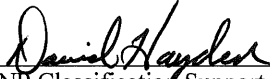


FRNP-RPT-0014/R1

**Strategic Plan for
Real Property Transfer at the
Paducah Site,
Paducah, Kentucky**

This document is approved for public release per review by:


FRNP Classification Support

4-10-18
Date

**Strategic Plan for
Real Property Transfer at the
Paducah Site,
Paducah, Kentucky**

Date Issued—April 2018

U.S. DEPARTMENT OF ENERGY
Office of Environmental Management

Prepared by
FOUR RIVERS NUCLEAR PARTNERSHIP, LLC,
managing the
Deactivation and Remediation Project at the
Paducah Gaseous Diffusion Plant
under Contract DE-EM0004895

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CONTENTS

FIGURES	v
TABLES	v
ACRONYMS	vii
EXECUTIVE SUMMARY	ix
1. INTRODUCTION.....	1
1.1 SITE LOCATION AND HISTORY	1
1.2 SITE MISSION	2
1.3 SCOPE/PURPOSE OF THIS PLAN	2
2. REVIEW OF POTENTIAL REAL PROPERTY PARCELS	5
2.1 STRATEGY FOR IDENTIFYING REAL PROPERTY PARCELS.....	5
2.2 REAL PROPERTY TRANSFER DRIVERS.....	7
2.3 REAL PROPERTY LAND USE FACTORS.....	8
2.4 REAL PROPERTY PARCEL IDENTIFICATION FOR TRANSFER.....	9
3. ENVIRONMENTAL COMPLIANCE AND DUE DILIGENCE	13
3.1 NEPA PROCESS	13
3.2 CERCLA SECTION 120(h).....	13
3.3 DOE ORDER 458.1	14
3.4 REGULATORY APPROVAL/CONCURRENCE	14
4. NOTIFICATION OF AVAILABLE LAND.....	15
5. APPROVAL AND TRANSFER PROCESS	17
5.1 DOE HEADQUARTERS' APPROVAL	17
5.2 CONGRESSIONAL NOTIFICATION.....	17
5.3 TRANSFER AGREEMENT AND QUITCLAIM DEED	17
6. SCHEDULE AND COST FOR PROPOSED LAND TRANSFER	19
7. REFERENCES.....	25
APPENDIX A: SCHEDULE FOR PROPOSED LAND TRANSFER	A-1
APPENDIX B: COST FOR PROPOSED LAND TRANSFER	B-1

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FIGURES

1.	Location of the Paducah Site.....	2
2.	Current Land Use in the Vicinity of the Paducah Site	6
3.	Paducah Parcels Proposed for Nearer-Term Property Transfer	10
4.	Summary Schedule for Property Transfer.....	22

TABLES

1.	Summary of Parcels Identified for Potential Transfer Comprising Parcel A.....	11
2.	Real Property Transfer Process Steps	19

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ACRONYMS

AEA	Atomic Energy Act of 1954
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
<i>CFR</i>	<i>Code of Federal Regulation</i>
CPD	clean parcel determination
CX	categorical exclusion
DOE	U.S. Department of Energy
DOE-HQ	U.S. Department of Energy Headquarters
DUF ₆	depleted uranium hexafluoride
EA	environmental assessment
EBS	environmental baseline survey
EM	environmental management
EMCBC	Environmental Management Consolidated Business Center
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
KNREPC	Kentucky Natural Resources and Environmental Protection Cabinet
NEPA	National Environmental Policy Act
NPL	National Priorities List
O	Order
PACRO	Paducah Area Community Reuse Organization
PGDP	Paducah Gaseous Diffusion Plant
PPPO	Portsmouth/Paducah Project Office
SWMU	solid waste management unit
U.S.C.	<i>United States Code</i>
USEC	United States Enrichment Corporation
WKWMA	West Kentucky Wildlife Management Area

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EXECUTIVE SUMMARY

The U.S. Department of Energy (DOE) seeks to reduce the footprint of the Paducah Site, which would reduce the cost to maintain the site. Additionally, members of the community, including Paducah Area Community Reuse Organization, the Commonwealth of Kentucky, or other entities, may be interested in obtaining Paducah Site real property for community use.

In anticipation of the potential transfer of Paducah Site real property to one or more entities for uses that could be different from its current use, DOE commissioned a review of Paducah Site conditions to identify parcels that may be available to transfer. Transfer of these parcels will be accomplished in a manner that does not interfere with DOE missions at the site and will be consistent with provisions of approved DOE documents, *U.S. Department of Energy Portsmouth/Paducah Project Office Protocol for the Environmental Regulatory Processes for the Transfer of Real Property at the U.S. Department of Energy Portsmouth and Paducah Sites, Volume 1: Uncontaminated Property*, PPPO-3392287 (DOE 2017a), and procedure document, *Planning and Due Diligence for Real Property Transfer*, PPPO-M-3463195 (DOE 2017b).

DOE and predecessor agencies have owned and operated all or parts of the Paducah Site in McCracken County, Kentucky, since 1950. The Energy Policy Act of 1992 transferred operational responsibility for uranium enrichment conducted at Paducah Gaseous Diffusion Plant (PGDP) to the United States Enrichment Corporation (USEC) in 1993. USEC ceased enrichment operations in May 2013 and returned the facilities to DOE control in October 2014.

DOE land holdings at the Paducah Site encompass 3,556 acres with a more heavily developed industrial center and less developed lands around it. The industrial area of the site occupies approximately 628 acres inside the security fence (referred to as the Limited Area); another approximately 809 acres that contain roads, parking lots, grassy areas, utility infrastructure, water impoundments, and some forested lands; and approximately 133 acres are in acquired easements. The predominantly undeveloped land (1,986 acres) is licensed to the Commonwealth of Kentucky for use as part of the West Kentucky Wildlife Management Area (WKWMA). The WKWMA-licensed lands contain access roads and multiple rights-of-way for electrical transmission lines, but otherwise are a mixture of grass meadows, wooded areas, and areas of diverse vegetation.

DOE's goal is to accelerate site cleanup at the Paducah Site, eliminate potential environmental threats, reduce the DOE footprint, and reduce life cycle cost (<http://energy.gov/pppo/pppo-mission>). This will reduce the footprint of the site requiring DOE maintenance by transferring land for beneficial uses. This Strategic Plan for Real Property Transfer has been prepared to provide a preliminary review of identified parcels suitable for nearer-term transfer as not impacted property and provide a plan for the transfer of these identified parcels (nearer-term refers to a time period within five years of this plan). The purpose of this plan is to target at least 500 acres for potential transfer, hereafter referred to as Parcel A by mid-March 2022.

This plan has identified eight parcels, totaling approximately 615 acres, that are candidates for transfer in the nearer-term for community, industrial, recreational, or other nonresidential beneficial land use. The eight parcels comprising Parcel A currently are outside the industrial area and licensed to WKWMA (License No. REEMCBDOE-3-16-0700), making recreation a preferred use for much of the real property. There are no indications that the release or disposal of hazardous substances or petroleum products poses a threat to human health or the environment (Section 2; DOE 2017a). Parcel A is appropriate for transfer when considering the mission need for the property and its utilization, and it will include the powerline

rights-of-way or easements not included in the previously identified parcels because these would not interfere with some future uses, recreational use for example.

1. INTRODUCTION

The U.S. Department of Energy (DOE) and predecessor agencies have owned and operated all or parts of the Paducah Site in McCracken County, Kentucky, since 1950. The Energy Policy Act of 1992 (42 U.S.C. 13201 note) transferred operational responsibility for uranium enrichment to the United States Enrichment Corporation (USEC) in 1993. USEC ceased operations in May 2013 and returned the leased facilities to DOE in October 2014.

With cessation of enrichment operations, DOE is interested in reducing the footprint of the site, which would reduce the cost to maintain the site. In Section 3158 of the National Defense Authorization Act for Fiscal Year 1998, Congress directed DOE to prescribe regulations specifically for the transfer by sale or lease of real property at defense nuclear facilities for purposes of permitting economic development (42 U.S.C. 7274q(a)(1)) to dispose of unneeded real property at DOE's defense nuclear facilities. In addition, members of the community, including the Paducah Area Community Reuse Organization (PACRO), the Commonwealth of Kentucky, or other entities, may be interested in real property transfer for potential community use (KDFWR 2015).

1.1 SITE LOCATION AND HISTORY

The Paducah Site is located in a generally rural area of McCracken County, Kentucky, 10 miles west of Paducah, Kentucky, and 3.5 miles south of the Ohio River (Figure 1) and is comprised of approximately 3,556 acres. Until 2013, the Paducah Gaseous Diffusion Plant (PGDP) was an active uranium enrichment facility with extensive support facilities. The uranium enrichment process was housed in several large buildings. The industrial area of the site occupies approximately 628 acres inside the security fence (referred to as the Limited Area); another approximately 809 acres that contain roads, parking lots, grassy areas, utility infrastructure, water impoundments, and some forested lands; and approximately 133 acres are in acquired easements. The predominantly undeveloped land (1,986 acres) is licensed to the Commonwealth of Kentucky for use as part of the West Kentucky Wildlife Management Area (WKWMA) (License No. REEMCBDOE-3-16-0700). The WKWMA-licensed lands contain access roads and multiple rights-of-way for electrical transmission lines, but the lands otherwise are a mixture of grass meadows, wooded areas, and areas of diverse vegetation.

