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Title: CAB Comments on Focused Feasibility for Solid Waste Management Units 211A and 211B

Background:

SWMU-211A, SWMU-211B (C-720 Northeast and Southeast)

In the revised focused feasibility study, DOE concluded that the preferred remedial action for SWMU-211A and SWMU-211B was Long Term Monitoring at an estimated cost of 4.4 million dollars and an estimated completion time of 97 years. EPA and Kentucky Division of Waste Management (DWM) believe that monitoring and land use controls do not meet the established remedial action objectives and prefer the use of *In-situ* Soil Flushing and Source Treatment via Multiphase Extraction. The estimated cost for this alternative is 8.8 million dollars with an estimated completion time of 39 years.

Based on data from the site investigation conducted in 2004 and continued periodic groundwater monitoring, DOE estimates the remaining TCE at these sites to be on the no more than a few tens of gallons. The data indicate that the TCE may be in the dissolved phase rather than in the higher concentrated DNAPL phase. Furthermore, DOE notes that the 97 year time estimate is relatively inconsequential in relation to other long term site monitoring that will be required at the site.

The CAB acknowledges that when considering current and projected funding levels compared with other site priorities, judicious use of resources is necessary. Current groundwater monitoring data indicate that the Southwest Plume flow is within the capture zone of the pump and treat system. Public health and environmental risks due to residual contamination are low. Even though the estimated time of completion is considerably less for the aggressive remedial action preferred by EPA and DWM, the estimated cost is twice as much.

The CAB is concerned, however, that long term monitoring, i.e. natural attenuation, implies a passive approach to remediation. If an estimated completion time of 97 years is considered inconsequential, the argument could be made that 150 years or more is also inconsequential. Thus, a passive approach could be taken in other areas. The CAB believes that passive approaches to remediation are generally unacceptable to the public unless substantial justification is provided.

Whether or not TCE still exists as DNAPL in the area is a determining factor for treatment. If DNAPL does remain, DOE agrees that a more aggressive remediation approach would be preferred. The site investigation was conducted seven years ago. Additional sampling does not guarantee an increase in precision, but the CAB believes that the possible presence of DNAPL needs to be resolved before the DOE preferred alternative of long term monitoring could be considered acceptable.

Recommendation

The CAB recommends that DOE negotiate with EPA and DWM to determine what additional sampling might be beneficial to determine if DNAPL is present. Although additional sampling would result in an implementation delay, the extra time is trivial compared with the overall estimated time of completion for either alternative. The additional costs are relatively low when considering the additional cost of the more aggressive remedial action.