

**DOE/LX/07-0121&D2/R1
Primary Document**

**Action Memorandum
for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant,
Paducah, Kentucky**



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DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

APRIL 2009

1. PURPOSE

Pursuant to Section X of the *Federal Facility Agreement for the Paducah Gaseous Diffusion Plant* (FFA) (EPA 1998); 40 *Code of Federal Regulations (CFR)* § 300.415 and Executive Order 12580, the U.S. Department of Energy (DOE) is providing this Action Memorandum (AM) for the Soils Operable Unit (OU) Inactive Facilities at the Paducah Gaseous Diffusion Plant (PGDP) (Identification Number KY8-890-008-982). The AM documents DOE's formal decision to select a removal action for hazardous substances associated with the Soils OU Inactive Facilities. The AM follows U.S. Environmental Protection Agency (EPA) guidance for action memoranda as outlined in *Superfund Removal Procedures Action Memorandum Guidance* (EPA 1990).

The purpose of this AM is to document selection and approval of the non-time-critical removal action for contamination at the C-218 Outdoor Firing Range [Solid Waste Management Unit (SWMU) 181], C-403 Neutralization Tank (SWMU 40), and C-410-B Hydrogen Fluoride (HF) Neutralization Lagoon (SWMU 19) of PGDP, EPA ID KY8-890-008-982. For the C-218 Firing Range (SWMU 181), this removal action is limited to the removal of lead-contaminated soil. For C-403 (SWMU 40) and C-410-B (SWMU 19), this removal action is limited to the removal of contamination within their respective SWMU boundaries (DOE 2007a).

The selected removal action is described in Alternative 3 in the *Engineering Evaluation/Cost Analysis for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/LX/07-0016&D2, (EE/CA) (DOE 2008a) in Attachment 2 and is described in this AM.

2. SITE CONDITIONS AND BACKGROUND

This section provides a summary description of the site; previous investigations and actions; and the known or expected hazardous substances, pollutants, and contaminants. A detailed discussion of site conditions and background is provided in Section 1 of the attached EE/CA (DOE 2008a). DOE is conducting this non-time-critical removal action at PGDP to address the threat posed to human health from direct contact with contaminated soil/sediment and accumulated rainwater associated with the Soils OU Inactive Facilities that resulted from past operations.

Site Description

PGDP is an active uranium enrichment facility located approximately 10 miles west of Paducah, Kentucky and 3.5 miles south of the Ohio River in the western part of McCracken County. The plant is on



U.S. Department of Energy Office of Environmental Management

Action Memorandum for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky **DOE/LX/07-0121&D2/R1 PRIMARY DOCUMENT**

a 3,556-acre DOE site, 748 acres of which are within a fenced security area; 822 acres are located outside the security fence (133 acres of which are in acquired easements); and the remaining 1,986 acres are licensed to the Commonwealth of Kentucky as part of the West Kentucky Wildlife Management Area. (Figure 1). Bordering the PGDP Reservation to the northeast, between the plant and the Ohio River, is a Tennessee Valley Authority Reservation, on which the Shawnee Steam Plant is located (Figure 2).

The PGDP is heavily industrialized; however, the area surrounding the plant is mostly agricultural and open land, with some forested areas. Total population within an 80.46 km (50-mile) radius of PGDP is approximately 500,000. An estimated 50,000 people live within 16.09 km (10 miles) of PGDP and homes are scattered along rural roads around the plant. The population of Paducah, based on the 2000 U.S. Census, is 26,307; the total population of McCracken County [650.4 km² (251 mi²)] is approximately 65,000. The closest communities to PGDP are the unincorporated towns of Grahamville [about 1.6 km (1 mile) to the east] and Heath [about 1.6 km (1 mile) southeast].

During the 1994 U.S. Army Corps of Engineers (COE) environmental investigations, 11,719 acres of wetlands were found in areas surrounding PGDP. These investigations identified 1,083 separate wetland areas and grouped them into 16 vegetative cover types encompassing forested, scrub/shrub, and emergent wetlands. Wetland vegetation consists of species such as sedges, rushes, spikerushes, and various other grasses and forbs in the emergent portions; red maple, sweet gum, oaks, and hickories in the forested portions; and black willow and various other saplings of forested species in the thicket portions.

Most area flooding at PGDP is caused by three bodies of water: the Ohio River, Bayou Creek, and Little Bayou Creek. A floodplain analysis also performed by COE (COE 1994) found that much of the built-up portions of the plant lie outside the 100- and 500-year floodplains of these streams. In addition, this analysis reports that ditches within the plant area can contain the expected 100- and 500-year discharges.

PGDP was placed on the National Priorities List (NPL), effective June 30, 1994 (59 *Federal Register* 27989, May 31, 1994). The FFA negotiated among DOE, EPA, and the Commonwealth of Kentucky coordinates the ongoing corrective action requirements of the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at the facility (EPA 1998).

The C-218 Outdoor Firing Range (SWMU 181), C-403 Neutralization Tank (SWMU 40), and C-410-B HF Neutralization Lagoon (SWMU 19) (Figure 3) are inactive facilities that supported plant activities associated with various historical plant processes at PGDP.

C-218 Outdoor Firing Range (SWMU 181)

The C-218 Firing Range (SWMU 181) is an inactive facility formerly used as an outdoor firing range that was operational from 1985 to 1992. The facility is located immediately west of PGDP on DOE property



U.S. Department of Energy Office of Environmental Management

*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*

DOE/LX/07-0121&D2/R1

PRIMARY DOCUMENT

Figure 1. PGDP Site Location



U.S. Department of Energy Office of Environmental Management

*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

Figure 2. PGDP Land Ownership Map



U.S. Department of Energy Office of Environmental Management

*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*

DOE/LX/07-0121&D2/R1

PRIMARY DOCUMENT

Figure 3. Location of SWMUs 19, 40, and 181



U.S. Department of Energy Office of Environmental Management

Action Memorandum for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky

DOE/LX/07-0121&D2/R1

PRIMARY DOCUMENT

and is a U-shaped soil berm approximately 4.88 m (16 ft) high. Excess excavation material from the East-West Ditch Oil Structure project (Engineering Service Order-13885) completed in 1983, along with possible additional fill material from C-611, was utilized to construct the berm. The facility was utilized for weapons training, and residual munitions fragments containing lead are found within the soils.

C-403 Neutralization Tank (SWMU 40)

The C-403 Neutralization Tank (SWMU 40) is located at the northeast corner of the C-400 Building. The tank is 7.62 m² (25 ft²) by 7.92 m (26 ft) deep, inground, and open-topped. It is constructed of concrete and lined with two layers of acid brick. The tank was used for the storage and treatment of acidic, uranium-bearing waste solutions generated during cleaning operations in the C-400 Building until 1957. In 1957, neutralization equipment was installed in the C-400 Building, and the C-403 Neutralization Tank no longer was used to neutralize waste solutions. Although neutralization no longer was carried out at C-403, contaminated wastewater such as low-level and uranium-bearing wastewater continued to be discharged to C-403 until 1990. These discharges included uranium hexafluoride cylinder hydrostatic-test water, overflow and runoff from cleaning tanks, discharge from floor drains, and other unknown sources. After 1990, the C-403 Neutralization Tank was removed from service.

C-410-B Hydrogen Fluoride Neutralization Lagoon (SWMU 19)

The C-410-B HF Neutralization Lagoon (SWMU 19) is located north of the C-410 Feed Plant. It is a rectangular, below grade impoundment with dimensions of 11.59 m x 15.55 m x 2.13 m (38 ft x 51 ft x 7ft) [383.88 m³ (1,938 ft³)]; has an earth-clay floor; and has sloped sides reinforced with wire and grout. It received effluent from the C-410-C Neutralization Building, where lime was used for the neutralization of HF cell electrolyte from lead-acid batteries. In addition, trucks transporting fly ash to the C-746-T Inert Landfill were rinsed in this impoundment. All processes in the C-410 Building ceased in the late 1970s.

Site Investigation

The C-218 Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon have been characterized in previous investigations. These include the Administrative Consent Order Phase II Site Investigation (SI) in 1991 (CH2MHILL 1992); SWMU/Area of Concern Self-Assessment Evaluation for Decision Report #65 in 1993 (MMES 1994); General Site Characterizations in 1993, 1997, and 1998; Waste Area Group (WAG) 6 Remedial Investigation in 1998 (DOE 1999a); and WAGs 9 and 11 Site Evaluation (SE) in 1999 (DOE 1999b). Investigations involved collecting soil, sediment, sludge, and surface water samples from the C-410-B HF Neutralization Lagoon, individual and composite surface soil samples from the C-218 Firing Range, and sediment and water samples from the C-403 Neutralization Tank. Further discussion of the previous investigations is provided in Section 1.3 and Section 1.5 of the EE/CA.

The investigations have identified a potential for, or threat of, release into the environment of hazardous substances, as defined by CERCLA § 101 (14), pollutants, or contaminants as defined by CERCLA § 101



U.S. Department of Energy Office of Environmental Management

***Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky***
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

(33), including lead at the C-218 Outdoor Firing Range; trichloroethene (TCE) at the C-403 Neutralization Tank; and radionuclides at the C-410-B HF Neutralization Lagoon. A complete list of detected analytes is provided in Appendix D of the EE/CA. A list of chemicals of potential concern (COPCs) with action levels is presented in Section 3, "Threats to Public Health or Welfare," of this AM.

Previous and Current Actions

There have been no previous response actions for the three inactive facilities. However, the C-410-B HF Neutralization Lagoon is roped off in accordance with 10 *CFR* Part 835 due the presence of radionuclides at concentrations up to 10 times background concentrations, based on data collected during the SE and Phase II SI (DOE 1999b). Current DOE plant controls associated with these units consist of the following:

1. The units are within areas protected from trespassing under the 1954 Atomic Energy Act as amended (referred to as the 229 Line). These areas are posted as "no trespassing" and trespassers are subject to arrest and prosecution.
2. Vehicle access to the units is restricted by passage through Security Post 57 and by the plant vehicle protection barrier.
3. The units are in areas that are subject to routine patrol and visual inspection by plant protective forces, at a minimum once per shift.
4. Section XLII of the FFA requires the sale or transfer of the site to comply with Section 120(h) of CERCLA.
5. Protection of the current PGDP industrial workers is addressed under DOE's ISMS/EMS program.

On February 27, 2007, DOE submitted a Non-Time-Critical Removal Notification for the three inactive facilities indicating that a removal action was warranted (DOE 2007a). Subsequent to receiving Removal Notification approval, DOE prepared an EE/CA that described the environmental conditions that supported the need for a removal action, developed and evaluated various alternatives, and recommended the alternative that best met the removal action objectives for the three inactive facilities. The recommended response action cited within the EE/CA is consistent with the final actions for the PGDP and will contribute to the efficient performance of long-term remediation of PGDP.



U.S. Department of Energy Office of Environmental Management

*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

3. THREATS TO PUBLIC HEALTH OR WELFARE

The C-218 Outdoor Firing Range (SWMU 181), C-403 Neutralization Tank (SWMU 40), and C-410-B HF Neutralization Lagoon (SWMU 19) have been identified as SWMUs under the FFA due to the potential for actual or threatened releases of hazardous constituents from the facilities. Soil, sediment, and accumulated rainwater are the exposure pathways of concern at the three inactive facilities. The inactive facilities are not suspected sources of surface water or groundwater contamination at the site and, as a result, direct contact with soil, sediment, and accumulated rainwater is the primary focus of the action. Should the C-403 Neutralization Tank (SWMU 40) or the C-410-B HF Neutralization Lagoon (SWMU 19) begin to leak, any accumulated rainwater contained within the tank or lagoon might increase the potential for contaminant migration to groundwater. In addition, DOE has considered results of the Soils Inactive Facilities Streamlined Human Health Risk Evaluation in determining appropriateness of the action.

Streamlined Human Health Risk Evaluation

In the streamlined human health risk evaluation, all of the analytical data for each of the inactive facilities were compared against the no action levels for the industrial worker and established background levels (if applicable) as defined in the *Methods for Conducting Human Health Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/OR/07-1506/V1&D2 (DOE 2001). This comparison (see Section 1.6.1 of the EE/CA) identified several COPCS, indicating that unacceptable human health risks could exist at each of the three inactive facilities. While ecological receptors may be exposed to on-site contaminants, the primary focus of the streamlined human health risk evaluation was to determine risks to human health. Current plans are to conduct an ecological risk assessment as part of future remedial investigative activities associated with the Surface Water Operable Unit.

Under this action, C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) will be removed to their respective SWMU boundaries; therefore, cleanup levels for these inactive facilities are not applicable. For the C-218 Firing Range (SWMU 181), a cleanup level for lead only is presented since the focus of this removal action is lead-contaminated soil at SWMU 181. The cleanup goals for lead at the C-218 Firing Range (SWMU 181) under this action are presented in Table 1.



U.S. Department of Energy Office of Environmental Management

***Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky***
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

Table 1. Cleanup Levels Based on Carcinogenic Risk and Hazard

	Background (mg/kg or pCi/g)	Risk- Derived Cleanup Goal (mg/kg)	Industrial Hazard- Derived Cleanup Goal (mg/kg)	Recreational Hazard- Derived Cleanup Goal (mg/kg)	Selected Cleanup Level (mg/kg)
<i>Soils and Sediment</i>					
Lead	36	-	800 ^a	1,420 ^b	800 ^c

^a An updated screening level for soil lead at industrial sites of 800 parts per million is based on a recent analysis of the combined phases of the National Health and Nutrition Examination Survey (NHANES III) that chose a cleanup goal protective for all subpopulations (EPA 2007).

^b Cleanup goal for lead in soil derived using the Integrated Exposure Uptake Biokinetic Model (IEUBK) (EPA 1994).

^c Cleanup level for lead in soil was evaluated for industrial (current) land use and recreational (future) land use, defaulting to the industrial no action level of 800 mg/kg as the more protective.

4. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this AM, may present an imminent and substantial endangerment to public health or welfare or the environment. The factors from 40 *CFR* § 300.415 (b)(2) were considered in determining the appropriateness of a removal action and are documented in the Removal Notification (DOE 2007a). These factors include the following:

- Actual or potential exposure to nearby populations, such as recreational users, current industrial users, animals, or the food chain from hazardous substances, pollutants, or contaminants;
- High levels of hazardous substances, pollutants, or contaminants in soils, largely at or near the surface, that may migrate; and
- Weather conditions (e.g., flooding that may affect surface water run-off) that may cause hazardous substances, pollutants, or contaminants to migrate or be released.

5. SELECTED ACTION

The action implements excavation and removal of areas of known contamination (i.e., soil/sediment and accumulated rainwater) associated with the three inactive facilities and includes one or more engineered



U.S. Department of Energy Office of Environmental Management

Action Memorandum for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky **DOE/LX/07-0121&D2/R1 PRIMARY DOCUMENT**

controls to prevent transport of contaminated soil/sediment and accumulated rainwater, as required. After completing the removal action and upon verifying the removal action objectives (RAOs) are achieved (including site restoration), temporary engineering controls will be evaluated and discontinued as appropriate. The removal action will reduce the risk to current and future workers and excavation workers from direct contact by removing known sources of contamination.

Removal Action Objectives

RAOs were developed for the removal action and include the following:

- Control current industrial worker exposure to soils, sediment, and accumulated rainwater containing hazardous substances, pollutants, or contaminants.
- Identify and control, as needed, off-site migration into multimedia exposure pathways such as surface water and groundwater.

Removal Action Description

The following activities are included in the selected removal action:

- Excavate approximately 165,500 ft³ of soil/sediment and remove 100,000 gal of accumulated rainwater from the areas of known contamination to eliminate the risk of human receptors contacting contaminated soil/sediment and accumulated rainwater. Under this action, C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) will be removed to their respective SWMU boundaries¹. For the C-218 Firing Range (SWMU 181), the focus of this removal action is lead-contaminated soil at SWMU 181.
- Perform verification soil sampling during excavation (limited to lead at the C-218 Firing Range).
- Collect soil characterization samples at the C-410-B HF Neutralization Lagoon and the C-403 Neutralization Tank prior to restoration for use in future CERCLA actions (e.g., Groundwater OU, Soils OU, Comprehensive Site OU, etc.).
- Install temporary localized engineering controls such as small stormwater retention areas, silt fencing, or rock check dams during excavation activities, as needed. Installation will control sediment and contaminant migration from the action and will be dependent upon the site conditions at the time of excavation.

¹ Defined boundaries of SWMU 40 extend no further than 3 ft on each side of or 3 ft from the bottom of the tank. Defined boundaries of SWMU 19 extend no further than 3 ft on each side of or 3 ft from the bottom of the lagoon.



U.S. Department of Energy Office of Environmental Management

Action Memorandum for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky **DOE/LX/07-0121&D2/R1 PRIMARY DOCUMENT**

- Restore (i.e., backfill with clean soil, reseeded, etc.) disturbed acreage to prevent erosion, migration and recontamination.
- Characterize, containerize, transport, and dispose of all equipment and contaminated soil/sediment and rainwater excavated/removed from the areas of known contamination at an appropriate on- or off-site disposal/storage facility.
- Assess temporary localized engineering controls and discontinue as appropriate.
- Continue inspection and site maintenance during and after excavation/removal and restoration to ensure that no additional erosion occurs and until the excavated/restored area is stable.

This removal action is complete after the RAOs have been verified as achieved; the site is restored; and treatment, storage, or disposal of contaminated media and waste is complete. Once the excavation is complete, verification or characterization sampling has been performed, and the excavated area has been restored and determined stable, temporary engineering controls will be evaluated and discontinued as appropriate. The applicable or relevant and appropriate requirements (ARARs) or to be considered (TBC) criteria for this action are identified in Attachment 1

Temporary exclusion zones and fencing were inadvertently described in the EE/CA as interim institutional controls. These controls are occupational safety and health measures and will be utilized, if needed, during implementation of the removal action consistent with standard industry practice.

In follow-up to this AM, a Removal Action Work Plan (RAWP) will be prepared and submitted to EPA and the Kentucky Department for Environmental Protection (KDEP).

Consistent with DOE's *Secretarial Policy Statement on the National Environmental Policy Act (NEPA)*, June 13, 1994, (DOE 1994), DOE has relied on the CERCLA process for evaluating the proposed activities and incorporated the analysis for NEPA values into Section 4 of the attached EE/CA. No significant adverse environmental impacts are expected from implementation of the selected alternative. The impact to vulnerable or sensitive populations, habitats, or natural resources (i.e., critical or aquatic habitat, migratory birds, wetlands, streams and floodplains) has been identified as part of the EE/CA. These impacts will be further evaluated, as appropriate, and any necessary mitigation measures will be documented in the RAWP.

The removal action will generate approximately 165,500 ft³ of soil/sediment and approximately 100,000 gal of accumulated rainwater requiring on-site or off-site disposal. Soil and other waste materials will be characterized, managed, transported, and disposed of in accordance with the ARARs/TBCs for low-level radioactive, RCRA, Toxic Substances and Control Act (TSCA), or industrial waste identified in the attached EE/CA. DOE will manage/store polychlorinated biphenyl (PCB) remediation waste in risk-based storage in accordance with 40 *CFR* § 761.61(c). The risk-based storage of PCBs will take place in



U.S. Department of Energy Office of Environmental Management

Action Memorandum for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky **DOE/LX/07-0121&D2/R1** **PRIMARY DOCUMENT**

containers (e.g., drums, B-12 boxes, B-25 boxes, intermodal containers, and/or sealand containers) stored indoor or outdoors, provided that the containers are sealed when not adding/removing materials. Details regarding risk-based PCB storage will be included in the RAWP. Although the above describes DOE's preferred method of storage, DOE may elect to store PCB remediation waste in other areas in accordance with TSCA requirements [e.g., RCRA storage facilities under 40 *CFR* 761.65(b)(2)]. DOE will perform disposal [in accordance with 40 *CFR* § 761.61(a)(5)(v)] of soil containing less than or equal to 49 parts per million (ppm) PCBs at the C-746-U Solid Waste Landfill. The Environmental Performance Standard in 401 Kentucky Administrative Regulations (*KAR*) 47:030, Section 8, and Condition Number ACTV0006, "Standard Requirement 1" of Solid Waste Permit No. 073-00014/073-00015/073-00045 currently allow such disposal. PCB remediation waste requiring off-site disposal (i.e., greater than 49 ppm) will be disposed of in accordance with 40 *CFR* § 761.61(a), (b), or (c) in a RCRA permitted landfill, in a landfill with a coordinated approval, in a chemical waste landfill, or in a facility with approval from EPA.

Health-based standards of 39.2 ppm TCE and 2,080 ppm 1,1,1-trichloroethane (TCA) in solids will be used as the criteria for making contained-in/contaminated-with determinations for environmental media and debris managed on-site and/or designated for disposal at the C-746-U Landfill. The Kentucky Energy and Environment Cabinet (KEEC) has agreed to consult with DOE and the state where the off-site facility is located to reach agreement on the appropriate health-based standard for making such determinations for waste that is to be shipped to such a facility.

Off-site transfer of any hazardous substance, pollutant, or contaminant generated during this action will be sent to a facility that complies with applicable federal and state laws and has been approved by EPA for acceptance of CERCLA waste. Accordingly, DOE will verify with the appropriate EPA regional contact that any needed off-site facility is acceptable for receipt of CERCLA wastes prior to transfer in accordance with the requirements of the Off-Site Rule in 40 *CFR* § 300.440(a)(4). Wastewater collected or generated as part of the removal action will be sent to an existing KPDES permitted Waste Water Treatment Facility (WWTF) located at PGDP for treatment prior to discharge into surface water.

This action is consistent with and is the next step in a phased approach toward meeting the Remedial Action Objectives for the Soils OU, which include the following:

- Control sources early; focus resources at areas that warrant attention in the near-term, prioritizing actions within areas to address the greatest risks first.
- Minimize human exposure to contaminants, maximizing the effectiveness of institutional controls.
- Control further migration of contaminated soils.
- Reduce risk from contaminated soil.



U.S. Department of Energy Office of Environmental Management

Action Memorandum for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky

DOE/LX/07-0121&D2/R1 PRIMARY DOCUMENT

- Make progress toward the ultimate goal of protecting recreational users and industrial workers from exposure to contaminated soils.

Upon completion of this response action, and in keeping with the phased approach, this interim action will be followed by the Soils Remedial OU and the Comprehensive Site OU for evaluation, with implementation of additional and final actions, as needed, to ensure long-term protectiveness (DOE 2008b).

Engineering Evaluation/Cost Analysis

The EE/CA evaluated three alternatives for accomplishing the Soils OU Inactive Facilities RAOs. The alternatives were as follows:

1. No soil control measures (no action);
2. Interim institutional controls measures only;
3. Combination of excavation and interim institutional (as needed);

Based on the analysis, Alternative 3 was the recommended removal action alternative. The alternative met all the RAOs for the removal action, was effective, could be implemented, and was the most cost-effective option that met the specified requirements. Under this alternative, C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) are removed to their respective SWMU boundaries; therefore, cleanup levels for these inactive facilities are not applicable. Any residual contamination from historical releases remaining after excavation is complete for the C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) will be evaluated and addressed as part of ongoing and future remedial investigation activities (e.g., Groundwater OU, Soils OU, etc.). For the C-218 Firing Range (SWMU 181), only a cleanup level for lead was determined to be necessary since the focus of this removal action is lead contaminated soil at SWMU 181. The cleanup goals for lead at the C-218 Firing Range (SWMU 181) are presented in Section 5 of the EE/CA. Any residual lead-contaminated soil remaining at the C-218 Firing Range (SWMU 181) after excavation is complete will be evaluated as part of ongoing and future remedial investigation activities associated with the Soils OU.

Current DOE plant controls associated with the C-218 Firing Range, as described in Section 2, Previous and Current Actions, are considered adequate to prevent any unauthorized access to the C-218 Firing Range. These controls would limit exposure potential to any residual contamination left in place above unrestricted levels at the C-218 Firing Range following implementation of the removal action.

For the C-218 Firing Range (SWMU 181), DOE will document the DOE plant controls that continue to be applicable to the unit in the FFA Semiannual Progress Report, if residual contamination above unrestricted levels remains at the unit at the conclusion of the removal action. In such case, the controls



U.S. Department of Energy Office of Environmental Management

*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

will be documented following completion of the removal action until a final remedy for the Soils OU is implemented.

The estimated capital cost for implementation of Alternative 3 is \$5,527,738, with an additional estimated annual operating and maintenance cost of \$5,000.

The project is estimated to take two years to complete, from initiation of the RAWP to finalization of the Removal Action Completion Report, depending upon available funding. The schedule is for planning and cost-estimating purposes only and is not an enforceable part of the action.

**6. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE
DELAYED OR NOT TAKEN**

A delay or inaction in implementing the alternative may result in an increased likelihood of direct human contact with hazardous substances. Currently, the C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) are not suspected sources of groundwater contamination at the site; however, should delay or inaction in implementing the alternative occur and the tank or lagoon begins to leak, any accumulated wastewater that might be contained within the tank or lagoon might increase the potential for contaminant migration to groundwater. No outstanding policy issues have been identified for this action.

7. STATUTORY AND REGULATORY AUTHORITIES

PGDP was placed on the NPL in 1994. The proposed action is being undertaken by DOE, as the lead agency, pursuant to CERCLA, as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Section 104(a), in accordance with Executive Order 12580 and the Federal Facility Agreement (FFA) for the PGDP, Section X. A response under CERCLA is appropriate when (1) hazardous substances or contaminants are released or (2) there is a substantial threat of a release into the environment and response is necessary to protect human health and the environment. There are no outstanding policy issues.



U.S. Department of Energy Office of Environmental Management

*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

8. PUBLIC PARTICIPATION

DOE held a 30-day public comment period on the EE/CA from September 8, 2008, to October 7, 2008. Notice of the public comment period was published in the local newspaper, the *Paducah Sun*. No comments were received during the public comment period, and, as a result, no changes were made to the preferred alternative.

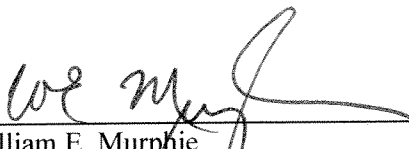
9. RECOMMENDATIONS

This decision document represents the selected non-time-critical removal action for contaminated soil/sediment and accumulated rainwater associated with the Soils OU Inactive Facilities at PGDP in Paducah, Kentucky. The document was developed in accordance with CERCLA, as amended by Superfund Amendments and Reauthorization Act, and is consistent with the National Contingency Plan and the Paducah FFA. This removal action is consistent with and will not preclude anticipated objectives for future CERCLA actions at PGDP.

This AM incorporates the following attachment: *Engineering Evaluation/Cost Analysis for the Soils Operable Units Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/LX/07-0016&D2. Both EPA and the Kentucky Department for Environmental Protection have approved the EE/CA for this removal action.

If a response action is not taken, there is an increased likelihood of direct human contact with hazardous substances over time. The selected action is consistent with the provisions of the FFA, based on the analysis presented here and in the attached EE/CA, and on review and consideration of the public comments. This action is appropriate and will be implemented in accordance with CERCLA.

Approval



William E. Murphie
U.S. Department of Energy



Date



U.S. Department of Energy Office of Environmental Management

***Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky***
DOE/LX/07-0121&D2/R1
PRIMARY DOCUMENT

The following attachments are enclosed with this Action Memorandum:

Attachment 1: *Applicable or Relevant and Appropriate Requirements and To Be Considered Guidance*

Attachment 2: *Engineering Evaluation/Cost Analysis for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-0016&D2*



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*Action Memorandum for the Soils Operable Unit Inactive Facilities
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*

**DOE/LX/07-0121& D2/R1
PRIMARY DOCUMENT**

10. REFERENCES

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- DOE (U.S. Department of Energy) 1994. *Secretarial Policy on the National Environmental Policy Act*, U.S. Department of Energy, June.
- DOE 1999a. *Remedial Investigation Report for Waste Area Grouping 6 at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/OR/07-1727/V1&D2, U.S. Department of Energy, Paducah, KY, January.
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- DOE 2001. *Methods for Conducting Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Volume 1, Human Health, and Volume 2, Ecological*, DOE/OR/07-1506/V1&D2, U.S. Department of Energy, Paducah, KY, December.
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- DOE 2008b. *Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/OR/07-0105&D2, U.S. Department of Energy, Paducah, KY, June.
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MMES (Martin Marietta Energy Systems) 1994. *Solid Waste Management Unit/Area of Concern Self-Assessment Evaluation for Decision Process Report No. 065, Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DPR-065, Science Applications International Corporation, Paducah, KY, October.