WKWMA consists of woodlands, meadows, and cultivated fields and is used by a considerable number of hunters, trappers, and anglers each year. Hunting and trapping activities may include such wildlife as rabbit, deer, quail, raccoon, squirrel, dove, turkey, waterfowl, and beaver. Additionally, the Kentucky Department of Fish and Wildlife Resources sponsors field hunting trials for dogs within WKWMA.

During World War II, the Paducah Site was part of the Kentucky Ordnance Works; however, the Kentucky Ordnance Works process areas were located south-southwest of the PGDP Limited Area on what largely now is the WKWMA.

Although uranium enrichment has ceased, DOE maintains several missions at the Paducah Site. These missions include environmental monitoring and surveillance to ensure protection of site personnel, the environment, and the community; conversion of depleted uranium hexafluoride (DUF_6) to an oxide to facilitate long-term management of uranium enrichment process residuals; and deactivation of site facilities to allow for the facilities to be decontaminated, decommissioned, and/or demolished.

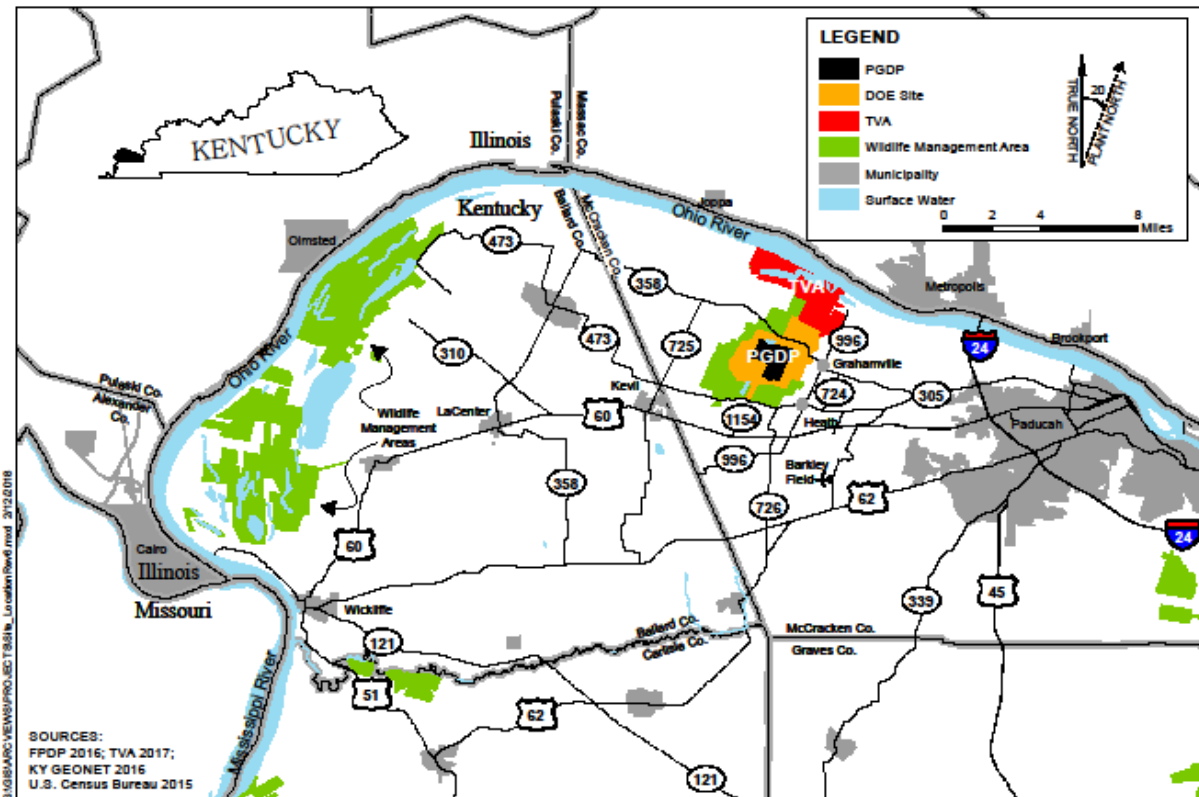


Figure 1. Location of the Paducah Site

1.2 SITE MISSION

DOE established the Portsmouth/Paducah Project Office (PPPO) on October 1, 2003, to provide focused leadership to the Environmental Management (EM) missions at the Portsmouth, Ohio, and Paducah, Kentucky, gaseous diffusion plants. DOE maintains a strong presence at the sites through the Portsmouth and Paducah Site Offices.

DOE's PPPO mission is to accomplish the following at the Paducah Site (<http://energy.gov/pppo/pppo-mission>):

- Environmental Remediation
- Waste Management
- Depleted Uranium Hexafluoride (DUF₆) Conversion
- Stabilization and Decommissioning
- Infrastructure Optimization

1.3 SCOPE/PURPOSE OF THIS PLAN

This Strategic Plan for Real Property Transfer has been prepared to identify suitable parcels of real property for transfer in the nearer-term along with a cost and schedule for transferring the identified parcels. Nearer-term is considered to be between the present and 5 years (DOE 2017a). The objective of

this plan is to target at least 500 acres for potential transfer between the present and March 2022; this plan has preliminarily identified approximately 615 acres for transfer, hereafter referred to as Parcel A.

Transfer of parcels will be accomplished in a manner that does not interfere with DOE missions at the site and will be consistent with rules governing DOE property transfer, as described in the approved *U.S. Department of Energy Portsmouth/Paducah Project Office Protocol for the Environmental Regulatory Processes for the Transfer of Real Property at the U.S. Department of Energy Portsmouth and Paducah Sites, Volume 1: Uncontaminated Property*, PPPO-3392287, (DOE 2017a), and procedure document, *Planning and Due Diligence for Real Property Transfer*, PPPO-M-3463195 (DOE 2017b). PPPO plans to transfer only real property in the nearer-term that is determined to be “uncontaminated per CERCLA Section 120(h)(4) and not radiologically impacted by DOE operations” (DOE 2017b). DOE’s goals for the Paducah Site are to reduce or eliminate the impacts of historical activities and simultaneously reduce DOE’s land footprint of the site that requires DOE maintenance by transferring land for beneficial uses. This plan provides a preliminary review of identified parcels suitable for nearer-term transfer.

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2. REVIEW OF POTENTIAL REAL PROPERTY PARCELS

A purpose of this plan is to identify preliminary parcels that are suitable for timely transfer where that transfer will not interfere with current or future DOE missions. As a result, this preliminary identification focuses on land located outside the DOE industrial area (also outside the existing DOE landfills) and outside the DOE-proposed locations being considered for future construction of a potential Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) On-site Waste Disposal Facility. In addition, major roads are not proposed for transfer (although minor roads located within parcels may be proposed for transfer).

This preliminary parcel identification is presented to provide a discussion of site features that may have differential impacts on property transfer. Parcels identified below may be combined, split, expanded, or otherwise modified to accommodate existing features or future uses, such as industrial and/or recreational uses. The general approach is to facilitate, to the extent practical, nearer-term land transfer of parcels for community use, irrespective of the type of use. There is potential to transfer real property for recreational use similar to its current use (e.g., land currently licensed to WKWMA for recreation and wildlife management) or for industrial use.

2.1 STRATEGY FOR IDENTIFYING REAL PROPERTY PARCELS

The parcels identified for potential land transfer in this plan were selected based on a previous evaluation of potential real property transfer (FPDP 2017). That evaluation primarily reviewed geographic information attributes of the site and developed separate parcels based on similar characteristics.

Figure 2 provides a map of the Paducah Site with buildings, roads, railroads, overhead powerlines, streams, and the current land use layers depicted (industrial, licensed to WKWMA, and non-DOE WKWMA property) (FPDP 2017).

Parcels were built from contiguous land that met these requirements (FPDP 2017):

- Has the same ownership/license condition (i.e., individual parcel land currently is all licensed to WKWMA or none of the land currently is licensed to WKWMA);
- Is outside the Limited Area;
- Is not expected to interfere with known DOE missions;
- Is not part of the DOE-proposed location for a CERCLA cell;
- Does not contain any solid waste management units (SWMUs); and
- Does not result in land-locked parcels by ensuring road access to each parcel (where practical) and maintaining road access to DOE land not targeted for land transfer.

