L), and toluene (16.7 µg/L)
- Pesticides in LS-1: alpha-chlordane (0.0317 µg/L) and gamma-chlordane (0.0118 µg/L)
- Total chromium (LF-1: 60.9 µg/L and LS-1: 45 µg/L)
- Other metals in LF-1: barium (150 µg/L), boron (68.2 µg/L), cobalt (13.6 µg/L), copper (26.4 µg/L), iron (17,900 µg/L), lead (22.2 µg/L), manganese (399 µg/L), mercury (0.225 µg/L), nickel (101 µg/L), vanadium (44 µg/L), and zinc (192 µg/L).
- Other metals in LS-1: antimony (120 µg/L), arsenic (5.9 µg/L), barium (250 µg/L), cadmium (1.4 µg/L), copper (62 µg/L), iron (14,500 µg/L), lead (26 µg/L), manganese (380 µg/L), nickel (83 µg/L), vanadium (41 µg/L), and zinc (730 µg/L).

Total dissolved solids, total organic carbon, barium, copper, lead, zinc, methyl ethyl ketone and acetone concentrations in storm water samples collected from LS-1 on April 11, 2007 were above their respective historical ranges. Of the analyte concentrations above historical ranges, lead and zinc results were qualified due to field duplicate imprecision high relative percent difference between the primary sample and field duplicate). No recent release of contamination has been reported at the LEHR site and the source of elevated concentrations in LS-1 storm water samples is currently unknown. Subsequent sampling at LS-1 will be reviewed to evaluate whether data indicate an elevated concentration trend.

Samples for acute aquatic toxicity were collected at LF-1 on February 26, 2007 and at LS-1 on April 11, 2007. Both samples demonstrated no toxicity, with 95% survival of the target species (pimephales, flathead minnow).

### 5.3.3 National Pollutant Discharge Elimination System Data

The Site discharges its sanitary waste to the UC Davis Waste Water Treatment Plant according to National Pollutant Discharge Elimination System permit requirements. Current DOE activities do not contribute to hazardous discharges.

## **6. WATER MONITORING AND PUBLIC DRINKING WATER PROTECTION PROGRAM**

Ground water monitoring has been conducted at the Site since November 1990 and has been the responsibility of UC Davis since 1997. UC Davis submits quarterly and annual reports on ground water monitoring to DOE for review and comment.

### **6.1 Uses of Ground Water in the LEHR Vicinity**

As discussed in Section 1.6.3, local ground water is utilized for both domestic supply and agricultural purposes. The major ground water sources for both public and private water supplies in the Sacramento Valley are unconsolidated deposits of Pliocene and Pleistocene age, and older alluvium (DOE, 1992). Water from the first HSU is not used for drinking or irrigating purposes due to inadequate yield. A number of domestic and irrigation wells in the site vicinity produce water from HSU-2.

### **6.2 Potential Sources of Ground Water Pollution**

Sources contributing to ground water pollution at the Site include the UC Davis Landfill No. 2 (apparent source of volatile organic compounds) and the UC Davis Waste Burial Holes (Figure 1-2) (apparent source of tritium and carbon-14 contamination). UC Davis landfills and the former animal handling facilities at LEHR may be potential sources of nitrate contamination in the site ground water.

### **6.3 Ground Water Monitoring**

UC Davis continued to monitor ground water at the Site. During 2007, 62 monitoring wells were used in the program; 36 of these wells are completed within HSU-1, 21 are completed within HSU-2, and five are completed within HSU-4. Four new groundwater monitoring wells were installed in November 2007 (UCD1-055, UCD2-056, UCD2-057, and UCD1-058) as part of an investigation effort to delineate the extent of chromium in groundwater. Sampling activities implemented in 2004 continued in 2007, including:

- Site-wide ground water program;
- Expanded dual-density convection pilot test program; and

- Land Treatment Pilot Study.

The ground water monitoring program and the 2007 sampling results are discussed in detail in the *Final 2007 Comprehensive Annual Water Monitoring Report* (Brown & Caldwell, 2008). The water monitoring program for 2007 included semi-annual collection of groundwater samples during the winter and summer quarters.

Consistent with previous data, the primary volatile organic compounds detected in groundwater samples during 2007 was chloroform. Chloroform was detected above the contract-required detection limit of 0.5 µg/L in 20 of the 50 wells monitored ranging in concentration from 0.691 µg/L (UCD1-022 in March 2007) to 430 µg/L (UCD1-050 in September 2007). In addition to chloroform, twelve other volatile organic compounds were reported at low concentrations in the chloroform source area. The 2007 monitoring data did not reflect any new releases to ground water from DOE or UC Davis areas at the Site.

