



Paducah Gaseous Diffusion Plant  
Citizens Advisory Board

Recommendation 10-06  
July 15, 2010

## Recommendation: 10-06

*Approved at the Citizens Advisory Board Meeting, July 15, 2010*

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### Title: Siting Criteria for a Potential CERCLA Cell

### 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 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. DOE is currently evaluating waste disposal alternatives to handle wastes generated under CERCLA actions at the PGDP. The disposition options include off-site disposal, on-site disposal or a combination of both on-site and off-site disposal.

Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at PGDP have been combined into six operable units (OUs). Each of these OUs is expected to generate a variety of CERCLA waste throughout the cleanup process, including radioactively contaminated media and debris. An estimated 573,000 yd<sup>3</sup> of waste is forecast to be generated prior to PGDP shut-down and an additional 3.14 million yd<sup>3</sup> is estimated to be generated after PGDP shut-down, totaling an estimated 3.7 million yd<sup>3</sup> from both phases of the cleanup.

DOE is evaluating a site wide disposal strategy to deal with these wastes. Both on-site and off-site disposal alternatives are being considered for this waste. Off-site disposal would involve shipping the waste either on a project by project basis or on a site wide basis to disposal facilities licensed to accept these wastes. The on-site alternative involves construction on the DOE reservation of a CERCLA Class D disposal facility meeting design and regulatory criteria. Both on-site and off-site waste disposal alternatives will be considered in the Remedial Investigation/ Feasibility Study (RI/FS) evaluation and decision documentation process required by CERCLA.

Based on the technical and public feedback information currently available, the Citizens Advisory Board (CAB) is unable to make a determination at this point as to whether or not the Board supports an on-site CERCLA cell. CAB members have, however, received sufficient community input and technical information to be able to make the recommendation that follows.

**Recommendation:**

**The CAB fully supports studies and investigations on waste disposal options, as required by the CERCLA Regulation, but does not support or oppose the siting and construction of a CERCLA cell at the PGDP at this time. In order to adequately address stakeholder concerns and issues during the siting study of a potential CERCLA cell, the PGDP CAB recommends that DOE give appropriate weighting and consideration to “non-technical” factors such as, but not limited to:**

- 1. The potential site’s impact on the future economic viability of that site.**
- 2. The potential site’s impact on the local environment, minimizing the disruption of “greenfield” areas.**
- 3. The potential site’s impact on the aesthetics of the site and the future landscape of the reservation.**
- 4. The potential site’s impact on plant neighborhoods and the emotional reactions of the affected communities.**