Attachment 1

Applicable or Relevant and Appropriate Requirements and To Be Considered Guidance

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CHEMICAL-SPECIFIC			
Chemical Characteristic	Requirement(s)	Prerequisite	Citation(s)
Screening level for lead	Establishes a screening level for lead in soil at commercial/industrial (i.e., nonresidential) sites of 800 ppm as found in Frequent Questions from Risk Assessors on the Adult Lead Methodology (ALM) accessed at http://www.epa.gov/superfund/health/contaminants/lead/al_mfaq.htm	Removal of lead-contaminated soils at the 218 Firing Range— TBC .	EPA-540-R-03-001 National Health and Nutrition Examination Survey III

LOCATION-SPECIFIC			
Location characteristic(s)	Requirement(s)	Prerequisite	Citation(s)
<i>Wetlands</i>			
Presence of wetlands as defined in 10 <i>CFR</i> 1022.4	Avoid, to the extent possible, the long- and short-term adverse effects associated with destruction, occupancy, and modification of wetlands. Take action, to extent practicable, to minimize destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands.	DOE actions that involve potential impacts to, or take place within, wetlands— applicable .	10 <i>CFR</i> 1022.3(a) 10 <i>CFR</i> 1022.3(a)(7) and (8)
	Undertake a careful evaluation of the potential effects of any new construction in wetlands. Identify, evaluate, and, as appropriate, implement alternative actions that may avoid or mitigate adverse impacts on wetlands.		10 <i>CFR</i> 1022.3(b) and (d)
	Measures that mitigate the adverse effects of actions in a wetland including, but not limited to, minimum grading requirements, runoff controls, design and construction constraints, and protection of ecologically-sensitive areas.		10 <i>CFR</i> 1022.13(a)(3)
	If no practicable alternative to locating or conducting the action in the wetland is available, then before taking action design or modify the action in order to minimize potential harm to or within the wetland, consistent with the policies set forth in Executive Order 11990.		10 <i>CFR</i> 1022.14(a)
Location encompassing aquatic ecosystem as defined in 40 <i>CFR</i> 230.3(c)	Except as provided under section 404(b)(2), no discharge of dredged or fill material is permitted if there is a practicable alternative that would have less adverse impact on the aquatic ecosystem or if it will cause or contribute to significant degradation of the waters of the United States. Except as provided under section 404(b)(2), no discharge of dredged or fill material shall be permitted unless appropriate and practicable steps have been taken that will minimize potential adverse impacts of the discharge on the aquatic ecosystem. 40 <i>CFR</i> 230.70 <i>et seq.</i> identifies such possible steps.	Action that involves the discharge of dredged or fill material into <i>waters of the United States</i> , including jurisdictional wetlands— relevant and appropriate .	40 <i>CFR</i> 230.10(a) and (c) 40 <i>CFR</i> 230.10(d)

LOCATION-SPECIFIC			
Location characteristic(s)	Requirement(s)	Prerequisite	Citation(s)
Nationwide Permit Program	Must comply with the substantive requirements of the NWP 38, General Conditions, as appropriate.	Discharge of dredged or fill material into <i>waters of the United States</i> , including jurisdictional wetlands— relevant and appropriate .	Nation Wide Permit (38) <u>Cleanup of Hazardous and Toxic Waste</u> 33 <i>CFR</i> 323.3(b)
Floodplains			
Presence of floodplain as defined in 10 <i>CFR</i> 1022.4	Avoid, to the extent possible, the long- and short-term adverse effects associated with occupancy and modification of floodplains.	DOE actions that involve potential impacts to, or take place within, floodplains— applicable .	10 <i>CFR</i> 1022.3(a)
	Undertake a careful evaluation of the potential effects of any action taken in a floodplain. Identify, evaluate, and, as appropriate, implement alternative actions that may avoid or mitigate adverse impacts on floodplains.		10 <i>CFR</i> 1022.3(b) and (d)
	Restore and preserve natural and beneficial values served by floodplains to the extent practicable.		10 <i>CFR</i> 1022.1(a)(3)
	Measures that mitigate the adverse effects of actions in a floodplain including, but not limited to, minimum grading requirements, runoff controls, design and construction constraints, and protection of ecologically-sensitive areas.		10 <i>CFR</i> 1022.13(a)(3)
	If no practicable alternative to locating or conducting the action in the floodplain is available, then before taking action design or modify its action in order to minimize potential harm to or within the floodplain, consistent with the policies set forth in E.O. 11988 and E.O. 11990.		10 <i>CFR</i> 1022.14(a)
Endangered, threatened, or rare species			
Presence of federally endangered or threatened species, as designated in 50 <i>CFR</i> 17.11 and 17.12 or critical habitat of such species	Actions that jeopardize the existence of a listed species or results in the destruction or adverse modification of critical habitat must be avoided or reasonable and prudent mitigation measures taken.	Action that is likely to jeopardize fish, wildlife, or plant species or destroy or adversely modify critical habitat— applicable .	16 <i>USC</i> 1531 <i>et. seq.</i> , Sect. 7(a)(2)
Presence of migratory birds and their habitats	Then unlawful killing, taking, possession, and sale of almost all species of native birds in the U.S. is prohibited.	If action is likely to impact migratory birds— applicable .	16 <i>USC</i> 703-704

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
	<i>Site preparation, construction, and excavation activities</i>		
Activities causing fugitive dust emissions	<p>No person shall cause, suffer, or allow any material to be handled, processed, transported, or stored; a building or its appurtenances to be constructed, altered, repaired, or demolished, or a road to be used without taking reasonable precaution to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, when applicable, but not be limited to the following:</p> <ul style="list-style-type: none"> • Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land; • Application and maintenance of asphalt, oil, water, or suitable chemicals on roads, materials stockpiles, and other surfaces which can create airborne dusts; • Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; • The maintenance of paved roadways in a clean condition; and • The prompt removal of earth or other material from a paved street which earth or other material has been transported thereto by trucking or earth moving equipment or erosion by water. 	Fugitive emissions from land-disturbing activities (e.g., handling, processing, transporting or storing of any material, demolition of structures, construction operations, grading of roads, or the clearing of land, etc.)— applicable .	401 KAR 63:010 § 3(1)
	No person shall cause or permit the discharge of visible fugitive dust emissions beyond the lot line of the property on which the emissions originate.		401 KAR 63:010 § 3(2)
Activities causing radionuclide emissions	<p>Emissions of radionuclides to the ambient air from DOE facilities shall not exceed those amounts that would cause any member of the public to receive in any year an EDE of 10 mrem/yr.</p> <p>Radioactive materials released to the atmosphere as a consequence of routine DOE activities shall not cause members of the public to receive, in a year, an EDE greater</p>	Radionuclide emissions at a DOE facility— applicable .	40 CFR 61.92 401 KAR 57:002
	Radioactive materials released to the atmosphere as a consequence of routine DOE activities shall not cause members of the public to receive, in a year, an EDE greater	Dose received from all sources of radionuclides via airborne emissions— TBC .	DOE O 5400.5(II)(1)(b)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
Activities causing toxic substances or potentially hazardous matter emissions	<p>than 10 mrem per year.</p> <p>Persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration in the handling of these materials to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.</p>	Potentially hazardous matter or toxic emissions— applicable .	401 KAR 63:020 § 3
Radiation protection of the public and the environment	<p>Except as provided in 5400.1(II)(1)(a)(4), the exposure of members of the public to radiation sources as a consequence of all routine DOE activities shall not cause, in a year, an EDE greater than 100 mrem per year.</p> <p>The ALARA process shall be implemented for all DOE activities and facilities that cause public doses.</p>	Dose received from all exposure modes from all DOE activities (including remedial actions) at a DOE facility— TBC .	DOE O 5400.5(II)(1)(a) and (2)
Activities causing storm water runoff	Utilize best management practices to control pollutants in storm water discharges during and after construction which may include, as appropriate, soil stabilization practices (e.g., seeding); perimeter structural practices (e.g., gabions, silt fences, sediment traps); and storm water management devices.	Storm water discharge associated with construction activities, including clearing, grading, and excavating, that result in land disturbance of equal to or greater than one (1) acre and less than five (5) acres, except where otherwise exempt as specified in 401 KAR 5:002 § 1 (293)(a)— applicable . Storm water discharge associated with construction activity at industrial sites, including clearing, grading, and excavation, that result in the disturbance of five (5) acres or more total land area— applicable .	401 KAR 5:060 § 12 (2)(a)(2) (c)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
<i>General Waste Management</i>			
General PCB management requirements	Any person storing or disposing of PCB waste must do so in accordance with 40 <i>CFR</i> 761, Subpart D.	Storage or disposal of waste containing PCBs at concentrations \geq 50 ppm— applicable .	40 <i>CFR</i> 761.50(a)
	Any person cleaning up and disposing of PCBs shall do so based on the concentration at which the PCBs are found.	Cleanup and disposal of PCB remediation waste as defined in 40 <i>CFR</i> 761.3— applicable .	40 <i>CFR</i> 761.61
Management of PCB/Radioactive waste	Any person storing such waste \geq 50 ppm PCBs must do so taking into account both its PCB concentration and radioactive properties, except as provided in 40 <i>CFR</i> 761.65(a)(1), (b)(1)(ii) and (c)(6)(i).	Storage of PCB/Radioactive waste for a disposal— applicable .	40 <i>CFR</i> 761.50(b)(7)(i)
	Any person disposing of such waste must do so taking into account both its PCB concentration and its radioactive properties. If, taking into account only the properties of the PCBs in the waste, the waste meets the requirements for disposal in a non-hazardous waste landfill then the PCB/radioactive waste may be disposed without regard to the PCB component of the waste.	Disposal of PCB/Radioactive waste for a disposal— applicable .	40 <i>CFR</i> 761.50(b)(7)(ii)
<i>Waste Characterization</i>			
Characterization of solid waste	Must determine if solid waste is excluded from regulation under 40 <i>CFR</i> 261.4.	Generation of solid waste as defined in 40 <i>CFR</i> 261.2— applicable .	40 <i>CFR</i> 262.11(a) 401 <i>KAR</i> 32:010 §2
	Must determine if waste is listed as a hazardous waste in subpart D of 40 <i>CFR</i> Part 261.	Generation of solid waste which is not excluded under 40 <i>CFR</i> 261.4— applicable .	40 <i>CFR</i> 262.11(b) 401 <i>KAR</i> 32:010 §2
	Must determine whether the waste is identified in subpart C of 40 <i>CFR</i> Part 261 by using prescribed testing methods or applying generator knowledge based on information regarding material or processes used.	Generation of solid waste that is not listed in subpart D of 40 <i>CFR</i> Part 261 and not excluded under 40 <i>CFR</i> 261.4— applicable .	40 <i>CFR</i> 262.11(c) 401 <i>KAR</i> 32:010 §2
	Must refer to Parts 261, 262, 264, 265, 266, 268, and 273 of Chapter 40 for possible exclusions or restrictions pertaining to management of the specific waste.	Generation of solid waste which is determined to be hazardous— applicable .	40 <i>CFR</i> 262.11(d) 401 <i>KAR</i> 32:010 §2

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
General waste analysis for treatment, storage, and disposal of hazardous waste	Must obtain a detailed chemical and physical analysis on a representative sample of the waste(s), which, at a minimum, contains all the information that must be known to treat, store, or dispose of the waste in accordance with pertinent sections of 40 <i>CFR</i> 264 and 268.	Treatment, storage, or disposal of RCRA-hazardous waste — applicable .	40 <i>CFR</i> 264.13(a)(1) 401 <i>KAR</i> 34:020 § 4
Characterization of industrial wastewater	Industrial wastewater discharges that are point source discharges subject to regulation under section 402 of the Clean Water Act, as amended, are not solid wastes for the purpose of hazardous waste management.	Generation of industrial wastewater for discharge— applicable .	40 <i>CFR</i> 261.4(a)(2) 401 <i>KAR</i> 31:010 § 4
Determinations for land disposal of hazardous waste	Must determine the underlying hazardous constituents [as defined in 40 <i>CFR</i> 268.2(i)] in the waste.	Generation of RCRA characteristic hazardous waste (and is not D001 non-wastewaters treated by CMBST, RORGs, or POLYM of Section 268.42 Table 1) for storage, treatment or disposal— applicable .	40 <i>CFR</i> 268.9(a) 401 <i>KAR</i> 37:010 § 8
	Must determine if the hazardous waste meets the treatment standards in 40 <i>CFR</i> 268.40, 268.45, or 268.49 by testing in accordance with prescribed methods or use of generator knowledge of waste.	Generation of hazardous waste— applicable .	40 <i>CFR</i> 268.7(a) 401 <i>KAR</i> 37:020 § 7
	Must determine each EPA Hazardous Waste Number (Waste Code) to determine the applicable treatment standards under 40 <i>CFR</i> 268.40 <i>et. seq.</i>		40 <i>CFR</i> 268.9(a) 401 <i>KAR</i> 37:010 § 8
Characterization of LLW	Shall be characterized using direct or indirect methods and the characterization documented in sufficient detail to ensure safe management and compliance with the WAC of the receiving facility.	Generation of DOE LLW— TBC .	DOE M 435.1-1-1(IV)(I)
	Characterization data shall, at a minimum, include the following information relevant to the management of the waste:		DOE M 435.1-1-1(IV)(I)(2)
	<ul style="list-style-type: none"> physical and chemical characteristics; 		DOE M 435.1-1-1(IV)(I)(2)(a)
	<ul style="list-style-type: none"> volume, including the waste and any stabilization or absorbent media; 		DOE M 435.1-1-1(IV)(I)(2)(b)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
	<ul style="list-style-type: none"> weight of the container and contents; identities, activities, and concentration of major radionuclides; characterization date; generating source; and any other information that may be needed to prepare and maintain the disposal facility performance assessment, or demonstrate compliance with performance objectives. 		<p>DOE M 435.1-1-(IV)(1)(2)(c)</p> <p>DOE M 435.1-1-(IV)(1)(2)(d)</p> <p>DOE M 435.1-1-(IV)(1)(2)(e)</p> <p>DOE M 435.1-1-(IV)(1)(2)(f)</p> <p>DOE M 435.1-1-(IV)(1)(2)(g)</p>
Waste Accumulation, Storage and Staging			
Temporary on-site storage of hazardous waste in containers	<p>A generator may accumulate hazardous waste at the facility provided that</p> <ul style="list-style-type: none"> waste is placed in containers that comply with 40 CFR 265.171-173; the date upon which accumulation begins is clearly marked and visible for inspection on each container; container is marked with the words “hazardous waste.” 	<p>Accumulation of RCRA hazardous waste on-site as defined in 40 CFR 260.10—applicable.</p>	<p>40 CFR 262.34(a) 401 KAR 32:030 §5</p> <p>40 CFR 262.34(a)(1)(i) 401 KAR 32:030 §5</p> <p>40 CFR 262.34(a)(2) 401 KAR 32:030 §5</p> <p>40 CFR 262.34(a)(3) 401 KAR 32:030 § 5</p>
Accumulation area	<p>Container may be marked with other words that identify the contents.</p>	<p>Accumulation of 55 gal or less of RCRA hazardous waste or one quart of acutely hazardous waste listed in 261.33(e) at or near any point of generation—applicable.</p>	<p>40 CFR 262.34(c)(1) 401 KAR 32:030 §5</p>
Temporary on-site storage of remediation waste in staging piles (e.g., excavated soils/sediments, sludge)	<p>May be temporarily stored, (including mixing, sizing, blending or other similar physical operations intended to prepare the wastes for subsequent management or treatment) at a facility if used only during remedial operations provided that the staging pile will be designed to</p> <ul style="list-style-type: none"> facilitate a reliable, effective and protective remedy; 	<p>Accumulation of non-flowing hazardous remediation waste in staging pile (or remediation waste otherwise subject to land disposal restrictions)—applicable.</p>	<p>40 CFR 264.554(a)(1) 401 KAR 34:287 § 5</p>
			<p>40 CFR 264.554(d)(1)(i) 401 KAR 34:287 § 5</p>

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
	<ul style="list-style-type: none"> prevent or minimize releases of hazardous wastes and constituents into the environment, and minimize or adequately control cross-media transfer as necessary to protect human health and the environment (e.g., use of liners, covers, run-off/run-on controls, as appropriate). 		40 <i>CFR</i> 264.554(d)(1)(ii) 401 <i>KAR</i> 34:287 § 5
	Must not place ignitable or reactive remediation waste in a staging pile unless the remediation waste has been treated, rendered, or mixed before placed in the staging pile so that	Storage of ignitable or reactive remediation waste in staging pile in— applicable.	40 <i>CFR</i> 264.554(e) 401 <i>KAR</i> 34:287 § 5
	<ul style="list-style-type: none"> The remediation waste no longer meets the definition of ignitable or reactive under 401 <i>KAR</i> 31:030 § 2 and § 4; and (ii) You have complied with 401 <i>KAR</i> 34:020 § 8, General Requirements for Ignitable, Reactive, or Incompatible Wastes. 		40 <i>CFR</i> 264.554(e)(1)(i) 401 <i>KAR</i> 34:287 § 5
	Must not place in the same staging pile unless you have complied with 40 <i>CFR</i> 264.17(b).	Storage of incompatible remediation waste in staging pile in— applicable.	40 <i>CFR</i> 264.554(f)(1) 401 <i>KAR</i> 34:287 § 5
	Must separate the incompatible materials or protect them from one another by using a dike, berm, wall or other device.		40 <i>CFR</i> 264.554(f)(2) 401 <i>KAR</i> 34:287 § 5
Use and management of containers holding hazardous waste	If container is not in good condition or if it begins to leak, must transfer waste into container in good condition.	Storage of RCRA hazardous waste in containers— applicable.	40 <i>CFR</i> 265.171 401 <i>KAR</i> 35:180 §2
	Use container made or lined with materials compatible with waste to be stored so that the ability of the container is not impaired.		40 <i>CFR</i> 265.172 401 <i>KAR</i> 35:180 §3
	Keep containers closed during storage, except to add/remove waste.		40 <i>CFR</i> 265.173(a) 401 <i>KAR</i> 35:180 §4
	Open, handle and store containers in a manner that will not cause containers to rupture or leak.		40 <i>CFR</i> 265.173(b) 401 <i>KAR</i> 35:180 §4
Storage of PCB waste and/or PCB/radioactive waste in a RCRA-regulated container storage area	Does not have to meet storage unit requirements in 40 <i>CFR</i> 761.65(b)(1) provided unit	Storage of PCBs and PCB Items designated for disposal — applicable.	40 <i>CFR</i> 761.65(b)(2)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
	<ul style="list-style-type: none"> is permitted by EPA under RCRA §3004, or qualifies for interim status under RCRA §3005; or is permitted by an authorized state under RCRA §3006; and, PCB spills cleaned up in accordance with Subpart G of 40 CFR 761. 		<p>40 CFR 761.65(b)(2)(i)</p> <p>40 CFR 761.65(b)(2)(ii)</p> <p>40 CFR 761.65(b)(2)(iii)</p> <p>40 CFR 761.65(c)(1)(iv)</p>
Storage of PCB waste and/or PCB/radioactive waste in non-RCRA regulated unit	<p>Except as provided in 40 CFR 761.65 (b)(2), (c)(1), (c)(7), (c)(9), and (c)(10), after July 1, 1978, owners or operators of any facilities used for the storage of PCBs and PCB items designated for disposal shall comply with the storage unit requirements in 40 CFR 761.65(b)(1).</p> <p>Storage facility must have or be</p> <ul style="list-style-type: none"> Adequate roof and walls to prevent rainwater from reaching stored PCBs and PCB items; Adequate floor that has continuous curbing with a minimum 6-inch high curb. Floor and curb must provide a containment volume equal to at least two times the internal volume of the largest PCB article or container or 25% of the internal volume of all articles or containers stored there, whichever is greater. <i>Note:</i> 6 inch minimum curbing not required for area storing PCB/radioactive waste; No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from curbed area; Floors and curbing constructed of Portland cement concrete, or a continuous, smooth, non-porous surface that prevents or minimizes penetration of PCBs; and Not located at a site that is below the 100-year flood water elevation. 	Storage of PCBs for disposal — applicable.	40 CFR 761.65(b)
			40 CFR 761.65(b)(1)
			40 CFR 761.65(b)(1)(i)
			40 CFR 761.65(b)(1)(ii)
			40 CFR 761.65(b)(1)(iii)
			40 CFR 761.65(b)(1)(iv)
			40 CFR 761.65(b)(1)(v)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
Risk-based storage of PCBs	TSCA provides for risk-based storage of PCBs when the method will not pose an unreasonable risk of injury to health or the environment.	Storage of waste containing PCBs in a manner other than prescribed in 40 <i>CFR</i> 761.65(b) (see above)— applicable .	40 <i>CFR</i> 761.61(c)
Temporary storage of PCB waste (e.g., PPE, rags) in a container(s)	Container(s) shall be marked as illustrated in 40 <i>CFR</i> 761.45(a). Storage area must be properly marked as required by 40 <i>CFR</i> 761.40(a)(10).	Storage of PCBs and PCB items in containers for disposal— applicable .	40 <i>CFR</i> 761.40(a)(1) 40 <i>CFR</i> 761.65(c)(3)
	Any leaking PCB Items and their contents shall be transferred immediately to a properly marked nonleaking container(s).		40 <i>CFR</i> 761.65(c)(5)
	Container(s) shall be in accordance with requirements set forth in DOT HMR at 49 <i>CFR</i> 171-180.		40 <i>CFR</i> 761.65(c)(6)
Temporary storage of bulk PCB remediation waste in a waste pile	Waste must be placed in a pile that <ul style="list-style-type: none"> is designed and operated to control dispersal by wind, where necessary, by means other than wetting; 	Storage of PCB remediation waste or PCB bulk product waste in waste pile at cleanup site or site of generation— applicable .	40 <i>CFR</i> 761.65(c)(9)(i)
	<ul style="list-style-type: none"> does not generate leachate through decomposition or other reactions; 		40 <i>CFR</i> 761.65(c)(9)(ii)
	<ul style="list-style-type: none"> is at a storage site with a liner designed, constructed, and installed to prevent any migration of wastes off or through liner into adjacent subsurface soil, groundwater or surface water. 		40 <i>CFR</i> 761.65(c)(9)(iii)(A)
	<p>Liner must be</p> <ul style="list-style-type: none"> constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure because of pressure gradients, physical contact with waste or leachate to which they are exposed, climatic conditions, the stress of installation, and the stress of daily operation; 		40 <i>CFR</i> 761.65(c)(9)(iii)(A)(I)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
	<ul style="list-style-type: none"> placed on foundation or base capable of providing support to liner and resistance to pressure gradients above and below the liner to prevent failure because of settlement compression or uplift; installed to cover all surrounding earth likely to be in contact with waste. 		40 <i>CFR</i> 761.65(c)(9)(iii)(A)(2)
	<p>The storage site must have a cover that meets the above requirements and installed to cover all of the stored waste likely to be contacted by precipitation, and is secured so as not to be functionally disabled by winds expected under normal weather conditions; and</p> <p>Have a run-on control system designed, constructed, operated and maintained such that it</p> <ul style="list-style-type: none"> prevents flow on the stored waste during peak discharge from at least a 25-year storm. 		40 <i>CFR</i> 761.65(c)(9)(iii)(B) 40 <i>CFR</i> 761.65(c)(9)(iii)(C)
	<p>Collection and holding facilities (e.g., tanks or basins) must be emptied or otherwise managed expeditiously after storms to maintain design capacity of the system.</p> <p>Requirements of 40 <i>CFR</i> 761.65(c)(9) may be modified under the risk-based disposal option of 40 <i>CFR</i> 761.61(c).</p>		40 <i>CFR</i> 761.65(c)(9)(iv)
Staging of LLW	Shall be for the purpose of the accumulation of such quantities of wastes necessary to facilitate transportation, treatment, and disposal.	Management of LLW at a DOE facility— TBC .	DOE M 435.1-1 (IV)(N)(7)
Packaging of LLW	Shall be packaged in a manner that provides containment and protection for the duration of the anticipated storage period and until disposal is achieved or until the waste has been removed from the container.	Packaging of DOE LLW in containers— TBC .	DOE M 435.1-1(IV)(L)(1)(a)
	Vents or other measures shall be provided if the potential exists for pressurizing or generating flammable or explosive concentrations of gases within the waste container.		DOE M 435.1-1(IV)(L)(1)(b)
	Containers shall be marked such that their contents can be identified.		DOE M 435.1-1(IV)(L)(1)(c)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
<i>Waste Treatment</i>			
Treatment of RCRA hazardous waste soil	<p>Prior to land disposal, all “constituents subject to treatment” as defined in 40 <i>CFR</i> 268.49(d) must be treated as follows:</p> <ul style="list-style-type: none"> • For non-metals (except carbon disulfide, cyclohexanone, and methanol), treatment must achieve a 90 percent reduction in total constituent concentrations, except as provided in 40 <i>CFR</i> 268.49(c)(1)(C). • For metals and carbon disulfide, cyclohexanone, and methanol, treatment must achieve a 90 percent reduction in total constituent concentrations as measured in leachate from the treated media (tested according to TCLP) <u>or</u> 90 percent reduction in total constituent concentrations (when a metal removal technology is used), except as provided in 40 <i>CFR</i> 268.49(c)(1)(C). • When treatment of any constituent subject to treatment to a 90 percent reduction standard would result in a concentration less than 10 times the Universal Treatment Standard for that constituent, treatment to achieve constituent concentrations less than 10 times the universal treatment standard is not required. [Universal Treatment Standards are identified in 40 <i>CFR</i> 268.48 Table UTS]. <p>In addition to the treatment requirement required by paragraph (c)(1) of 40 <i>CFR</i> 268.49, soils must be treated to eliminate these characteristics.</p>	<p>Treatment of restricted hazardous waste soils—applicable.</p>	<p>40 <i>CFR</i> 268.49(c)(1) 401 <i>KAR</i> 37:040 §10</p> <p>40 <i>CFR</i> 268.49(c)(1)(A) 401 <i>KAR</i> 37:040 §10</p> <p>40 <i>CFR</i> 268.49(c)(1)(B) 401 <i>KAR</i> 37:040 §10</p> <p>40 <i>CFR</i> 268.49(c)(1)(C) 401 <i>KAR</i> 37:040 §10</p>
Treatment of collected wastewater	<p>All tank systems, conveyance systems, and ancillary equipment used to treat, store or convey wastewater to an on-site KPDES-permitted wastewater treatment facility are exempt from the requirements of RCRA Subtitle C standards.</p>	<p>Treatment of soils that exhibit the hazardous characteristic of ignitability, corrosivity, or reactivity—applicable.</p> <p>On-site wastewater treatment units subject to regulation under § 402 or § 307(b) of the CWA (KPDES-permitted)—applicable.</p>	<p>40 <i>CFR</i> 268.49(c)(2) 401 <i>KAR</i> 37:040 §10</p> <p>40 <i>CFR</i> 264.1(g)(6) 401 <i>KAR</i> 34:010 § 1</p>

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
Treatment of LLW	Treatment to provide more stable waste forms and to improve the long-term performance of a LLW disposal facility shall be implemented as necessary to meet the performance objectives of the disposal facility.	Treatment of LLW for disposal at a LLW disposal facility— TBC .	DOE M 435.1-1(IV)(O)
Waste Disposal or Effluent Discharge			
Disposal of prohibited RCRA hazardous waste in a land-based unit	Are not prohibited if the wastes no longer exhibit a prohibited characteristic at the point of land disposal, unless the wastes are subject to a specified method of treatment other than DEACT in 40 <i>CFR</i> 268.40, or are D003 reactive cyanide. May be land disposed if it meets the requirements in the table “Treatment Standards for Hazardous Waste” at 40 <i>CFR</i> 268.40 before land disposal.	Land disposal of restricted RCRA hazardous wastes that are hazardous only because they exhibit a hazardous characteristic— applicable .	40 <i>CFR</i> 268.1(c)(4)(iv) 401 <i>KAR</i> 37:010 §2
	Must be treated according to the alternative treatment standards of 40 <i>CFR</i> 268.49(c) or according to the UTSS specified in 40 <i>CFR</i> 268.48 applicable to the listed and/or characteristic waste contaminating the soil prior to land disposal.	Land disposal, as defined in 40 <i>CFR</i> 268.2, of prohibited RCRA waste—applicable .	40 <i>CFR</i> 268.40(a) 401 <i>KAR</i> 37:040 §2
Disposal of RCRA hazardous debris in a land-based unit	Must be treated prior to land disposal as provided in 40 <i>CFR</i> 268.45(a)(1)-(5) unless EPA determines under 40 <i>CFR</i> 261.3(f)(2) that the debris no longer contaminated with hazardous waste or the debris is treated to the waste-specific treatment standard provided in 40 <i>CFR</i> 268.40 for the waste contaminating the debris.	Land disposal, as defined in 40 <i>CFR</i> 268.2, of restricted hazardous soils— applicable .	40 <i>CFR</i> 268.49(b) 401 <i>KAR</i> 37:040 §10
Disposal of RCRA characteristic waste that is managed in an CWA wastewater treatment unit	Are not prohibited, if the wastes are managed in a treatment system which subsequently discharges to waters of the U.S. under the CWA unless the wastes are subject to a specified method of treatment other than DEACT in 40 <i>CFR</i> 268.40, or are D003 reactive cyanide.	Land disposal, as defined in 40 <i>CFR</i> 268.2, of RCRA-hazardous debris— applicable .	40 <i>CFR</i> 268.45(a) 401 <i>KAR</i> 37:040 §7
Disposal of bulk PCB remediation waste off-site (self-implementing)	May be sent off-site for decontamination or disposal provided the waste either is dewatered on-site or transported off-site in containers meeting the requirements of DOT HMR at 49 <i>CFR</i> parts 171-180.	Restricted RCRA hazardous waste that are hazardous only because they exhibit a hazardous characteristic— applicable .	40 <i>CFR</i> 268.1(c)(4)(i) 401 <i>KAR</i> 37:010 §2
		Off-site disposal of bulk PCB remediation waste (as defined in 40 <i>CFR</i> 761.3)— relevant and appropriate .	40 <i>CFR</i> 761.61(a)(5)(i)(B)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
	<p>Must provide written notice including the quantity to be shipped and highest concentration of PCBs [using extraction EPA Method 3500B/3540C or Method 3500B/3550B followed by chemical analysis using Method 8082 in SW-846 or methods validated under 40 <i>CFR</i> 761.320-26 (Subpart Q)] before the first shipment of waste to each off-site facility where the waste is destined for an area not subject to a TSCA PCB Disposal Approval.</p> <p>Shall be disposed of in accordance with the provisions for cleanup wastes at 40 <i>CFR</i> 761.61(a)(5)(v)(A).</p> <p>Shall be disposed of</p> <ul style="list-style-type: none"> • in a hazardous waste landfill permitted by EPA under §3004 of RCRA; • in a hazardous waste landfill permitted by a state authorized under §3006 of RCRA; or • in a PCB disposal facility approved under 40 <i>CFR</i> 761.60. 	<p>Off-site disposal of bulk PCB remediation waste (as defined in 40 <i>CFR</i> 761.3) to a facility not subject to a TSCA PCB Disposal Approval—relevant and appropriate.</p> <p>Off-site disposal of dewatered bulk PCB remediation waste with a PCB concentration < 50 ppm—relevant and appropriate.</p> <p>Off-site disposal of dewatered bulk PCB remediation waste with a PCB concentration ≥ 50 ppm—relevant and appropriate.</p>	<p>40 <i>CFR</i> 761.61(a)(5)(i)(B)(2)(iv)</p> <p>40 <i>CFR</i> 761.61(a)(5)(i)(B)(2)(ii)</p> <p>40 <i>CFR</i> 761.61(a)(5)(i)(B)(2)(iii)</p>
Disposal of PCB contaminated porous surfaces (self-implementing)	<p>Shall be disposed off-site as bulk PCB remediation waste according to 40 <i>CFR</i> 761.61(a)(5)(i) or must meet the substantive requirements of these regulations for on-site disposal or decontaminated for use according to 40 <i>CFR</i> 761.79(b)(4).</p>	<p>PCB remediation waste porous surfaces (as defined in 40 <i>CFR</i> 761.3) —relevant and appropriate.</p>	<p>40 <i>CFR</i> 761.61(a)(5)(iii)</p>
Disposal of liquid PCB remediation waste (self-implementing)	<p>Shall either</p> <ul style="list-style-type: none"> • decontaminate the waste to the levels specified in 40 <i>CFR</i> 761.79(b)(1) or (2); or • dispose of the waste in accordance with the substantive requirements of 40 <i>CFR</i> 761.61(b) or 40 <i>CFR</i> 761.61(c). 	<p>Liquid PCB remediation waste (as defined in 40 <i>CFR</i> 761.3)—relevant and appropriate.</p>	<p>40 <i>CFR</i> 761.61(a)(5)(iv)</p> <p>40 <i>CFR</i> 761.61(a)(5)(iv)(A)</p> <p>40 <i>CFR</i> 761.61(a)(5)(iv)(B)</p>