#### **6.4 Off-Site Supply Well Sampling**

Private wells south, north and east of the Site have been sampled since 1989. Monitoring of radiological constituents in private wells ceased in 1996 after adequate monitoring wells and hydrologic information had been established to ensure that no radioactive materials were migrating off site in ground water. UC Davis continues to monitor off-site wells for non-radiological constituents, including chloroform and nitrates, among others contaminants. Results of this monitoring are reported annually by UC Davis to the Regional Water Quality Control Board. This information is considered confidential, based on the agreements between UC Davis and the private well owners.

## 7. QUALITY ASSURANCE

Quality assurance is a key element of the environmental protection program for the Site. A Quality Assurance Project Plan (Weiss, 2000b) describes the requirements for all quality-related work on the LEHR project and is fully implemented. The Quality Assurance Project Plan and other quality-assuring documents, such as standard quality procedures, standard operating procedures and task-specific work plans, govern all phases of the LEHR program, including site characterization, investigation, risk assessments, decontamination and decommissioning, waste management and site restoration. The purpose of the Quality Assurance Project Plan and the other documents are to identify the specifications and methods employed to establish technical accuracy, precision and validity of measurements and statistics; and to provide a sound basis for management decisions based on environmental information collected from the Site. The LEHR Quality Assurance Project Plan, which was last revised in June 2000, was prepared in accordance with US EPA quality assurance specifications. It also conforms to DOE Order 414.1a; the Nuclear Safety Management Quality Assurance Requirements in Title 10 CFR, Part 830; and incorporates requirements of DOE Order 5400.1, General Environmental Protection, to ensure that DOE quality and environmental goals are met.

Environmental samples collected by DOE that are discussed in this report were collected, analyzed, reviewed and validated according to the Quality Assurance Project Plan and other relevant standard operating procedures and/or task-specific work plans. To assure quality, quality control is integrated into all aspects of environmental sampling. Included in the Quality Assurance Project Plan and related documents are sections identifying quality control for sample collection requirements and specific quality assurance objectives for the measurement data. Quality control samples are run with each sample batch at the analytical laboratory to validate the method of analysis and the proficiency of the analyst. Because holding times are important to sample quality, they are carefully controlled. To ensure comparability of analytical data, all samples are analyzed by US EPA-approved methods, when available. When analytical results are received, they are reviewed according to the appropriate data quality objectives and data review procedures. All of the 2007 site air and water monitoring data have been presented in other reports. The specific review and validation process for each data set are presented in these reports, and are not discussed in detail herein.

### 7.1 Field Quality Assurance

Quality assurance for field sampling is accomplished by collecting field duplicates, decontamination rinsates, trip blanks and field blanks, as appropriate. For each round of sampling, duplicate samples are collected from a selected sample point at the same location as the original sample to check for consistency in the sampling process. The duplicate sample serves as a check on the precision of the sampling and analytical procedures. Decontamination rinsates are analyzed

whenever the potential exists for cross-contamination from sampling equipment. Trip blanks are sent with each shipment of water samples requiring analysis for volatile organic compounds. Field blanks are collected to check for contamination during the water sampling process. Calibration records for each field instrument are maintained in the project files.

## **7.2 Laboratory Quality Assurance**

Contracted laboratories providing analytical services for the LEHR project were evaluated by Weiss, S.M. Stoller Corporation, or UC Davis to ensure compliance with the quality assurance program requirements. Laboratory quality assurance is analyzed externally by submitting split samples, spiked samples and blanks to the laboratories analyzing environmental samples. Laboratories must submit their analytical procedure for review if it differs from standard procedures. Each contract laboratory is required to maintain participation, as applicable, in DOE, State of California and/or US EPA-approved inter-laboratory quality assurance programs such as DOE's Environmental Measurement Laboratory Inter-Laboratory Comparison Program or US EPA's Water Pollution/Water Supply Program.

## **7.3 Summary of Quality Control Data Validation**

The overall LEHR quality assurance objective is to collect and analyze environmental samples from the Site in a manner that ensures technical data are accurate and representative, are able to withstand scientific and legal scrutiny, and are useful for evaluating site conditions and remedial actions. The criteria used to specify quality assurance goals are precision, accuracy, representativeness, completeness and comparability for evaluation of quality control data. These parameters are evaluated through data validation. Table 7-1 summarizes the components used to monitor and evaluate the quality of LEHR environmental data.



