



Paducah Gaseous Diffusion Plant
Citizens Advisory Board

Chair

Allen Burnett

Chair-Elect

Bobby Lee

Board Members

John Anderson

Judy Clayton

Shirley Lanier

Elton Priddy

Alex Roman

John Russell, Ph.D.

Jim Smart, Ph.D.

Don Swearingen

Liaisons

Reinhard Knerr

DOE DDFO

Rob Seifert

DOE Federal Coordinator

Ed Winner

Division of Waste

Management

Turpin Ballard

Environmental Protection

Agency

Mike Hardin

Fish and Wildlife Resources

Dr. John Volpe

Radiation Health Branch

Support Services

EHI Consultants, Inc.

111 Memorial Drive

Paducah, KY 42001

Phone 270.554.3004

Fax 270.554.3248

www.pgdp CAB.org

paducahcab@bellsouth.net

Recommendation: 08-03

Approved at the Citizens Advisory Board Meeting, May 15, 2008

Title: Public Participation in Waste Disposal Option Decisions

Background:

The Paducah Gaseous Diffusion Plant (PGDP) was placed on the National Priorities List (NPL) in 1994. As a consequence of being placed on the NPL, the U.S. Department of Energy (DOE) was required to commence cleanup of PGDP, in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA). DOE, the U.S. Environmental Protection Agency and the Commonwealth of Kentucky entered into the Federal Facility Agreement for the PGDP in 1998 that established the regulatory framework for CERCLA projects at the PGDP.

A variety of CERCLA waste is expected to be generated throughout the cleanup process, including both contaminated media and debris. An estimated 600,000 yd³ of waste is forecast to be generated prior to PGDP decontamination and decommissioning (D&D) and an estimated 3.1 million yd³ is estimated to be generated during PGDP D&D, totaling an estimated 3.7 million yd³ from both phases of cleanup. This volume would fill an area approximately 30 football fields 25 yards high. DOE is currently evaluating waste disposal alternatives to handle wastes generated under CERCLA actions at the PGDP. One of the options for the management of these wastes is construction and operation of an on-site CERCLA waste disposal facility.

The types of CERCLA waste designated for disposal in a potential on-site facility would include waste to be generated from environmental restoration activities and waste generated from the D&D of facilities located at the PGDP. The waste generated will include low-level waste (LLW), radioactively contaminated industrial or research waste such as paper, rags, plastic bags, protective clothing, cardboard, packaging material, organic fluids, and water-treatment residues; waste defined under the Resource Conservation and Recovery Act of 1976 (RCRA), containing hazardous chemicals; waste defined under the Toxic Substances Control Act of 1976 (TSCA); and mixed wastes consisting of combinations of these waste types. Any waste accepted in an on-site CERCLA waste disposal facility would be required to meet the facility's waste acceptance criteria, which would be established in agreement with the regulators.

The CERCLA cleanup process designates specific times where public involvement is required. DOE presented a skeleton plan for public involvement in the CERCLA waste disposal alternatives evaluation (see attachment) at the March 2008 CAB Working Session. The proposed DOE plan includes two public involvement opportunities in addition to those required by the CERCLA process. The discussion following the presentation to the CAB identified several areas for development and enhancement of the public involvement process. In addition, Assistant Secretary James Rispoli requested at the Spring 2008 EM SSAB Chairs Meeting that local boards take a closer look at how DOE communicates with the public and informs them of their decisions, actions, and challenges.

Recommendation:

The Citizens Advisory Board (CAB) commends DOE on recognizing the need to assure public involvement throughout the evaluation of CERCLA waste disposal alternatives. The CAB recommends that DOE incorporate the following considerations into its plan for public involvement:

- 1) Anticipated timeline for the project including public input periods**
- 2) Materials to educate the public on the community impacts of the CERCLA cell. These should include the benefits, concerns, and consequences for both on-site and off-site disposal and alternatives to the CERCLA cell.**
- 3) Clearly defined goals and expectations for each CERCLA Process Step of the public involvement process**
- 4) Broad based communication tools (newspaper, radio, and electronic media) for public outreach. Utilize existing databases to mail public meeting notices to local community.**
- 5) Glossary to explain acronyms and technical terms specific to the waste disposal alternatives to be provided at public outreach activities (i.e. on-site, off-site, Subtitle C Landfill, Subtitle D Landfill).**
- 6) Detailed waste cell siting maps and a 3-D model for public meetings.**
- 7) Update the plan as the public involvement process evolves.**

Public Involvement in the CERCLA Waste Disposal Alternatives Evaluation

CERCLA Process Steps	Public Involvement
Prior to commencement of RI/FS (Issue D1 Scoping Document)	Public notice of Administrative Record open and available in newspaper of general circulation (i.e., <i>The Paducah Sun</i>)
Issue D1 RI/FS Work Plan	*Public information workshop
Issue D1 Feasibility Study Report	*Public information workshop
Issue Proposed Plan	Public notice in newspaper of general circulation (i.e., <i>The Paducah Sun</i>); open public comment period; *host public meeting
Issue Record of Decision	Public notice of ROD availability in newspaper of general circulation (i.e., <i>The Paducah Sun</i>)

***Voluntary public involvement activity not otherwise required by CERCLA**