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
Performance-based disposal of PCB remediation waste	<p>May dispose by one of the following methods</p> <ul style="list-style-type: none"> in a high-temperature incinerator under 40 <i>CFR</i> 761.70(b); by an alternate disposal method under 40 <i>CFR</i> 761.60(e); in a chemical waste landfill under 40 <i>CFR</i> 761.75; in a facility under 40 <i>CFR</i> 761.77; or through decontamination in accordance with 40 <i>CFR</i> 761.79. <p>Shall be disposed according to 40 <i>CFR</i> 761.60(a) or (e), or decontaminate in accordance with 40 <i>CFR</i> 761.79.</p>	Disposal of non-liquid PCB remediation waste (as defined in 40 <i>CFR</i> 761.3)— applicable .	40 <i>CFR</i> 761.61(b)(2) 40 <i>CFR</i> 761.61(b)(2)(i)
Risk-based disposal of PCB remediation waste	<p>May dispose of in a manner other than prescribed in 40 <i>CFR</i> 761.61(a) or (b) if method will not pose an unreasonable risk of injury to [sic] human health or the environment.</p>	Disposal of PCB remediation waste— applicable .	40 <i>CFR</i> 761.61(c)
Disposal of PCB cleanup wastes (e.g., PPE, rags, non-liquid cleaning materials) (self-implementing option)	<p>Shall be disposed of either</p> <ul style="list-style-type: none"> in a municipal solid waste facility under 40 <i>CFR</i> 258 or non-municipal, nonhazardous waste subject to 40 <i>CFR</i> 257.5 thru 257.30; or in a RCRA Subtitle C landfill; or in a PCB disposal facility; or through decontamination under 40 <i>CFR</i> 761.79(b) or (c). 	Generation of non-liquid PCBs during and from the cleanup of PCB remediation waste— relevant and appropriate .	40 <i>CFR</i> 761.61(a)(5)(v)(A)
Disposal of PCB cleaning solvents, abrasives, and equipment (self-implementing option)	<p>May be reused after decontamination in accordance with 40 <i>CFR</i> 761.79; or</p> <p>For liquids, disposed in accordance with 40 <i>CFR</i> 761.60(a).</p>	Generation of PCB wastes from the cleanup of PCB remediation waste— relevant and appropriate .	40 <i>CFR</i> 761.61(a)(5)(v)(B) 40 <i>CFR</i> 761.60(b)(1)(i)(B)
Disposal of PCB decontamination waste and residues	<p>Shall be disposed of at their existing PCB concentration unless otherwise specified in 40 <i>CFR</i> 761.79(g).</p>	PCB decontamination waste and residues for disposal— applicable .	40 <i>CFR</i> 761.79(g)
Disposal of LLW	<p>LLW shall be certified as meeting waste acceptance requirements before it is transferred to the receiving facility.</p>	Disposal of LLW at a DOE facility— TBC .	DOE M 435.1-1-(IV)(J)(2)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
Disposal of waste with residual radioactive material off-site	If residual radioactive material is released to a non-DOE or non-NRC licensed facility, the waste must achieve authorized limits in accordance with DOE Order 5400.5(IV)(4)(a) before that release.	Release of residual radioactive material to a non-DOE or non-NRC licensed facility for disposal— TBC .	DOE O 5400.5(II)(5)(c)(6) and 5400.5(IV)(5)(a)
On-site disposal of waste with residual radioactive Material	Disposal of residual radioactive material must achieve the authorized limits in accordance with DOE Order 5400.5(IV)(4)(a).	Release of residual radioactive material for disposal on-site— TBC .	DOE O 5400.5(IV)(5)(a)
Decontamination/Cleanup			
Decontamination of movable equipment contaminated by PCBs (self-implementing option)	May decontaminate by <ul style="list-style-type: none"> • swabbing surfaces that have contacted PCBs with a solvent; • a double wash/rinse as defined in 40 CFR 761.360-378; or • another applicable decontamination procedure under 40 CFR 761.79. 	Decontaminating movable equipment contaminated by PCB, tools and sampling equipment— applicable .	40 CFR 761.79(c)(2)
Decontamination of PCB Containers (self-implementing option)	Must flush the internal surfaces of the container three times with a solvent containing < 50 ppm PCBs. Each rinse shall use a volume of the flushing solvent equal to approximately 10% of the PCB container capacity.	Decontaminating a PCB Container as defined in 40 CFR 761.3— applicable .	40 CFR 761.79(c)(1)
Decontamination of PCB contaminated water	The decontamination standard for water containing PCBs is less than or equal to 0.5 µg/L (i.e., approximately ≤0.5 ppb PCBs) for unrestricted use.	Water containing PCBs regulated for disposal— applicable .	40 CFR 761.79(b)(1)(iii)
Release of property having residual radioactive material to an off-site commercial facility	Prior to being released, property shall be surveyed to determine whether both removable and total surface contamination (including contamination present on and under any coating) are in compliance with the standards set forth in DOE O 5400.5.	Release of materials and equipment with surface residual radioactive contamination— TBC .	DOE O 5400.5(II)(5)(c)(1) and 5400.5(IV)(5)(d)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
<i>Unit Closure</i>			
Closure of RCRA container management unit	<p>Generators must close the container management unit in a manner that</p> <ul style="list-style-type: none"> Minimizes the need for further maintenance; Controls, minimizes or eliminates, to the extent necessary to protect human health and environment, postclosure escape of hazardous waste, hazardous constituents, contaminated runoff or hazardous waste decomposition products to ground or surface waters or to the atmosphere; and Complies with closure requirements of 40 <i>CFR</i> 265.111 and 40 <i>CFR</i> 265.114. 	Management of RCRA hazardous waste in containers— applicable .	40 <i>CFR</i> 262.34(a)(1)(iv)(B) 401 <i>KAR</i> 32:030 § 5 (1)
Closure of staging piles of remediation waste	<p>Must be closed by removing or decontaminating all remediation waste, contaminated containment system components, and structures and equipment contaminated with waste and leachate.</p> <p>Must decontaminate contaminated sub-soils in a manner that will protect human and the environment.</p> <p>Must be closed according to substantive requirements in 40 <i>CFR</i> 264.258(a) and 264.111.</p>	Storage of remediation waste in staging pile located in previously contaminated area— relevant and appropriate .	40 <i>CFR</i> 264.554(j)(1) 401 <i>KAR</i> 34:287 § 5
		Storage of remediation waste in staging pile located in uncontaminated area— relevant and appropriate .	40 <i>CFR</i> 264.554(j)(2) 401 <i>KAR</i> 34:287 § 5
			40 <i>CFR</i> 264.554(k) 401 <i>KAR</i> 34:287 § 5

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
<i>Waste Transportation</i>			
Transportation of RCRA hazardous waste on-site	The generator manifesting requirements of 40 <i>CFR</i> 262.20–262.32(b) do not apply.	Transportation of hazardous wastes on a public or private right-of-way within or along the border of contiguous property under the control of the same person, even if such contiguous property is divided by a public or private right-of-way— applicable .	40 <i>CFR</i> 262.20(f) 401 <i>KAR</i> 32:020 § 1
Transportation of RCRA hazardous waste off-site	Must comply with the generator requirements of 40 <i>CFR</i> 262.20–23 for manifesting, Sect. 262.30 for packaging, Sect. 262.31 for labeling, Sect. 262.32 for marking, Sect. 262.33 for placarding, Sect. 262.40, 262.41(a) for record keeping requirements, and Sect. 262.12 to obtain EPA ID number.	Preparation and offering of hazardous waste for transport off-site— applicable .	40 <i>CFR</i> 262.10(h) 401 <i>KAR</i> 32:010 § 1
Transportation of PCB wastes off-site	Must comply with the manifesting provisions at 40 <i>CFR</i> 761.207 through 218.	Relinquishment of control over PCB wastes by transporting, or offering for transport— applicable .	40 <i>CFR</i> 761.207(a)
Transportation of radioactive waste	Shall be packaged and transported in accordance with DOE Order 460.1B and DOE Order 460.2.	Preparation of shipments of radioactive waste— TBC .	DOE M 435.1-1-(I)(1)(E)(11)
Transportation of LLW	To the extent practical, the volume of the waste and the number of the shipments shall be minimized.	Preparation of shipments of LLW— TBC .	DOE M 435.1-1-(IV)(L)(2)
Transportation of hazardous materials	Shall be subject to and must comply with all applicable provisions of the HMR at 49 <i>CFR</i> 171–180 related to marking, labeling, placarding, packaging, emergency response, etc.	Any person who, under contract with a department or agency of the federal government, transports “in commerce,” or causes to be transported or shipped, a hazardous material— applicable .	49 <i>CFR</i> 171.1(c)

ACTION-SPECIFIC			
Action	Requirements	Prerequisite	Citation(s)
Transportation of hazardous materials on-site	Shall comply with 49 <i>CFR</i> Parts 171-174, 177, and 178 or the site- or facility-specific Operations of Field Office approved Transportation Safety Document that describes the methodology and compliance process to meet equivalent safety for any deviation from the Hazardous material Regulations [i.e., Transportation Safety Document for On-Site Transport within the Paducah Gaseous Diffusion Plant, PRS-WSD-0661, (PRS 2007b)].	Any person who, under contract with the DOE, transports a hazardous material on the DOE facility— TBC .	DOE Order 460.1B(4)(b)
Transportation of hazardous materials off-site	Off-site hazardous materials packaging and transfers shall comply with 49 <i>CFR</i> Parts 171-174, 177, and 178 and applicable tribal, State, and local regulations not otherwise preempted by DOT and special requirements for Radioactive Material Packaging.	Preparation of off-site transfers of LLW— TBC .	DOE O 460.1B(4)(a)

Attachment 2

*Engineering Evaluation/Cost Analysis for the Soils Operable Unit
Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah,
Kentucky*

DOE/LX/07-0016&D2

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**Engineering Evaluation/Cost Analysis
for Soils Operable Unit Inactive Facilities at the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky**



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**DOE/LX/07-0016&D2
Primary Document**

**Engineering Evaluation/Cost Analysis
for Soils Operable Unit Inactive Facilities at the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky**

Date Issued—July 2008

Prepared for the
U.S. DEPARTMENT OF ENERGY
Office of Environmental Management

Prepared by
PADUCAH REMEDIATION SERVICES, LLC
managing the

Environmental Management Activities at the
Paducah Gaseous Diffusion Plant
under contract DE-AC30-06EW05001

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PREFACE

This *Engineering Evaluation/Cost Analysis for the Soils Operable Unit Inactive Facilities at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky* (EE/CA), DOE/LX/07-0016&D2, was prepared to evaluate removal action alternatives associated with the Soils Operable Unit Inactive Facilities in compliance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act. The alternatives considered address contaminants of concern identified and their associated concentration levels located at the C-218 Outdoor Firing Range [Solid Waste Management Unit (SWMU) 181], C-403 Neutralization Tank (SWMU 40), and C-410-B Hydrogen Fluoride Neutralization Lagoon (SWMU 19). The objectives of this report are to (1) describe the environmental conditions supporting the need for a removal action, (2) develop and evaluate alternatives, and (3) recommend the alternative that best meets the removal action objectives. This document provides the basis for development of the Action Memorandum to be issued after receipt and consideration of public comments on the EE/CA.

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CONTENTS

PREFACE.....	iii
FIGURES.....	vii
TABLES.....	vii
ACRONYMS.....	ix
EXECUTIVE SUMMARY.....	xi
1. INTRODUCTION.....	1
1.1 SITE DESCRIPTION AND BACKGROUND.....	1
1.1.1 Regional Topography.....	4
1.1.2 Land Use and Population.....	4
1.1.3 Climate.....	5
1.1.4 Geology.....	5
1.1.5 Hydrogeology.....	7
1.1.6 Soils.....	10
1.1.7 Ecology.....	10
1.2 SOILS OPERABLE UNIT STRATEGY.....	11
1.3 PREVIOUS INVESTIGATIONS AND RESPONSE ACTIONS.....	14
1.4 ANALYTICAL DATA.....	14
1.5 SOURCE, NATURE, AND EXTENT OF CONTAMINATION.....	16
1.5.1 C-218 Outdoor Firing Range (SWMU 181).....	16
1.5.2 C-403 Neutralization Tank (SWMU 40).....	16
1.5.3 C-410-B Hydrogen Fluoride Neutralization Lagoon (SWMU 19).....	20
1.6 STREAMLINED RISK EVALUATION.....	20
1.6.1 Human Health Risk.....	20
1.7 COMMUNITY PARTICIPATION.....	23
2. REMOVAL ACTION OBJECTIVES.....	24
2.1 RESPONSE AUTHORITY.....	24
2.2 REMOVAL SCOPE AND PURPOSE.....	24
2.3 REMOVAL ACTION OBJECTIVES.....	24
2.4 JUSTIFICATION FOR THE PROPOSED ACTION.....	25
3. REMOVAL ACTION TECHNOLOGIES AND DEVELOPMENT OF ALTERNATIVES.....	26
3.1 TECHNOLOGY IDENTIFICATION AND SCREENING.....	26
3.2 DEVELOPMENT OF ALTERNATIVES.....	26
3.2.1 No Action Alternative – Alternative 1.....	26
3.2.2 Interim Institutional Controls—Alternative 2.....	27
3.2.3 Excavation and Interim Institutional Controls—Alternative 3.....	27
4. ANALYSIS OF ALTERNATIVES.....	28
4.1 ANALYSIS CRITERIA.....	28
4.1.1 Applicable or Relevant and Appropriate Requirements.....	29
4.1.2 NEPA Values.....	31
4.2 ANALYSIS OF INDIVIDUAL ALTERNATIVES.....	32
4.2.1 Alternative 1—No Action Alternative.....	33
4.2.2 Alternative 2—Interim Institutional Controls.....	34
4.2.3 Alternative 3—Excavation and Interim Institutional Controls.....	35
4.3 COMPARATIVE ANALYSIS OF ALTERNATIVES.....	40

4.3.1 Effectiveness	40
4.3.2 Implementability	41
4.3.3 Cost.....	42
5. RECOMMENDED REMOVAL ACTION ALTERNATIVE	44
6. REFERENCES	46
APPENDIX A: POTENTIALLY APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS	A-1
APPENDIX B: COST ESTIMATE AND CONCEPTUAL DESIGN.....	B-1
APPENDIX C: ANALYTICAL DATA	C-1
APPENDIX D: ACTION LEVEL COMPARISON AND COPC SELECTION	D-1
APPENDIX E: CLEANUP GOALS	E-1

FIGURES

1.	PGDP Site Location	2
2.	PGDP Land Ownership Map.....	3
3.	Conceptual Model of the Stratigraphy in the Vicinity of PGDP.....	6
4.	Surface Water Features in the Vicinity of the DOE Site.....	8
5.	Locations of SWMUs 19, 40, and 181.....	15
6.	Soil Sampling at SWMU 181.....	17
7.	Soil Sampling at SWMU 40.....	18
8.	Soil Sampling at SWMU 19.....	19

TABLES

1.	Previous Investigations and Response Actions	14
2.	Selected COPCs for Soil/Sludge for C-218 Outdoor Firing Range (SWMU 181)	21
3.	Selected COPCs for Soil/Sludge for C-403 Neutralization Tank (SWMU 40).....	21
4.	Selected COPCs for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)	22
5.	Selected COPCs for Accumulated Rainwater for C-403 Neutralization Tank (SWMU 40)	23
6.	Selected COPCs for Accumulated Rainwater for C-410-B HF Neutralization Lagoon (SWMU 19)	23
7.	Removal Action Alternative Comparisons	41
8.	Cleanup Levels Based on Carcinogenic Risk and Hazard	44

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ACRONYMS

ACO	Administrative Consent Order
ALARA	as low as reasonably achievable
amsl	above mean sea level
ARAR	applicable or relevant and appropriate requirement
AWQC	Ambient Water Quality Criteria
BJC	Bechtel Jacobs Company LLC
BMP	best management practice
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
<i>CFR</i>	<i>Code of Federal Regulations</i>
COC	contaminant of concern
COE	U.S. Army Corps of Engineers
COPC	chemical of potential concern
CSOU	Comprehensive Site Operable Unit
CWA	Clean Water Act
D&D	decontamination and decommissioning
DOE	U.S. Department of Energy
EDE	effective dose equivalent
EE/CA	Engineering Evaluation/Cost Analysis
ELCR	excess lifetime cancer risk
EM	Environmental Management
EPA	U. S. Environmental Protection Agency
FFA	Federal Facility Agreement
<i>FR</i>	<i>Federal Register</i>
ha	hectare
HF	hydrogen fluoride
HI	hazard index
IEUBK	Integrated Exposure Uptake Biokinetic Model
<i>KAR</i>	Kentucky Administrative Regulations
KDFWR	Kentucky Department of Fish and Wildlife Resources
KOW	Kentucky Ordnance Works
KPDES	Kentucky Pollutant Discharge Elimination System
LMES	Lockheed Martin Energy Systems, Inc.
LLW	low-level waste
MDL	method detection limit
MOU	Memorandum of Understanding
NA	not applicable
NAAQS	National Ambient Air Quality Standards
ND	not detected
NEPA	National Environmental Policy Act
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NHANES	National Health and Nutrition Examination Survey
NPL	National Priorities List
NRC	Nuclear Regulatory Commission
NSDD	North-South Diversion Ditch
NWP	Nationwide Permit
O&M	operation and maintenance
OU	operable unit
PAH	polycyclic aromatic hydrocarbon compound

PCB	polychlorinated biphenyl
PGDP	Paducah Gaseous Diffusion Plant
PPE	personal protective equipment
PPG	preliminary remediation goal
PRS	Paducah Remediation Services, LLC
RAO	Removal Action Objective
RAWP	Removal Action Work Plan
RCRA	Resource Conservation and Recovery Act
RESRAD	Residual Radioactivity
RfD	reference dose
RGA	Regional Gravel Aquifer
SAP	Sampling and Analysis Plan
SE	Site Evaluation
SF	slope factor
SI	Site Investigation
SMP	Site Management Plan
SVOA	semivolatile organic analysis
SWMU	solid waste management unit
SWOU	Surface Water Operable Unit
T&E	threatened and endangered
TBC	to be considered
TCA	trichloroethane
TCE	Trichloroethene
TEF	toxicity equivalence factor
TSCA	Toxic Substance Control Act of 1976
TSD	Transportation Safety Document
TVA	Tennessee Valley Authority
UCL	upper confidence limit
UCRS	Upper Continental Recharge System
<i>USC</i>	<i>United States Code</i>
USEC	United States Enrichment Corporation
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
WAG	waste area grouping
WKWMA	West Kentucky Wildlife Management Area
VOA	volatile organic analysis

EXECUTIVE SUMMARY

The Paducah Gaseous Diffusion Plant (PGDP) is an active uranium enrichment facility owned by the U.S. Department of Energy. PGDP is located in western Kentucky, approximately 10 miles west of Paducah, Kentucky.

The Soils Inactive Facilities Engineering Evaluation/Cost Analysis scope includes evaluating removal at the C-218 Outdoor Firing Range [Solid Waste Management Unit (SWMU) 181], C-403 Neutralization Tank (SWMU 40), and C-410-B Hydrogen Fluoride Neutralization Lagoon (SWMU 19). For the C-218 Firing Range (SWMU 181) this is limited to alternatives that address lead-contaminated soil. For C-403 (SWMU 40) and C-410-B (SWMU 19) this is limited to alternatives that will address contamination within their respective SWMU boundaries (DOE 2007).

The following are the Remedial Action Objectives that have been established for the Soils Operable Unit (OU).

- Control sources early; focus resources at areas that warrant attention in the near term, prioritizing actions within areas to address the greatest risks first.
- Minimize human exposure to contaminants, maximizing the effectiveness of institutional controls.
- Control further migration of contaminated soils.
- Reduce risk from contaminated soil hot spots.
- Reduce the risk, making progress toward the ultimate goal of protecting recreational users and industrial workers from exposure to contaminated soils.

The Removal Action Objectives (RAOs) for this removal action are consistent with the overall Remedial Action Objectives for the Soils OU and are as follows:

- Control current industrial worker exposure to soils, sediment, and/or accumulated rainwater containing hazardous substances, pollutants, or contaminants.
- Identify and control, as needed, off-site migration into multimedia exposure pathways such as surface water and groundwater.

Based on evaluations of the effectiveness, implementability, and cost of each proposed alternative, the preferred alternative identified for this removal action is Alternative 3 – “Excavation and Interim Institutional Controls.” This alternative meets all the RAOs for the removal action, is effective, can be implemented, and is the most cost-effective option that meets the specified requirements. Cost of implementation of the recommended alternative (Alternative 3) is estimated to have a present value of \$5.7M and an escalated value of \$6.1M over a 30-year design life.

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1. INTRODUCTION

This Engineering Evaluation/Cost Analysis (EE/CA) documents and describes the evaluation of alternatives to address the potential threat to human health and the environment resulting from the release or potential release of hazardous materials associated with contamination at the C-218 Outdoor Firing Range [Solid Waste Management Unit (SWMU) 181], C-403 Neutralization Tank (SWMU 40), and C-410-B Hydrogen Fluoride (HF) Neutralization Lagoon (SWMU 19). For the C-218 Firing Range (SWMU 181) this is limited to alternatives that address lead-contaminated soil. For C-403 (SWMU 40) and C-410-B (SWMU 19) this is limited to alternatives that will address contamination within their respective SWMU boundaries (DOE 2007). This document was prepared in accordance with the U.S. Environmental Protection Agency's (EPA's) *Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA* (EPA 1993).

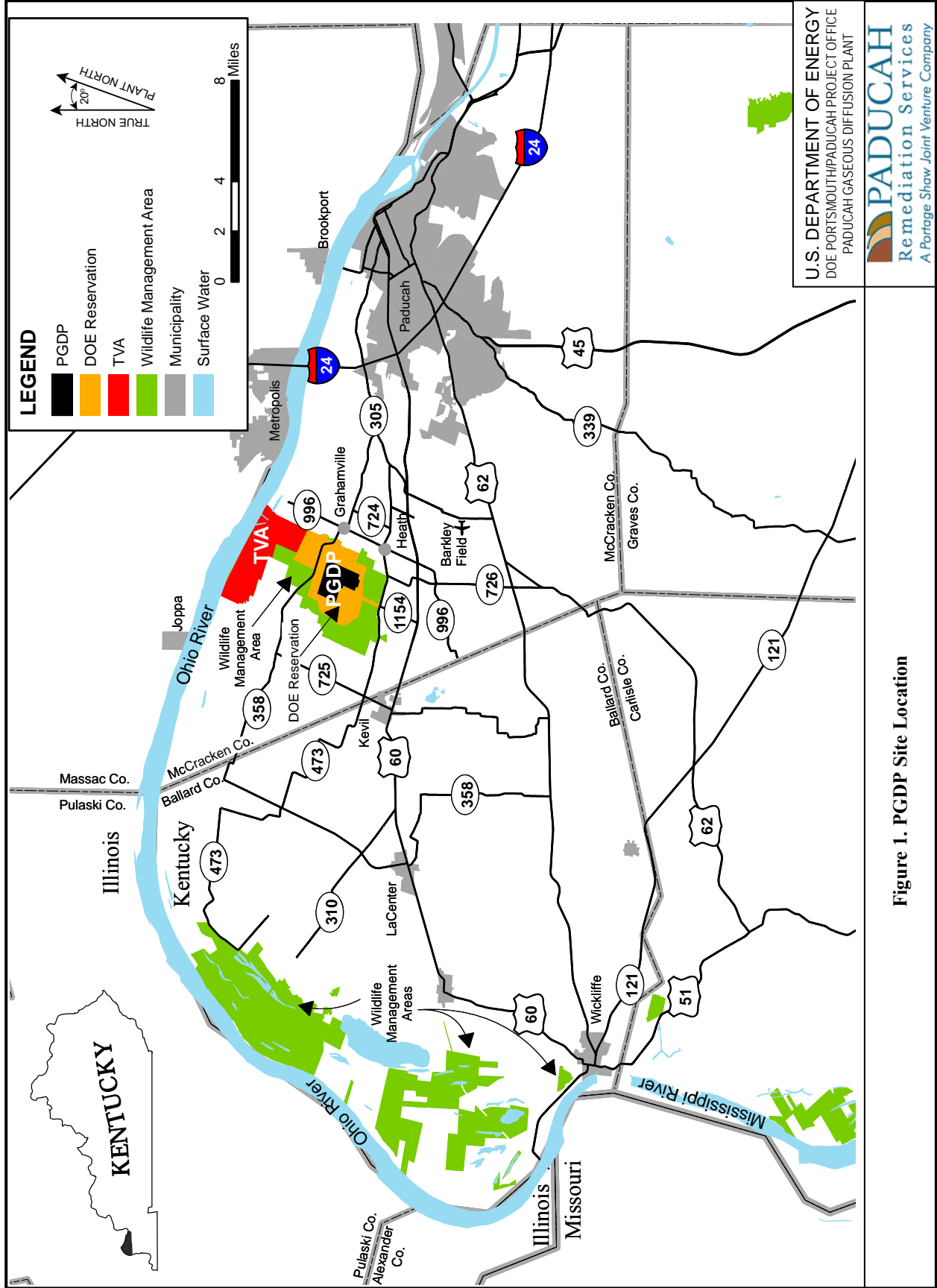
1.1 SITE DESCRIPTION AND BACKGROUND

Paducah Gaseous Diffusion Plant (PGDP) is located approximately 10 miles west of Paducah, Kentucky (population approximately 26,000), and 3.5 miles south of the Ohio River in the western part of McCracken County (Figure 1). The plant is on a 3,556-acre U.S. Department of Energy (DOE) site, 748 acres of which are within a fenced security area, 822 acres are located outside the security fence (133 acres are in acquired easements), and the remaining 1,986 acres are licensed to the Commonwealth of Kentucky as part of the West Kentucky Wildlife Management Area (WKWMA). Bordering the PGDP reservation to the northeast, between the plant and the Ohio River, is a Tennessee Valley Authority (TVA) reservation on which the Shawnee Steam Plant is located (Figure 2).

Before the PGDP was built, a munitions-production facility, the Kentucky Ordnance Works (KOW), was operated at the current PGDP location and at an adjoining area southwest of the site. Munitions, including trinitrotoluene, were manufactured and stored at the KOW between 1942 and 1945. The KOW was shut down immediately after World War II. Construction of PGDP was initiated in 1951 and the plant began operations in 1952. Construction was completed and PGDP became fully operational in 1955, supplying enriched uranium for commercial reactors and military defense reactors.

PGDP was operated by Union Carbide Corporation until 1984, when Martin Marietta Energy Systems, Inc. [which later became Lockheed Martin Energy Systems, Inc. (LMES)], was contracted to operate the plant for DOE. On July 1, 1993, DOE leased the plant production/operations facilities to the United States Enrichment Corporation (USEC); however, DOE maintains ownership of the plant and is responsible for environmental restoration and waste management activities. On April 1, 1998, Bechtel Jacobs Company LLC, (BJC) replaced LMES in implementing the Environmental Management (EM) Program at PGDP. On April 23, 2006, Paducah Remediation Services, LLC, (PRS) replaced BJC in implementing the EM Program at PGDP.

PGDP was placed on the National Priorities List (NPL), effective June 30, 1994 [59 *Federal Register (FR)* 27989, May 31, 1994]. A Federal Facility Agreement (FFA) negotiated by DOE, EPA, and the Commonwealth of Kentucky coordinates the requirements of the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at the facility.



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Figure 1. PGDP Site Location

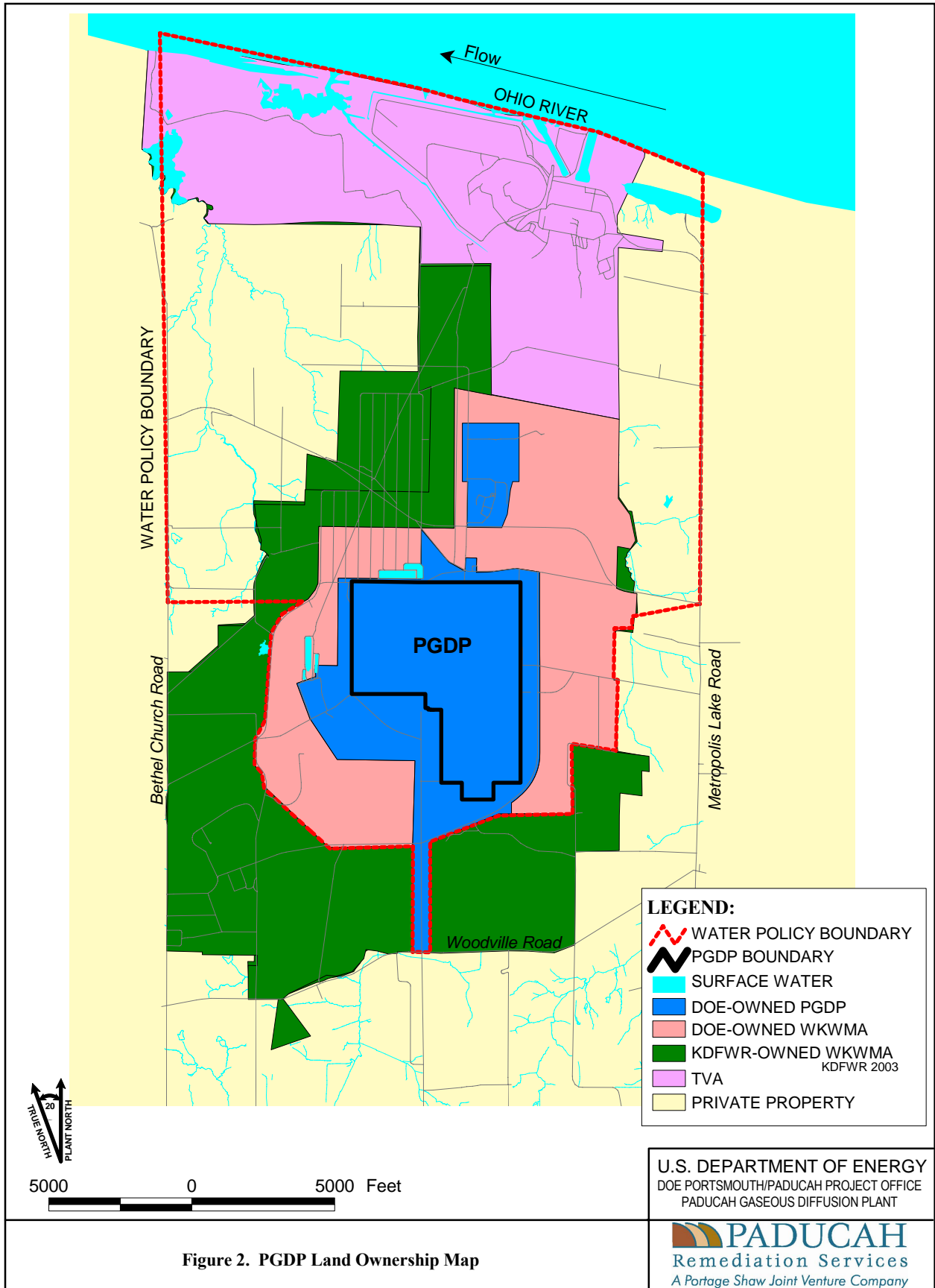


Figure 2. PGDP Land Ownership Map

DOE has undertaken projects to identify, investigate, and remediate, as necessary, all SWMUs and areas of concern at PGDP. To facilitate the remediation process at PGDP and focus investigations on the most effective and efficient remedial actions, operable units (OUs) have been defined. These OUs consist of both source control units (i.e., units that may contribute contamination to other units) and integrator units (i.e., units that “collect” contamination from source control units). Six OUs have been defined at PGDP: groundwater, surface water, soil, burial grounds, decontamination and decommissioning (D&D), and comprehensive site. This removal action is included as part of the Soils OU.