Using these requirements, 14 parcels of real property preliminarily were identified for potential transfer at the site. Potential parcels were not differentiated by the following features:

- **Have a current WKWMA license** because the agreement can be revoked at DOE's option and the parcel thus de-licensed;

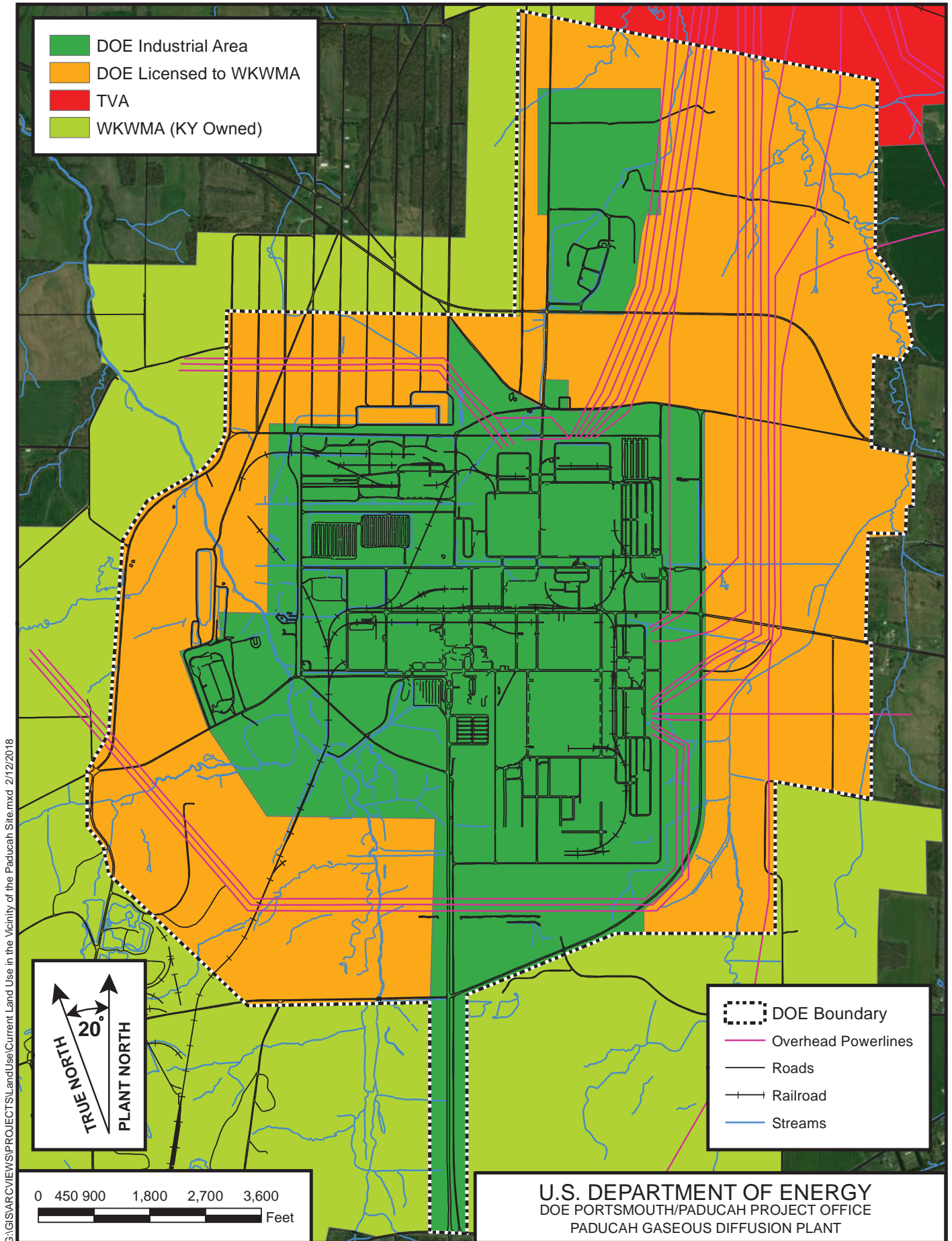


Figure 2. Current Land Use in the Vicinity of the Paducah Site

- **The presence of wetlands** because all parcels have had a preliminary identification of wetlands and thus, the presence of wetlands will need to be addressed as part of any property transfer;
- **The presence of cultural resources or threatened/endangered species** because the presence has not been confirmed and an evaluation of impacts will need to be incorporated into any land transfer;
- **The proximity of DOE-provided electricity, water, and sewer services** because use of DOE-provided utilities after transfer is unlikely;
- **The presence of non-DOE buildings or features (e.g., monitoring wells)** because these features are unlikely to interfere with most development, may be properly abandoned, or may need to be preserved and sampled in support of DOE missions; and
- **The current land use** because impacts from changes to land use that may occur from land transfer will be considered as part of the transfer; land transfer is not restricted based on current land use.

2.2 REAL PROPERTY TRANSFER DRIVERS

In response to restructuring the DOE EM Program in 2002 to emphasize cost reduction through site closures (DOE 2002), DOE plans to transfer real property that no longer has a mission need and that is suitable for transfer from an environmental and health and safety perspective. The authority and requirements for the title transfer of DOE real property come from several sources. The basis of PPPO's authorization for title transfer is the Atomic Energy Act of 1954 (AEA). Another federal requirement that PPPO must comply with is the National Environmental Policy Act (NEPA). In addition, because the Paducah Site is a federal facility, the requirements for property transfer must comply with Section 120(h) of CERCLA. Although there are several mechanisms available to PPPO for transferring real property, it is anticipated that the process outlined in 10 *CFR* Part 770 for title transfers for economic development purposes likely will be followed for most ownership transfers of real property at the Paducah Site. Additionally, title transfer will conform to the requirements of the Federal Facility Agreement (FFA).

Section 161(g) of the Atomic Energy Act of 1954

This U.S.C. authorizes DOE to sell, lease, or transfer excess real property, under certain circumstances. It also requires that DOE protect human health, safety, and the environment and authorizes DOE to establish, implement, and enforce protective standards with respect to activities under its jurisdiction. DOE requirements under AEA apply, irrespective of any requirements or arrangements made under the Resource Conservation and Recovery Act of 1976, CERCLA, or the Federal Facility Compliance Act.

CERCLA Section 120(h)

PGDP was added to the National Priorities List (NPL) in May 1994. In February 1998, DOE entered into a tri-party agreement (FFA) with the U.S. Environmental Protection Agency (EPA) and Commonwealth of Kentucky (EPA 1998). The following language is provided in Section XLII of the FFA (EPA 1998):

In the event that DOE decides to enter into any contract for the sale or transfer of any of the Site, DOE shall comply with the requirements of Section 120(h) of CERCLA, 42 U.S.C. § 9620 (h), in effectuating that sale or transfer, including all notice requirements. In addition, DOE shall include notice of this Agreement in any document

transferring ownership or operation of the Site to any subsequent owner and/or operator of any portion of the Site and shall notify EPA and KNREPC of any such sale or transfer at least ninety (90) days prior to such sale or transfer. No change in ownership of the Site or any portion thereof or notice pursuant to Section 120(h)(3)(B) of CERCLA, 42 U.S.C. § 9620 (h)(3)(B), shall relieve DOE of its obligation to perform pursuant to this Agreement. No change of ownership of the Site or any portion thereof shall be consummated by DOE without provision for continued maintenance of any containment system, treatment system, or other response action(s) installed or implemented pursuant to this Agreement. This provision does not relieve DOE of its obligations under 40 *CFR* 270, and *KRS* 224 § 46, 401 *KAR* Chapter 38.

10 *CFR* Part 770, “Transfer of Real Property at Defense Nuclear Facilities for Economic Development”

This rule was issued in February 2000 and applies to sale or lease of real property at DOE defense nuclear facilities if the purpose of transfer is economic development. Transfers of real property under 10 *CFR* Part 770 are intended to offset negative impacts on communities caused by unemployment from related DOE downsizing, facility closeouts, and workforce restructuring at Defense Nuclear Facilities. Economic development is defined in 10 *CFR* § 770.4 as “the use of transferred DOE real property in a way that enhances the production, distribution, or consumption of goods and services in the surrounding regions(s) and furthers the public policy objectives of the laws governing the downsizing of DOE’s defense nuclear facilities.” PGDP is a defense nuclear facility as defined at 10 *CFR* § 770.4 and, therefore, is eligible to use the 10 *CFR* Part 770 process. Although there are several mechanisms available to DOE for transferring real property, it is anticipated that the process outlined in 10 *CFR* Part 770 for title transfers for economic development purposes will be the predominant process followed for transfers at the Paducah Site.

10 *CFR* Part 770 provides for indemnification to transferees, if requested in writing at the time of their proposal for transfer, and depending on availability of funding. Indemnification offered under 10 *CFR* Part 770 is for claims based on the release or threatened release of a hazardous substance or pollutant or contaminant resulting from DOE activities [10 *CFR* § 770.7(a)(2)]. Transfer at less than fair market value is also available for economic development transfers if considerable infrastructure improvements are needed to make it economically viable, or if a less than fair market value transfer would further the public policy objectives of the laws governing the downsizing of defense nuclear facilities (10 *CFR* § 770.8).

