

Solving Cleanup Challenges Through Risk Reduction

CERCLA Waste Disposal Evaluation Scoping Document

Presentation to the
Paducah Citizens Advisory Board

April 17 , 2008



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Purpose of Presentation

- Define a Scoping Document
- Document Summary
- CERCLA Process Layout
- Provide Near Term Schedule
- Near Term Public Involvement



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What is a Scoping Document?

- **First step of Remedial Investigation/Feasibility Study process**
- **Provides a summary of how the RI/FS is to be conducted**
- **Provides information to be used in scoping meeting(s)**

(For this project, DOE is scoping waste disposal alternatives for CERCLA derived wastes.)



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What's in This Document

- Information sources
- Preliminary summary of alternatives
- Data needs
- Projected waste generation volumes
- Near-term schedule



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Information Sources for Feasibility Study

- Previous environmental studies at PGDP
- Other DOE sites with on-site CERCLA disposal facilities
 - Oak Ridge
 - Weldon Spring
 - Fernald
 - Hanford
- Commercial waste disposal facilities
- Other DOE sites with disposal facilities regulated by DOE
- Federal regulations
- State regulations
- DOE orders
- Discussions with EPA and Kentucky
- Citizens Advisory Board and public



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Preliminary Alternatives Summary

- **No Action**
 - General response action required by National Contingency Plan
 - Provides baseline for comparison
 - In this case, “No Action” means no sitewide strategy; continued project-by-project waste disposal decisions
- **Off-Site Disposal**
 - Only existing facilities will be considered
 - Commercial and DOE-owned facilities included
 - Potential construction of on-site handling facilities
- **On-Site Disposal**
 - Construction, operation, closure, and post-closure maintenance and monitoring of a facility on DOE-owned land in Paducah
 - Facility would be able to dispose of most of the waste forecasted
 - Wastes unsuitable for on-site disposal would be shipped off-site
 - May include continued use of C-746-U Landfill

(Alternatives will be more clearly defined as the process continues.)



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Key Information to be Collected

- **Off-Site Disposal Option**
 - Confirmation of disposal facilities disposal capacity and ability to meet waste generation schedule
 - Identification of requirements for handling and staging waste (rail spur, equipment, staging area, etc.) at PGDP
 - NEPA values (e.g., analysis of cumulative, off-site, ecological, and socioeconomic impacts)
- **On-Site Disposal Option**
 - NEPA values (e.g., analysis of cumulative, off-site, ecological, and socioeconomic impacts)
 - Siting Study
 - Preliminary Waste Acceptance Criteria



Waste Generation Volumes

Waste form	LLW (yd ³)	LLW/RCRA (yd ³)	LLW/RCRA/TSCA (yd ³)	LLW/TSCA (yd ³)	RCRA (yd ³)	TSCA (yd ³)	Nonhazardous Solid Waste (yd ³)	Total (yd ³)
Asbestos	3,742	21	24,773	0	0	4,031	980	33,547
Concrete	377,393	746	0	0	0	0	393,349	771,488
General Construction Debris	425,867	2,863	0	19	0	2,871	235,380	667,000
Other Dry Solids	45,951	95	5,325	167	542	780	4,172	57,032
Scrap Metal	407,746	172	0	0	0	3,676	68,827	480,421
Soil	1,286,267	29,154	12	0	16,121	1,685	376,273	1,709,512
Total	2,546,966	33,051	30,110	186	16,663	13,043	1,078,981	3,719,000



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Near-Term Schedule

- **Scoping Document – April 2008**
- **Scoping meeting – May 2008**
- **Public workshop**
 - **September 2008**
- **RI/FS Work Plan – October 2008**
- **RI/FS Report – July 2009**



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Diagram of Coordination of CERCLA and RCRA Process in Final Remedial Actions