Table 7-1. Components of the LEHR Quality Control Program in Support of Data Quality Objectives

Data Quality Objective	Quality Control Component	Evaluation Criteria
Precision	<ul style="list-style-type: none"> <li>• Field duplicate</li> <li>• Matrix spike</li> <li>• Matrix spike duplicate</li> </ul>	Relative percent difference
Accuracy	<ul style="list-style-type: none"> <li>• Matrix spike</li> <li>• Matrix spike duplicate</li> <li>• Surrogate spikes</li> </ul>	Percent recovery
Representativeness	<ul style="list-style-type: none"> <li>• Trip blanks</li> <li>• Field duplicate</li> <li>• Method blanks</li> </ul>	Qualitative degree of confidence
Completeness	<ul style="list-style-type: none"> <li>• Holding time</li> <li>• Valid data points</li> </ul>	Percent valid data
Comparability	<ul style="list-style-type: none"> <li>• Analytical methods</li> <li>• Field duplicates</li> </ul>	Qualitative degree of confidence

## 8. DEFINITIONS

The following definitions are adapted from DOE Order 5400.5 and the US EPA.

Term	Definition
absorbed dose	The energy imparted to matter by ionizing radiation per unit mass of irradiated material at the place of interest in that material. The absorbed dose is expressed in units of rad (or gray) (1 rad = 0.01 gray).
as-low-as-reasonably-achievable (ALARA)	A phrase (acronym) used to describe an approach to radiation protection to control or manage exposures (both individual and collective to the work force and the general public) and releases of radioactive material to the environment as low as social, technical, economic, practical, and public policy considerations permit. As used in United DOE Order 5400.5, ALARA is not a dose limit, but rather it is a process that has as its objective the attainment of dose levels as far below the applicable limits of the DOE Order as practicable.
collective dose equivalent and collective effective dose equivalent	The sums of the dose equivalents or effective dose equivalents of all individuals in an exposed population within an 80-km radius, for the purposes of DOE Order 5400.5, expressed in units of person-Roentgen equivalent, man (rem), (or person-Sievert). When the collective dose equivalent of interest is for a specific organ, the units would be organ-rem (or organ-Sievert). For purposes of DOE Order 5400.5, the 80-km distance shall be measured from a point located centrally with respect to major facilities or DOE program activities.
committed dose equivalent	The predicted total dose equivalent to a tissue or organ over a 50-year period after a known intake of a radionuclide into the body. It does not include contributions from external dose. Committed dose equivalent is expressed in units of rem (or Sievert).
committed effective dose equivalent	The sum of the committed dose equivalents to various tissues in the body, each multiplied by the appropriate weighting factor. Committed effective dose equivalent is expressed in units of rem (or Sievert).
confirmation samples	Analysis for metals, nitrate, pesticides/polychlorinated biphenyls, semi-volatile organic compounds, volatile organic compounds and hexavalent chromium.
Curie (Ci)	A unit of radioactivity equal to $3.7 \times 10^{10}$ disintegrations per second.
derived concentration guide	The concentration of a radionuclide in air or water that, under conditions of continuous exposure for one year by one exposure mode (i.e., ingestion of water, submersion in air, or inhalation), would result in an effective dose equivalent of 100 millirem (1 milliSievert). Derived concentration guides do not consider decay products when the parent radionuclide is the cause of the exposure (derived concentration guide values are presented in Chapter III of DOE Order 5400.5).