10 *CFR* Part 770 is the most likely path to be taken for future transfers, but should a non-10 *CFR* Part 770 process transfer be pursued, the environmental due diligence tasks are the same. Differences occur in the realty-led aspects of the transfer and review processes. PPPO will coordinate with the Certified Realty Specialist at the Environmental Management Consolidated Business Center (EMCBC) for Paducah Site real property transfers, regardless of the process followed.

2.3 REAL PROPERTY LAND USE FACTORS

The 14 parcels of real property preliminarily identified for potential transfer were developed by grouping contiguous property in areas with limited potential to interfere with DOE missions. The land in each parcel is all licensed to WKWMA for recreational use. Parcels were created to maintain nearby road access without leaving landlocked properties, to the extent practical. In addition, the land parcels identified as candidates for transfer are located within the Water Policy Area. As part of the residential well sampling program that began when off-site contamination was discovered in 1988, DOE established

a Water Policy in 1994 (DOE 1994). This policy provides that, in the event contamination originating from the Paducah Site is detected above plant action levels, a response will be initiated. DOE modified this Water Policy to include provisions to extend a municipal water line to the entire area of the groundwater contamination originating from the Paducah Site.

2.4 REAL PROPERTY PARCEL IDENTIFICATION FOR TRANSFER

The methodology used in parcel identification focused on identifying parcels suitable for timely transfer, wherein that transfer does not interfere with current or future DOE missions (FPDP 2017). Land transfer for recreational uses is more closely aligned with current parcel uses under WKWMA; however, proposals for industrial or other nonresidential beneficial uses also will be considered if received. A preliminary prioritization assuming transfer for recreational use is presented below. Land transfer for recreational use readily allows expansion of the previously identified parcel boundaries to include features like overhead powerline rights of way and some SWMUs because their inclusion may have value for recreational use and may not interfere with the transfer. Figure 3 shows the real property parcels preliminarily proposed for transfer. These parcels, including the powerline rights of way, are collectively referred to as Parcel A in this plan. Table 1 shows a summary of parcels identified for potential transfer for recreational land use.

The inclusion of these features may result in additional access provisions (e.g., to the powerlines) being incorporated as part of the land transfer. The ranking of parcels are discussed below.

Priority 1

Parcels of greatest likelihood of timely transfer (assuming recreational use) include 1R, 2R-1, 2R-2, 8R, 9R, and 10R (totaling approximately 559 acres). These parcels have limited improved road access, are located further from current or potential development, are unlikely to interfere with the current and intermediate DOE missions for the site, and/or have wooded wetlands. Depending on the future use, these parcels could be expanded to include adjacent parcels, areas with powerlines, internal roads, or other areas that currently are not part of the identified parcels. For example, if powerlines do not interfere with the recreational use, Parcels 2R-1 and 2R-2 can be combined and incorporate the powerline rights of way between them. Parcel A will include the powerline right of way or easements not included in the previously identified parcels because these would not interfere with some future uses, particularly recreation uses. Priority 1 parcels have these characteristics:

- Lack improved road access within/immediately adjacent to the parcel;
- Have wooded wetlands; and
- Use of these parcels for many recreational activities would not unduly interfere with DOE missions.

Priority 2

Secondary parcels for transfer include Priority 2 parcels 7R-1 and 7R-2 (totaling approximately 54 acres). These have better road access; thus, they may be more suitable for other uses (e.g., industrial) and/or may interfere more with current or transitional DOE missions. Priority 2 parcels have these characteristics:

- Have better road access and may be suitable for higher uses (i.e., industrial) than recreational;
- May have some wooded wetlands (but less than Priority 1 parcels); and
- Use of these parcels may interfere with DOE missions peripherally.

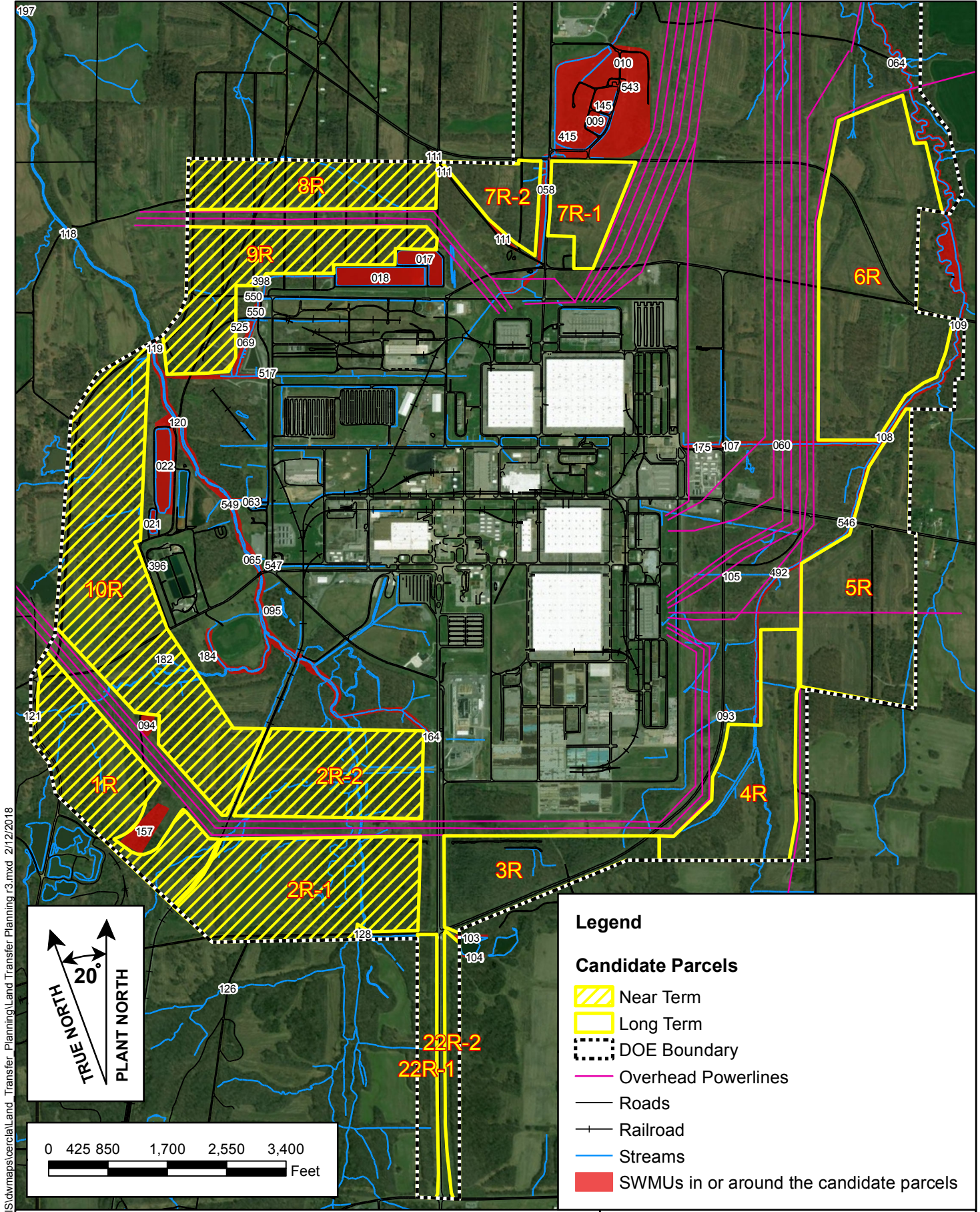


Figure 3. Paducah Parcels Proposed for Nearer-Term Property Transfer

U.S. DEPARTMENT OF ENERGY
 DOE PORTSMOUTH/PADUCAH PROJECT OFFICE
 PADUCAH GASEOUS DIFFUSION PLANT

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Table 1. Summary of Parcels Identified for Potential Transfer Comprising Parcel A

Parcel ID	Owner/License	Acres	Parcel Characteristics
Priority 1 Parcels			
1R	DOE/WKWMA	78	Wooded wetlands; currently licensed to WKWMA.
2R-1 & 2R-2	DOE/WKWMA	175	Wooded wetlands; currently licensed to WKWMA.
8R	DOE/WKWMA	59	Currently licensed to WKWMA.
9R	DOE/WKWMA	78	Currently licensed to WKWMA.
10R	DOE/WKWMA	169	Some wooded wetlands; currently licensed to WKWMA.
Total—Priority 1		559	
Priority 2 Parcels			
7R-1 & 7R-2	DOE/WKWMA	54	Currently used for recreation; currently licensed to WKWMA; Ogden Landing Road access; premium location close to plant could be used to support site closure (e.g., located between the plant and the C-746-U Landfill).
Total Priority 2		54	
Total Priority 1 and Priority 2		613	

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3. ENVIRONMENTAL COMPLIANCE AND DUE DILIGENCE

3.1 NEPA PROCESS

NEPA requires federal agencies, such as DOE, to conduct environmental analyses to assist in the decision-making process prior to taking an action. The transfer of real property could result in impacts that range from no effect, to minor effect, to significant effect. The impacts would be evaluated in the appropriate documentation, which could include a Categorical Exclusion, an environmental assessment (EA), or an environmental impact statement, respectively.

