

F-Complex Removal Action at the Knolls Atomic Power Laboratory

CERCLA FAQs

January 2023

What is CERCLA?

CERCLA, which stands for Comprehensive Environmental Response, Compensation, and Liability Act, was enacted by Congress in 1980 to respond to releases and threatened releases of hazardous substances into the environment. CERCLA is sometimes referred to as “Superfund.”

Although Knolls Laboratory and the F-Complex are not CERCLA/Superfund sites the Department of Energy (DOE) is using the CERCLA process. The CERCLA process develops an approach to environmental decision-making that ensures worker health, public health, and the environment are protected; provides for community involvement; and reduces risk without unnecessary delay.

Knolls Laboratory is not a CERCLA site. The CERCLA process is a well-established and consistent approach to regulatory decision-making that can be used at non-CERCLA sites.

CERCLA has two kinds of response actions:

- Short-term removal actions, such as the “non-time critical removal action” under evaluation for the F-Complex.
- There are no CERCLA long-term remedial actions taking place at Knolls Laboratory.

F-Complex is “non-time critical” because the removal action is not urgent, and there is sufficient time to plan for and implement the selected alternative .

What is a Removal Action?

Generally, when there is a relatively non-complex problem that is well understood and defined, a removal action is proposed. An **Engineering**

Evaluation/Cost Analysis (EE/CA) is prepared for removal actions. An EE/CA uses environmental information such as sampling, monitoring, and survey data that provides details on the nature and extent of contamination and describes removal action alternatives to address the contamination. An EE/CA evaluates the effectiveness, implementability, and cost of each alternative identified and recommends a preferred alternative.

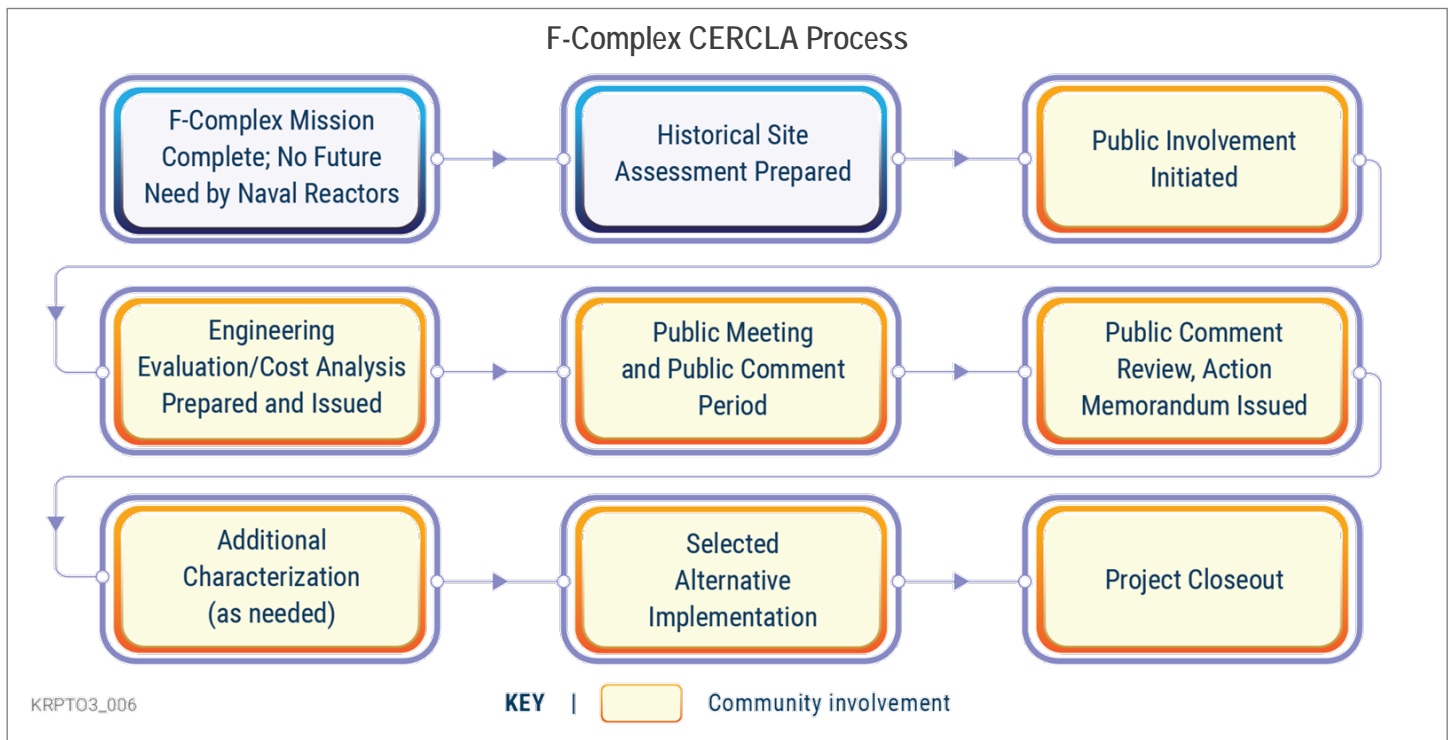
An **Action Memorandum (AM)** is the decision document for a removal action. An AM documents the alternative selected for implementation.

An EE/CA has been prepared for F-Complex. An Action Memorandum will be prepared following the public comment period and evaluation of the comments.

If Knolls Laboratory is not a CERCLA Site, why would the CERCLA process be used for F-Complex?

The CERCLA process, shown in the graphic on the next page, focuses on reducing risks to human health and the environment and is a well-established and efficient process for enabling decision-making. It also includes provisions for streamlining environmental regulatory processes so that administrative burdens are reduced, and substantive compliance is attained. Additionally, Executive Order 12580, *Superfund Implementation*, gives federal agencies such as DOE the authority to use the CERCLA process and conduct and oversee CERCLA actions.

F-Complex is very well suited to a CERCLA removal action because there is a great deal of information known about it. Using the CERCLA process will enable an efficient and streamlined evaluation, provide numerous opportunities for community involvement, and facilitate informed decision making.



What about NEPA?

In accordance with DOE policy, National Environmental Policy Act of 1970 (NEPA) is incorporated into the CERCLA process rather than being conducted as a separate analysis. DOE analyzes “NEPA values” for CERCLA actions, looking at factors such as cumulative, off-site, ecological, and socioeconomic impacts. Stakeholder engagement is a key NEPA value. DOE takes steps to provide opportunities for public involvement, including making documents available and offering an opportunity for public involvement in the CERCLA decision process.

What is an Administrative Record File?

The EE/CA and other key project documents associated with the removal action are kept in the **Administrative Record** (or “AR”) file, which is the publicly available official body of documents that form the basis for the selection of a particular response action. CERCLA requires that an AR file be created for each response action. An AR file is developed for each project in which a CERCLA decision will be generated. The AR file is closed when the decision document is signed.

The AR file is a vehicle for and a record of public participation in the response selection process. The AR file for the F-Complex Project is housed at the Knolls Laboratory. All of the documents in the AR file are available in the **Information Repository** located at the Niskayuna Branch of the Schenectady County Public Library, 2400 Nott Street East, Niskayuna, New York, 12309.

Key Contact

Mr. Martin Krentz
 Federal Project Director
 U.S. Department of Energy
 2425 River Road
 Niskayuna, NY 12309
 (518) 395-4580
 martin.krentz@emcbc.doe.gov