



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000

JUN 18 2015

Mr. Ben Peterson, Chair
Paducah Citizens Advisory Board
111 Memorial Drive
Paducah, Kentucky 42001

PPPO-02-2905105-15

Dear Mr. Peterson:

RECOMMENDATION 15-02: BURIAL GROUNDS SOLID WASTE MANAGEMENT UNITS 5 & 6 REMEDIATION PRIORITIES

Reference: Letter from B. Peterson to J. Woodard, "Paducah Gaseous Diffusion Plant (PGDP) Citizens Advisory Board (CAB) Consensus Recommendation 15-02," dated April 17, 2015

The U.S. Department of Energy (DOE) is in receipt of the Citizens Advisory Board (CAB) Recommendation 15-02 (reference). In the recommendation, the CAB requests DOE delay the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decision process for Solid Waste Management Units (SWMU) 5 & 6 prior to finalizing the Record of Decision. The CAB recommends DOE use lessons learned from the excavation of SWMU 4 to incorporate into a future decision on SWMUs 5 & 6. Additionally, as part of a holistic approach to site cleanup, the CAB asks that resources anticipated for the implementation of SWMUs 5 & 6 remedial action be re-allocated to other site activities such as decontamination, decommissioning, or demolition.

As stated in a previous recommendation related to SWMUs 5 & 6, environmental restoration decisions at the Paducah Gaseous Diffusion Plant (PGDP) are made jointly by DOE, the U.S. Environmental Protection Agency (EPA), and the Kentucky Department for Environmental Protection (KDEP) through the Federal Facility Agreement (FFA). Consequently, DOE cannot act unilaterally on this recommendation. This recommendation has been shared with the FFA parties. As part of the CERCLA and FFA process, DOE will be required to meet regulatory milestones currently associated with SWMUs 5 & 6 until such time that the milestones are renegotiated. DOE, EPA, and KDEP have acknowledged that the return of the PGDP plant facilities in October 2014 creates a need to develop a comprehensive approach to cleanup at the site. The parties are currently discussing regulatory options for moving forward, including decisions related to SWMUs 5 & 6. DOE encourages local stakeholders to submit their comments to the EPA and KDEP in order to best ensure any response is provided to the local stakeholders directly.

SWMU 4 is currently moving forward in the CERCLA process and a final remedy has not been chosen. The budget assumption for SWMU 4 is excavation of the burial ground along with

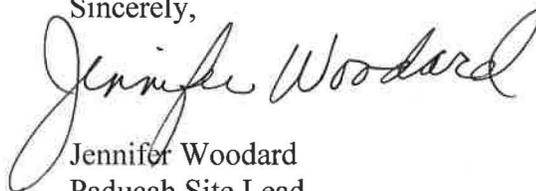
treatment for groundwater contamination. DOE agrees that the final remedial action for SWMU 4 could provide valuable lessons learned for future actions at the Paducah Site.

The SWMUs 5 & 6 draft Proposed Plan identifies an engineering cap as the preferred remedial action. Since the proposed remedial action is an engineering cap and has a projected cost over \$10M, it is classified as a capital line item project. As such, the project is specifically funded by Congress. Once the funding is assigned to the SWMUs 5 & 6 project, the funds cannot be diverted to any other site cleanup or projects without Congressional approval. Therefore, DOE recognizes it is important to address the schedule with the FFA parties associated with SWMUs 5 & 6 before the funding is assigned to SWMUs 5 & 6.

DOE values the community's input regarding integration of the different remedial actions at the Paducah site. DOE will provide feedback to the CAB on the SWMUs 5 & 6 schedule and continue to engage the CAB as the process moves forward to integrate all scope into a cleanup plan for the PGDP.

If you have any questions or require additional information, please contact Buz Smith at (270) 441-6821.

Sincerely,



Jennifer Woodard
Paducah Site Lead
Portsmouth/Paducah Project Office

e-copy:

april.webb@ky.gov, KDEP/Frankfort
bpeterson@ci.paducah.ky.us, CAB/PAD
corkran.april@epa.gov, EPA/Atlanta
dave.dollins@lex.doe.gov, PPPO/PAD
eric@pgdpcab.org, EHI/PAD
gaye.brewer@ky.gov, KDEP/PAD
jeffrey.gibson@ky.gov, KDEP/Frankfort
jennifer.woodard@lex.doe.gov, PPPO/PAD
jim@pgdpcab.org, EHI/PAD
joe.walker@lataky.com, LATA/Kevil
leo.williamson@ky.gov, KDEP/Frankfort
pad.dmc@swiftstaley.com, SSI/Kevil
robert.smith@lex.doe.gov, PPPO/PAD