Title transfer cannot take place until the NEPA process is complete. In 2015, an EA, *Paducah Gaseous Diffusion Plant Final Environmental Assessment for Potential Land and Facilities Transfers, McCracken County, Kentucky*, DOE/EA-1927, was prepared that evaluated the transfer of Paducah Site property for industrial/commercial and recreation/wildlife management uses (DOE 2015). A Finding of No Significant Impact was signed for this NEPA document on December 14, 2015.

Although the EA took a broad approach and analyzed a conceptual project to support evaluation of future land uses, no additional NEPA analyses should be required for the property transfer discussed in this plan other than a NEPA adequacy review (DOE 2015). The NEPA adequacy review will be performed to ensure the proposed uses of the parcel are consistent with the uses evaluated in the EA or whether additional NEPA analysis is required.

3.2 CERCLA SECTION 120(h)

Notification and warranty obligations imposed by CERCLA Section 120(h) necessitates that all federal real property transfers require an environmental due diligence review. The environmental due diligence review establishes the baseline conditions of property proposed for transfer and documents these conditions in an Environmental Baseline Survey (EBS) report. Types of due diligence activities for uncontaminated property include a title search to determine prior ownership history, a property description, a review of aerial and other photographs, interviews with people familiar with the property and activities that took place on it, and visual and physical inspections of the property. These requirements originate in CERCLA Section 120(h)(4), which addresses uncontaminated property transfers or a Clean Parcel Determination (CPD) transfer. The objective of the due diligence effort is to be able to determine if the property is eligible for transfer as uncontaminated.

When pursuing an uncontaminated determination for a CPD, evidence must be provided that demonstrates constituents in all media are below action levels, which may include background levels, maximum contaminant levels, and risk-based criteria (including both human health and ecological risk). For example, a CPD can be made if soil constituent concentrations are at or below soil background levels and/or risk-based criteria, as set by the site, and if groundwater constituent concentrations are below maximum contaminant levels.

Existing historical data will be evaluated for the CPD; however, additional sampling may be needed if existing data are not sufficient to address the data quality objectives of the CPD. For example, sampling of sediment/surface water in drainage ways or tributaries near the Paducah Site may be warranted depending on any data gaps identified after evaluation of existing data.

For the property transfer discussed in this plan, the due diligence requirements of CERCLA Section 120(h)(4) will need to be completed and an EBS report prepared. These activities are included in the development of the schedule in Section 6.

3.3 DOE ORDER 458.1

DOE Order (O) 458.1 applies to property transfer at the Paducah Site because it is a DOE site with a history of radiological activities. DOE O 458.1 requires the establishment of DOE-approved authorized limits (DOE 2012) and independent verification of the radiological condition of a property before it can be released from DOE control. PPPO has adopted a method to complete DOE O 458.1 requirements, including the independent verification process necessary for real property. The method specified in the Paducah Site authorized limits implementation plan will be used to address the transfer of real property (DOE 2014). For example, a radiological scoping survey of the gravel roads within Parcel A may be warranted for developing the historical site assessment, depending on any potential data needs identified after evaluation of existing data.

For the property transfer discussed in this plan, completion of DOE O 458.1 requirements is included in the schedule of activities provided in Section 6.

3.4 REGULATORY APPROVAL/CONCURRENCE

The FFA requires a 90-day notification to EPA and the Commonwealth of Kentucky of the intent to transfer property. This notification will be included in the EBS report transmittal letter sent to EPA Region 4 and the Commonwealth of Kentucky.

The completed CERCLA Section 120(h) documentation, the EBS report, will be submitted by DOE for concurrence by the appropriate regulatory officials involved in the transfer. Concurrence on identification of real property that is part of a facility on the NPL will be obtained from the EPA Regional Administrator. Concurrence on the identification of uncontaminated real property that is not part of a facility on the NPL will be from the appropriate state official. The schedule in Appendix A indicates when the EBS report will be submitted for regulatory concurrence.

4. NOTIFICATION OF AVAILABLE LAND

In accordance with the requirements of 10 *CFR* § 770.5, DOE is required annually to make available, to potentially interested persons or entities, a list of real property that has been identified as appropriate for transfer for economic development purposes. Only real property that may be considered “Underutilized” or “Unneeded” is eligible for transfer under the regulation.

Following concurrence on the EBS report, notification of availability can be made to the community reuse organizations, community, and/or others who have expressed an interest in the available property. For the Paducah Site, notification consists of providing information to PACRO, local government, and other persons and entities who may have expressed an interest in available property. Property that has obtained regulatory concurrence on the EBS is considered available.

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5. APPROVAL AND TRANSFER PROCESS

5.1 DOE HEADQUARTERS' APPROVAL

Approval of information prepared for real property transfer under DOE O 458.1 is obtained from the DOE Assistant Secretary of Environmental Management, who has delegated the approval authority to the Deputy Assistant Secretary for Site Restoration.

The transfer process also consists of the consolidation of the transfer agreement and all supporting materials into a transfer package, which is sent to U.S. Department of Energy Headquarters (DOE-HQ) EM for their review and approval. This is an effort involving Paducah Site, the PPPO Reuse Lead, the DOE EMCBC Certified Realty Specialist, and DOE counsel, in coordination with the EM program liaison at DOE-HQ.

DOE-HQ Coordination for submittal of the transfer package is managed and led by PPPO. A briefing of DOE-HQ management, to include Asset Management, the Chief Financial Officer, Environmental Management, and General Counsel will occur prior to submittal of the transfer package so that DOE-HQ can be informed of the proposed transfer actions, sequencing, issues and opportunities. This briefing will assist DOE-HQ in working with PPPO and anticipating their needs when the transfer package is submitted. The DOE-HQ briefing and estimated time frame for approval are considered in the development of the schedule (Section 6).

5.2 CONGRESSIONAL NOTIFICATION

The final phase of the real property land transfer process begins when the DOE Secretary's office transmits the transfer package to Congress to initiate the notification recommending the transfer. The notification letters are forwarded to the Congressional Committees by the Assistant Secretary for Congressional and Intergovernmental Affairs to the House and Senate Appropriations, Armed Services, Strategic Forces, and Energy and Water subcommittees. The notification periods are 30 days for the House committees and 60 days for the Senate; these periods run concurrently so the overall Congressional notification period is 60 days. During the notification period the Congressional committees may have questions that will be communicated by the DOE-HQ EM liaison to the PPPO Reuse lead for response. The transfer may occur following the conclusion of the notification period.

5.3 TRANSFER AGREEMENT AND QUITCLAIM DEED

Once the Congressional notification period has ended, DOE PPPO will be notified by the DOE-HQ EM Liaison that the transfer process is completed, and the transfer action is approved. For an approved transfer action, the PPPO Reuse Lead then will coordinate with the DOE EMCBC Certified Realty Specialist, providing them the information they need to enable preparation of the final deed for signature by the transferee and DOE's Certified Realty Specialist. Once executed, the deed will be recorded in the county where the property is located.

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6. SCHEDULE AND COST FOR PROPOSED LAND TRANSFER

This section provides a summary and schedule of the activities and an estimated cost of the activities, proposed to complete the transfer of real property discussed in this plan. The schedule represents an estimate for planning purposes and is not intended to establish enforceable schedules or milestones.

The schedule includes several process steps to completing the property transfer (Table 2). A detailed schedule is provided in Appendix A.