1.1.1 Regional Topography

PGDP lies in the Jackson Purchase Region of western Kentucky between the Tennessee and Mississippi Rivers, bounded on the north by the Ohio River. The confluence of the Ohio and Mississippi Rivers is approximately 56 km (35 miles) downstream (southwest) from the site. The confluence of the Ohio and Tennessee Rivers is approximately 24.14 km (15 miles) upstream (east) from the site.

Local elevations range from 88.41 m (290 ft) above mean sea level (amsl) along the Ohio River to 137.2 m (450 ft) amsl in the southwestern portion of PGDP near Bethel Church Road. Generally, the topography in the PGDP area slopes toward the Ohio River at an approximate 5.11 m/km (27 ft/mile) gradient (CH2M HILL 1992). Within the plant boundaries, ground surface elevations vary from 109.75 m (360 ft) to 118.9 m (390 ft) amsl. The terrain in the vicinity of the plant is slightly modified by the dendritic drainage systems associated with the two principal streams in the area, Bayou Creek and Little Bayou Creek. These streams have small valleys, which are about 6.09 m (20 ft) below the adjacent plain. These small valleys are the result of construction of plant drainage systems in the early 1950s, natural erosion, and/or maintenance.

The average pool elevation of the Ohio River is 88.41 m (290 ft) amsl, and the high water elevation is 104.26 m (342 ft) amsl (TCT-St. Louis 1991). Approximately 100 small lakes and ponds exist on DOE property (TCT-St. Louis 1991). A marsh covering 66.8 hectares (ha) (165 acres) exists off-site of DOE property, immediately south of the confluence of Bayou Creek and Little Bayou Creek (TCT-St. Louis 1991).

1.1.2 Land Use and Population

The PGDP is heavily industrialized; however, the area surrounding the plant is mostly agricultural and open land, with some forested areas. The TVA’s Shawnee Steam Plant, adjacent to the northeast border of the DOE reservation, is the only other major industrial facility in the immediate area. The Honeywell Plant (formerly Allied Signal) north of the Ohio River near Metropolis, Illinois, produces feed material for the PGDP.

The PGDP site includes 804 ha (1,986 acres) licensed to the Commonwealth of Kentucky Department of Fish and Wildlife Resources (KDFWR). This area is part of the WKWMA and borders PGDP to the north, west, and south. The WKWMA is an important recreational resource for western Kentucky and is used by more than 10,000 people each year. Major recreational activities include hunting, field trials for dogs and horses, trail riding, fishing, and skeet shooting.

Total population within an 80.46 km (50-mile) radius of PGDP is approximately 500,000. Approximately 50,000 people live within 16.09 km (10 miles) of PGDP and homes are scattered along rural roads around the plant. The population of Paducah, based on the 2000 U.S. Census, is 26,307; the total population of McCracken County [650.4 km² (251 mi²)] is approximately 65,000. The closest communities to PGDP are the unincorporated towns of Grahamville [about 1.6 km (1 mile) to the east] and Heath [about 1.6 km (1 mile) southeast].

1.1.3 Climate

The climate of the region may be broadly classified as humid-continental. The term “humid” refers to the surplus of precipitation versus evapotranspiration that normally is experienced throughout the year. The “continental” nature of the local climate refers to the dominating influence of the North American landmass. Continental climates typically experience large temperature changes between seasons.

Current and historical meteorological information regarding temperature, precipitation, and wind speed/direction was obtained from the National Oceanic and Atmospheric Administration’s National Climatic Data Center. Additional data were obtained from the National Weather Service office at Barkley Regional Airport.

The mean annual temperature for the Paducah area for 2005 was 58.6 °F. The 22-year average monthly temperature is 58.0°F, with the coldest month being January with an average temperature of 35.1 °F and the warmest month being July with an average temperature of 79.2 °F.

The 22-year average monthly precipitation is 10.16 cm (4.00 in.), varying from an average of 6.93 cm (2.73 in.) in August (the monthly average low) to an average of 11.63 cm (4.58 in.) in April (the monthly average high). The total precipitation for 2005 was 95.12 cm (37.45 in.), compared to the normal of 125.07 cm (49.24 in.).

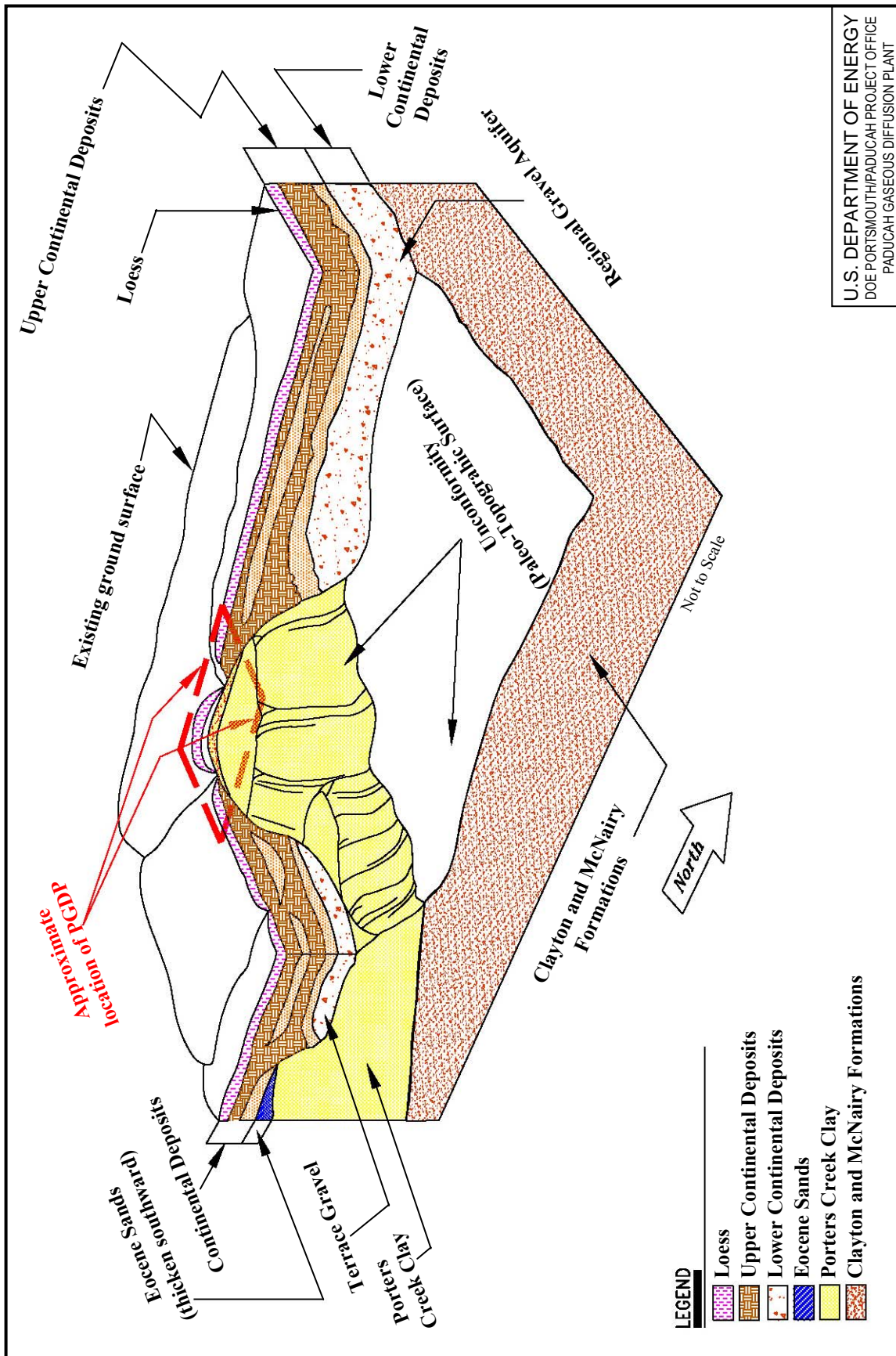
The average mean prevailing wind speed during 2005 was 6.2 mph from the south-southwest. Historically, stronger winds are recorded when the winds are from the southwest.

1.1.4 Geology

PGDP is located in the Jackson Purchase Region of Western Kentucky, which represents the northern tip of the Mississippi Embayment portion of the Coastal Plain. The Jackson Purchase Region is an area of land that includes all of Kentucky west of the Tennessee River. The stratigraphic sequence in the region consists of Cretaceous, Tertiary, and Quaternary sediments unconformably overlying Paleozoic bedrock. A generalized geologic cross-section for the PGDP site is presented in Figure 3.

Within the Jackson Purchase Region, strata deposited above the Precambrian basement rock attain a maximum thickness of 3,659 m to 4,573 m (12,000 ft to 15,000 ft). Exposed strata in the region range in age from Devonian to Holocene. The Devonian stratum crops out along the western shore of Kentucky Lake. Mississippian carbonates form the nearest outcrop of bedrock and are exposed approximately 14.5 km (9 miles) northwest of PGDP in southern Illinois (Clausen et al. 1992). The Coastal Plain deposits unconformably overlie Mississippian carbonate bedrock and consist of the following: the Tuscaloosa Formation; the sand and clays of the Clayton/McNairy Formations; the Porters Creek Clay; and the Eocene sand and clay deposits (undivided Jackson, Claiborne, and Wilcox Formations). Continental deposits unconformably overlie the Coastal Plain deposits, which are, in turn, covered by loess and/or alluvium.

Relative to the shallow groundwater flow system in the vicinity of the PGDP, the continental deposits and the overlying loess and alluvium are of key importance. The continental deposits locally consist of an upper silt member, with lesser sand and gravel interbeds, and a thick, basal sand and gravel member, which fills a buried river valley. A subcrop of the Porters Creek Clay, located beneath and immediately south of PGDP, marks the south extent of the buried river valley. Fine sand and clay of the McNairy Formation directly underlie the continental deposits. These continental deposits are continuous from beneath the PGDP to beyond the present course of the Ohio River. The general soil map for Ballard and McCracken counties indicates that three soil associations are found within the vicinity of PGDP (USDA



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Figure 3. Conceptual Model of the Stratigraphy in the Vicinity of PGDP

1976): the Rosebloom-Wheeling-Dubbs association, the Grenada-Calloway association, and the Calloway-Henry association. The predominant soil association in the vicinity of PGDP is the Calloway-Henry association, which consists of nearly level, somewhat poorly drained to poorly drained, medium-textured soils on upland positions. Several other soil groups also occur in limited areas of the region, including the Grenada, Falaya-Collins, Waverly, Vicksburg, and Loring.

Although the soil over most of PGDP may be Henry silt loam with a transition to Calloway, Falaya-Collins, and Vicksburg away from the site, many of the characteristics of the original soil have been lost due to industrial activity that has occurred over the past 45 years. Activities that have disrupted the original soil classifications include filling, mixing, and grading.

1.1.5 Hydrogeology

1.1.5.1 Surface Water

PGDP is located in the western portion of the Ohio River drainage basin, approximately 24 km (15 miles) downstream of the confluence of the Ohio River with the Tennessee River and approximately 56 km (35 miles) upstream of the confluence of the Ohio River with the Mississippi River. Locally, the PGDP is within the drainage areas of the Ohio River, Bayou Creek (also known as Big Bayou Creek), and Little Bayou Creek.¹ Multiple groundwater aquifers underlie PGDP. The shallowest aquifers occur in the Continental Deposits and the McNairy Formation, both of which discharge into the Ohio River north of PGDP. Surface water/groundwater relationships vary significantly across the Soils Operable Unit.

A shallow water table aquifer, with discharge to the area creeks, occurs to the south of PGDP.² Under most of PGDP and the adjacent area to the north, large, downward, vertical hydraulic gradients dominate within the shallow groundwater system, and groundwater infiltrates downward to the Regional Gravel Aquifer (RGA) at a depth of approximately 60 ft (see Section 3.6), limiting the amount of groundwater discharge to the ditches of the PGDP and adjacent creeks. During periods of sustained rainfall, infiltrating water accumulates in the shallow soils and develops an increased throughflow system that discharges infiltrating water temporarily to plant ditches and the area creeks. In the vicinity of the Ohio River, where the land surface is approximately 60 ft lower than at PGDP, Bayou and Little Bayou Creeks cut down to near the potentiometric surface of the RGA. In this area, horizontal groundwater gradients predominate within the water table flow system. Gaining reaches in the creeks are found on Bayou Creek south of PGDP and on both creeks north of PGDP near the Ohio River. While there are no springs near PGDP, seeps are present over a limited stretch of Little Bayou Creek near the Ohio River where hydraulic potential within the RGA exceeds the elevation of the creek. *Surface Water to Groundwater Interaction at the Paducah Gaseous Diffusion Plant* (PRS 2007a) discusses the conceptual model for surface water/groundwater interactions at PGDP.

The plant is situated on the divide between the two creeks (Figure 4). Surface flow is east-northeast toward Little Bayou Creek and west-northwest toward Bayou Creek. Bayou Creek is a perennial stream on the western boundary of the plant that flows generally northward, from approximately 2.5 miles south of the plant site to the Ohio River along a 14.5-km (9-mile) course. A 4,820-ha (11,910-acre) drainage basin supplies Bayou Creek. Little Bayou Creek becomes a perennial stream at the east outfalls of PGDP.

¹ Use designations described in 401 KAR 5:026 for Bayou Creek and Little Bayou Creek are warm water aquatic habitat (WAH), primary contact recreation (PCR), secondary contact recreation (SCR), and domestic water supply (DWS) at Cario, Illinois, which is the location of the nearest downstream public water supply (401 KAR 5:031).

² This water table aquifer exists where the top of the Porters Creek Clay occurs near land surface. The water table aquifer is part of the Terrace Gravel flow system (see Section 1.1.4). The Porters Creek Clay is absent under most of PGDP and the adjacent area to the north.

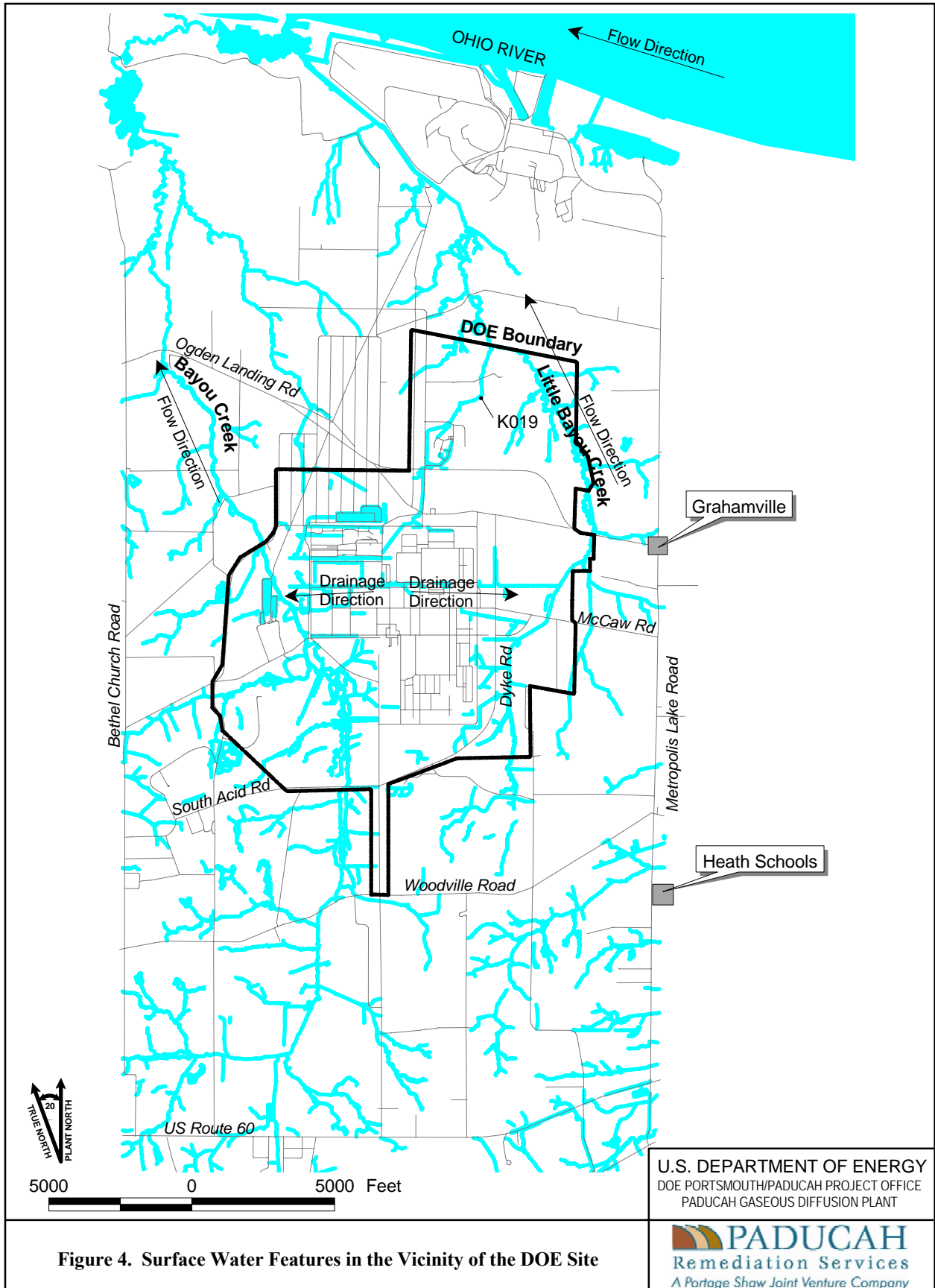


Figure 4. Surface Water Features in the Vicinity of the DOE Site

The Little Bayou Creek drainage originates within WKWMA and extends northward and joins Bayou Creek near to the Ohio River along a 10.5-km (6.5-mile) course within a 2,400-ha (6,000-acre) drainage basin. Drainage areas for both creeks are generally rural; however, they receive surface drainage from numerous swales that drain residential and commercial properties, including WKWMA, PGDP, and the TVA Shawnee Steam Plant. The confluence of the two creeks is approximately 4.8 km (3 miles) north of the plant site, just upstream of the location at which the combined flow of the creeks discharges into the Ohio River.

Most of the flow within Bayou and Little Bayou Creeks is from process effluents or surface water runoff from PGDP. A network of ditches discharges effluent and surface water runoff from PGDP to the creeks. Plant discharges are monitored at the Kentucky Pollutant Discharge Elimination System (KPDES) outfalls prior to discharge into the creeks. These creeks are monitored at KPDES outfalls for possible contaminant releases from the plant. Outfalls 002, 010, 011, 012, 013, and 018 receive water from the eastern-most portion of the plant and discharge to Little Bayou Creek. Water from the western portion of the plant drains to Bayou Creek through Outfalls 001, 006, 008, 009, 014, 015, 016, and 017. Outfall 004 receives waste water from the C-615 Sewage Treatment Facility and combines with the effluents that lead to Outfall 008. Outfall 019 receives runoff from the C-746-U Landfill located north of PGDP and discharges to the North-South Diversion Ditch (NSDD), which flows to Little Bayou Creek. Outfalls 003, 005, and 007 no longer are permitted or discharging.

1.1.5.2 Groundwater

The discussion is intended to provide the reader with a general overview of the groundwater flow regime for PGDP. The local groundwater flow system at the PGDP site occurs within the sands of the Cretaceous McNairy Formation, Pliocene terrace gravels, Plio-Pleistocene lower continental gravel deposits and upper continental deposits, and Holocene alluvium. Four specific components have been identified for the groundwater flow system and are defined in the following paragraphs.

- (1.) **McNairy Flow System.** Formerly called the deep groundwater system, this component consists of the interbedded and interlensing sand, silt, and clay of the Cretaceous McNairy Formation. Sand facies account for 40–50% of the total formation's thickness of approximately 68.6 m (225 ft). Groundwater flow is predominantly north.
- (2.) **Terrace Gravel.** This component consists of Pliocene (?) -aged gravel deposits (a question mark indicates uncertain age) and later reworked sand and gravel deposits found at elevations higher than 97.5 m (320 ft) amsl in the southern portion of the plant site; they overlie the Paleocene Porters Creek Clay and Eocene sands. These deposits usually lack sufficient thickness and saturation to constitute an aquifer.
- (3.) **Regional Gravel Aquifer.** This component consists of the Quaternary sand and gravel facies of the lower continental deposits and Holocene alluvium found adjacent to the Ohio River and is of sufficient thickness and saturation to constitute an aquifer. These deposits are commonly thicker than the Pliocene (?) gravel deposits, having an average thickness of 9.1 m (30 ft), and range up to 15.24 m (50 ft) along an axis that trends east–west through the plant site. The RGA is the primary local aquifer. Groundwater flow is predominantly north toward the Ohio River.
- (4.) **Upper Continental Recharge System (UCRS).** Formerly called the shallow groundwater system, this component consists of the surficial alluvium and upper continental deposits. Sand and gravel lithofacies appear relatively discontinuous in cross-section, but portions may be interconnected. The most prevalent sand and gravel deposits occur at an elevation of approximately 105.2 to 106.9 m (345 to 351 ft) amsl; less prevalent deposits occur at elevations of 102.7 to 103.9 m (337 to 341 ft)

amsl. Groundwater flow is predominantly downward into the RGA from the UCRS, which has a limited horizontal component in the vicinity of PGDP.

1.1.6 Soils

The surficial deposits found in the vicinity of PGDP are Pleistocene to Recent in age and consist of loess and alluvium. Both units are composed of clayey silt or silty clay and range in color from yellowish-brown to brownish-gray or tan, making field differentiation difficult.

The loess (wind-blown) deposits overlie the upper continental deposits over the entire PGDP area. Loess deposition probably occurred in upland areas during all stages of the glaciation that extended into the Ohio and Mississippi River Valleys.

1.1.7 Ecology

The following sections give a brief overview of the terrestrial and aquatic systems at PGDP. A more detailed description, including an identification and discussion of sensitive habitats and threatened and endangered (T&E) species, is contained in the *Investigation of Sensitive Ecological Resources Inside the Paducah Gaseous Diffusion Plant, Paducah, Kentucky* (CDM 1994) and *Environmental Investigations at the Paducah Gaseous Diffusion Plant and Surrounding Area, McCracken County, Kentucky* (COE 1994a).

1.1.7.1 Terrestrial Systems

The terrestrial component of the PGDP ecosystem includes the plants and animals that use the upland habitats for food, reproduction, and protection. The upland vegetative communities consist primarily of grassland, forest, and thicket habitats with agricultural areas. The main crops grown in the PGDP area include soybeans, corn, tobacco, and sorghum.

Most of PGDP has been cleared of vegetation at some time, and much of the grassland habitat currently is mowed by PGDP personnel. A large percentage of the adjacent WKWMA is managed to promote native prairie vegetation by burning, mowing, and various other techniques. These areas have the greatest potential for restoration and for establishment of a sizeable prairie preserve in the Jackson Purchase area (KSNPC 1991).

Canopy species of the forested areas include oaks, hickories, maples, elms, and sweetgum. Understory species include snowberry, poison ivy, trumpet creeper, Virginia creeper, and Solomon's seal.

Thicket areas consist predominantly of maples, black locust, sumac, persimmon, and forest species in the sapling stage with herbaceous ground cover similar to that of the forest understory.

Wildlife commonly found in the PGDP area consists of species indigenous to open grassland, thicket, and forest habitats. The species documented to occur in the area are discussed in the following paragraphs.

Small mammal surveys conducted on WKWMA documented the presence of southern short-tailed shrew, prairie vole, house mouse, rice rat, and deer mouse (KSNPC 1991). Large mammals commonly present in the area include coyote, eastern cottontail, opossum, groundhog, whitetail deer, raccoon, and gray squirrel.

Typical birds of the area include European starling, cardinal, red-winged blackbird, mourning dove, bobwhite quail, turkey, killdeer, American robin, eastern meadowlark, eastern bluebird, bluejay, red-tail hawk, and great horned owl.

Amphibians and reptiles present include cricket frog, Fowler's toad, common snapping turtle, green tree frog, chorus frog, southern leopard frog, eastern fence lizard, and red-eared slider (KSNPC 1991).

Mist netting activities in the area have captured red bat, little brown bat, Indiana bat, northern long-eared bat, evening bat, and eastern pipistrelle (KSNPC 1991).

1.1.7.2 Aquatic Systems

The aquatic communities in and around the PGDP area that could be impacted by plant discharges include two perennial streams (Bayou Creek and Little Bayou Creek), the NSDD, a marsh located at the confluence of Bayou Creek and Little Bayou Creek, and other smaller drainage areas. The dominant taxa in all surface waters include several species of sunfish, especially bluegill and green sunfish, as well as bass and catfish. Shallow streams, characteristic of the two main area creeks, are dominated by bluegill, green and longear sunfish, and stonerollers.

1.1.7.3 Wetlands and Floodplains

During the 1994 U.S. Army Corps of Engineers (COE) environmental investigations, 11,719 acres of wetlands were found in areas surrounding the PGDP. These investigations identified 1,083 separate wetland areas and grouped them into 16 vegetative cover types encompassing forested, scrub/shrub, and emergent wetlands (COE 1994b). Wetland vegetation consists of species such as sedges, rushes, spikerushes, and various other grasses and forbs in the emergent portions; red maple, sweet gum, oaks, and hickories in the forested portions; and black willow and various other saplings of forested species in the thicket portions.

At the PGDP, three bodies of water cause most area flooding: the Ohio River, Bayou Creek, and Little Bayou Creek. A floodplain analysis performed by COE (1994b) found that much of the built-up portions of the plant lie outside the 100- and 500-year floodplains of these streams. In addition, this analysis reports that ditches within the plant area can contain the expected 100- and 500-year discharges.

1.2 SOILS OPERABLE UNIT STRATEGY

The Soils OU is one of five media-specific OUs at PGDP being used to evaluate and implement remedial actions. DOE, EPA, and the Commonwealth of Kentucky have agreed upon five media-specific strategic cleanup initiatives as follows [from Site Management Plan (SMP), DOE 2007b]:

- Burial Grounds OU Strategic Initiative,
- D&D OU Strategic Initiative,
- Groundwater OU Strategic Initiative,
- Soils OU Strategic Initiative, and
- Surface Water Operable Unit (SWOU) Strategic Initiative.

These initiatives include taking early actions, as necessary, to prevent and reduce exposure and unacceptable risks. This includes completion of a series of prioritized response actions, ongoing site characterization activities to support future response action decisions, and D&D of the currently operating gaseous diffusion plant once it ceases operation. These initiatives will be followed by Comprehensive Site

Operable Unit (CSOU) evaluation, with implementation of additional and final actions, as needed, to ensure long-term protectiveness. The intended scope, sequence, and timing of the OU initiatives are documented in the SMP (DOE 2007b) and in the FFA (EPA 1998a).

The primary objectives of these initiatives are to protect human health and the environment by taking actions necessary to prevent both on-site and off-site human exposure that presents an unacceptable risk, to provide safe environmental conditions for industrial workers performing ongoing gaseous diffusion plant operations, and to implement actions that provide the greatest opportunities to achieve significant risk reduction before site closure.

For the Soils OU, and consistent with EPA guidance (EPA 1998b; EPA 2005), a phased approach is used to meet the primary objectives. A phased approach is used because the complex soil contamination problems at the site (i.e., ongoing operational activities, multiple sources of contamination, and the potential for a complicated contaminant fate and transport process³) prevent PGDP from implementing one comprehensive, cost-effective remedy at this time. Additionally, the phased approach allows the site to use information gained in earlier phases of the cleanup to refine and implement subsequent cleanup objectives and actions.

The phased approach for the Soils OU consists of implementing a series of steps that will meet short-term protection goals, intermediate performance goals, and long-term, final cleanup goals. Sequencing the steps in this manner is consistent with EPA's recommendation to use these goals to accomplish the following EPA objectives (EPA 2005):

- Control sources early; focus resources at areas that warrant attention in the near term, prioritizing actions within areas to address the greatest risks first;
- Minimize human exposure to contaminants, maximizing the effectiveness of institutional controls;
- Control further migration of contaminated soils;
- Reduce risk from contaminated soil; and
- Make progress toward the ultimate goal of protecting recreational users and industrial workers from exposure to contaminated soils.

The following four steps are being used at PGDP to implement the phased approach for the Soils OU [adapted from the SMP (DOE 2007b)]:

- (1) Prevent human exposure to contamination presenting an unacceptable risk (short-term protection goal);
- (2) Prevent or minimize further off-site migration (intermediate performance goals);
- (3) Reduce, control, or minimize contaminated soil contributing to off-site contamination (intermediate performance goals); and

³ It should be noted that there is minimal migration associated with contaminated soils (i.e., "hot spots"). The primary issue associated with contaminated soils is direct contact risk to the industrial worker. Additional multimedia evaluation (e.g., groundwater, surface water) will be conducted to ensure that all exposure pathways have been adequately assessed to support cleanup decisions.

- (4) Evaluate multimedia exposure pathways and select long-term solutions to protect human health and the environment (long-term, final cleanup goals).

