

Solving Cleanup Challenges Through Risk Reduction

Site Management Plan

Update to the
Paducah Citizens Advisory Board

October 18, 2007

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Purpose of Presentation

- To update the CAB on the status of the FY07 and FY08 Site Management Plan
 - Background on SMP
 - FY07 Status
 - FY08 Status



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Site Management Plan Background

- What it is
- Why do we have it
- How do we use it

NOTE: FFA requires draft SMP to EPA and Kentucky by November 15 for the current fiscal year



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FY07 Site Management Plan Status

- FY07 D1 submitted to regulatory agencies November 15, 2006
 - Kentucky comments received February 21, 2007
 - EPA comments received September 14, 2007
 - D2 scheduled to be submitted to EPA and KY by October 29, 2007
- Kentucky requested new milestones be included in FY07 SMP
 - Facility D&D EE/CA
 - Groundwater Dissolved Phase Plume Feasibility Study
- EPA granted approval if Kentucky comments addressed; but made comments that need to be addressed in the FY08 SMP
- DOE proposing one new milestone be added
 - Facility D&D EE/CA – Will consist of a generic EE/CA to streamline the regulatory documentation process and provide opportunities to accelerate D&D of other facilities, as appropriate



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FY08 Site Management Plan Status

- Draft FY08 SMP due November 15, 2007
- KY comments on the FY-07 D1 SMP deferred to FY-08 include:
 - Additional milestones - providing the necessary interim dates to measure progress toward out year dates (e.g., Dissolved-Phase Groundwater Plume, soil piles, etc).
- EPA comments on the FY07 D1 SMP deferred to FY08 include questions about:
 - Groundwater strategy and cleanup expectations
 - Increased use of Baseline Risk Assessments
 - Use of Alternate Concentration Limits
 - Effect of Agreed Order with Kentucky on CERCLA cleanup
 - Point of exposure for determining risk and cleanup goals
 - Language in the SMP that appears pre-decisional and therefore may undermine CERCLA process



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Path Forward

- FY-07 D2 SMP will be submitted to EPA and KY by October 29, 2007.
- EPA will provide its proposed changes for the FY08 SMP in writing by October 18, 2007
- Deferred comments will be addressed in the FY08 submittal and submitted to Kentucky/EPA by November 15, 2007
- DOE, Kentucky and EPA have targeted having an approved FY08 SMP by February 2008



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