



## Paducah Citizens Advisory Board

*"working for the future"*

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### **Recommendation 13-09: DOE request an extension for the submission of the Proposed Plan for the Waste Disposal Alternatives Evaluation due October 20, 2013**

September 19, 2013

#### **Background**

The Remedial Investigation/Feasibility Study (RI/FS) for the Waste Disposition Alternatives Evaluation was issued in May 2012. This document outlined the waste disposal alternatives for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) waste that will be generated from environmental restoration of the Paducah Gaseous Diffusion Plant (PGDP) site. The RI/FS document presented a technical evaluation of three waste disposal options that included the No-Action, Off-site disposal, and On-site disposal alternatives. Even though 11 locations were identified for the On-site alternative, only two of them were evaluated in depth and included in detailed analysis in the report.

Under the CERCLA process, DOE is required to submit a Proposed Plan for the RI/FS to KY EEC and US EPA by October 20, 2013. This Proposed Plan is required to include a recommended alternative for the disposal of CERCLA waste generated by the plant clean-up. If the on-site alternative is recommended, DOE is also required to recommend a specific location on the PGDP site for a "CERCLA Cell" to contain the waste. In response to many inquiries about all the location of a potential CERCLA Cell, DOE is performing some additional evaluations of the five locations in the D2 RI/FS.

Since the RI/FS was published in 2012, there have been many changes at the site that will have a long term impact on the future use of the PGDP site, the clean-up of the site, and the surrounding community. With the recent termination of uranium enrichment operations at the site, the Waste Disposal Alternatives decision has grown in importance to have regional impact. Given the shutdown of enrichment operations and the pending decisions for the future use of the site, the Waste Disposal Alternatives Evaluation decision will have major implications for the economic viability of the region and future tenants for the site. Many of these economic decisions regarding future use of the PGDP site are evolving under the Request for Offers (RFO) process initiated by DOE.

Over the past year, DOE, KY DEP, and US EPA have recognized the importance of the Waste Disposal Alternatives Project by granting several extensions to the D1 Proposed Plan submittal date. With the current due date of October 20, 2013, the CAB feels that a Proposed Plan submittal will adversely impact the businesses decision-making process concerning future use of the site. The CAB also feels that an extension will not adversely impact the overall mission of site clean-up.

#### **Recommendation**

**The CAB, therefore, recommends that DOE request an extension of 90 – 180 days for the date to submit the Proposed Plan for the Waste Disposition Alternatives Evaluation currently due October 20, 2013.**