

Cotter Corporation (N.S.L.)

Soil Cleanup Methodology for 2012

1. Re-baseline –perform the following
  - a. Gamma Survey
  - b. Utilities assessment
  - c. Delineate sump areas and leach fields
  - d. Utilize TCE area and interim soils cleanup results
  - e. Other
2. Identify starting points using the following criteria:
  - a. Gamma Survey
  - b. Elevation
  - c. Historical photos and site knowledge
  - d. Previous interim excavations
  - e. Sump locations
  - f. Upwind
  - g. Other
3. Excavate using typical 6" to 2' cuts with occasional pit excavations to approximate gamma level of 25 uR/hr
  - a. Typically excavate highest to lowest gamma areas, highest to lowest elevations and work upwind to downwind
  - b. Define haul routes to limit tracking
  - c. Use Dust Control to limit recontamination
4. Direct and evaluate cleanup using following tools:
  - a. Field gamma
  - b. Gross alpha screening
  - c. XRF
  - d. Gamma counting soils samples
  - e. Lab analysis soil samples
  - f. Visual inspection
5. Repeat steps 1-4 as needed to achieve approximate gamma level 25 uR/hr in separate locations
6. Screen for other potential contaminants of concern (COCs)
  - a. Clean as necessary or
7. Continue to ALARA gamma goal of 20 uR/hr sitewide
8. Do final verification survey