Paducah Citizens Advisory Board
"working for the future"

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Recommendation 15-02: Burial Grounds Solid Waste Management Units 5 & 6 Remediation Priorities
Revision 4

January 15, 2015

Background

In July 2013, the CAB recommended that the final decision on remediation of Solid Waste Management Units (SWMUs) 5 and 6 (part of the burial grounds operable unit) be delayed until after further information was available on the likelihood and probable location of an on-site Waste Disposal Facility (OSWDF). The primary reason for delay was to allow the community to better assess potential site reuse goals and requirements, which could be impacted by the location of the OSWDF. Capping and on-site disposal of SWMUs 5 and 6 were among the alternatives evaluated in the feasibility study, and both alternatives were determined to be technologically feasible to protect public health and the environment. Capping is the alternative recommended by DOE in the draft Proposed Plan.

A secondary reason for the recommendation was to allow re-evaluation of all burial ground alternatives with consideration to the probability that an OSWDF would indeed exist. The CAB and community leaders prefer that the PGDP site be cleared of as much contaminated material as possible to reduce limits on future land use. Given the probable presence of an OSWDF, the CAB questions the justification for leaving any contaminated material in the burial ground. For budgeting purposes, DOE anticipates excavation of the remaining burial grounds and has stated that the material in SWMUs 5 and 6 should meet the waste acceptance criteria for the OSWDF.

State and Federal regulators agreed to the original delay, which the CAB greatly appreciates. In November 2014, the CAB approved a recommendation giving qualified approval to the OSWDF. Soon afterward, the CAB received word that capping of SWMUs 5 and 6 would proceed. To allow time for the CAB to react, the regulators agreed to seek a short term extension, which the CAB also appreciates.

Use of an OSWDF versus off-site disposal will result in an estimated cost savings of approximately $500 million dollars. Even if excavation of SWMUs 5 and 6 is more expensive than capping (by approximately $63 million), the overall savings could seemingly be applied to the implementation of more permanent and secure solutions such as excavation. Excavation of the sites is also more protective of the environment than leaving the contaminated material in a capped burial ground.

Over the past two years, the CAB has advocated that DOE and the regulators take a more holistic approach in planning site clean-up. Priorities that made sense when trying to work around an operating gaseous diffusion plant no longer apply. It is in this spirit that the CAB offers this recommendation.

Recommendations

- Continue to follow the CERCLA process for remediation of SWMUs 5 and 6, i.e., allow the proposed plan to proceed to the next stages of review and comment. At the appropriate time during the remediation plan review and public comment period, but ***before*** the Record of Decision (ROD) is finalized, place the project on hold. The hold will allow potential re-evaluation of the selected remediation as described in the next bulleted item. DOE and the regulators have stated that SWMUs 5 and 6 present a low risk of

groundwater contamination. Therefore, delaying remedial action apparently will not increase public health and environmental risks.

- SWMU 4 has been identified as a source of TCE contamination in the groundwater. Excavation is the remediation option anticipated for budgeting purposes. Assuming excavation is implemented, experience with SWMU 4 could be useful in re-evaluating excavation for SWMUs 5 and 6. The ROD for SWMUs 5 and 6 should be delayed unit after remediation of SWMU 4.
- In light of the desire to view site restoration holistically, resources currently anticipated for capping SWMUs 5 and 6 should be re-allocated to other site activities such as decontamination, decommissioning, or demolition that provide continuing overall progress.