In implementing this phased approach, the following Soils OU actions have been implemented to meet the short-term goal of preventing human exposure to contaminated soil hot spots:

- Implementation of on-site institutional controls (1993); and
- Monitoring and posting of radiological areas (ongoing)

The following additional actions have been taken for the Soils OU to meet the intermediate performance goal of reducing, controlling, or minimizing contaminated soil, soil off-site migration, and contributing source areas:

- Removed approximately 5,000 drums of polychlorinated biphenyl- (PCB-) contaminated soils from vaporizer areas in C-337-A (1985 – 1986) and C-333-A (1987);
- Removed various Underground Storage Tanks (USTs) and any associated petroleum-contaminated soils:
 - UST #1 (SWMU 142) containing gasoline, located at C-750-A (1991);
 - UST #2 (SWMU 143) containing diesel fuel, located at C-750-B (1991);
 - UST #3 (SWMU 25) containing used motor oil, located at C-750-C (1993);
 - UST #17 (SWMU 183) containing various petroleum products, located at C-745-K (2002);
 - UST #18 (SWMU 534) containing various petroleum products, located at C-745-K2 and within the footprint of SWMU 193 (2002);
 - UST #5 (SWMU 139) containing diesel fuel, located at C-746-A (2003);
- Removed PCB- and dioxin-contaminated soil at Waste Area Group (WAG) 23 (1997);
- Excavated radiologically contaminated soil associated with concrete rubble piles for AOC 124 under WAG 17 (1997); and
- Treated trichloroethene- (TCE-) contaminated soil at the Cylinder Drop Test Area (SWMU 91) using LASAGNA *in situ* technology (2001)

In addition to the removal actions, the field investigation of WAGs 9 and 11 (DOE 1999a) should be mentioned. This investigation included the sampling and evaluation of potential soil contamination at SWMUs 19, 20, 27, 28, 41, 165, and 170.

Implementation of the Soils OU Inactive Facilities EE/CA is the next step in the phased approach for the Soils OU. The Soils OU Inactive Facilities EE/CA is an interim action consistent with the intermediate performance goal for the Soils OU of reducing, controlling, or minimizing contaminated soil contributing to off-site contamination. Upon completion of Soils OU Inactive Facilities EE/CA, and in keeping with the phased approach, this interim action will be followed by the Soils OU Remedial Investigation and the CSOU (DOE 2007b).

1.3 PREVIOUS INVESTIGATIONS AND RESPONSE ACTIONS

The C-218 Outdoor Firing Range (SWMU 181), C-403 Neutralization Tank (SWMU 40), and C-410-B HF Neutralization Lagoon (SWMU 19) are inactive facilities that supported plant activities associated with various historical plant processes at the PGDP (Figure 5). Each of these inactive facilities has been investigated previously. The contamination associated with each inactive facility originated from plant activities. Table 1 provides a listing of the previous investigations associated with each facility. Detailed descriptions of the investigations are discussed in Section 1.5, “Source, Nature, and Extent of Contamination.”

Table 1. Previous Investigations and Response Actions

Facility	Previous Investigations	Response Actions
C-218 Outdoor Firing Range (SWMU 181)	1) Solid Waste Management Unit/Area of Concern Self Assessment Evaluation for Decision Process Report #65 (1994)	None
C-403 Neutralization Tank (SWMU 40)	1) General Site Characterization (1993, 1997, 1998) 2) WAG 6 Remedial Investigation (1998)	None
C-410-B Hydrogen Fluoride Neutralization Lagoon (SWMU 19)	1) Administrative Consent Order (ACO) Phase II Site Investigation (SI) (1991) 2) WAGs 9 & 11 Site Evaluation (SE) (1999)	None

1.4 ANALYTICAL DATA

Analytical data from previous investigations that were representative of current site conditions were utilized in support of this evaluation. Appendix C provides the complete dataset utilized, including data qualifiers.

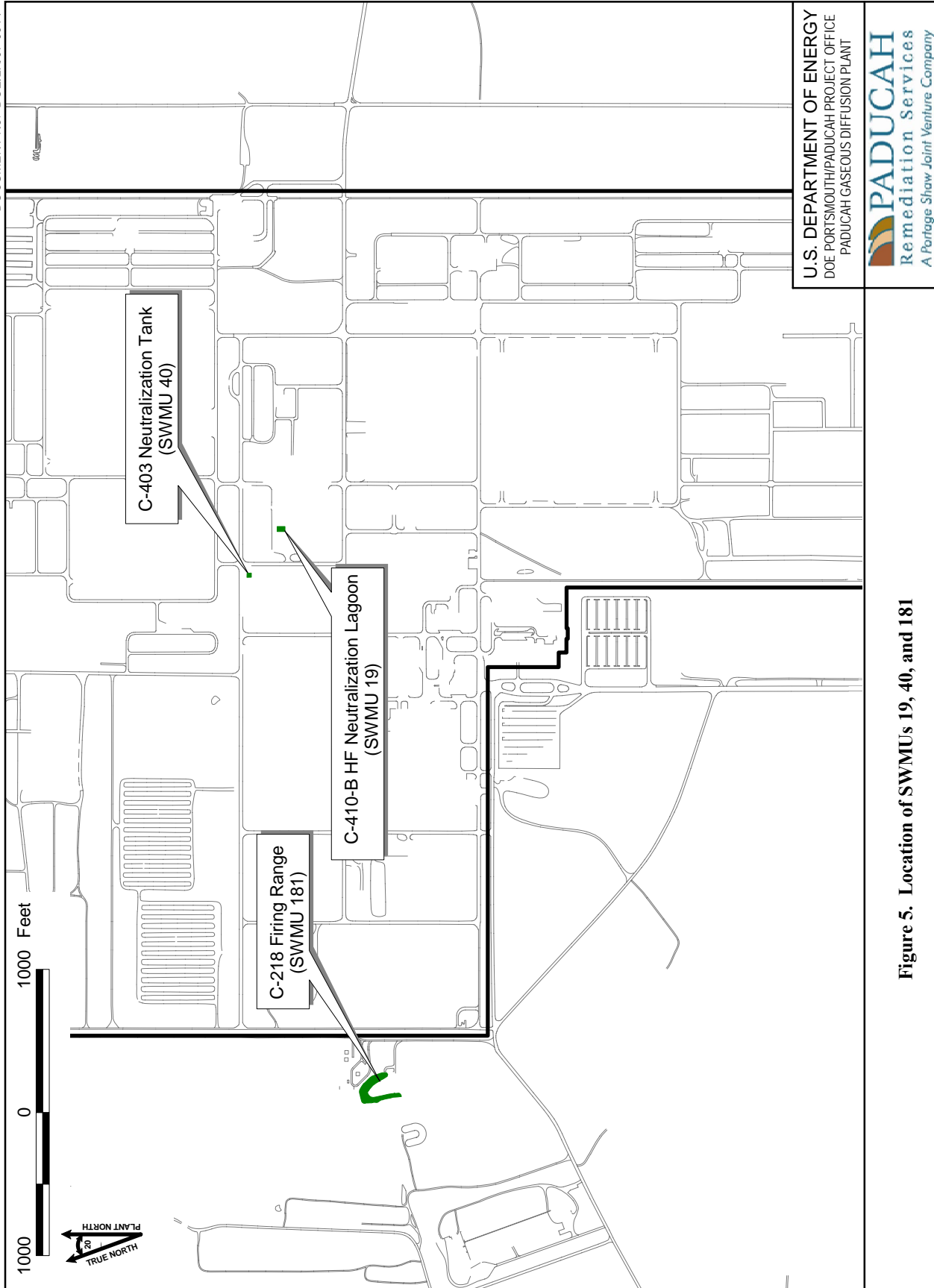


Figure 5. Location of SWMUs 19, 40, and 181

1.5 SOURCE, NATURE, AND EXTENT OF CONTAMINATION

The source, nature, and extent of the potential chemical contamination present at the C-218 Outdoor Firing Range (SWMU 181), C-403 Neutralization Tank (SWMU 40), and C-410-B HF Neutralization Lagoon (SWMU 19) have been defined by previous investigations (Figure 6 through Figure 8). The identified contamination for each facility was derived from various plant activities conducted at PGDP.

1.5.1 C-218 Outdoor Firing Range (SWMU 181)

The C-218 Firing Range (SWMU 181) is a former outdoor firing range that was in operation from 1985 to 1992. The facility is located immediately west of PGDP on DOE property and consists of a U-shaped soil berm approximately 4.88 m (16 ft) high. Excess excavation material from the East-West Ditch Oil Structure project (Engineering Service Order-13885) completed in 1983, along with possible additional fill material from C-611, was utilized to construct the berm. In 1993, a site characterization of the berm was performed (MMES 1994). The surface soil was sampled for radiological constituents, PCBs, and RCRA bulk metals. Eight sampling locations were chosen at random, resulting in the collection of eight individual and two composite samples. The two composite samples were analyzed for lead. Bulk lead concentrations were 1,774.2 mg/kg to 14,880.0 mg/kg (MMES 1994). The lead results from the two sampled locations [WC-1042 (duplicates) and WC-1043] indicate lead present at concentrations above the background concentration (36 mg/kg) and risk-based action level for the industrial worker (1,250 mg/kg) (DOE 2001). All ten locations were sampled for radionuclides and PCBs. Of the ten locations, total uranium was detected at four (WC-1042, WC-1046, WC-1047, and WC-1049) locations at concentrations below the surface soil background concentration (3.8 pCi/g) and risk-based action level for the industrial worker (171 pCi/g; uranium-238) (DOE 2001). The remaining six locations (WC-1043, WC-1044, WC-1045, WC-1048, WC-1050, and WC-1051) had total uranium below detectable limits for uranium (less than 1.5 pCi/g). PCBs were not detected at any of the ten locations sampled for PCBs. There have been no previous response actions for the C-218 Firing Range; however, based upon historical use, analytical data, and process knowledge, lead is the only chemical of potential concern (COPC) that will be targeted in this removal action. Characterization for other COPCs associated with the source of the berm material is being planned in conjunction with the Soil Pile Project sampling event, and the characterization data will be utilized as part of a follow-up evaluation of the C-218 Firing Range currently scheduled under Soils OU.

1.5.2 C-403 Neutralization Tank (SWMU 40)

The C-403 Neutralization Tank (SWMU 40) is located at the northeast corner of the C-400 Building. The tank is 7.62 m² (25 ft²) by 7.92 m (26 ft) deep, in-ground, and open-topped. It is constructed of concrete and lined with two layers of acid brick. The tank was used for the storage and treatment of acidic, uranium-bearing waste solutions generated during cleaning operations in the C-400 Building until 1957. In 1957, neutralization equipment was installed in the C-400 Building, and the C-403 Neutralization Tank no longer was used to neutralize waste solutions. Although neutralization no longer was carried out at C-403, low-level, uranium-bearing wastewater continued to be discharged to C-403 until 1990. These discharges included uranium hexafluoride cylinder hydrostatic-test water, overflow and runoff from cleaning tanks, discharge from floor drains, and other unknown sources. After 1990, the C-403 Neutralization Tank was removed from service. In 1993, nine water and three sediment samples were collected from the C-403 Neutralization Tank. Analytical results indicated that TCE concentrations in the nine water samples ranged from 17 to 1,300 µg/L and TCE concentrations in the three sediment samples ranged from 35 to 6,700 µg/l (unpublished source referenced in DOE 1997b). During the WAG 6 Remedial Investigation, a water line located near the C-403 tank broke, and water flowed into the tank from one of the still existing fill lines. Approximately 198 m³ (7,000 ft³) of water accumulated in the tank.

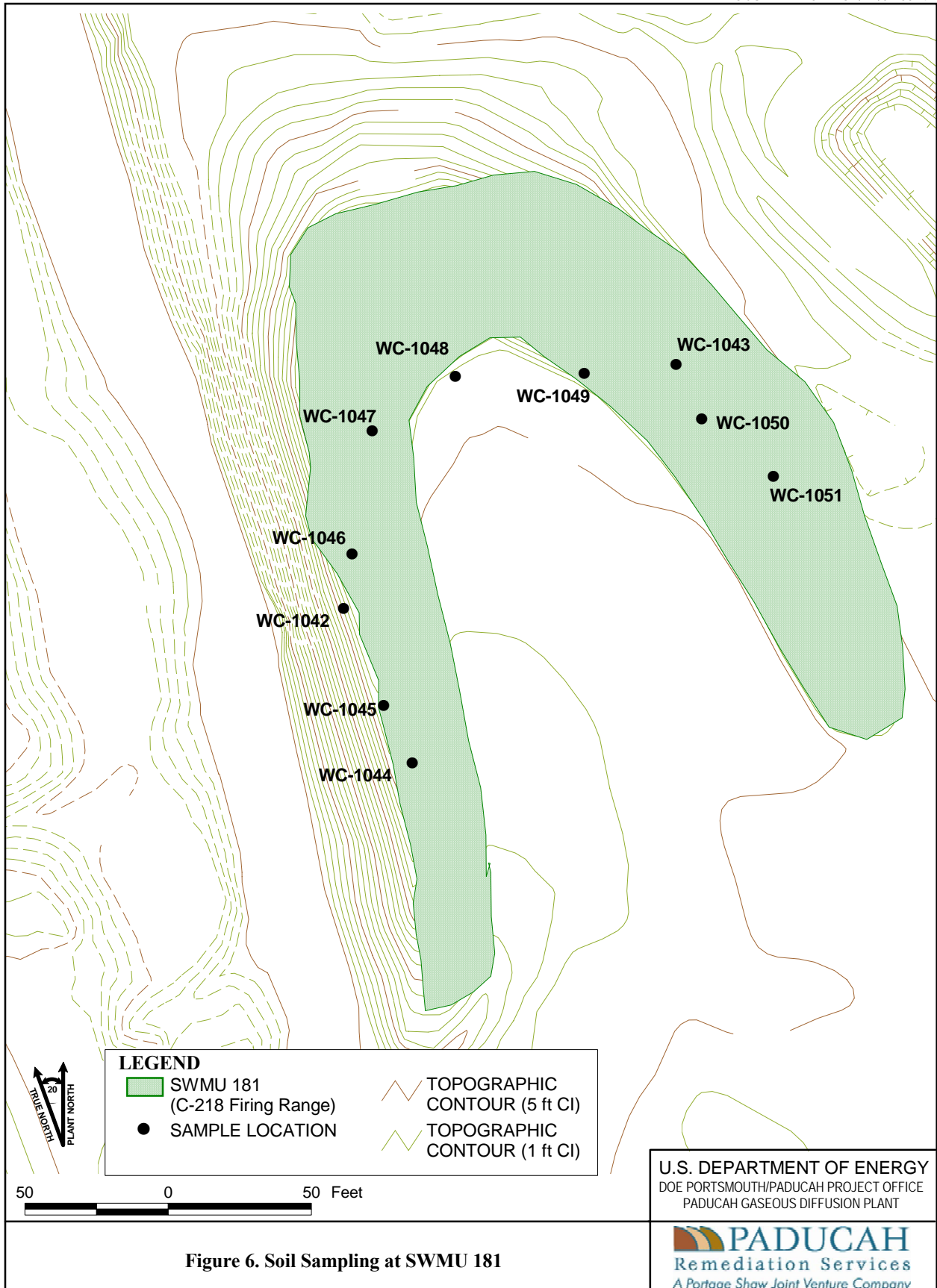


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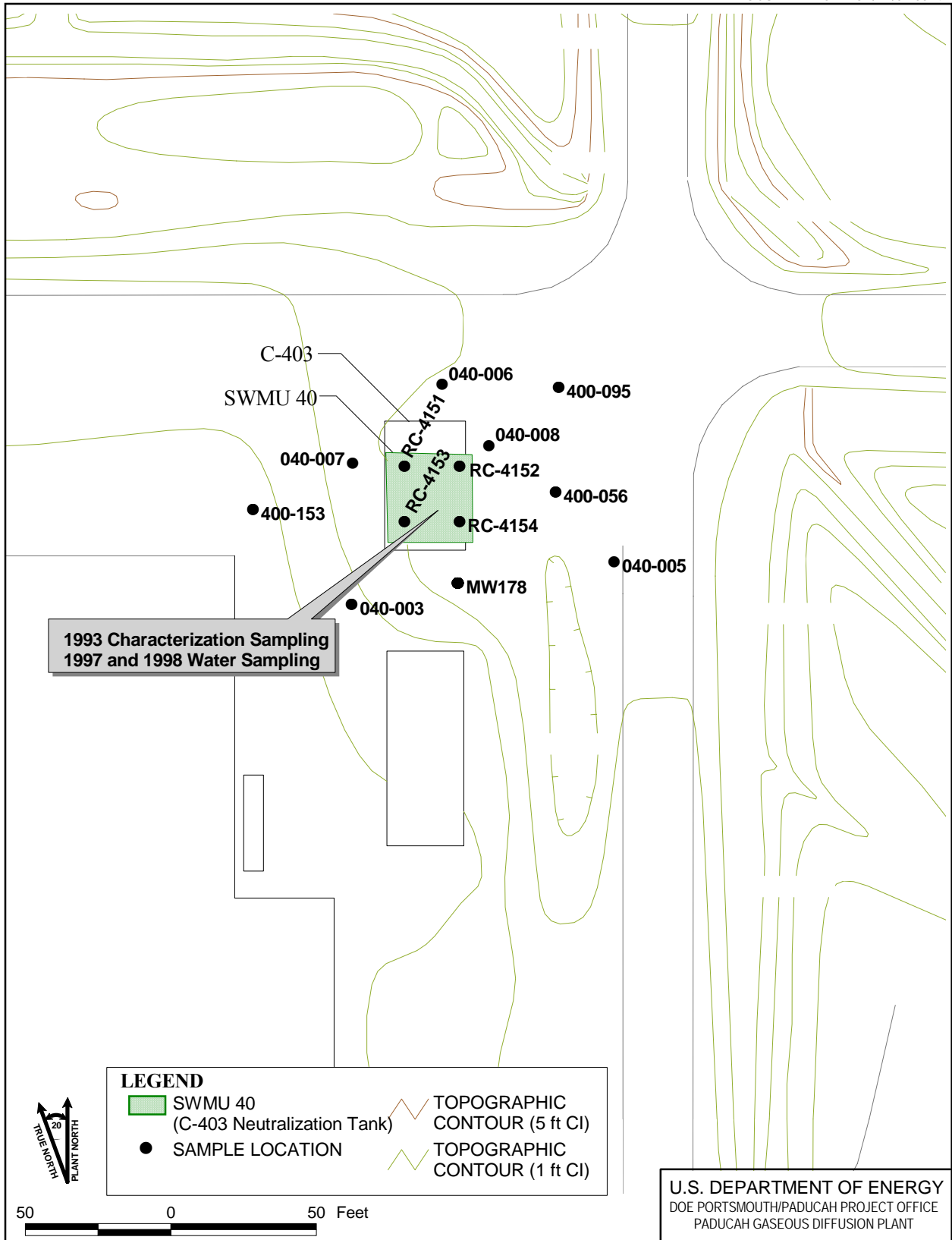


Figure 7. Soil, Sludge, and Water Sampling at SWMU 40



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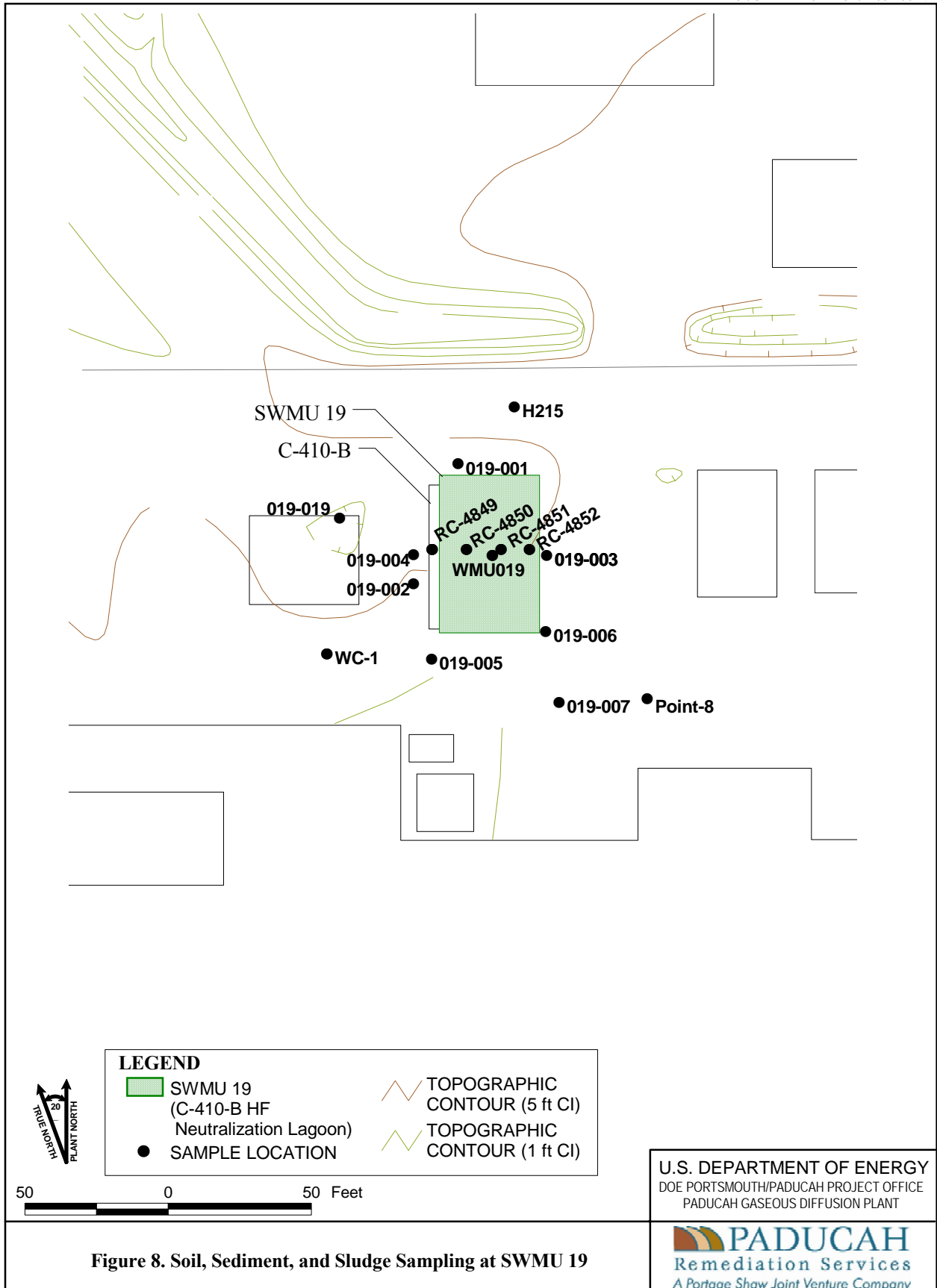


Figure 8. Soil, Sediment, and Sludge Sampling at SWMU 19

Samples of the water from the tank were analyzed in November 1997 and were found to contain TCE at concentrations up to 23 mg/L. Resampling in January 1998 indicated that TCE concentrations in water were up to 5.6 mg/L (DOE 1999b), which exceed the risk-based action levels for the industrial worker (0.02 mg/l; TCE) (DOE 2001). There have been no previous response actions for the C-403 Neutralization Tank; however, based upon historical use, analytical data, and process knowledge, TCE is the primary COPC that will be considered in this removal action. Other potential contaminants include uranium metal, PCBs, and radionuclides.

1.5.3 C-410-B Hydrogen Fluoride Neutralization Lagoon (SWMU 19)

The C-410-B HF Neutralization Lagoon (SWMU 19) is located north of the C-410 Feed Plant. It is a rectangular, below grade impoundment with dimensions of 11.59 m x 15.55 m x 2.13 m (38 ft x 51 ft x 7 ft) [383.88 m³ (1938 ft³)]; has an earth-clay floor; and has sloped sides reinforced with wire and grout. It received effluent from the C-410-C Neutralization Building, where lime was used for the neutralization of HF cell electrolyte from lead-acid batteries. In addition, trucks transporting fly ash to the C-746-T inert landfill were rinsed in this impoundment. All processes in the C-410 Building ceased in the late 1970s. In 1991, the C-410-B HF Neutralization Lagoon was investigated as part of the ACO Phase II Site Investigation (SI), and sediment and soil samples were collected from the lagoon (CH2M HILL 1992). Analytical results indicated low-level concentrations of polycyclic aromatic hydrocarbons (PAHs) in soil samples from a single soil boring. TCE was detected in soil samples from the upper 4.57 m (15 ft) of the boring. Water samples collected from the lagoon indicated traces of PAHs. In addition, the water samples contained detectable concentrations of technetium-99, uranium-235, uranium-234, uranium-238, barium, and nickel. Sediment samples contained PAHs at 6,650 µg/kg, as well as detectable concentrations of arsenic, chromium, mercury, selenium, barium, lead, nickel, silver, technetium-99, uranium-234, uranium-235, and uranium-238. Sludge samples taken from the C-410-B Lagoon in July 1991 for waste characterization also indicated detectable concentrations of total uranium and technetium-99. In 1999, the C-410-B HF Neutralization Lagoon was investigated during the WAGs 9 and 11 Site Evaluation (SE). The SE found detected concentrations of technetium-99, uranium-234, uranium-235, and uranium-238 that were about 10 times their background concentration (DOE 1999a). The SE and Phase II SI did not find contaminants of concern (COCs) within the C-410-B HF Neutralization Lagoon that exceeded risk-based action levels for the industrial worker; however, the facility was roped off in accordance with 10 *CFR* 835 to prevent radiological contamination to the industrial worker (DOE 2001). There have been no previous response actions for the C-410-B HF Neutralization Lagoon; however, based upon historical use, analytical data, and process knowledge, radionuclides are the primary COPCs that will be considered in this removal action.

1.6 STREAMLINED RISK EVALUATION

As discussed in Section 1.3, “Previous Investigations and Response Actions,” the C-218 Outdoor Firing Range (SWMU 181), the C-403 Neutralization Tank (SWMU 40), and the C-410-B HF Neutralization Lagoon (SWMU 19) are inactive facilities that previously have been investigated in association with historical plant processes. Contamination has been identified at these three inactive facilities based upon historical use, analytical data, and process knowledge associated with various plant processes. Each inactive facility or SWMU has been evaluated individually to determine risk to human health.

1.6.1 Human Health Risk

As part of this EE/CA, analytical data associated with each of the three inactive facilities were compared against site specific industrial worker no action levels for soil/sediment presented in Appendix A of *Methods for Conducting Human Health Risk Assessments and Risk Evaluations at the Paducah Gaseous*

Diffusion Plant, Paducah, Kentucky, DOE/OR/07-1506&D1/V1/D2 (DOE 2001). The following are exposure pathways considered for the industrial worker:

- Incidental ingestion of soil/sediment
- Dermal contact with soil/sediment
- Inhalation of particulates emitted from soil/sediment
- External exposure to ionizing radiation emitted from soil/sediment

If the analytical results for an analyte were greater than the specified no action level and above the established background (if available), then the analyte was retained as a COPC for further analysis. If the analytes were not detected during analysis or exhibited a concentration less than the specified no action level or the established background concentration, then the analyte was removed from further consideration as a COPC. The summary of this evaluation is presented in Appendix D. A summary of those analytes that were retained as COPCs for further risk assessment is presented in Table 2 through Table 4.

Table 2. Selected COPCs for Soil/Sludge for C-218 Outdoor Firing Range (SWMU 181)

Analytes Retained as COPCs	Concentration (mg/kg) or (pCi/g)	No Action Level (Industrial Worker) (mg/kg) or (pCi/g)	Exceeds No Action Level Yes or No	Background (mg/kg) or (pCi/g)	Exceeds Background Yes or No
Lead	1.49E+04	8.00E+02 ^a	Yes	3.60E+01	Yes
Thallium ^b	6.63E+01	7.27E-01	Yes	2.10E-01	Yes

^a Screening level for lead in soil for industrial (current) land use. See Appendix E for details.

^b Since the removal action associated with C-218 is for lead only, this COPC will be addressed as part of the Soils OU.

Table 3. Selected COPCs for Soil/Sludge for C-403 Neutralization Tank (SWMU 40)

Analytes Retained as COPCs	Concentration	No Action Level (Industrial Worker)	Exceeds No Action Level	Background	Exceeds Background
	(mg/kg) or (pCi/g)	(mg/kg) or (pCi/g)	Yes or No	(mg/kg) or (pCi/g)	Yes or No
Metals (mg/kg)					
Uranium	4.05E+03	2.02E+01	Yes	4.90E+00	Yes
Organic Compounds (mg/kg)					
Total PCBs	1.49E+01	1.99E-01	Yes	NA	NA
Radionuclides (pCi/g)					
Neptunium-237	3.89E+01	2.71E-01	Yes	1.00E-01	Yes
Thorium-230	2.38E+01	1.49E+01	Yes	1.50E+00	Yes
Uranium-235 ^a	1.45E+03	3.95E-01	Yes	1.40E-01	Yes

^a The 25 mrem/yr dose-based limit for uranium-235 is 1.77E+02 pCi/g, which is greater than the no action screening level.

NA= not applicable

Table 4. Selected COPCs for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)

Analytes Retained as COPCs	Concentration	No Action Level (Industrial Worker)	Exceeds No Action Level	Background	Exceeds Background
	(mg/kg) or (pCi/g)	(mg/kg) or (pCi/g)	Yes or No	(mg/kg) or (pCi/g)	Yes or No
Metals (mg/kg)					
Silver	7.92E+01	4.11E+01	Yes	2.30E+00	Yes
Uranium	3.67E+01	2.02E+01	Yes	4.90E+00	Yes
Organic Compounds (mg/kg)					
Fluoranthene	1.90E+03	2.21E+02	Yes	NA	NA
Total PAHs ^a	6.86E+00	2.12E-02	Yes	NA	NA
Radionuclides (pCi/g)					
Uranium-234	4.50E+01	1.98E+01	Yes	2.50E+00	Yes
Uranium-235	7.67E-01	3.95E-01	Yes	1.40E-01	Yes
Uranium-238	4.80E+01	1.71E+00	Yes	1.20E+00	Yes

^a Total PAH is the sum of the concentration of the carcinogenic PAHs multiplied by their toxicity equivalence factor (TEF).

NA= not applicable

The soil/sediment COPCs that exceeded the no action level as well as the background concentrations (if available) for the current industrial worker were lead and thallium at the C-218 Outdoor Firing Range (SWMU 181); uranium, Total PCBs, neptunium-237, thorium-230, and uranium-235 at the C-403 Neutralization Tank (SWMU 40); and silver, uranium, fluoranthene, Total PAHs, uranium-234, uranium-235, and uranium-238 at C-410-B HF Neutralization Lagoon (SWMU 19).