Table 2. Real Property Transfer Process Steps

Transfer Process Step	Description
1	<i>Parcel Identification.</i> This initial planning step is coordinated among the Paducah Site Reuse Lead the PPPO Reuse Lead, and the realty specialists at DOE’s EMCBC. This step is aimed at identifying potential parcels that are appropriate for transfer in consideration of when they may become available with the primary consideration being the mission need for the property and its utilization.
2	<i>Environmental Due Diligence.</i> Due diligence is a process of conducting thorough research into the history of a parcel of real property, in particular the environmental history, and is performed to establish the baseline conditions at the time of transfer. The methodology followed for environmental due diligence of uncontaminated real property is identified in CERCLA Section 120(h)(4). During this step, relevant records are reviewed, the property is walked down and photographed, and interviews are conducted with people knowledgeable of the property and operations that may have occurred on it and immediately adjacent to it. Existing environmental data are reviewed to determine if data gaps exist and whether additional data (e.g., radiological surveys and/or physical samples) are needed. The requirements of DOE O 458.1 are also evaluated concurrently with the environmental due diligence to demonstrate that the property is suitable for release from DOE control from a radiological perspective. The result of the environmental due diligence effort is the preparation of an EBS report. The EBS includes information that satisfies the requirements of both CERCLA Section 120(h)(4) and DOE O 458.1 and demonstrates that the property is eligible for transfer as uncontaminated.
3	<i>Regulatory Notification.</i> In accordance with the Paducah FFA, DOE shall provide notification of any sale or transfer of real property to the U.S. Environmental Protection Agency and the Kentucky Department for Environmental Protection at least 90 days prior to the sale or transfer. This notification will be provided concurrently with submittal of the EBS report.
4	<i>Regulatory Concurrence.</i> The completed CERCLA Section 120(h)(4) documentation (i.e., EBS report) is submitted by DOE for concurrence. Concurrence on identification of real property that is part of a facility on the NPL is obtained from the EPA Regional Administrator. Concurrence on identification of real property that is not part of a facility on the NPL is from the appropriate state official.
5	<i>Independent Verification.</i> As part of the DOE O 458.1 compliance, Independent Verification is performed to ensure that control and release of property is consistent with DOE requirements, approved Authorized Limits, and procedures.
6	<i>Notification of Parcel Availability.</i> After regulatory concurrence is obtained, the property is considered available for transfer and notification of availability can be made to the PACRO, Commonwealth of Kentucky, community, and/or others who have expressed an interest in the available property.

Table 2. Real Property Transfer Process Steps (Continued)

Transfer Process Step	Description
7	NEPA Adequacy Review. In addition to environmental compliance related to CERCLA Section 120(h), the Paducah FFA, etc., a NEPA adequacy review of the proposal is completed to ensure the proposed uses of the parcel are bounded adequately by the analyses in the sitewide EA, and no additional NEPA analyses are required beyond the EA (DOE 2015).
8	Proposal Review. Review transfer proposals against the requirements of 10 <i>CFR</i> § 770.7 and obtain additional information if needed to allow for complete review and evaluation. Note that proposals may be received at any time in the process.
9	Transfer Recommendation (or “business case”). Develop the recommendation that supports proceeding with the transfer process and provides the rationale as to why the transfer is in the best interest of the government.
10	Transfer Package. The transfer agreement and supporting materials needed for review by DOE-HQ to enable the transfer of real property are compiled into a “transfer package.” A listing of the contents of the transfer package for uncontaminated property is found in Appendix G to the <i>Protocol for the Environmental Regulatory Processes for the Transfer of Real Property at the U.S. Department of Energy Portsmouth and Paducah Sites, VOLUME 1: Uncontaminated Property</i> , PPPO-3392287 (DOE 2017a).
11	DOE-HQ Review and Approval. Obtain review and approval from DOE-HQ EM, General Counsel, Chief Financial Officer, and Management and Administration. Obtain Secretarial signature on Congressional notification transmittals that serves as DOE-HQ support and approval of the transfer.
12	Congressional Notification. Congressional committees review the transfer package for a maximum of 60 days. At the conclusion of the 60 day Congressional review period, the transfer agreement (the deed) can be finalized.
13	Deed Execution. Following finalization of required approvals and notifications, the deed can be executed between EMCBC and the transferee.

The following assumptions were used to develop this schedule. Delays in or changes to any of these assumptions could result in overall scope delay (Figure 4).

- The Deactivation and Remediation Contractor assumes DOE approval of this land transfer plan prior to beginning title search and review of existing environmental (and radiological) data.
- If additional sampling is required beyond that proposed as part of the Land Review/Strategy phase for regulatory concurrence of the EBS report, then the completion date of subsequent tasks will be delayed.
- The schedule assumes a transfer proposal is received following notification of property availability. A sampling and analysis plan, if needed based on identification of data gaps following evaluation of existing data, does not require regulatory review and approval.
- The schedule assumes that finalization of an agreement between DOE and EPA about what constitutes the NPL site is made in a timely manner. Disagreement on this could impact severely the schedule of transfer activities.
- DOE does not expand its mission into the proposed parcels for transfer (e.g., expansion of the DOE industrial area) or change boundary after land survey is completed.

- NEPA adequacy review determines that no additional NEPA analyses are required beyond those completed in the sitewide EA (DOE 2015).
- No major changes to the rules or requirements governing DOE property transfer, as described in the approved *U.S. Department of Energy Portsmouth/Paducah Project Office Protocol for the Environmental Regulatory Processes for the Transfer of Real Property at the U.S. Department of Energy Portsmouth and Paducah Sites, Volume 1: Uncontaminated Property*, PPPO-3392287, (DOE 2017a), and procedure document, *Planning and Due Diligence for Real Property Transfer* (PPPO-M-3463195) (DOE 2017b).
- Approved authorized limits developed for the likely or expected use of the property are suitable for the release and transfer of the subject real property (DOE 2012).
- Portions of the proposed real property are not determined to be contaminated.
- Deed restrictions on future uses (i.e., restrictions on future residential use of the property) and on use of groundwater are put in place prior to submittal of the transfer package to DOE-HQ.
- The cost estimate assumes that additional data will be needed prior to preparation of the EBS report (e.g., additional radiological survey of the gravel roads in the parcels and additional samples related to sediment/surface water in the drainage ways or tributaries).

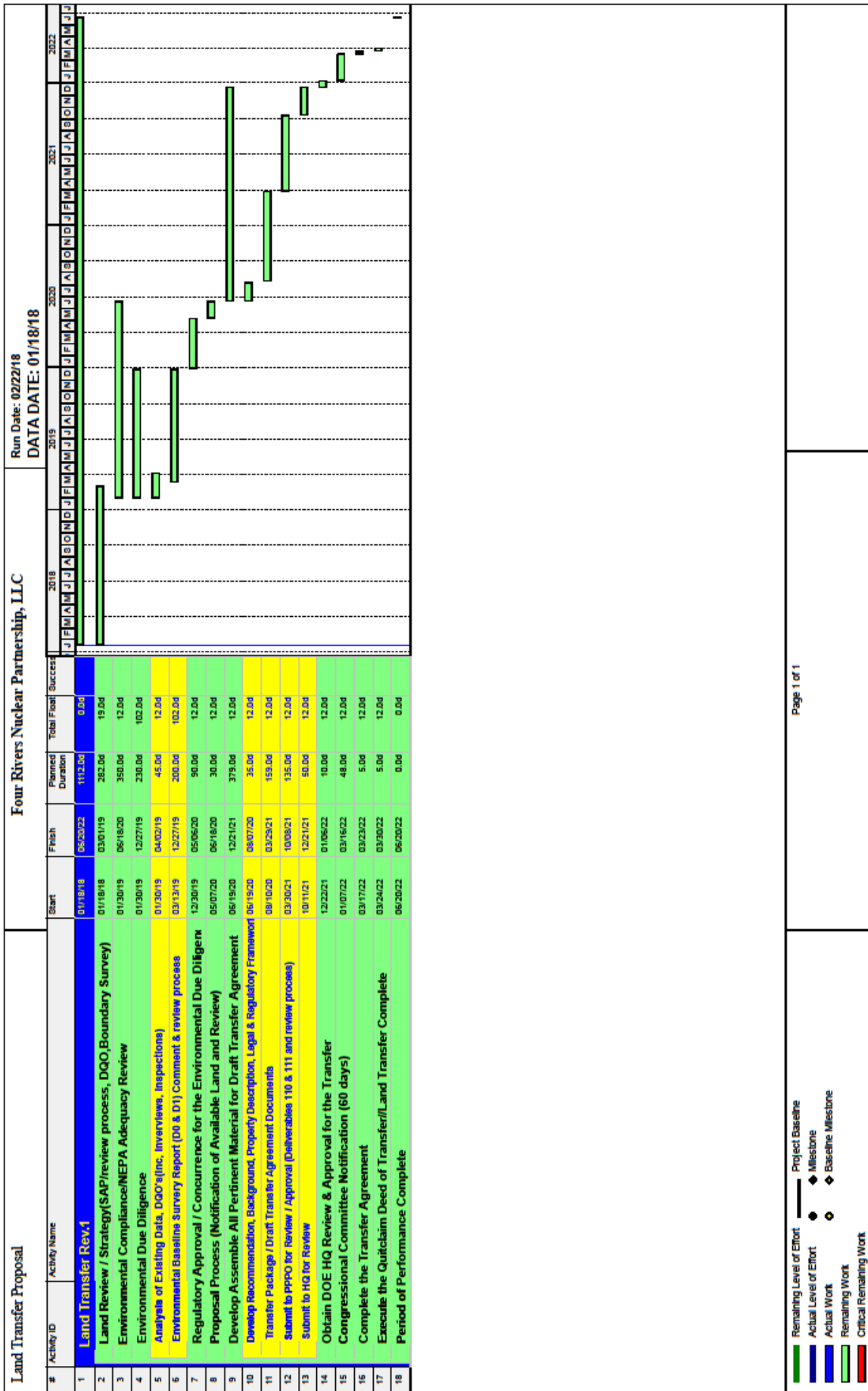


Figure 4. Summary Schedule for Property Transfer

Appendix B provides an associated cost estimate for real property transfer. The estimate is a bottom-up, activity-based cost estimate relying on process knowledge of the project team and property transfer activities at similar sites. The estimated approximate cost for transfer of approximately 500 acres is \$950,000. Cost estimate, including management reserve and fee, is approximately \$1,333,000. This estimate assumes that additional data will be needed prior to preparation of the EBS report (e.g., additional radiological survey of the gravel roads in the parcels and additional samples related to sediment/surface water in drainage ways or tributaries).