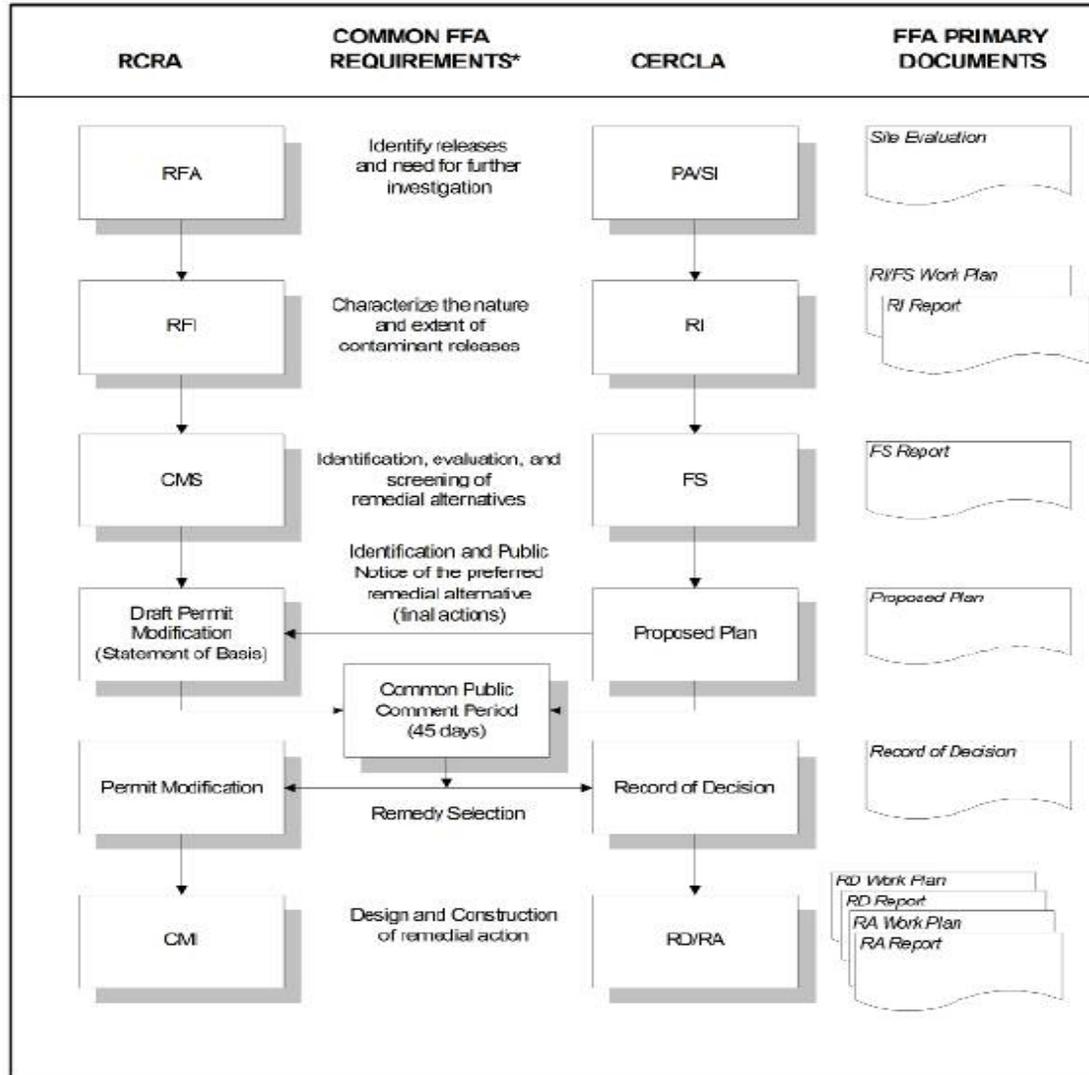


Figure 4.6



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Near Term Public Involvement Schedule

- **Announcement of Administrative Record File availability – May 4**
- **Public information workshop announcement – August 2008**
- **Public information workshop – September 2008**



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DOE Portsmouth/Paducah Project Office

References

1. BJC (Bechtel Jacobs Company LLC) 2003. *Waste Acceptance Criteria for the Department of Energy Treatment, Storage, and Disposal Units at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, BJC/PAD-11/R4.
2. U.S. Department of Energy 1994. *Memorandum for Secretarial Officers and Head of Field Elements: National Environmental Policy Act Statement*, DOE Headquarters, Washington, DC.
3. DOE 1995. *Policy on Decommissioning Department of Energy Facilities Under CERCLA*. May 22, 1995, Memorandum from U.S. Department of Energy and U.S. Environmental Protection Agency to DOE Field Offices and EPA Regional Offices.
4. DOE 2006. *Paducah-Final Cost and Schedule Summary Report, Scenarios I-II*, U.S. Department of Energy.
5. DOE 2007. *Site Management Plan Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/LX/07 - 0009&D2, U.S. Department of Energy, Paducah, KY.
6. EPA (U.S. Environmental Protection Agency) 1993. *Data Quality Objectives Process for Superfund*, Interim Final Guidance, EPA/540/R-93/071.
7. EPA 1998. *Federal Facility Agreement for the Paducah Gaseous Diffusion Plant*, U.S. Environmental Protection Agency, Atlanta, GA.
8. EPA 2000. *A Guide to Developing and Documenting Cost Estimates During the Feasibility Study*, U.S. Environmental Protection Agency, EPA 540-R-00-002, OSWER 9355.0-72.
9. Previously written documents – 2000 Initial Assessment, 2001 Siting Study, 2001 Seismic Issues, 2004 Seismic Investigation Report



More about CERCLA

- **Comprehensive Environmental Response, Compensation, and Liability Act, commonly known as Superfund**
- **Created 1980; governs cleanup of sites included on the National Priorities List (NPL)**
- **Details in the Code of Federal Regulations**
 - Main reference sections: 40 CFR 300.420 and 40 CFR 300.430
- **Major CERCLA components**
 - Preliminary Assessment
 - National Priorities List designation
 - Remedial Investigations and Feasibility Studies
 - Includes Baseline Risk Assessments
 - Public Involvement
 - Records of Decision