Since the C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) also are known to contain accumulated rainwater in addition to sludge/sediment, a similar comparison was conducted of the water analytical data against site specific industrial worker no action levels for surface water presented in Appendix A of *Methods for Conducting Human Health Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/OR/07-1506&D1/V1/D2 (DOE 2001). The exposure pathway considered for the industrial worker in this scenario was dermal contact with the accumulated rainwater. The summary of this comparison is presented in Appendix D. Those analytes that were retained as COPCs are presented in Table 5 and Table 6. No dose-based COPCs were identified based upon a 25 mrem/yr dose to the industrial worker.

The COPCs that exceeded the no action level for the current industrial worker were cadmium, uranium, endrin, heptachlor epoxide, Aroclor-1260, Total PCBs, toxaphene, and TCE at C-403 Neutralization Tank (SWMU 40) and antimony and lead at C-410-B HF Neutralization Lagoon (SWMU 19). There are no relevant background concentrations available to screen the analytes present in this water.

Table 5. Selected COPCs for Accumulated Rainwater in C-403 Neutralization Tank (SWMU 40)

Analytes Retained as COPCs	Concentration	No Action Level (Industrial Worker)	Exceeds No Action Level	Background	Exceeds Background
	(mg/L) or (pCi/L)	(mg/L) or (pCi/L)	Yes or No	(mg/L) or (pCi/L)	Yes or No
Metals (mg/L)					
Cadmium	2.45E-02	4.57E-03	Yes	NA	NA
Uranium	1.07E+00	4.66E-01	Yes	NA	NA
Organic compounds (mg/L)					
Endrin	2.00E-03	3.43E-04	Yes	NA	NA
Heptachlor Epoxide	1.00E-03	3.68E-05	Yes	NA	NA
Aroclor-1260	8.70E+00	5.24E-05	Yes	NA	NA
Total PCB	1.76E+01	1.65E-04	Yes	NA	NA
Toxaphene	2.00E-02	7.76E-04	Yes	NA	NA
Trichloroethene	1.70E+00	2.18E-02	Yes	NA	NA

NA – not applicable

Table 6. Selected COPCs for Accumulated Rainwater in C-410-B HF Neutralization Lagoon (SWMU 19)

Analytes Retained as COPCs	Concentration ^a	No Action Level (Industrial Worker)	Exceeds No Action Level	Background	Exceeds Background
	(mg/L) or (pCi/L)	(mg/L) or (pCi/L)	Yes or No	(mg/L) or (pCi/L)	Yes or No
Metals (mg/L)					
Antimony	1.09E+00	7.31E-03	Yes	NA	NA
Lead	1.65E+00	1.50E-02	Yes	NA	NA

NA – not applicable

1.6.1.1 Human Health Risk Conclusions

Several COPCS were identified in the streamlined risk evaluation. The detected concentrations for these COPCs exceeded no action levels taken from the Risk Methods Document (DOE 2001).

Details concerning the development of cleanup goals for protection of human health are presented in Appendix E. A summary of the final cleanup levels consistent with the preferred alternative is presented in Section 5, “Recommended Removal Action Alternative.”

1.7 COMMUNITY PARTICIPATION

Community involvement is a necessary aspect of the CERCLA process. DOE is conducting community relations activities for this project in compliance with 40 *CFR* 300.415(n)(1), (n)(3), and (n)(4), and the community relations plan, *Community Relations Plan Under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant* (DOE 2007c).

2. REMOVAL ACTION OBJECTIVES

This section addresses DOE's response authority under CERCLA for removal actions and identifies the scope, purpose, and general Removal Action Objectives (RAOs) for this removal action. Justification for the removal action also is addressed.

2.1 RESPONSE AUTHORITY

PGDP was placed on the NPL in 1994. Pursuant to Section 120 of CERCLA, the PGDP FFA was negotiated and implemented to provide the framework for site CERCLA actions.

Section 104 of CERCLA addresses the mitigation of releases or threatened releases of hazardous substances to the environment through response action. Executive Order 12580, "Superfund Implementation," delegates to DOE the authority for response actions at DOE facilities. As lead agency, DOE is authorized to conduct response measures (e.g., removal actions) under CERCLA.

The National Environmental Policy Act of 1969 (NEPA) requires federal agencies to evaluate and document the effect of their proposed actions on the quality of the human environment. DOE issued a *Secretarial Policy Statement* on NEPA in June of 1994 (DOE 1994), stating that DOE hereafter will rely on the CERCLA process for review of actions to be taken under CERCLA and incorporate NEPA values in CERCLA documents to the extent practicable. Such values may include analysis of socioeconomic, cultural, ecological, and cumulative impacts, as well as environmental justice and land use issues and the impacts of off-site transportation of wastes. NEPA values have been incorporated into this EE/CA in accordance with the Secretarial Policy.

2.2 REMOVAL SCOPE AND PURPOSE

The purpose of this EE/CA is to evaluate alternatives to address the potential threat posed to human health and the environment from the release or potential release of hazardous substances associated with the C-218 Outdoor Firing Range (SWMU 181), C-403 Neutralization Tank (SWMU 40), and C-410-B HF Neutralization Lagoon (SWMU 19).

2.3 REMOVAL ACTION OBJECTIVES

The overall Remedial Action Objectives that have been established for the Soils OU are as follows.

- Control sources early; focus resources at areas that warrant attention in the near term, prioritizing actions within areas to address the greatest risks first.
- Minimize human exposure to contaminants, maximizing the effectiveness of institutional controls.
- Control further migration of contaminated soils.
- Reduce risk from contaminated soil.

- Reduce the risk, making progress toward the ultimate goal of protecting recreational users and industrial workers from exposure to contaminated soils.

The Removal Action Objectives (RAOs) specific for this removal action are consistent with the overall Remedial Action Objectives for the Soils OU and are as follows:

- Control current industrial worker exposure to soils, sediment, and accumulated rainwater containing hazardous substances, pollutants, or contaminants.
- Identify and control, as needed, off-site migration into multimedia exposure pathways such as surface water and groundwater.

Details associated with the development of cleanup goals for protection of human health considered in meeting these RAOs are presented in Appendix E. The human health cleanup goals consider a range of risk and hazard targets consistent with *Methods for Conducting Human Health Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky* (DOE 2001). A summary of the proposed final cleanup levels that were selected from the cleanup goals and consistent with the RAOs is presented in Section 5, “Recommended Removal Action Alternative.” The final cleanup levels will be presented in the Soils OU Inactive Facilities Action Memo and Removal Action Work Plan (RAWP). Once the cleanup levels are determined, the final hot spot areas will be delimited and presented in the Soils OU Action Memo and RAWP.

2.4 JUSTIFICATION FOR THE PROPOSED ACTION

The C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon have been identified as SWMUs under the PGDP FFA due to the potential for actual or threatened releases of hazardous constituents from the site. Risk evaluations of chemicals and compounds in soils indicate that there is a threat to human health greater than the EPA risk range under some scenarios.

3. REMOVAL ACTION TECHNOLOGIES AND DEVELOPMENT OF ALTERNATIVES

This chapter identifies the applicable representative technologies and alternatives that will be considered for the removal action proposed for the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon. Analyses of the alternatives considered are presented in Section 4.

3.1 TECHNOLOGY IDENTIFICATION AND SCREENING

The alternatives identified and screened in this EE/CA were evaluated based on their ability to meet effectiveness (including RAOs), implementability, and cost. Based on the alternative evaluation, Alternative 3 – “Excavation and Interim Institutional Controls” was chosen as the preferred alternative.

The following alternatives are evaluated in this EE/CA:

1. No Soil Control Measures (No Action);
2. Interim institutional control measures only;
3. Combination of excavation and interim institutional controls (as needed).

A discussion of these alternatives, including their relative effectiveness, feasibility of implementation, and cost, is provided in the following sections.

3.2 DEVELOPMENT OF ALTERNATIVES

This EE/CA provides a description of the alternatives being considered for reducing human health risk from direct contact with contaminated soils associated with the C-218 Outdoor Firing Range, and contaminated soils/sediment and accumulated rainwater associated with C-403 Neutralization Tank and C-410-B HF Neutralization Lagoon. The alternatives developed in this EE/CA serve as the basis for the preparation, analysis, and comparison of cost estimates for implementation of the alternatives. The specific methods employed in implementing selected controls, would be defined prior to implementation. The action would be consistent with this EE/CA and the Action Memorandum to be issued following public comment on this EE/CA.

3.2.1 No Action Alternative – Alternative 1

Under the No Action Alternative (Alternative 1), there would be no change to the current configuration of the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon. No additional controls would be implemented to mitigate the threat of contaminant migration within these systems or the threat of exposure to human and environmental receptors by contaminant releases. Requirements for evaluation of the No Action Alternative are presented in EPA guidance for CERCLA response actions (EPA 1999).

3.2.2 Interim Institutional Controls—Alternative 2

Interim institutional controls (Alternative 2) include administrative policies and exclusion or barrier type controls implemented to reduce the risk of exposure to contaminated soils and accumulated rainwater, prior to selection of the remedial action and pending the selection of additional response actions. Alternative 2 is the implementation of interim institutional controls to reduce the potential of human exposure. These controls include methods of excluding facility personnel and the public from known contamination areas; communicating hazards; monitoring areas for contamination or contaminant mobility; and implementing additional requirements for personal protective equipment (PPE). Interim institutional controls may be either short-term or long-term depending on site characteristics.

The specific type of interim institutional control implemented would be dependent on the specific physical and chemical characteristics of the hazard. For example, contaminated soils within the C-218 Firing Range may require different controls than contaminated soils and accumulated rainwater identified within C-403 Neutralization Tank and C-410-B HF Neutralization Lagoon. Interim institutional controls do not completely eliminate issues of contaminant transport, endpoints, or exposure. Removal of contaminated soils or accumulated rainwater would not occur under Alternative 2, and the risk of human contact with contaminated soil and accumulated rainwater is reduced, but not completely eliminated. The following are interim institutional controls evaluated under Alternative 2:

- Hazard postings,
- Appropriate PPE requirements,
- Additional radiological survey and other monitoring requirements,
- Fencing,
- Exclusion zones, and
- Long-term environmental monitoring.

Since the risk to human health associated with C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon is due to direct contact (see Appendix E), the institutional control of exclusion fencing and hazard posting combined with long-term monitoring (i.e., applicable parameters to monitor whether contaminant migration at levels of concern is occurring) was selected as the institutional control alternative for the detailed analysis that is summarized in Section 4, “Analysis of Alternatives.”

3.2.3 Excavation and Interim Institutional Controls—Alternative 3

Alternative 3 would implement excavation and removal of areas of known contamination (i.e., soil/sediment and accumulated rainwater) that were identified in Section 1.6, “Streamlined Risk Evaluation” and Appendix E, “Cleanup Goals.” During implementation of this alternative, one or more engineered controls to prevent transport of contaminated soil/sediments and accumulated rainwater would be required. Interim institutional controls, such as exclusion zones and fencing, also would be utilized as needed during implementation of Alternative 3. After completion of the removal action, and upon verification that the alternative action objectives were achieved (including site restoration), engineering and interim institutional controls would be evaluated and discontinued as appropriate.

Unlike Alternatives 1 and 2, Alternative 3 would reduce the risk of exposure to human receptors by removing known sources of contamination. This alternative assumes a low probability of future contamination discovery in areas where removal actions have occurred.

4. ANALYSIS OF ALTERNATIVES

To determine the relative performance of the proposed technologies, the alternatives discussed in Section 3 were evaluated against three criteria specified by the EPA, including compliance with applicable or relevant and appropriate requirements (ARARs). NEPA values not normally considered in CERCLA documentation also are considered relative to each of the alternatives. Section 4.1 provides a brief description of the evaluation criteria. Analyses of each individual alternative, based on these criteria, are presented in Section 4.2. A comparison of the alternatives is included in Section 4.3.

4.1 ANALYSIS CRITERIA

The EPA *Guidance on Conducting Non-Time-Critical Removal Actions Under CERCLA* (EPA 1993) contains three criteria for the evaluation of removal action alternatives. These criteria are effectiveness, implementability, and cost.

Effectiveness evaluates the protectiveness of the removal action and its achievement of the RAOs. Criteria for considering effectiveness include the following.

- RAOs – assess each alternative’s ability to meet the project RAOs.
- Overall Protection of Human Health and the Environment – assess how each alternative achieves adequate protection and describe how the alternative would reduce, control, or eliminate risks at the site through treatment, engineering controls, or interim institutional controls.
- Long-Term Effectiveness and Permanence – assess the ability of the alternative technologies to reduce the potential risk posed by the contamination. These criteria address the magnitude of residual risks at the site after the removal efforts are complete, the adequacy and reliability of in-place controls, and long-term environmental and cumulative effects.
- Short-Term Effectiveness – assess any threats to site workers and the effectiveness and reliability of protective measures that would be taken during the removal action.

For implementability, the following three factors were used to assess how realistic a removal alternative is in practice: (1) technical feasibility, (2) administrative feasibility, and (3) resource availability. Criteria for considering implementability include the following:

- Ability to Construct and Operate Technologies – construction and operating complexities are presented. Some operational complexities could include the frequency or complexity of equipment maintenance or controls, the need for raw materials, the need for a large technical staff, and the effects to the environment.
- Availability and Reliability of Technologies – each alternative is evaluated to determine if technologies or services are obtainable, are mature enough to implement, and have been used under similar conditions for similar wastes.
- Availability of Treatment, Storage, and Disposal Services and Capacity – it must be determined whether treatment, storage, and disposal capacity, equipment, personnel, services, materials, and

other resources necessary to implement an alternative would be available in time to maintain the removal schedule.

Finally, the alternative is evaluated to determine costs. These are the criteria for considering cost:

- Capital costs – these are comprised of the expenditures associated with construction, equipment and materials, land and building, relocation and transportation, analytical and treatment services, disposal services, engineering and design, legal fees, mobilization and demobilization, and contingencies.
- Operation and Maintenance (O&M) – these costs are comprised of labor and materials to support a routine or defined plan to maintain an institutional control such as performing inspections, replacing signs, repairing fencing, collecting samples for a monitoring program, and preparing reports to document that the maintenance has occurred or presenting results of the monitoring sampling.

4.1.1 Applicable or Relevant and Appropriate Requirements

In accordance with the National Oil and Hazardous Substances Pollution Contingency Plan, on-site removal actions conducted under CERCLA are required to attain ARARs to the extent practicable, considering the scope and urgency of the action. ARARs include only federal and state environmental or facility siting laws/regulations; they do not include occupational safety or worker radiation protection requirements. Additionally, per 40 *CFR* § 300.405(g)(3), other advisories, criteria, or guidance may be considered in determining remedies [to be considered (TBC) category].

ARARs typically are divided into three categories: (1) location-specific, (2) chemical-specific, and (3) action-specific. Location-specific requirements establish restrictions on permissible concentrations of hazardous substances or establish requirements for how activities will be conducted because they are in special locations (e.g., floodplains or historic districts). Chemical-specific ARARs provide health- or risk-based concentration limits or discharge limitations in various environmental media (i.e., surface water, groundwater, soil, or air) for specific hazardous substances, pollutants, or contaminants. Action-specific ARARs include operation, performance, and design of the preferred alternative based on waste types and/or media to be addressed and removal/remedial activities to be implemented.

TBC information also may be used in developing and evaluating removal action alternatives. In the absence of ARARs, TBC information consisting of advisories, criteria, or guidance, such as DOE Orders, may be useful in determining cleanup levels that are protective of human health and the environment. A list of potential ARARs/TBCs has been identified to address the alternatives proposed in this EE/CA and is included as Appendix A.

When DOE proposes a response action, Section XXI of the FFA requires that DOE identify each state and federal permit that otherwise would have been required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan. Such permits are identified in Tables A-1, A-2, and A-3 of Appendix A. DOE also must identify the standards, requirements, criteria, or limitations necessary to obtain such permits and provide an explanation of how the proposed action will meet the standards, requirements, criteria, or limitations identified. The evaluation determined that the otherwise required permits may include KPDES; RCRA Treatment, Storage, and Disposal Facility; and Solid Waste Landfill permits. In addition, a permit from the U.S. Fish and Wildlife Service (USFWS) otherwise may be required in the likely event that the selected alternative affects the “taking” of migratory birds and such taking cannot be mitigated. PGDP currently operates under KPDES Permit No. KY0004049, Hazardous Waste Facility Operating Permit No. KY8-890-008-982, and Solid Waste Permit No. 073-00014/073-00015/073-00045, which define the applicable standards, requirements, criteria, or limitations. Upon final selection of an alternative, the USFWS migratory bird list will be reviewed and/or a field survey conducted to determine

which species occur or are likely to occur on DOE property and the impact of the alternative on those species. The RAWP will further discuss how the substantive requirements specific for the selected alternative will be satisfied.

DOE also determined that if the selected alternative has the potential to impact waters of the United States (including wetlands) and this cannot be avoided, compliance with the substantive TBC requirements of the Nationwide Permits (NWP) discussed herein may be required. Wetlands will be delineated, as necessary prior to the removal action. Specifically, excavating or backfilling in a water body or wetland and building a temporary or permanent road across a water body or wetland otherwise may require the additional permits such as the following:

- Backfilling an excavation and excavation of hazardous sediments in a water body or in a wetland would require a combination of the following:
 - NWP 38 – Cleanup of Hazardous and Toxic Waste,
 - NWP 18 – Minor Discharges,
- Construction of a temporary access road across a water body or wetland would require
 - NWP 33 – Temporary Construction Access.
- Construction of a permanent access road across a water body or wetland would require
 - NWP 14 – Linear Transportation Projects.

Under the NWP program, a prospective permittee must comply with the NWP general conditions, as appropriate, contained in Part II of the March 12, 2007, *FR* (Volume 72, Number 47). The NWP general conditions that may be TCB requirements for implementation of the selected Removal Action alternative pertain to, but are not limited to, the following:

- Suitable material
- Fills within 100-year floodplains
- Equipment
- Soil erosion and sediment controls
- Removal of temporary fills
- Proper maintenance
- Wild and scenic rivers
- Endangered species
- Historic properties
- Designated critical resource waters
- Mitigation
- Water quality
- Regional and case-by-case conditions
- Use of multiple nationwide permits

In addition to the general NWP requirements, specific TBC requirements of NWPs may address any of the following:

- The loss of waters of the United States exceeding 1/10 acre;

- Discharge or the volume of area excavated that exceeds 10 yd³ below the plane of the ordinary high water mark or the high tide line;
- Discharges in a special aquatic site, including wetlands;
- Requirements for a restoration plan showing how all temporary fills and structures will be removed and the area restored to pre-project conditions.

Applicability of the general and specific standards, requirements, criteria, or limitations of NWP's will be delineated in the RAWP after final alternative selection. Requirements will be implemented as part of this removal action.

Implementation of the selected alternative will comply with the ARARs/TBCs criteria specified in Appendix A, to the extent practicable. Activities conducted on-site must comply with the substantive but not administrative requirements of ARARs. Administrative requirements include applying for permits, recordkeeping, consultation and reporting. Activities conducted off-site must comply with both the substantive and administrative requirements of applicable laws. Required measures will be incorporated into the design phase and implemented during the construction and operation phases of the removal action. Additional discussion of pertinent ARARs is set forth in Section 4.2 for each alternative, including the No Action Alternative.

4.1.2 NEPA Values

The following NEPA values, not normally addressed by CERCLA documentation, also are considered in this EE/CA to the extent practicable, consistent with DOE policy (DOE 1994):

- Land use
- Air quality and noise
- Geology and soils
- Water resources
- Wetlands and floodplains
- Ecological resources
- T&E species
- Migratory birds
- Cultural resources
- Socioeconomics, including environmental justice and transportation

The action alternatives analyzed in this EE/CA would have no identified short-term or long-term impacts on geological resources, T&E species, migratory birds, cultural resources, or socioeconomics. Upon final selection of the alternative, the absence of any short- and long-term impacts to these values, including T&E species, migratory birds, and cultural resources, will be verified. Short- or long-term impacts would be managed, to the extent practicable, through compliance with ARARs/TBCs.

No long-term impacts to air quality or noise would result from implementation of any of the action alternatives. Interim institutional controls, engineering controls, and removal actions should not result in generation of air pollutants above regulatory limits, and noise levels should be similar to current background levels.

None of the action alternatives would have any impacts on geology and construction activities would have only short-term impacts on soils. Site clearing, excavation, grading, and contouring would alter the topography of the area where the removal actions are located, but the geologic formations underlying those sites should not be affected. Construction would disturb existing soils, and some topsoil might be removed in the process. Soil erosion impacts during construction would be mitigated through the use of best management practice (BMP) control measures (e.g., covers and silt fences). No conversion of prime farmland soils is expected to occur. Any alternative that would create disturbances also would include restoration to these areas.

Carrying capacity calculations that have been performed indicate that all the drainage ditches will contain the 100-year and 500-year flood discharges associated with Little Bayou Creek and Bayou Creek (COE 1994c). If during the design phase of a removal action, it is determined that wetlands and/or floodplains would be impacted, compliance with ARARs/TBCs for floodplain/wetlands activities would be followed.

No archaeological resources have been identified within the vicinity of the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon. All three facilities are located in areas where previous ground disturbance activities have occurred.

No historical resources have been identified in the vicinity of the C-218 Outdoor Firing Range. The C-403 Neutralization Tank (Kentucky Survey #MCN-142) and the C-410 Feed Plant (Kentucky Survey #MCN-148), which includes the C-410-B HF Neutralization Lagoon, are designated as facilities that are eligible for listing in the PGDP Historic District (BJC 2006a). The C-403 Neutralization Tank and the C-410-B HF Neutralization Lagoon are documented with survey forms and photographs in the Cultural Resources Survey (BJC 2006b). Since the two facilities are ancillary facilities, additional mitigation measures beyond the current documented survey forms and photography are not needed, consistent with Section 4.3 of the Cultural Resources Management Plan (BJC 2006a), which has been approved by the Kentucky State Historic Preservation Officer.

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations," requires agencies to identify and address disproportionately high and adverse human health or environmental effects their activities may have on minority and low-income populations. No census tracts near the site include a higher proportion of minorities than the national average. Therefore, there would be no disproportionate or adverse environmental justice impacts to any minority or low-income populations.

No long-term or short-term adverse transportation impacts are expected to result from implementation of action alternatives. During construction activities there would be a slight increase in the volume of truck traffic in the vicinity of the C-218 Firing Range, but the affected roads are capable of handling the additional truck traffic.

Additional discussion of pertinent NEPA values is set forth in Section 4.2 for each alternative including the No Action Alternative.

4.2 ANALYSIS OF INDIVIDUAL ALTERNATIVES

Analysis of each alternative is provided in the following sections.

4.2.1 Alternative 1—No Action Alternative

The No Action Alternative is considered the least protective of the alternatives presented in Section 3. Because none of the EE/CA RAOs are achieved by implementation of the No Action Alternative, it is considered the least effective of all of the alternatives presented.

4.2.1.1 Effectiveness

The No Action alternative would be ineffective in meeting any of the RAOs stated in Section 3. The alternative would not provide for overall protection of human health or the environment because the potential for on-site worker contact with contaminated soil/sediment and accumulated rainwater would not be addressed. Comparison to the effectiveness criteria follows.

- **RAOs**—The alternative does not achieve any of the project RAOs.
- **Overall Protection of Human Health and the Environment**—The alternative does not provide for protection of human health and the environment since no action is taken. As a result, the alternative is not protective.
- **Long-Term Effectiveness and Permanence**—The alternative has no long-term effectiveness.
- **Short-Term Effectiveness**—The alternative does not provide for short-term control measures to protect industrial workers.
- **Compliance with ARARs**—This is discussed in Section 4.2.1.4.

There is no overall effectiveness rating of the No Action Alternative.

4.2.1.2 Implementability

The No Action alternative ranks high in ease of implementation since implementation requires no further resources, and technical feasibility is not a consideration. Because of DOE policy and state and federal law, however, the No Action Alternative is not considered to be administratively feasible.

4.2.1.3 Cost

There would be no cost for implementing the No Action Alternative.

4.2.1.4 Compliance with ARARs

The No Action Alternative would not comply with ARARs.

4.2.1.5 NEPA Values

Under the No Action Alternative, short- and long-term impacts may occur to the following NEPA values identified in Section 4.1.

- Soils
- Water resources
- Ecological resources

Soils in and around the PGDP may be impacted as contaminated soils are redistributed from existing contamination areas by surface water runoff into areas previously uncontaminated. Similarly, water resources may be impacted as contaminants are mobilized by surface water runoff and transported to Bayou Creek. Ecological resources in the Bayou Creek may be impacted as terrestrial and aquatic biota is exposed to contaminated media.

4.2.2 Alternative 2—Interim Institutional Controls

The interim institutional controls identified for analysis under this EE/CA are exclusion fencing and hazard posting in combination with long-term monitoring (i.e., applicable parameters to monitor whether contaminant migration at levels of concern is occurring). Fencing is a control intended to exclude unauthorized personnel from entry into a contaminated area. Hazard postings are intended to warn site workers of the hazard and provide direction should access to the area be required. In the case of routine maintenance activities, additional contingency controls such as PPE, radiological surveying, or environmental monitoring may be required as short-term institutional controls while the maintenance activity is being performed. Long-term monitoring for applicable parameters will be performed to ensure that contaminant migration does not occur.

4.2.2.1 Effectiveness

Implementation of interim institutional controls would achieve the RAOs identified in Section 2.3. Implementation of interim institutional controls would decrease the risk of human exposure through exclusion or other interim institutional means. Interim institutional controls alone, however, would not control contaminant sources, nor would they control the potential for contaminant migration. Additionally, interim institutional controls would prevent entry by those who do not adhere to the control (e.g., the intentional trespasser). A discussion of the alternative effectiveness criteria follows.

- **RAOs**—The alternative only partially achieves the project RAOs and therefore is rated low.
- **Overall Protection of Human Health and the Environment**—The alternative provides for limited protection of human health by controlling access to the contamination, but does not remove contamination. As a result, this alternative is rated moderate.
- **Long-Term Effectiveness and Permanence**—The alternative has limited long-term effectiveness since it does not remove contamination or control migration. As a result, this alternative is rated low.
- **Short-Term effectiveness**—The alternative provides for limited short-term control measures to protect industrial workers and its effectiveness therefore is considered moderate.
- **Compliance with ARARs**—This is discussed in Section 4.2.2.4.

The overall effectiveness rating of Alternative 2 is low to moderate.

4.2.2.2 Implementability

Alternative 2 would require a relatively low effort to implement. The interim institutional controls identified in this section can be rapidly implemented with a minimum amount of planning or supporting work. These controls include installation of exclusion fencing and hazard postings. Long-term monitoring would require more effort to implement. Plans [sampling and analysis plans (SAPs), site specific health and safety plans, O&M plans, etc.] would need to be prepared and approved. Additional personnel and

training may be required. The following discussion evaluates the implementability criteria for Alternative 2.

- **Ability to Construct and Operate Technologies**—The resources required to implement interim institutional controls such as fencing and hazard postings are considered minimal. There would be a slight increase in demands on staff for inspection and maintenance activities and long-term monitoring; there would be minimal needs for raw materials; implementation of controls would not require complex operating technologies; and the effects to the environment due to alternative implementation would be minimal. The ranking for this criterion is high.
- **Availability and Reliability of Technologies**—The technology is proven and readily available to implement interim institutional controls. The ranking for this criterion is high.
- **Availability of Treatment, Storage, and Disposal Services and Capacity**—This alternative does not require treatment, storage, or disposal services, and the criterion does not apply.

The overall implementability ranking of Alternative 2 is high.

4.2.2.3 Cost

The estimated capital cost for the various interim institutional controls associated with Alternative 2 is \$119,696, with an additional estimated O&M cost of \$50,918 (see Appendix B, Table B.1). Because the costs are low relative to other alternatives, the cost ranking for Alternative 2 is high.

4.2.2.4 Compliance with ARARs

Implementation of interim institutional controls would comply to the extent practicable with ARARs in Appendix A.

4.2.2.5 NEPA Values

Similar to the No Action Alternative, short- and long-term impacts may occur to the following NEPA values identified in Section 4.1 by implementation of Alternative 2.

- Soils
- Water resources
- Ecological resources

Soils in and around the PGDP may be impacted as contaminated soils are redistributed from existing contamination areas by surface water runoff into areas previously uncontaminated. Similarly, water resources may be impacted as contaminants are mobilized by surface water runoff and transported to Bayou Creek. Ecological resources in Bayou Creek may be impacted as terrestrial and aquatic biota are exposed to contaminated media.

These impacts to NEPA values may occur because interim institutional controls alone will not remove contaminated soils from the environment.

4.2.3 Alternative 3—Excavation and Interim Institutional Controls

Alternative 3 would implement removal actions in the contaminated areas that were identified in Section 1.6, “Streamlined Risk Evaluation” in order to meet cleanup goals discussed in Appendix E, “Cleanup

Goals,” and implement exclusion fencing and hazard postings as needed to minimize direct contact with contaminated soil and accumulated rainwater. Excavation of the contaminated area will eliminate the risk of human receptors contacting contaminated soils and accumulated rainwater. Fencing is a control intended to exclude unauthorized personnel from entry into the contaminated area and will adequately manage future risk of residual contamination. Hazard postings are intended to warn site workers of the hazard and provide direction should access to the area be required. During excavation activities, additional contingency controls such as small stormwater retention areas, silt fencing, or rock check dams may be temporarily required as localized engineering controls. Installation of these temporary controls is dependent upon the site conditions at the time of excavation. After excavation of the contaminated area is complete, samples would be collected for verification purposes (SWMU 181) and for characterization purposes (SWMU 19 and SWMU 40). Upon verification that the alternative action objectives were achieved (including site restoration), localized engineering controls would be evaluated and discontinued as appropriate. In the case of routine maintenance activities, a different set of contingency controls such as PPE, radiological surveying, or environmental monitoring may be required as short-term institutional controls while the maintenance activity is being performed. Because the contaminated area will be removed, no long-term monitoring for contaminant migration will be required.

4.2.3.1 Effectiveness

Implementation of excavation (including removal of accumulated rainwater, as appropriate) in combination with exclusion fencing and hazard posting outlined in Alternative 3 would achieve all of the RAOs identified in Section 2.3. This alternative provides for a complete level of protectiveness for industrial workers. The RAOs are satisfied by this alternative. The combination of excavation (including removal of accumulated rainwater, as appropriate) with interim institutional controls, as needed, not only removes the contamination, but also adequately manages future risk of any residual contamination. Under Alternative 3, contaminated soil/sediment and accumulated rainwater would be removed from the environment. The risk to industrial workers from direct contact with contaminated soil/ sediment or accumulated rainwater would be permanently reduced and contamination would be permanently eliminated. A discussion of the alternative effectiveness criteria follows.