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7. REFERENCES

- DOE (U.S. Department of Energy) 1994. *Action Memorandum for the Water Policy at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/OR/06-1201&D2, U.S. Department of Energy, Paducah, KY, December.
- DOE 2002. *A Review of the Environmental Management Program*, presented to the Assistant Secretary for Environmental Management by the Top-to-Bottom Review Team, U.S. Department of Energy, Washington, DC, February.
- DOE 2012. *Authorized Limits Request For DOE-Owned Property Outside The Limited Area at the Paducah Gaseous Diffusion Plant*, U.S. Department of Energy, Paducah, KY, September.
- DOE 2014. *Authorized Limits Implementation Plan for the U.S. Department of Energy Owned Property Outside the Limited Area in Paducah, Kentucky*, DOE/PPPO/02-1270699, U.S. Department of Energy, Paducah, KY, October.
- DOE 2015. *Paducah Gaseous Diffusion Plant Final Environmental Assessment for Potential Land and Facilities Transfers, McCracken County, Kentucky*, DOE/EA-1927, U.S. Department of Energy Portsmouth/Paducah Project Office, Lexington, KY, December.
- DOE 2017a. *Protocol for the Environmental Regulatory Processes for the Transfer of Real Property at the U.S. Department of Energy Portsmouth and Paducah Sites*, Volume 1: Uncontaminated Property, PPPO-3329827, Rev. 1, U.S. Department of Energy Portsmouth/Paducah Project Office, Lexington, KY, April.
- DOE 2017b. *Planning and Due Diligence for Real Property Transfer*, PPPO-M-3463195, U.S. Department of Energy Portsmouth/Paducah Project Office, Lexington, KY, May.
- EPA (U.S. Environmental Protection Agency) 1998. *Federal Facility Agreement for the Paducah Gaseous Diffusion Plant*, DOE/OR/07-1707, U.S. Environmental Protection Agency, Atlanta, GA, February 13.
- FPDP (Fluor Federal Services, Inc., Paducah Deactivation Project) 2017. *Site Planning Report for Land Transfer at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, FPDP-RPT-0069, Fluor Federal Services, Inc., Paducah Deactivation Project, Kevil, KY, May.
- KDFWR (Kentucky Department of Fish and Wildlife Resources) 2015. Correspondence from G. K. Jackson, Commissioner KDFWR, to J. Woodard, DOE Paducah Site Lead, "Re: Paducah Gaseous Diffusion Plant EA for Potential Land Transfer," dated July 22, 2015.

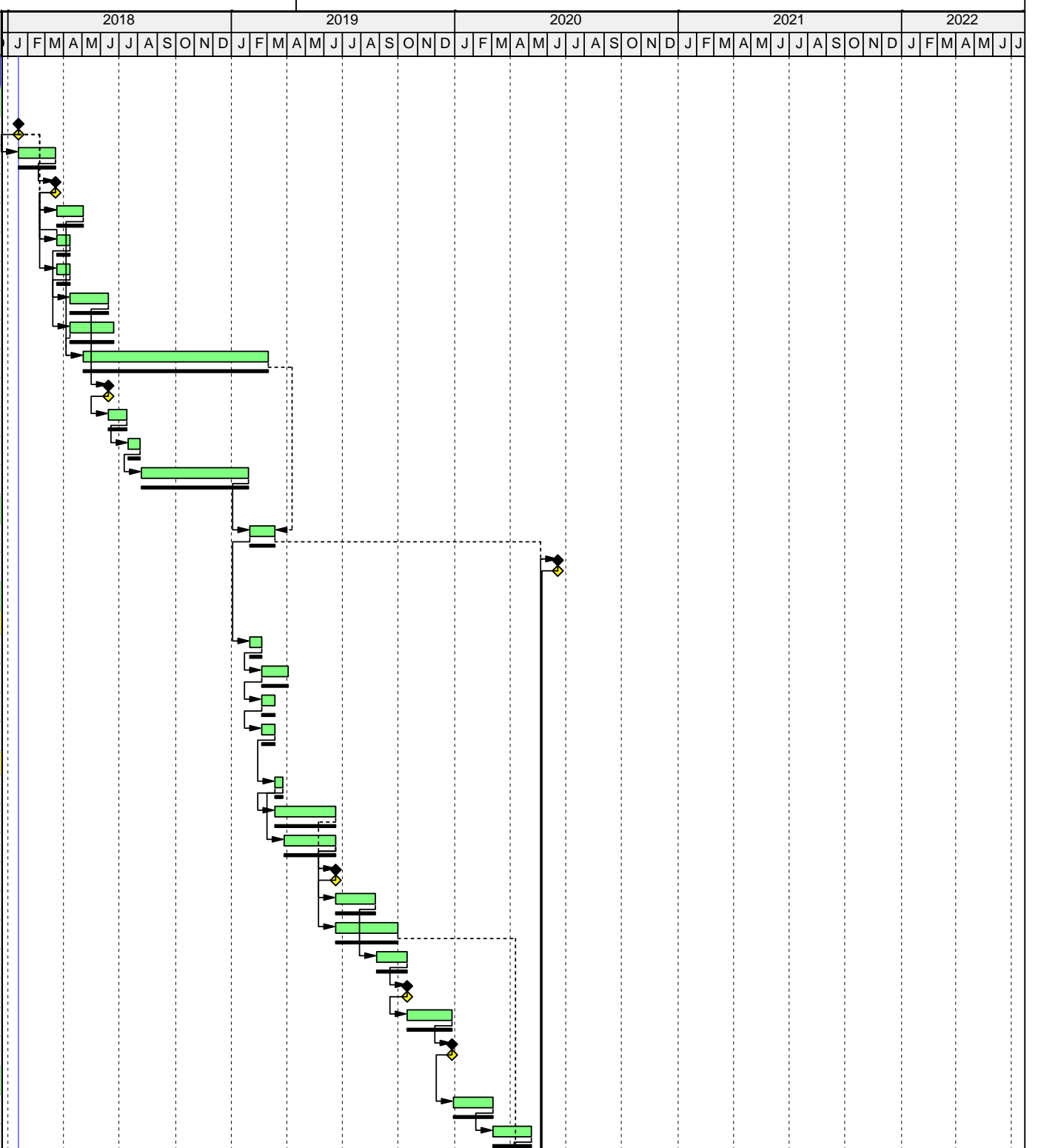
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APPENDIX A

