



PADUCAH GASEOUS DIFFUSION PLANT CITIZENS ADVISORY BOARD

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Consensus Recommendation: 04-05

Submitted for discussion by the Waste Operations Task Force, January 15, 2004

Title: Discontinuation of the S&T Landfill Site Investigation

Reference Document: S&T Landfill Site Investigation Work Plan

Background:

The Citizens Advisory Board believes the Site Investigation Work Plan for the C-746-S&T Landfills has the limited purpose of determining whether or not the trichloroethylene (TCE) and technetium-99 (TC⁹⁹) detected in the groundwater monitoring wells in the area of the S&T Landfills is originating from up-gradient sources. The work plan proposes installation of a series of borings to gather groundwater samples from areas up-gradient to the areas of the landfills. Analytical results will be compared to values detected in the S&T Landfill's monitoring wells.

The Waste Operations Task Force discussed the proposed project on October 14, 2003, and again on January 14, 2004. The task force suggested a recommendation earlier adopted as Consensus Recommendation 04-03 concerning additions to the proposed work plan. At the meeting on January 14, 2004, the task force raised additional issues and concerns.

Concerns:

- It is unlikely that the site investigation will yield a result that establishes whether or not all of the groundwater contamination in the vicinity of the S&T Landfills stem from up-gradient sources.
- In the event that it is determined that a portion or even all of the groundwater contamination of concern comes from up-gradient sources, the proposed/contemplated remediation measures for the northwest and northeast plumes will not be affected.
- A determination that the groundwater contamination of concern comes from up-gradient sources does not identify any new risk or cause any existing risk to be re-evaluated at a higher level.
- The task force believes, therefore, that there is little possible value of the results from the proposed study comparable to the costs.

Recommendation:

The Board recommends that the proposed S&T Landfill Site Investigation be discontinued.

Approved by consensus 01/15/04