

## Recommendation: 11-1



### Title: Southwest Plume Sources Project

#### Background:

In early August of 2010, key performance results from Phase 1 of the C-400 Electrical Resistance Heating (ERH) project became available. Initially, it was thought that this technology, *in-situ* thermal treatment (ISTT) would be extremely useful for treatment of the southwest plume sources, including the C-747-C Oil Landfarm (SWMU 11) and the C-720 Building (SWMUs 211 A&B). As such, this technology underwent detailed evaluation in the Focused Feasibility Study for the SW Plumes Sources and was the preferred alternative identified in the draft proposed plan. Based on the predicted results of ISTT and early project estimates, the CAB Groundwater Subcommittee was in agreement that ISTT appeared to be the best alternative for remediating the SW Plume sources.

However, after evaluating the technology based on the performance of the Phase 1 C-400 Electrical Resistance Heating project, DOE concluded that ISTT might not be the best alternative for treatment of the southwest plume sources. DOE recommended additional technologies should be re-considered to ensure that the best balance of approaches were identified and considered given the site conditions and remedial action objectives for SW Plume source areas (SWMU 1 and SWMU 211a and b). DOE therefore decided to delay the submittal of the Southwest Plume Sources D2/R1 Proposed Plan so that further evaluation, including technical feasibility and cost effectiveness of appropriate technologies, could be considered.

#### Recommendation

**Recognizing that making any kind of change after a consensus has been reached by DOE and the regulators is difficult, the CAB supports DOE's decision to delay the submittal of the Southwest Plume Sources D2/R1 Proposed Plan pending further evaluation of proposed remediation alternatives. With the data collected to date for the C-400 project, we concur with the DOE that this technology may not be the best treatment option for the southwest plume sources. The CAB also supports DOE's decision to re-evaluate their options before resubmitting the Southwest Plume Sources Proposed Plan to the regulators.**

**While we understand that it is important for the DOE to aggressively implement technologies that will address environmental risks found at the PGDP site, we also feel it is important to make practical decisions using tax payer dollars for these remediation efforts. We encourage DOE to continue to be diligent in the use of cleanup funds at the site. The CAB understands that delaying the CERCLA process is frustrating and costly for all concerned, but in this case, we feel the delay is justified.**

**As the CAB considers the project timeline, the remediation process has been delayed by an estimated eight months, which in the overall scope of the cleanup process, is insignificant. The lessons learned from this action will be beneficial to future cleanup actions at the site, and could result in expedited decisions. We look forward to continuing our work with the DOE on this project, including learning more about the alternatives being considered for treatment of the southwest plume sources.**

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