- **RAOs**—The alternative achieves the project RAOs and therefore is rated high.
- **Overall Protection of Human Health and the Environment**—The alternative provides for a high level of overall protection of human health and the environment since the contaminated soil/sediment and accumulated rainwater are removed. As a result, this alternative is rated high.
- **Long-Term Effectiveness and Permanence**—The alternative has high long-term effectiveness and permanent solutions since the contaminated soil/sediment and accumulated rainwater are removed. As a result, this alternative is rated high.
- **Short-Term Effectiveness**—The alternative provides for short-term control measures to protect industrial workers and its effectiveness therefore is considered high.
- **Compliance with ARARs**—This is discussed in Section 4.2.3.4.

The overall effectiveness rating of Alternative 3 is high.

4.2.3.2 Implementability

Alternative 3 would require a level of implementation effort greater than the previous alternatives (Alternatives 1 and 2). Excavation of the contaminated area, along with removal of accumulated rainwater

(if applicable) will require engineering plans, specifications, bid packages, and other documents. The interim institutional controls identified in this section can be implemented rapidly with a minimum amount of planning or supporting work. These controls include installation of exclusion fencing and hazard postings as needed to minimize direct contact with contaminated soil and accumulated rainwater. Additional personnel and training may be required. The following discussion evaluates the implementability criteria for Alternative 3.

- **Ability to Construct and Operate Technologies**—The resources required to implement excavation of the contaminated area are readily available and the provision of construction support is available locally. There would be an increase in demands on engineering and scientific staff for the design and development of engineering plans, specifications, bid packages, and other documents. Operating technologies for most sediment and stormwater engineering controls are not complex and may be implemented with a minimal amount of engineering and hydrologic analysis. Environmental impacts due to alternative implementation typically would be minor. The resources required to construct interim institutional controls such as fencing and hazard postings also are considered minimal. There would be a slight increase in demands on staff for inspection and maintenance activities and long-term monitoring; there would be minimal needs for raw materials; implementation of controls would not require complex operating technologies; and the effects to the environment due to alternative implementation would be minimal. The ranking for this criterion is high.
- **Availability and Reliability of Technologies**—The technology is proven and readily available to implement excavation activities and interim institutional controls. The ranking for this criterion is high.
- **Availability of Treatment, Storage, and Disposal Services and Capacity**—Excavation activities (including accumulated rainwater removal as appropriate) would require treatment, storage, and disposal services. It is expected that these services would be provided by existing PGDP facilities or appropriate off-site disposal facilities. The ranking for this criterion is moderate.

The overall implementability ranking of Alternative 3 is high.

4.2.3.3 Cost

The estimated capital cost for the excavation and interim institutional controls (as needed) associated with Alternative 3 is \$5,527,738 with an additional estimated O&M cost of \$5,000 (see Appendix B, Table B.2). Because the costs are comparable to implementation of complex engineering controls, the cost ranking for Alternative 3 is moderate to high.

4.2.3.4 Compliance with ARARs

Implementation of Alternative 3 would comply to the extent practicable with ARARs as listed in Appendix A.

Impacts to wetlands, critical habitat, migratory birds, floodplains, streams, and/or aquatic habitat would be determined during the design phase of an excavation and removal of contaminated soil/sediment and accumulated rainwater. Required measures for compliance with the location-specific ARARs/TBCs to the extent practicable would be incorporated into the design phase and implemented during the construction and operation phases of the excavation and removal action. For example, the only sensitive resource located in close proximity to the removal areas is the nesting habitat for the Indiana bat. During the nesting season (spring and summer), the Indiana bat may inhabit deciduous trees with greater than a 3

inch diameter at breast height. If this critical habitat cannot be protected through avoidance during spring and summer, the lost habitat will be replaced to ensure no net loss or adverse modification of the resource.

All action-specific ARARs listed in Appendix A are applicable for the implementation of Alternative 3. Compliance with ARARs/TBCs would be followed to the extent practicable. Required measures that will be incorporated into the design phase and implemented during the construction and operation phases of Alternative 3 include, but are not limited to, the following:

- Excavation and removal activities will be conducted in a manner that will limit fugitive dust emissions and will provide sedimentation controls, thereby limiting potential impacts due to airborne particulates and suspended solid loading.
- Soil and other waste materials generated as a result of this excavation and removal of contaminated media will be characterized properly and disposed of in accordance with the substantive provisions of ARARs/TBCs in Appendix A for low-level wastes (LLW), RCRA, and PCB waste. All on-site management of such materials also will be conducted in accordance with the substantive provisions of ARARs/TBCs. In the preamble to the *FR* Notice for the 1998 PCB Disposal Amendment, EPA discussed the applicability of 40 *CFR* § 761.61, which provides cleanup and disposal options for PCB remediation waste, as an applicable ARAR and stated: “EPA anticipates that today’s rule will be a potential ARAR at CERCLA sites where PCBs are present. EPA would expect that CERCLA cleanups typically would comply with the substantive requirements of one of the three options [self-implementing, performance-based, or risk-based] provided by 761.61, upon completion of the cleanups. This decision would not be made by the facility, but in the remedy selection process” 63 *FR* 35407 (June 29, 1998).
- DOE will perform disposal [in accordance with 40 *CFR* § 761.61(a)(5)(v)] of soil and other waste materials containing equal to or less than 49 ppm PCBs at the C-746-U solid waste landfill. The Environmental Performance Standard in 401 Kentucky Administrative Regulations (*KAR*) 47:030, Section 8, and Condition Number T-66 of Solid Waste Permit No. 073-00014/073-00015/073-00045 currently allow such disposal. Compliance with the performance standard and solid waste permit condition will not pose an unreasonable risk of injury to human health or the environment. PCB-contaminated soils and solids requiring off-site disposal (greater than 49 ppm) will be disposed of at EnergySolutions in Clive, Utah, or the Nevada Test Site under their current coordinated approval in accordance with 40 *CFR* § 761.61(b). An alternate facility (facilities) for disposal of solid PCB remediation waste may be used if the receiving facility also is a performance based facility under 40 *CFR* § 761.61(b). Liquid PCB remediation waste will be disposed of at the Toxic Substances Control Act (TSCA) incinerator in Oak Ridge, Tennessee, in accordance with 40 *CFR* § 761.61(b)(1). An alternate facility (facilities) for the decontamination/disposal of liquid PCB remediation waste may be used in accordance with 40 *CFR* § 761.61(a)(5)(iv).
- Any wastes transferred off-site or transported in commerce along public rights-of-way must meet the requirements summarized on Appendix A, depending on the type of waste (e.g., RCRA, PCB, or LLW). These include packaging, labeling, marking, manifesting, and placarding requirements for hazardous materials at 49 *CFR* §§ 170–180 *et seq.* Transport of wastes along roads within the PGDP site that are not accessible to the public would not be considered “in commerce.”
- In addition, CERCLA Section 121(d)(3) provides that the off-site transfer of any hazardous substance, pollutant, or contaminant generated during CERCLA response actions be sent to a treatment, storage, or disposal facility that complies with applicable federal and state laws and has been approved by the EPA for acceptance of CERCLA waste (see also the “Off-Site Rule” at 40 *CFR*

§ 300.440 *et seq.*). Accordingly, DOE will verify with the appropriate EPA regional contact that any needed off-site facility is acceptable for receipt of CERCLA wastes before transfer.

4.2.3.5 NEPA Values

No long-term and minor short-term impacts to land use would occur under Alternative 3. Land surrounding the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon is designated as industrial within the DOE “buffer zone.” Land use of the immediate area surrounding the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon currently is governed by interim institutional controls that restrict access to these areas. It is assumed that these controls would remain in place under Alternative 3; thus, land use would remain unchanged.

Short-term impacts may occur to the following NEPA values identified in Section 4.1 by implementation of Alternative 3.

- Air quality and noise
- Wetlands and floodplains
- Soils
- Water resources
- Ecological resources

Excavation activities would require heavy construction. There would be minor short-term impacts to air quality and noise resulting from Alternative 3 during construction activities. Air quality impacts would include emissions from vehicle and equipment exhaust and fugitive dust from vehicle traffic and disturbance of soils. Site preparation and construction activities would be short-term, sporadic, and localized (except for emissions from vehicles of construction workers and transport of construction materials and equipment). Fugitive dust from excavation and earthwork activities would be noticeable on-site and in the immediate vicinity. Dispersion would decrease concentrations of pollutants in the ambient air as distance from the construction site increased. The use of control measures (i.e., covers and water or chemical dust suppressants) would minimize fugitive dust emissions. No exceedances of primary or secondary National Ambient Air Quality Standards (NAAQS) would be expected.

Increased noise levels from the transport and use of construction equipment in the immediate vicinity of construction also would be short-term, sporadic, and localized. Noise levels already are slightly elevated in the vicinity of the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon because of their location within or close proximity to the industrialized portion of PGDP. No sensitive noise receptors (e.g., residences) are located near the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon; thus, no noise impacts would occur. Construction or operational activities, including excavation, dredging, or road building, may impact wetlands or regulatory floodways. If, during the design phase of the removal action, it is determined that wetlands and/or floodplains would be impacted, ARARs/TBCs requirements for floodplain/wetlands would be implemented to the extent practicable and mitigate short- or long-term impacts.

Alternative 3 would have short-term impacts on soils. Site clearing, excavation, grading, and contouring would alter the topography of the area where the removal actions are located, but the geologic formations underlying those sites should not be affected. Construction would disturb existing soils, and some topsoil might be removed in the process. Soil erosion impacts during construction would be mitigated through the use of control measures (e.g., covers and silt fences). No conversion of prime farmland soils is expected to occur. Site restoration would be performed at the conclusion of this alternative to minimize the impacts to the areas disturbed during implementation.

Short-term impacts to water resources may result from localized construction activity, especially in the areas immediately surrounding the C-218 Firing Range, which is adjacent to Bayou Creek. These impacts typically would occur in the form of stormwater runoff from the construction site resulting in elevated levels of suspended solids. Silt fencing and other construction BMPs would be used to minimize short-term impacts to water quality.

Short-term negative impacts to ecological resources are likely to occur during construction activities associated with Alternative 3. The existing vegetation that provides habitat and food to plants and animals would be eliminated in the vicinity of the work site. Site preparation activities and excavation also could cause the direct loss of some less mobile wildlife located at the construction site, while other wildlife could be displaced from the cleared areas.

4.3 COMPARATIVE ANALYSIS OF ALTERNATIVES

The following sections present a comparison of the proposed removal action alternatives based on effectiveness, implementability, and cost criteria. A summary of the alternative comparisons is shown in Table 7.

4.3.1 Effectiveness

Alternative 1, the No-Action Alternative is considered the least protective of all of the alternatives considered. Alternative 1 does not meet project RAOs, nor does it provide for overall protection of human health and the environment. Direct contact risk at the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon is not eliminated or controlled by Alternative 1. There is no overall effectiveness associated with Alternative 1.

Alternative 2 provides for limited protection against direct contact with the contamination area for on-site workers. The RAOs are partially satisfied by this alternative. Implementation of interim institutional controls would decrease the risk of human exposure through exclusion or other institutional means. Interim institutional controls alone would not control contaminant sources nor would they control the potential for contaminant migration, since the contaminated areas are not removed. Interim institutional controls would not prevent entry by those who do not adhere to the control (e.g., the intentional trespasser) and, as a result, are only partially protective of human health and the environment. The effectiveness of Alternative 2 is ranked as low to moderate.

Alternative 3 provides for excavation of contamination from the C-218 Outdoor Firing Range and excavation of contamination and removal of accumulated rainwater (if applicable) from the C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon. This alternative provides for a complete level of protectiveness for industrial workers. The RAOs are satisfied by this alternative. The combination of excavation (including removal of accumulated rainwater, as appropriate) with interim institutional controls not only removes the contamination, but also adequately manages future risk of any residual contamination. Under Alternative 3, contamination areas would be removed from the environment. The risk to industrial workers from direct contact with soil/sediment and surface water would be permanently reduced and the contamination area would be permanently eliminated. All project RAOs are achieved by this alternative and its effectiveness is ranked high.

Table 7. Removal Action Alternative Comparisons

Criteria	Alternative 1. No Action Alternative	Alternative 2. Interim Institutional Controls	Alternative 3. Combination of Excavation and Interim Institutional Controls
<i>Effectiveness</i>			
RAOs	Does not meet RAOs.	Partially meets RAOs.	Meets RAOs.
Overall Protection of Human Health and the Environment	Not protective.	Moderate.	High.
Long-term Effectiveness and Permanence	Not effective.	Low.	High.
Short-term Effectiveness	No short-term effectiveness.	Moderate.	High.
Overall Effectiveness	None.	Low to moderate.	High.
<i>Implementability</i>			
Ability to Construct and Operate Technologies	Not applicable.	High. Minimal construction and operating effort.	High. Standard construction techniques and minimal operator effort.
Availability and Reliability of Technologies	Not applicable.	High. Technology is readily available.	High. Technology is readily available.
Availability of Treatment, Storage, and Disposal Services and Capacity	Not applicable.	Not applicable.	Moderate. Will require waste storage and disposal.
Overall Implementability	Not applicable.	High. Easily implemented.	High. Easily implemented.
<i>Cost</i>			
Capital Cost	Not applicable.	\$119,696	\$5,527,738
O&M Cost	Not applicable.	\$50,918	\$5,000
Present Value Total Cost with 30-year O&M	Not applicable.	\$1,647,233	\$5,677,738
Escalated Total Cost with 30-year O&M	Not applicable.	\$2,547,617	\$6,066,922

4.3.2 Implementability

Alternative 1, the No Action alternative ranks high in ease of implementation since implementation requires no further resources and technical feasibility is not a consideration. Because of DOE policy and state and federal law, however, the No Action Alternative is not considered to be administratively feasible.

Alternative 2 would require a relatively low effort to implement. The interim institutional controls identified in this section can be rapidly implemented with a minimum amount of planning or supporting work. These controls include installation of exclusion fencing and hazard postings. Long-term monitoring would require more effort to implement. Plans (SAPs, site specific health and safety plans, O&M plans, etc.) would need to be prepared and approved. Additional personnel and training may be required.

Alternative 3 would require a level of implementation effort greater than the previous alternatives (Alternatives 1 and 2). Excavation of the contaminated area (including removal of accumulated rainwater as appropriate) will require engineering plans, specifications, bid packages, and other documents. The interim institutional controls identified in this section can be rapidly implemented with a minimum amount of planning or supporting work. These controls include installation of exclusion fencing and hazard postings as needed to minimize direct contact with contaminated soil and accumulated rainwater. Additional personnel and training may be required.

4.3.3 Cost

Estimated action alternative costs are presented in Appendix B, Tables B.1 through B.2. In order to estimate and compare the relative magnitude of cost for each action alternative, assumptions were made regarding the types of controls implemented, the amount of long-term monitoring and O&M required, and the quantities of waste removed. All alternatives assume a 30-year design life. These assumptions for the cost model are presented below.

Alternative 2. Interim institutional control measures only.

- Installation of exclusion fencing and hazard posting for the C-218 Outdoor Firing Range, C-403 Neutralization Tank, and C-410-B HF Neutralization Lagoon.
- Inspection and maintenance of fencing and hazard postings.
- Long-term monitoring for applicable parameters until D&D of the plant to ensure that contaminant migration does not occur.

Alternative 3. Combination of excavation (including the removal of accumulated rainwater as appropriate) and interim institutional controls (as needed).

- Excavation and off-site disposal of contamination areas (i.e., “hot spots”) – approximately 165,493 ft³ of soil (C-218 Outdoor Firing Range: 120,000 ft³; C-403 Neutralization Tank: 36,981 ft³; and C-410-B HF Neutralization Lagoon: 8,512 ft³); including the removal of approximately 100,000 gallons of accumulated rainwater (C-403 Neutralization Tank: 75,000 gallons and C-410-B HF Neutralization Lagoon: 25,000 gallons).
- Restoration (i.e., backfill with clean soil, reseeded, etc.) of disturbed acreage.
- Engineered sediment controls and temporary fencing during implementation (BMPs).
- Verification soil sampling during excavation (limited to lead at the C-218 Firing Range)
- Collection of soil characterization samples at SWMU 19 and SWMU 40 prior to restoration, for use in future CERCLA actions (e.g., Groundwater OU, Soils OU, CSOU, etc.).

- Continued inspection and maintenance during and after excavation and restoration.
- No long-term monitoring for contaminant migration.

As shown in the accompanying economic analysis, the initial capital investment (capital cost) is most expensive for Alternative 3 and least expensive for Alternative 2.

If it is determined through the CERCLA review process that the proposed final cleanup levels presented in Section 5, “Recommended Removal Action Alternative,” require modification, then the impacts to the contaminated area will need to be reevaluated to determine if the selected alternative still is correct. The cost associated with excavation and disposal is most significantly impacted by the size of the contaminated area.

5. RECOMMENDED REMOVAL ACTION ALTERNATIVE

Based on the comparative analysis, Alternative 3 - “Excavation and Interim Institutional Controls,” is the recommended removal action alternative. The evaluation included consideration of effectiveness, implementability, cost, and whether the alternative meets RAOs. Under this alternative, C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) will be removed to their respective SWMU boundaries; therefore, cleanup levels for these inactive facilities are not applicable. For the C-218 Firing Range (SWMU 181), only a cleanup level for lead is presented since the focus of this removal action is lead contaminated soil at SWMU 181. The cleanup goals for lead at the C-218 Firing Range (SWMU 181) under alternative 3 are presented in Table 8. Methods to validate the achievement of the cleanup levels will be presented in the RAWP.

Table 8. Cleanup Levels Based on Carcinogenic Risk and Hazard

	Background (mg/kg or pCi/g)	Risk- Derived Cleanup Goal (mg/kg)	Industrial Hazard- Derived Cleanup Goal (mg/kg)	Recreational Hazard- Derived Cleanup Goal (mg/kg)	Selected Cleanup Level (mg/kg)
<i>Soils and Sediment</i>					
Lead	36	-	800 ^a	1420 ^b	800 ^c

^a An updated screening level for soil lead at industrial sites of 800 parts per million is based on a recent analysis of the combined phases of the National Health and Nutrition Examination Survey (NHANES III) that chose a cleanup goal protective for all subpopulations (EPA 2007).

^b Cleanup goal for lead in soil derived using the Integrated Exposure Uptake Biokinetic Model (IEUBK) (EPA 1994).

^c Cleanup level for lead in soil was evaluated for industrial (current) land use and recreational (future) land use; defaulting to the industrial no action level of 800 mg/kg as the more protective.

The following summarizes the selected cleanup levels presented in Table 8 and the impact to the three respective inactive facilities.

- **C-218 Firing Range (SWMU 181):** Reduce the lead concentration within the facility “hot spot” below 800 mg/kg. It currently is estimated that this will result in the “hot spot” excavation of approximately 3,398 m³ (120,000 ft³) of contaminated soil. Further evaluation of the firing range for other COPCs will be deferred to the Soils OU.
- **C-403 Neutralization Tank (SWMU 40):**
 - **Soil/Sediment:** To achieve risk reduction, SWMU 40 within its defined boundaries will be removed. Defined boundaries of SWMU 40 extend no further than 3 ft on each side of or 3 ft from the bottom of the tank. This will result in the removal of approximately 1,048 m³ (36,981 ft³) of soil, sediment, concrete, and brick, which includes the tank and its defined area.
 - **Accumulated Rainwater:** To achieve risk reduction, accumulated rainwater estimated at approximately 283,906 L (75,000 gal) will be pumped from the tank and properly stored and disposed of prior to excavation of the tank and surrounding soil.
- **C-410 B HF Neutralization Lagoon (SWMU 19):**

- **Soil/Sediment:** While radionuclides are not shown to exceed an excess lifetime cancer risk (ELCR) of 1E-05, the C-410-B HF Neutralization Lagoon contains radionuclides that are approximately 10 times their background concentration (DOE 1999a) and the facility has been roped off and posted in accordance with 10 *CFR* 835 to prevent radiological contamination to the industrial worker (DOE 2001). As a result, to achieve risk reduction, SWMU 19 within its defined boundaries will be removed. Defined boundaries of SWMU 19 extend no further than 3 ft on each side of or 3 ft from the bottom of the lagoon. This will result in the removal of approximately 241 m³ (8,512 ft³) of sludge, concrete, and soil, which includes the lagoon structure and its defined area, as well as approximately 94,635 L (25,000 gal) of water (see below).
- **Accumulated Rainwater:** To achieve risk reduction, accumulated rainwater estimated at approximately 94,633 L (25,000 gals) will be pumped from the lagoon and properly stored and disposed of prior to excavation of the lagoon and surrounding soil.

Based on the evaluation, this alternative meets all the RAOs for the removal action, is effective, and can be implemented. Alternative 3 is the most cost-effective option that meets the requirements of effectiveness, implementability, and RAOs. In addition, a “no further action” will be achieved for SWMU 19 and SWMU 40 since they will be completely removed. For SWMU 181, a “no further action” will be achieved for lead and further evaluation of a “no further action” for other possible COPCs will be evaluated as part of the Soils OU.

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APPENDIX A

**POTENTIALLY APPLICABLE OR RELEVANT AND
APPROPRIATE/TO BE CONSIDERED REQUIREMENTS**

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Table A.1 Summary of Location-Specific ARARs/TBCs for Soils Operable Unit

Standards, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Protection of Wetlands	10 <i>CFR</i> Part 1022; 40 <i>CFR</i> § 230.10 (c)	<p>Activities must avoid or minimize impacts to wetlands to preserve and enhance their natural and beneficial value. If wetland resources are not avoided, measures must be taken to address ecologically sensitive areas and mitigate adverse effects. Such measures may include minimum grading requirements, runoff controls, design, and construction considerations.</p> <p>Discharges of dredge and fill material for which there is no practicable alternative may be conducted provided that the substantive requirements of (general) NWP (TBCs 14, 18, 33, and/or 38) are met.</p>	<p>The substantive requirements are applicable if impacts to wetlands cannot be avoided during implementation.</p> <p>As referenced in Section 4.1.1, NWPs otherwise would be required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.</p>
Protection of Aquatic Ecosystems	40 <i>CFR</i> § 230.10 (a) & (d)	<p>Places restrictions on discharge of dredge and fill materials into waters of the United States that will minimize potential adverse impacts on the discharge on the aquatic ecosystem.</p> <p>Discharges of dredge and fill material for which there is no practicable alternative may be conducted provided that the substantive requirements of (general) NWP (TBCs 14, 18, 33, and/or 38) are met.</p>	<p>The substantive requirements are applicable because of the close proximity of Bayou Creek.</p> <p>As referenced in Section 4.1.1, NWPs otherwise would be required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.</p>

Table A.1 Summary of Location-Specific ARARs/TBCs for Soils Operable Unit (Continued)

Standards, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Nationwide Permit Program	33 <i>CFR</i> § 330.5	NWP are a type of general permit issued by the Corps of Engineers and are designed to regulate, with little if any delay or paperwork, certain activities having minimal impacts. NWPs can be issued to satisfy the permit requirements of Section 10 of the Rivers and Harbors Act of 1899, Section 404 of the Clean Water Act, Section 103 of the Marine Protection, Research, and Sanctuaries Act, or some combination thereof.	<p>Unless impacts to wetlands or aquatic ecosystems are avoided or an alternative is selected that does not impact wetlands or aquatic ecosystems, compliance with the substantive TBC requirements of NWPs 14, 18, 33, and/or 38 would be required as follows:</p> <ol style="list-style-type: none"> 1. Backfilling an excavation and excavation of hazardous sediments in a water body or wetland would require a combination of NWP 38 – Cleanup of Hazardous and Toxic Waste, and NWP 18 – Minor Discharges. 2. Construction of a temporary access road across a water body or wetland would require NWP 33 – Temporary Construction Access. 3. Construction of a permanent access road across a water body or wetland would require NWP 14 – Linear Transportation Projects. <p>These substantive TBC requirements will be delineated in the RAWP after final alternative selection.</p> <p>As referenced in Section 4.1.1, NWPs otherwise would be required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.</p>

Table A.1 Summary of Location-Specific ARARs/TBCs for Soils Operable Unit (Continued)

Standards, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Endangered Species Act	16 <i>USC</i> 1531 <i>et seq.</i> § 7(a)(2); 50 <i>CFR</i> Part 402	Actions that jeopardize the existence of listed species or result in the destruction or adverse modification of critical habitat must be avoided or reasonable and prudent mitigation measures must be taken.	The substantive requirements are applicable because critical habitat for T&E species is present near PGDP outside the industrialized area. The requirements will be met through avoidance of critical habitat or mitigation measures.
Migratory Bird Treaty Act	16 <i>USC</i> 703-711; 50 <i>CFR</i> Part 21	Prohibits killing, unlawful taking, possession, and sale of almost all species of native birds in the U.S.	The substantive requirements are applicable because migratory birds frequent PGDP. As referenced in Section 4.1.1, permits otherwise may be required if migratory birds are taken (i.e., taking cannot be avoided) in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.
Memorandum of Agreement - Migratory Bird Treaty Act	Executive Order 13186	Under a Memorandum of Understanding signed between DOE and the U.S. Fish and Wildlife Service (USFWS) DOE shall: <ul style="list-style-type: none"> • Avoid or minimize, to the extent practicable, adverse impacts on migratory bird resources when conducting agency actions; • Restore and enhance the habitats of migratory birds, as practicable; • Prevent or abate the pollution or detrimental alteration of the environment for the benefit of migratory birds, as practicable; • Identify where unintentional uptake likely will result from agency actions and develop standards and/or practices to minimize such unintentional take; and • Obtain permits if required for the taking of migratory 	Should the selected alternative impact migratory birds, substantive TBC requirements such as scheduling construction time around nesting seasons, or controlling airborne pollution will be delineated in the RAWP.

Table A.1 Summary of Location-Specific ARARs/TBCs for Soils Operable Unit (Continued)

Standards, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Protection of Water Resources and Floodplain Management	10 <i>CFR</i> Part 1022; 401 <i>KAR</i> 4:060, Section 4	birds. Protects floodplains and streams by regulating fill, deposits, obstructions, excavation, or storage of materials or structures that may adversely affect the floodway, stream channel, or drainage capability of a stream or flowing body of water.	The substantive requirements are applicable because the close proximity of Bayou Creek. If encroachments cannot be avoided, the substantive requirements for uses of regulatory floodway will be met by ensuring that the encroachments shall have “no impact” or not result in any increase in flood levels during occurrence of the base flood discharge. Dredging or other removal of material from between the stream banks and the regulatory floodway may be conducted if disposal of the dredged material is outside of the floodway and does not result in increases in flood elevations.

ARAR = applicable or relevant and appropriate requirement
CFR = *Code of Federal Regulations*
 USFWS = U.S. Fish and Wildlife Service
KAR = *Kentucky Administrative Regulation*
 MOU = Memorandum of Understanding
 NEPA = National Environmental Policy Act
 NWP = Nationwide Permit
 PGDP = Paducah Gaseous Diffusion Plant
 RAWP = Removal Action Work Plan
 T&E = threatened and endangered species
 TBC = to be considered
 USC = *United States Code*

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
<p>Kentucky Water Quality Criteria</p> <ul style="list-style-type: none"> • Designated Uses of Surface Water • Surface Water Standards • KPDES Program 	<p>401 KAR 5:026; 401 KAR 5:031, Sections 1 – 7, excluding Section 2(1)(g) and Section 3(3)(d); KPDES Permit KY0004049; 401 KAR 5:055, Section 1; 401 KAR 5:070, Section 4</p>	<p>KPDES Program provides designated uses of surface waters and physical and chemical-specific numeric standards for pollutants discharged or found in surface waters and in domestic water supplies.</p> <p>The KPDES program requires a permit to discharge pollutants from a point source into waters of the Commonwealth. Compliance with the KPDES program requirements constitutes compliance with the operational permit requirements of 401 KAR 5:005 and requirements related to the operational permit.</p>	<p>The substantive standards of the regulations are applicable and implemented through the TBC effluent limits in the KPDES permit. BMPs will be implemented to control storm water and sedimentation runoff.</p> <p>As referenced in Section 4.1.1, a KPDES permit would be required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.</p>

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Fugitive Dust Emissions during Site Preparation and Construction Activities	401 KAR 63:010	<p>Precautions must be taken to prevent particulate matter from becoming airborne. Such precautions must be incorporated into the planning and design of activities and include actions such as these:</p> <ul style="list-style-type: none"> • Wetting or adding chemicals to control dust from construction activities; • Using materials such as asphalt or concrete (or other suitable chemicals/fixing agents) on roads or material stockpiles to prevent fugitive emissions; and • Using covers on trucks when transporting materials to and from the construction site(s). <p>This requirement specifies that, for on-site construction activities, no visible emissions may occur at the PGDP fence line.</p>	The substantive requirements are applicable and will be met through the use of appropriate dust control practices identified during the design/planning phase.
Toxic Emissions and National Emission Standards for Hazardous Air Pollutants	401 KAR 63:020, Section 3; 40 CFR § 61.92	<p>No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals, and plants.</p> <p>The radiological dose to the most exposed member of the public resulting from site-wide radionuclide emissions to the atmosphere must not exceed 10 mrem/year.</p>	<p>The substantive requirements are applicable. Based on preliminary evaluation of similar removal actions at the PGDP, it is anticipated that emissions will not exceed the KAR or NESHAPS limits.</p> <p>Verification modeling will be conducted and the results presented in the RAWP.</p>
Radiation Protection of the Public and the Environment	DOE Order 5400.5(II)(1)(a) and (2)	<p>Except under unusual circumstances, the exposure of members of the public to radiation sources as a consequence of all routine DOE activities shall not cause, in a year, an EDE greater than 100 mrem.</p>	The substantive requirements are TBC and activities necessary to comply will be incorporated into the design/planning phase.

