



## Paducah Citizens Advisory Board

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### **Recommendation 13-07: Delay of Remedial Action Implementation for the Burial Grounds Operable Unit (BGOU)**

July 18, 2013

#### **Background**

The BGOU consists of 10 burial areas (solid waste management units or SWMUs) containing waste materials from a variety of sources and contaminated with metals, organic compounds, and radionuclides. The depth of burial is typically less than 20 feet, although underlying soils and groundwater are contaminated in some areas as a result of waste disposal. Because of funding availability, site proximity, similarity of materials, and other factors, the BGOU was separated into five subprojects. For example, SWMU 5 and SWMU 6 were combined into one subproject, and work has proceeded on this project at a quicker rate than the other subprojects. Release of the proposed remedial action plan for SWMU 5 and SWMU 6 is imminent. Remedial action is scheduled to begin in mid-2015. Field investigations, feasibility studies, and remediation of the remaining SWMUs will occur over the next decade. Therefore, this recommendation, while pertinent to the entire BGOU, applies immediately to SWMU 5 and SWMU 6.

The most likely remedial alternatives for SWMU 5 and SWMU 6 are leaving the material in place and capping the site, excavating and disposing of the material at an offsite location, or excavating and disposing of the material in an onsite landfill that is being evaluated in a separate project. Therefore, complete evaluation of the alternatives is intertwined with the decision regarding the onsite landfill, which has not yet been made.

The Department of Energy (DOE), representatives of the Commonwealth, and representatives of the Federal government judge these alternatives primarily on the basis of risk reduction and protection of human health and the environment, with costs being a secondary factor. Potential reuse of the site is considered with respect to risk, but not with respect to economic development.

Shutdown of the Paducah Gaseous Diffusion Plant (PGDP) will ultimately result in the loss of more than 1000 jobs. Paducah, unlike Oak Ridge or Portsmouth, currently offers little opportunity for direct re-employment. Therefore, redevelopment of the site for industrial and other purposes is of utmost importance to the community. Redevelopment is extremely complicated because of uncertain funding availability for site shutdown, demolition and remediation; Federal requirements for environmental assessments and property transfer; and the procedures for accepting and evaluating proposals from interested parties.

The condition in which the site is left, i.e. the types and levels of remediation directly impact how the site can be redeveloped. For example, leaving material capped and in place might allow for a parking or storage area, but not for construction of a manufacturing facility. An onsite landfill, while less expensive than offsite disposal, interferes with reuse of a relatively large area.

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DOE has requested input from the community on how the site might be redeveloped, but given the aforementioned uncertainties and complexities, providing such input will require considerable time and effort.

### **Recommendation**

**The Paducah Citizen's Advisory Board (CAB) understands that remedial investigation, feasibility study, and remedial planning are ongoing activities that must proceed. Remedial action for the BGOU, however, must be integrated with decisions yet to be made on the use of an onsite landfill for waste disposition, and more importantly, site reuse and redevelopment. Immediate selection and implementation of a remedial action for SWMU 5 and SWMU 6 is not warranted.**

**Therefore, the CAB recommends the following:**

- 1. The waste disposition study regarding use and location of an onsite landfill must be completed prior to selection and implementation of BGOU remedial actions.**
- 2. Selection and implementation of BGOU remedial actions that result in limiting land use options for redevelopment must be delayed until the community has had time to provide input to DOE relative to site redevelopment; until DOE and the community have had time to solicit and evaluate redevelopment proposals from interested parties; and until uncertainties in funding relative to plant shutdown, demolition, and remediation are resolved.**