Term	Definition
designated level	Cleanup levels for specific constituents of a waste that provide a site-specific indication of the water quality impairment potential of the waste. Designated levels are calculated by first determining the bodies of water that may be affected by a waste and the present and probable future beneficial uses of these waters. Next, site-specific "water quality goals" are selected, based on background water quality or accepted criteria and standards, to protect those beneficial uses. Finally, these water quality goals are multiplied by factors that account for environmental attenuation and leachability. The result is a set of Soluble and total designated levels that are applicable to a particular waste and disposal site and which, if not exceeded, should protect the beneficial uses of waters of the State. Wastes having constituent concentrations in excess of these designated levels are assumed to pose a threat to water quality and are, therefore, classified as 'designated wastes' and directed to waste management units that isolate these wastes from the environment.
DOE Orders	DOE directives intended to direct, guide, inform and instruct DOE employees in the performance of their jobs, and enable them to work effectively within the DOE and with agencies, contractors, and the public.
dose equivalent	The product of absorbed dose in rad (or gray) in tissue and a quality factor. Dose equivalent is expressed in units of rem (or Sievert).
effective dose equivalent	The summation of the products of the dose equivalent received by specified tissues of the body and a tissue-specific weighting factor. This sum is a risk-equivalent value and can be used to estimate the health-effects risk of the exposed individual. The tissue-specific weighting factor represents the fraction of the total health risk resulting from uniform whole-body irradiation that would be contributed by that particular tissue. The effective dose equivalent includes the committed effective dose equivalent from internal deposition of radionuclides and the effective dose equivalent due to penetrating radiation from sources external to the body. Effective dose equivalent is expressed in units of rem (or Sievert).
effluent monitoring	The collection and analysis of samples or measurements of liquid and gaseous effluents for purposes of characterizing and quantifying contaminants, assessing radiation exposures of members of the public and demonstrating compliance with applicable standards.
environmental surveillance	The collection and analysis of samples of air, water, soil, foodstuffs, biota, and other media from DOE sites and their environs, and the measurement of external radiation for purposes of demonstrating compliance with applicable standards, assessing radiation exposures of members of the public, and assessing effects, if any, on the local environment.
hazard index	The health impact of the non-carcinogenic compounds is quantified through the hazard index, which is the ratio of the expected concentration of a compound to the acceptable concentration of the compound. When more than one toxic compound is emitted, the hazard indices of the compounds are summed to give the total hazard index. A total hazard index of 1.0 or less is considered to be not significant and the resulting impact on public health is deemed acceptable.
maximally exposed individual	The maximally exposed individual is the representative member of the public who receives the highest estimated effective dose equivalent based on the sum of the individual pathway doses.

Term	Definition
members of the public	Persons who are not occupationally associated with a DOE facility or operations (i.e., persons whose assigned occupational duties do not require them to enter the DOE site). Also see: public dose.
picoCurie (pCi)	A unit of radioactivity equal to $1 \times 10^{-12}$ Curies or 2.2 disintegrations per minute.
preliminary remediation goal	Initial cleanup goals that (1) are protective of human health and the environment and (2) comply with applicable or relevant and appropriate requirements. Preliminary remediation goals are developed early in the remedy selection process based on readily available information and are modified to reflect results of the baseline risk assessment. They also are used during analysis of remedial alternatives in the remedial investigation/feasibility study.
public dose	The dose received by member(s) of the public from exposure to radiation and to radioactive material released by a DOE facility or operation, whether the exposure is within a DOE site boundary or off site. It does not include dose received from occupational exposures, doses received from naturally occurring "background" radiation, doses received as a patient from medical practices or doses received from consumer products.
quality factor	The principal modifying factor used to regulate the dose equivalent from the absorbed dose. For the purposes of DOE Order 5400.5, quality factors taken from DOE Order 5480.11 are to be used.
rad	Historical unit of measurement of the radiation energy absorption (dose) in matter. The rad is defined as the amount of radiation required for absorption of 100 ergs ( $1 \text{ erg} = 10^{-7} \text{ joule}$ ) per gram of irradiated material.
radioactivity	Property or characteristic of radioactive material to spontaneously "disintegrate" with the emission of energy in the form of radiation. The unit of radioactivity is the Curie (or Becquerel).
reference man	A hypothetical aggregation of human (male and female) physical and physiological characteristics arrived at by international consensus (International Council for Radiation Protection Publication 23). These characteristics may be used by researchers and public health workers to standardize results of experiments and to relate biological effects from ionizing radiation to a common base. The "reference man" is assumed to inhale 8,400 cubic meters of air in a year and to ingest 730 liters of water in a year.
remedial action	Those actions consistent with permanent remedy taken instead of, or in addition to, removal action in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release of hazardous substances so that they do not migrate to cause substantial danger to present or future public health or welfare or the environment.
residual radioactive material	Any radioactive material which is in or on soil, air, equipment, or structures as a consequence of past operations or activities.
RESRAD	<u>Residual Radioactivity</u> model. Argonne National Laboratory computer model for evaluating radioactively contaminated sites (Argonne National Laboratory).
risk-based action standard	Site-specific, soil contaminant-specific concentrations above which an unacceptable risk to human health is predicted to exist. An unacceptable risk to human health is defined as exceeding a one-in-one million excess cancer risk over a 60-year exposure period.

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Term	Definition
Roentgen	A unit of radiation exposure equal to the quantity of ionizing radiation that will produce one electrostatic unit of electricity in one cubic centimeter of dry air at zero degrees Celsius and standard atmospheric pressure.
Roentgen equivalent man (rem)	The dosage of ionizing radiation that will cause the same biological effect as one roentgen of x-ray or one gamma-ray dosage.

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## 10. ACKNOWLEDGMENTS

The following LEHR Project personnel worked on the Annual Site Environmental Report:

<b>Name and Position</b>	<b>Responsibility</b>
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