SCHEDULE FOR PROPOSED LAND TRANSFER

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#	Activity ID	Activity Name	Start	Finish	Planned Duration	Total Float	Success	2018					2019					2020					2021					2022																															
								J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A
1	Land Transfer Rev.1		01/18/18	06/20/22	1112.0d	0.0d																																																					
2	Land Review / Strategy		01/18/18	03/01/19	282.0d	19.0d																																																					
3	LT1650	Submit Plan to DOE(Deliverable 109)		01/18/18*	0.0d	1.0d	LT102																																																				
4	LT1910	DOE Plan Review and Response	01/18/18	03/19/18	43.0d	12.0d	LT1920																																																				
5	LT1920	Receive Plan Approval from DOE		03/19/18	0.0d	12.0d	LT100																																																				
6	LT1000	Update Final Review High Level Map	03/20/18	05/03/18	32.0d	19.0d	LT1670																																																				
7	LT1020	Confirm ID Parcel Candidates / Categorize Best Land Use	03/20/18	04/11/18	16.0d	19.0d	LT100																																																				
8	LT1160	SAP Scoping / Identify Data Gaps / Define DQO's (included MQOs)	03/20/18	04/10/18	15.0d	12.0d	LT1170																																																				
9	LT1170	Develop SAP	04/11/18	06/13/18	45.0d	12.0d	LT1200																																																				
10	LT1660	Perform Title Search	04/12/18	06/21/18	50.0d	35.0d	LT1670																																																				
11	LT1670	Schedule, Plan and Perform Boundary Survey	05/04/18	03/01/19	207.0d	19.0d	LT1700																																																				
12	LT1200	Submit SAP for DOE Review		06/13/18	0.0d	12.0d	LT1210																																																				
13	LT1210	DOE Review / Comment Resolution Mtg.	06/14/18	07/13/18	21.0d	12.0d	LT1220																																																				
14	LT1220	Revise SAP	07/16/18	08/03/18	15.0d	12.0d	LT1230																																																				
15	LT1230	Implement SAP	08/06/18	01/29/19	120.0d	12.0d	LT1700																																																				
16	Environmental Compliance		01/30/19	06/18/20	350.0d	12.0d																																																					
17	LT1700	NEPA Adequacy Review (Sensitive Resources Review and Proposed Land Use Review	01/30/19	03/12/19	30.0d	12.0d	LT1111																																																				
18	LT1890	NEPA Adequacy Compliant		06/18/20	0.0d	12.0d	LT1380																																																				
19	Environmental Due Diligence		01/30/19	12/27/19	230.0d	102.0d																																																					
20	Analysis		01/30/19	04/02/19	45.0d	12.0d																																																					
21	LT1110	Define DQO's for Environmental Due Diligence Process (included MQOs)	01/30/19	02/19/19	15.0d	12.0d	LT1120																																																				
22	LT1120	Compile / Review Existing Data	02/20/19	04/02/19	30.0d	12.0d	LT1130																																																				
23	LT1130	Visual & Physical Inspections	02/20/19	03/12/19	15.0d	12.0d	LT1150																																																				
24	LT1150	Interviews with Current & Former Employees	02/20/19	03/12/19	15.0d	12.0d	LT1240																																																				
25	Environmental Baseline Survey Report (D0 & D1)		03/13/19	12/27/19	200.0d	102.0d																																																					
26	LT1240	Perform Screening Risk Evaluation	03/13/19	03/26/19	10.0d	12.0d	LT171																																																				
27	LT1720	Prepare Environmental Baseline Survey (EBS) Report / Appendix Documents	03/13/19	06/19/19	69.0d	13.0d	LT1730																																																				
28	LT1710	Prepare Characterization Report / Issue to DOE for Independent Verification (IV)	03/27/19	06/20/19	60.0d	12.0d	LT173																																																				
29	LT1730	Issue Draft EBS Report (D0) for DOE Review		06/20/19	0.0d	12.0d	LT1740																																																				
30	LT1740	DOE Review of D0 EBS Report	06/21/19	08/23/19	45.0d	12.0d	LT1750																																																				
31	LT1880	Perform Independent Verification (ORISE)	06/21/19	09/30/19	70.0d	162.0d	LT1350																																																				
32	LT1750	Revise EBS Report / Comment Response	08/26/19	10/14/19	35.0d	12.0d	LT1760																																																				
33	LT1760	Issue Revised EBS Report to DOE (D1)		10/14/19	0.0d	12.0d	LT1770																																																				
34	LT1770	DOE Final Review / Concurrence	10/15/19	12/27/19	50.0d	12.0d	LT1780																																																				
35	LT1780	Issue D1 EBS Report to EPA / Notify of Potential Transfer		12/27/19	0.0d	12.0d	LT1330																																																				
36	Regulatory Approval / Concurrence for the Environmental Due Diligen		12/30/19	05/06/20	90.0d	12.0d																																																					
37	LT1330	Regulatory Requirements for CERCLA 120(h)(4)(B) for uncontaminated property	12/30/19	03/03/20	45.0d	12.0d	LT1870																																																				
38	LT1870	Regulator Comment Response / Document Revision	03/04/20	05/06/20	45.0d	12.0d	LT1340																																																				



- Remaining Level of Effort
- Actual Level of Effort
- Actual Work
- Remaining Work
- Critical Remaining Work
- Project Baseline
- Milestone
- Baseline Milestone

APPENDIX B

COST FOR PROPOSED LAND TRANSFER

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Activity ID	Activity Name		Cost to Perform and Support
LTMM Land Transfer Transfer Plan Timeline			\$ 949,346.40
LTMM.1 Land Review / Strategy			\$ 532,030.20
LT1910	DOE Plan Review and Response (Comment Review)		
LT1000	Update Final Review High Level Map	\$ 6,739.00	
LT1020	Confirm ID Parcel Candidates / Categorize Best Land Use	\$ 11,307.20	
LT1160	SAP Scoping / Identify Data Gaps / Define DQO's	\$ 18,495.80	
LT1170	Develop SAP	\$ 7,862.20	
LT1660	Perform Title Search	\$ 71,758.80	
LT1670	Schedule, Plan and Perform Boundary Survey	\$ 175,228.80	
LT1210	DOE Review / Comment Resolution Mtg.	\$ 23,002.00	
LT1220	Revise SAP	\$ 5,522.00	
LT1230	Implement SAP	\$ 212,114.40	
LTMM.2 Environmental Compliance			\$ 29,827.60
LT1700	NEPA Adequacy Review (Sensitive Resources Review and Proposed Land Use Review)	\$ 29,827.60	
LTMM.3 Environmental Due Diligence			\$ 162,803.80
LTMM.3.1 Analysis			\$ -
LT1110	Define DQO's for Environmental Due Diligence Process (Includes MQO's)	\$ 20,329.20	
LT1120	Compile / Review Existing Data	\$ 17,427.20	
LT1130	Visual & Physical Inspections	\$ 27,883.60	
LT1150	Interviews with Current & Former Employees	\$ 6,363.60	
LTMM.3.2 Environmental Baseline Survey Report (D0 & D1)			
LT1240	Perform Screening Risk Evaluation	\$ 4,032.40	
LT1720	Prepare Environmental Baseline Survey (EBS) Report / Appendix Documents	\$ 36,968.00	
LT1710	Prepare Characterization Report / Issue to DOE for Independent Verification (IV)	\$ 18,507.20	
LT1740	DOE Review of D0 EBS Report	\$ 6,153.60	
LT1750	Revise EBS Report / Comment Response *	\$ 9,414.80	
LT1770	DOE Final Review / Concurrence	\$ 7,239.40	
LT1880	Perform Independent Verification (ORISE)	\$ 8,484.80	
LTMM.4 Regulatory Approval / Concurrence for the Environmental Due Diligence Work			\$ 46,987.20
LT1330	Regulatory Requirements for CERCLA 120(h)(4)(B) for uncontaminated property	\$ 7,788.20	
LT1870	Regulator Comment Response / Document Revision	\$ 6,654.80	
LT1350	Notification of Land Availability (with CRO/PACRO/KDFW)	\$ 9,836.60	
LT1360	Obtain and Review Proposals (Discussions should be ongoing with CRO/PACRO/KDFW)	\$ 13,712.40	
LT1370	Perform CERCLA 120(h)(4)Deed Requirements for uncontaminated properties.	\$ 8,995.20	
LTMM.6 Develop Assemble All Pertinent Material for Draft Transfer Agreement			\$ 124,015.60
LTMM.6.1 Develop Recommendation			\$ -
LT1380	Prepare Background Documentation	\$ 4,918.60	
LT1390	Compile Description of Real Property Proposed for Transfer	\$ 4,918.60	
LT1400	Prepare Document for Legal and Regulatory Framework for the Proposed Transfer	\$ 6,364.80	
LT1430	Prepare Recommendation	\$ 2,651.80	
LTMM.6.2 Transfer Package / Draft Transfer Agreement Documents			\$ -
LT1440	Prepare Memo for Transmittal	\$ 1,856.50	
LT1450	Business Case for Title Transfer Draft Development	\$ 14,632.10	
LT1830	Prepare Business Case Documents - Final	\$ 10,344.90	
LT1460	Draft Final Quitclaim Deed	\$ 1,591.50	
LT1470	Compile Draft Transfer Package	\$ 1,060.90	
LTMM.6.3 Submit to PPPO for Review / Approval			\$ -
LT1680	Deliverable 110 Submittal of Draft Document for Transfer of Real Property	\$ 39,402.80	
LT1570	Comment / Response with Site Office (15 Steps)	\$ 17,260.80	
LT1690	Deliverable 111 Submittal of Final Document for Transfer of Real Property	\$ 8,115.10	
LTMM.6.4 Submit to HQ for Review			\$ -
LT1580	Submit to Headquarters for Review	\$ 10,897.20	
LTMM.7 Obtain DOE HQ Review & Approval for the Transfer			\$ 9,307.80
LT1590	Work with PPPO/HQ	\$ 9,307.80	
LTMM.8 Congressional Committee Notification			\$ 42,517.10
LT1600	Support/60 day review Review/Select Congressional Committees	\$ 37,211.10	
LT1610	Execute Quitclaim Deed of Transfer	\$ 5,306.00	
LTMM.9 Complete the Transfer Agreement			\$ 1,061.20
LT1620	Complete Transfer Agreement		
LTMM.10 Execute the Quitclaim Deed of Transfer			\$ 795.90
LT1630	Execute the Quitclaim Deed of Transfer		
LTMM.11	Period of Performance Complete		\$ -

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