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
		The ALARA process shall be implemented for all DOE activities and facilities that cause public doses.	
Toxic Substances Control Act	40 <i>CFR</i> § 761.61(c)	TSCA provides for risk-based cleanup of PCBs when the method will not pose an unreasonable risk of injury to health or the environment.	The substantive requirements are applicable if the selected alternative includes removal to the proposed PCB risk-based levels. Activities necessary to comply will be incorporated into the design/planning phase.
Public Dose Limits	DOE Order 5400.5 II(1)(b)	The public dose limits apply to doses from exposures to radiation sources and radioactive materials released to the atmosphere from routine DOE activities, including remedial actions.	The substantive requirements are TBC during implementation of the preferred alternative. Exposure limits from materials released to the atmosphere will not be exceeded through the use of any necessary dust control practices identified during the design/planning phase.
Management and Control of Radioactive Materials in Liquid Discharges	DOE Order 5400.5, Chapter II(3)(a)	At the point of discharge from the conduit to the environment, control must be imposed on liquid releases to protect resources such as land, surface water, groundwater, and the related ecosystems from undue contamination.	The substantive requirements are TBC because of the potential for discharges of radioactive material in liquid discharges. Activities necessary to comply will be incorporated into the design/planning phase.
Low-Level Waste Management	DOE Order 435.1 and DOE M. 435.1-1	Provides DOE requirements for characterization, packaging, certification, and disposal of LLW, mixed LLW, and TSCA-contaminated LLW waste.	The substantive requirements are TBC and will be implemented through the characterization and appropriate management of LLW wastes generated. Waste management will be predicated upon waste characterization and will comply with the substantive requirements associated with

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Hazardous Waste Management	401 KAR 30-34 and 37	<p>All wastes or environmental media containing wastes must be characterized to determine whether the waste also is a hazardous. If it is determined that a waste is a hazardous waste or that environmental media contain a hazardous waste subject to the KAR regulations, requirements of the KAR are applicable.</p> <p>Waste management will be predicated upon waste characterization and will comply with all substantive requirements associated with on-site hazardous waste management, as appropriate. Hazardous waste sent off-site will be managed in accordance with the substantive and administrative requirements of applicable regulations.</p> <p>For contained-in/no-longer-contaminated-with determinations, the waste will be characterized to apply the TCE/TCA contained-in/no-longer-contaminated levels of 39.2 ppm TCE in solids and 0.081 ppm TCE in water to media and debris generated by this action. The characterization plan will be subject to regulator review and approval under the procedures outlined in the FFA. The characterization results will be compared against the contained-in, health-based levels listed above, and a contained-in determination will be made. Land Disposal Restrictions apply to media and debris that no longer contain or are no longer contaminated with RCRA regulated waste.</p>	<p>LLW management</p> <p>The substantive requirements are applicable on-site and compliance will be ensured through the characterization and appropriate management of hazardous wastes and environmental media generated.</p> <p>Waste management will be predicated upon waste characterization and will comply with all substantive requirements associated with on-site hazardous waste management, as appropriate. Hazardous waste sent off-site will be managed in accordance with the substantive and administrative requirements of applicable regulations.</p> <p>For contained-in/no-longer-contaminated-with determinations, the waste will be characterized to apply the TCE/TCA contained-in/no-longer-contaminated levels of 39.2 ppm TCE in solids and 0.081 ppm TCE in water to media and debris generated by this action. The characterization plan will be subject to regulator review and approval under the procedures outlined in the FFA. The characterization results will be compared against the contained-in, health-based levels listed above, and a contained-in determination will be made. Land Disposal Restrictions apply to media and debris that no longer contain or are no longer contaminated with RCRA regulated waste.</p>

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
			As referenced in Section 4.1.1, a Treatment, Storage, and Disposal permit would be required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.
PCB Waste Management	40 <i>CFR</i> Part 761;	<p>General TSCA requirements for the management of PCB wastes or items include the following:</p> <ul style="list-style-type: none"> • Management of waste and material; • Characterization of PCB-containing materials; • Labeling and storage for disposal; • Manifest completion for shipment off-site; • Decontamination of affected equipment or items; and • Disposal of PCB wastes. <p>Or</p>	<p>The substantive requirements are applicable if PCBs are identified as regulated under 40 <i>CFR</i> Part 761. Activities necessary to comply with these ARARs shall be incorporated into the RAWP.</p> <p>For up to 180-days, PCB remediation wastes will be managed/stored in risk-based storage instead of storage meeting 40</p>
	<p>40 <i>CFR</i> § 761.65(b);</p> <p>40 <i>CFR</i> § 761.61 (a)(5)(iv)</p>	<p>In addition, TSCA provides for risk-based storage of PCBs when the method will not pose an unreasonable risk of injury to health or the environment.</p> <p>Or</p> <p>Any person disposing of liquid PCB remediation waste shall either: 1) decontaminate the waste to the levels specified in 40 <i>CFR</i> § 761.79(b)(1) or (b)(2), or 2) dispose of the waste in accordance with requirements for performance based standards or risk-based approval.</p>	<p><i>CFR</i> § 761.61(b) requirements. Such wastes will be stored up to 180-days in drums, B-12 boxes, B-25 boxes, Intermodal containers, and/or Sealand containers, provided that</p> <p>the containers are sealed when not adding/removing materials. Storing PCB Remediation wastes in this manner (which will be further detailed in the RAWP) provides a level of protectiveness that is similar to storing PCB remediation wastes in piles under 40 <i>CFR</i> § 761.65(c)(9).</p>
Disposal of PCB Remediation Waste	40 <i>CFR</i> § 761.61 (a), (b), and (c)	Provides requirements and options for disposing of PCB remediation waste. Options include methods for	The substantive requirements are relevant and appropriate. DOE will perform on-site risk-

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
		<p>performance based, risk-based, and coordinated approval disposal.</p>	<p>based cleanup; however, wastes containing equal to or less than 49 ppm PCBs will be disposed of on-site at the C-746-U solid waste landfill pursuant to substantive requirements of 40 <i>CFR</i> § 761.61(a)(5)(v). The Environmental Performance Standard in 401 <i>KAR</i> 47:030, Section 8 and referenced in Condition Number T-66 of Solid Waste Permit No. 073-00014/073-00015/073-00045 currently allow such disposal.</p> <p>PCB remediation waste above 49 ppm will be disposed off-site at EnergySolutions in Clive, Utah, or the Nevada Test Site under a current coordinated approval in accordance with 40 <i>CFR</i> § 761.61(b). An alternate facility (facilities) for disposal of solid PCB remediation waste may be used if the receiving facility is a performance-based facility under 40 <i>CFR</i> § 761.61(b) such as the Oak Ridge TSCA Incinerator or an approved risk-based disposal facility as allowed in 40 <i>CFR</i> § 761.61(c). PCB waste disposed of off-site will be managed in accordance with the substantive and administrative requirements of applicable regulations.</p> <p>As referenced in Section 4.1.1, a Solid Waste Landfill permit would be required in the absence of CERCLA Section 121(e)(1) and the National Contingency Plan.</p>

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Disposal of Waste with Residual Radioactive Material Off-Site	DOE Order 5400.5(II)(5)(c) (6) and 5400.5(IV)(5)(a)	If residual radioactive material is released to a non-DOE or non-NRC licensed facility, the waste must achieve authorized limits equal to the specific guidelines derived from the basic dose limit using DOE/CH-8901a (or equivalent) in accordance with DOE Order 5400.5 (IV)(4)(a) before that release. Authorized limits shall be consistent with limits and guidelines established by other applicable federal and state laws.	The substantive requirements are TBC prior to the release of residual radioactive material to a non-DOE or non-NRC licensed facility for disposal.
Disposal of Waste with Residual Radioactive Material in the C-746-U Landfill	DOE Order 5400.5(IV)(5)(a)	Disposal of residual radioactive material must achieve the authorized limits equal to the specific guidelines derived from the basic dose limit using DOE/CH-8901a (or equivalent) in accordance with DOE Order 5400.5 (IV)(4)(a).	<p>The substantive requirements are TBC for waste with residual radioactive materials disposed on-site in the C-746-U Landfill.</p> <p>The substantive requirements will be met through compliance with the already established authorized limits for the C-746-U Landfill.</p>
Transportation of Hazardous Materials (RCRA, PCB and Radioactive) Off-Site	49 <i>CFR</i> Part 171; 40 <i>CFR</i> § 761.207; 401 <i>KAR</i> Chapters 32 and 34	Provides requirements for marking, labeling, placarding, packaging, manifesting, emergency response, obtaining an identification number, use of transporters, recordkeeping, etc., when transporting or offering to transport hazardous materials, including hazardous, radioactive, and PCB waste in commerce.	Hazardous material offered for transportation off-site will be conducted in accordance with the administrative and substantive requirements of the applicable hazardous materials regulations.
Transportation of Hazardous Materials (RCRA, PCB and Radioactive) On-Site	DOE Order 460.1B	Provides requirements for identification, packaging, control, etc., for on-site transfer or movement of hazardous materials at PGDP per the <i>Transportation Safety Document for On-Site Transport within the Paducah Gaseous Diffusion Plant</i> , PRS-WSD-0661, (TSD)(PRS 2007b).	The substantive requirements are TBC for on-site transfer or movement of hazardous materials (RCRA, PCB and radioactive).

Table A.2 Summary of Action-Specific ARARs/TBCs for the Soils Operable Unit (Continued)

Standard, Requirement, Criteria, or Limitation	Citation	Description of Requirement	Comments
Transportation of LLW	DOE Order 435.1 and DOE M 435.1-1	Provides requirements for packaging and transporting LLW.	The substantive requirements are TBC during the labeling, packaging, and transportation of low-level waste that may be generated during implementation.

- ALARA = as low as reasonably achievable
- ARAR = applicable or relevant and appropriate requirement
- AWQC = Ambient Water Quality Criteria
- BMP = best management practice
- CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
- CFR = Code of Federal Regulations
- CWA = Clean Water Act
- DOE = U.S. Department of Energy
- EDE = effective dose equivalent
- FFA = Federal Facility Agreement
- KAR = Kentucky Administrative Regulation
- KPDES = Kentucky Pollutant Discharge Elimination System
- LLW = low-level waste
- mrem = millirem
- NESHAPS = National Emission Standards for Hazardous Air Pollutants
- NRC = Nuclear Regulatory Commission
- PCB = polychlorinated biphenyl
- PGDP = Paducah Gaseous Diffusion Plant
- RAWP = Removal Action Work Plan
- RCRA = Resource Conservation and Recovery Act
- SAP = Sampling and Analysis Plan
- TBC = to be considered
- TCA = trichloroethane
- TCE = trichloroethene
- TSCA = Toxic Substances Control Act
- TSD = Transportation Safety Document

APPENDIX B

**COST ESTIMATE AND
CONCEPTUAL DESIGN**

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Table B.1 Alternative 2 – Interim Institutional Controls Cost Analysis

Alternative 2 Cost Analysis						
<i>Cost Item</i>	<i>Description</i>	<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
1	Project Management		80	Hrs	77.2	6176.0
2	Project Planning					
	2.1 Procedures	Work Package	100	Hrs	64.40	6,440.0
	2.2 Plans	Site specific Health and Safety Plan and Sampling and Analysis Plan	50	Hrs	64.40	3,220.0
	2.3 Design	Fencing and signage specifications	60	Hrs	60.66	3,642.0
3	Execution					
	3.1 HP Support	Construction subcontractor support	40	Hrs	46.37	1,856.0
	3.2 Superintendent	Construction subcontractor support	80	Hrs	54.57	4,368.0
	3.3 HSO	Construction subcontractor support	80	Hrs	60.66	4,856.0
4	Administration					
	4.1 Procurement	Supplies, bid packages	32	Hrs	27.60	883.2
	4.2 Contracting	Subcontract	40	Hrs	27.60	1,104.0
	4.3 Other Administrative Adders	Assumes 5% of capital	1	L.S.	4,784.4	4,784.4
5	Site Prep					
	5.1 Clear and Grub	2-man crew Cut and chip trees, clear brush, area needed for fence installation only	0.5	Acres	6,000.0	3,000.0
	5.2 Utility Locate		8	Hrs.	37.40	299.2
6	Security Fencing	Installed cost, 8 foot, 6 gauge, galvanized chain link, 3 strand barbed wire, 2 inch posts at 10 foot O.C.	1,464	L.F.	37.40	54,753.6
7	Gate	20 foot x 8 foot, 6 gauge, galvanized chain link, 3 strand barbed wire	3	Ea.	1,290.0	3,870.0

Table B.1 Alternative 2 – Interim Institutional Controls Cost Analysis (Continued)

Alternative 2 Cost Analysis		<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
<i>Cost Item</i>	<i>Description</i>					
8	Signage	Hazard postings	1	L.S.	500.0	500.0
9	Other Advers	Tax, overhead, fringe, etc. @ 20% of capital	1	L.S.	19,943.3	19,943.3
		<i>Subtotal Capital</i>				119,695.7
10	O&M					
	10.1 Tarps	20 mil, woven reinforced, fire retardant	2	Ea.	1,710.0	3,420.0
	10.2 Materials	Miscellaneous materials/supplies	1	L.S.	1,800.00	1,800.0
	10.3 Installation	Labor (framing and installation)	1	L.S.	6,300.0	6,300.0
	10.4 Maintenance and Inspections	Fencing and postings	1	L.S.	5,000.0	5,000.0
	10.5 Sampling @ SW/MU 40 (C-403)					
	10.5.1 Sampling labor	Semiannual sampling of monitoring wells for environmental surveillance parameters (MW178 and MW341)	8	Hrs	37.21	297.7
	10.5.2 Analytical		4	Events	850.00	3,400.0
	10.5.3 Sample Shipping		2	Ea.	750.00	1,500.0
	10.5.4 Env. Compliance	Data interpretation and annual reporting	80	Hrs.	64.40	5,152.0
	10.6 Sampling @ SW/MU 19 (C-410)					
	10.6.1 Sampling labor	Semiannual sampling of monitoring wells for environmental surveillance and groundwater quality parameters (MW260)	4	Hrs	37.21	148.8
	10.6.2 Analytical		2	Events	850.00	1,700.0
	10.6.3 Sample Shipping		2	Ea.	750.00	1,500.0
	10.6.4 Env. Compliance	Data interpretation and annual reporting	80	Hrs	64.40	5,152.0

Table B.1 Alternative 2 – Interim Institutional Controls Cost Analysis (Continued)

Alternative 2 Cost Analysis						
<i>Cost Item</i>	<i>Description</i>	<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
	10.7 Sampling @ SWMU 181 (C-218)					
	10.7.1 Sampling labor	Quarterly sampling of surface water at Bayou Creek for environmental surveillance parameters (C-746-K-5 and S-31)	16	Hrs	37.21	595.4
	10.7.2 Analytical		8	Events	850.00	6,800.0
	10.7.3 Sample Shipping	6 coolers/yr.	4	Ea.	750.00	3,000.0
	10.7.4 Env. Compliance	Data interpretation and annual reporting	80	Hrs	64.40	5,152.0
		Subtotal O&M				50,917.9
		Grand Total				170,613.6
		Cost/Benefit Analysis				
		Capital Cost (2006\$)				119,695.7
		Annual Cost (O&M) (2006\$)				50,917.9
		Design Life (yrs)				30.0
		Present Value Total Cost with 30-year O&M (2006\$)				1,647,232.7
		Escalated Total Cost with 30-year O&M				2,547,617.1

Table B.2 Alternative 3 – Excavation and Interim Institutional Controls Cost Analysis

<i>Alternative 3 Cost Analysis</i>						
<i>Cost Item</i>	<i>Description</i>	<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
1	Project Management		1,000	Hrs	77.20	77,200.0
2	Project planning					
	2.1 Procedures	Site security and control	400	Hrs	64.40	25,760.0
	2.2 Plans	Site specific HASP and SAP	480	Hrs	64.40	30,912.0
	2.3 Design	Design, specifications, bid package	800	Hrs	60.66	48,560.0
3	Execution					
	3.1 HP Support	Construction subcontractor support	880	Hrs	46.37	40,832.0
	3.2 Superintendent	Construction subcontractor support	960	Hrs	54.57	52,416.0
	3.3 HSO	Construction subcontractor support	880	Hrs	60.66	53,416.0
4	Administration					
	4.1 Procurement	Supplies, bid packages	180	Hrs	27.57	4,968.0
	4.2 Contracting	Subcontract	180	Hrs	27.57	4,968.0
	4.3 Other Administrative Adders	Assumes 5% of capital	1	L.S.	219,354.67	219,354.7
5	Mobe/Demobe					
	5.1	Portable toilet, assume 4-month rental	4	Month	300.00	1,200.0
	5.2	Office trailer	4	Month	500.00	2,000.0
6	Decontamination					
	6.1 Decon pad		1	L.S.	600.00	600.0
	6.2 Decon water treatment		5,000	Gallons	1.30	6,500.0
	6.3 Decon water storage drums		100	Drums	50.60	5,060.0
	6.4 PPE	3 persons, 90 days	270	Ea.	33.80	9,126.0
	6.5 Decon equipment	Pressure washer	1	Ea.	400.00	400.0
7	Site Prep					
	7.1 Survey	2-man crew	6	Day	720.00	4,320.0
	7.2 Clear and Grub		1.5	Acres	6,000.00	9,000.0
	7.3 Utility locate		24	Hrs	37.40	897.6
8	Excavation					
	8.1 Shoring	Sheet piling @ C-403 only	5,200	Ft ²	30.00	156,000.0
	8.2 Load and Haul	All three subunits in plan	6,130	Yd ³	65.00	398,450.0

Table B.2 Alternative 3 – Excavation and Interim Institutional Controls Cost Analysis (Continued)

<i>Alternative 3 Cost Analysis</i>							
<i>Cost Item</i>	<i>Description</i>		<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
9	Remove Contaminated Liquid		105,000 gallons				
	9.1 Pumping		105,000 gallons	1	L.S.	2,400.00	2,400.0
	9.2 Transportation		Tanker Truck	24	Trip	4,271.00	102,504.0
	9.3 Treatment		EnviroCare incinerator	209,000	Lbs.	1.20	250,800.0
			TSCA incinerator	Remainder	Lbs.	0.0	0.0
10	Backfill						
	10.1 Select fill			3,200	Yd ²	15.00	48,000.0
	10.2 Compact			40	Hrs.	7.20	288.0
	10.3 Install geotextile		20 mil, woven	19,000	Ft ²	0.90	17,100.0
11	Waste Disposal						
	11.1 Off-site Transportation		Disposal volumes include swell and excess material; total @ 165,493 ft ³				
		C-218	See 11.2				0.0
		C-403	2000 ft ³ gondola @ 36,981 ft ³	19	Railcar	15,631.00	296,989.0
		C-410	2000 ft ³ gondola @ 8,512 ft ³	5	Railcar	15,631.00	78,155.0
	11.2 Treatment/Disposal						
		C-218	Assumes macroencapsulation; includes trucks, transport, treatment, and disposal*	6,366	Tons	181.0	1,152,246.0
		C-403	No treatment; disposal as mixed low-level waste	36,981	Ft ³	23.0	850,563.0
	C-410	No treatment; disposal as low-level waste	8,512	Ft ³	16.87	143,597.4	
12	Removal Action Labor						
	12.1 Labor		Foreman	720	Hrs	40.00	28,800.0
	12.2 Labor		Operator	720	Hrs	36.00	25,920.0
	21.3 Labor		Laborer	720	Hrs	27.50	19,800.0

*If a more effective/efficient disposal alternative is available, it will be presented in the RAWP.

Table B.2 Alternative 3 – Excavation and Interim Institutional Controls Cost Analysis (Continued)

<i>Alternative 3 Cost Analysis</i>	<i>Description</i>	<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
13	Embankment Stabilization and Site Restoration					
	13.1 Revegetation	Fertilize, mulch, seed	2	Acre	1,500.00	3,000.0
	13.2 Contour	Cat D-6 or equivalent, 6.0 acres	6	Hrs	65.00	390.0
	13.3 Silt fence	Installed cost, adverse conditions	2,000	L.F.	0.32	640.0
	13.4 Erosion Control Matting	Stapled polypropylene mesh for embankment stabilization	3,000	Yd ²	1.80	5,520.0
	13.5 Rip-rap small	5 to 20 lb angular rock for embankment stabilization	2,500	Yd ³	75.00	187,500.0
	13.6 Labor	Foreman	140	Hrs	40.00	5,600.0
	13.7 Labor	Operator	140	Hrs	36.00	5,040.0
	13.8 Labor	Laborer	140	Hrs	27.50	3,850.0
	13.9 Backhoe	Cat 420 or equivalent	80	Hrs	59.00	4,720.0
13.10 Bobcat	Cat 277 or equivalent	80	Hrs	45.00	3,600.0	
14	Temporary Fencing	Installed, barricade safety fence (orange, woven polypropylene), ultraviolet stabilized pre-posts, 10 ft O.C.	1,830	L.F.	1.43	2,616.9
15	Signage	Hazard postings	3	L.S.	500.00	1,500.0
16	Verification Sampling	Verification				
	16.1 Sampling labor		160	Hrs	37.21	5,953.6
	16.2 Samples	Waste characterization and verification sampling (TCLP metals, total metals)	104	Ea.	271.00	28,184.0
	16.3 Samples	Waste characterization and post removal sampling (VOAs, SVOAs, PCB, TCLP metals, Rad suite)	48	Ea.	1742.00	83,616.0
	16.4 Samples	Waste characterization and post removal sampling (VOAs, SVOAs, PCB, TCLP metals, total metals, Rad suite)	41	Ea.	1835.00	75,235.0
	16.5 Sample shipping	10 coolers for 193 samples @ 20 samples/cooler	10	Ea.	750.00	7,500.0
	16.6 Env. Compliance	Data interpretation and reporting	200	Hrs	64.40	12,880.0
17	Other Adders	Tax, overhead, fringe, etc. @ 20 % of capital	1	L.S.	681,737.70	921,289.6
		Subtotal Capital				5,527,737.8

Table B.2 Alternative 3 – Excavation and Interim Institutional Controls Cost Analysis (Continued)

<i>Alternative 3 Cost Analysis</i>							
<i>Cost Item</i>	<i>Description</i>		<i>Extended Description</i>	<i>Quantity</i>	<i>Unit</i>	<i>Unit Cost (\$)</i>	<i>Extended Cost (\$)</i>
18	O&M						
	18.1 Maintenance		Fencing, postings, repair restoration	1	L.S.	5,000.0	5,000.0
			<i>Subtotal O&M</i>				<i>5,000.0</i>
			<i>Grand Total</i>				<i>5,532,737.8</i>
			<i>Cost/Benefit Analysis</i>				
			Capital Cost (2006\$)				<i>5,527,737.8</i>
			Annual Cost (O&M) (2006\$)				<i>5,000.0</i>
			Design Life (yrs)				<i>30.0</i>
			Present Value Total Cost with 30-year O&M (2006\$)				<i>5,677,737.80</i>
			Escalated Total Cost with 30-year O&M				<i>6,066,921.90</i>

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APPENDIX C
ANALYTICAL DATA
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APPENDIX D

**ACTION LEVEL COMPARISON AND CHEMICAL OF POTENTIAL
CONCERN SELECTION**

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Table D.1. Action Level Comparison for Soil/Sludge for C-218 Outdoor Firing Range (SWMU 181)

Analyte	Concentration Detected (mg/kg) or (pCi/g)	No Action Level (mg/kg) or (pCi/g)	Exceeds No Action Level Yes or No	Background (mg/kg) or (pCi/g)	Exceeds Background Yes or No	Selected as COPC Yes or No
Metals (mg/kg)						
Antimony	ND	NA	NA	NA	NA	No
Arsenic	7.50E+00	5.23E-01	Yes	12	No	No
Barium	1.16E+02	2.29E+02	No	NA	NA	No
Cadmium	5.00E+00	2.13E+01	No	NA	NA	No
Chromium	3.22E+01	3.56E+02	No	NA	NA	No
Lead	1.49E+04	4.00E+02	Yes	3.60E+01	Yes	Yes
Mercury	2.00E-01	1.00E+05	No	NA	NA	No
Nickel	1.19E+01	2.42E+02	No	NA	NA	No
Selenium	5.00E-01	9.49E+01	No	NA	NA	No
Silver	2.39E+01	4.11E+01	No	2.30E+00	Yes	No
Thallium	6.63E+01	7.27E-01	Yes	2.10E-01	Yes	Yes
Uranium	1.80E+00	2.02E+01	No	NA	NA	No
Organic Compounds (mg/kg)						
PCB, Total	1.00E-01	1.99E-01	No	NA	NA	No
Radionuclides (pCi/g)						
Americium-241	ND	NA	NA	NA	NA	No
Cesium-137	ND	NA	NA	NA	NA	No
Cobalt-60	ND	NA	NA	NA	NA	No
Neptunium-237	ND	NA	NA	NA	NA	No
Plutonium-239	ND	NA	NA	NA	NA	No
Technetium-99	1.70E+01	3.62E+02	No	NA	NA	No
Thorium-230	ND	NA	NA	NA	NA	No

ND = not detected
NA = not applicable

Table D.2. Action Level Comparison for Soil/Sludge for C-403 Neutralization Tank (SWMU 40)

Analyte	Concentration Detected (mg/kg) or (pCi/g)	No Action Level (mg/kg) or (pCi/g)	Exceeds No Action Level Yes or No	Background (mg/kg) or (pCi/g)	Exceeds Background Yes or No	Selected as COPC Yes or No
Metals (mg/kg)						
Arsenic	ND	NA	NA	NA	NA	No
Barium	ND	NA	NA	NA	NA	No
Cadmium	2.84E-01	2.13E+01	No	NA	NA	No
Lead	ND	NA	NA	NA	NA	No
Mercury	ND	NA	NA	NA	NA	No
Nickel	1.63E+01	2.42E+02	No	NA	NA	No
Selenium	ND	NA	NA	NA	NA	No
Silver	ND	NA	NA	NA	NA	No
Thallium	ND	NA	NA	NA	NA	No
Uranium	4.05E+03	2.02E+01	Yes	4.9E+00	Yes	Yes
Organic Compounds (mg/kg)						
Benzene	ND	NA	NA	NA	NA	No
2-Butanone	ND	NA	NA	NA	NA	No
Carbon Tetrachloride	ND	NA	NA	NA	NA	No
Chlorobenzene	ND	NA	NA	NA	NA	No
Chloroform	ND	NA	NA	NA	NA	No
Chromium	ND	NA	NA	NA	NA	No
1,2-Dichlorobenzene	ND	NA	NA	NA	NA	No
1,4-Dichlorobenzene	ND	NA	NA	NA	NA	No
1,2-Dichloroethane	ND	NA	NA	NA	NA	No
1,1-Dichloroethene	ND	NA	NA	NA	NA	No
2,4-Dinitrotoluene	ND	NA	NA	NA	NA	No
Endrin	ND	NA	NA	NA	NA	No
Heptachlor Epoxide	ND	NA	NA	NA	NA	No
Hexachlorobenzene	ND	NA	NA	NA	NA	No
Hexachlorobutadiene	ND	NA	NA	NA	NA	No
Hexachloroethane	ND	NA	NA	NA	NA	No
Methoxychlor	ND	NA	NA	NA	NA	No
2-Methylphenol	ND	NA	NA	NA	NA	No
Nitrobenzene	ND	NA	NA	NA	NA	No
Pentachlorophenol	ND	NA	NA	NA	NA	No
Pyridine	ND	NA	NA	NA	NA	No
Toxaphene	ND	NA	NA	NA	NA	No
Trichloroethene	ND	NA	NA	NA	NA	No
2,4,5-Trichlorophenol	ND	NA	NA	NA	NA	No
2,4,6-Trichlorophenol	ND	NA	NA	NA	NA	No
PCB, Total	1.49E+01	1.99E-01	Yes	NA	NA	Yes

Table D.2. Action Level Comparison for C-403 Neutralization Tank Soil/Sludge (SWMU 40) (Continued)

Analyte	Concentration Detected (mg/kg) or (pCi/g)	No Action Level (mg/kg) or (pCi/g)	Exceeds No Action Level Yes or No	Background (mg/kg) or (pCi/g)	Exceeds Background Yes or No	Selected as COPC Yes or No
Radionuclides (pCi/g)						
Neptunium-237	3.89E+01	2.71E-01	Yes	1.0E-01	Yes	Yes
Plutonium-239/240	2.19E+00	1.15E+01	No	2.50E-02	Yes	No
Technetium-99	2.30E+01	3.62E+02	No	NA	NA	No
Thorium-230	2.38E+01	1.49E+01	Yes	1.5E+00	Yes	Yes
Uranium-235	1.45E+03	3.95E-01	Yes	1.40E_01	Yes	Yes

ND = not detected
 NA = not applicable

Table D.3. Action Level Comparison for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)

Analyte	Concentration Detected (mg/kg) or (pCi/g)	No Action Level (mg/kg) or (pCi/g)	Exceeds No Action Level Yes or No	Background (mg/kg) or (pCi/g)	Exceeds Background Yes or No	Selected as COPC Yes or No
Metals (mg/kg)						
Antimony	ND	NA	NA	NA	NA	No
Arsenic	8.37E+00	5.23E-01	Yes	1.20E+01	No	No
Barium	1.06E+02	2.29E+02	No	NA	NA	No
Benzene	6.00E-03	1.13E+00	No	NA	NA	No
Aluminum	9.01E+03	4.64E+03	Yes	1.30E+04	No	No
Beryllium	7.30E-01	9.48E-01	No	NA	NA	No
Cadmium	5.70E+00	2.13E+01	No	NA	NA	No
Calcium	8.74E+04	NA	NA	NA	NA	No
Cobalt	7.79E+00	1.92E+03	No	NA	NA	No
Copper	1.78E+02	4.93E+02	No	NA	NA	No
Chromium	1.73E+01	3.56E+02	No	NA	NA	No
Iron	1.34E+04	2.07E+03	Yes	2.80E+04	No	No
Lead	1.71E+01	4.00E+02	No	NA	NA	No
Magnesium	3.47E+03	NA	NA	NA	NA	No
Manganese	3.37E+02	4.52E+01	Yes	1.50E+03	No	No
Mercury	3.10E-01	1.00E+05	No	NA	NA	No
Nickel	5.27E+01	2.42E+02	No	NA	NA	No
Potassium	9.91E+02	NA	NA	NA	NA	No
Selenium	1.20E+00	9.49E+01	No	NA	NA	No
Silver	7.92E+01	4.11E+01	Yes	2.30E+00	Yes	Yes
Sodium	8.88E+02	NA	NA	NA	NA	No
Thallium	5.48E-01	7.27E-01	No	NA	NA	No
Uranium	3.67E+01	2.02E+01	Yes	4.90E+00	Yes	Yes
Vanadium	2.39E+01	3.32E+00	Yes	3.80E+01	No	No
Zinc	8.59E+01	2.73E+03	No	NA	NA	No
Organic Compounds (mg/kg)						
Acenaphthylene	ND	NA	NA	NA	NA	No
Acetone	4.39E-02	3.58E+02	No	NA	NA	No
Aldrin	ND	NA	NA	NA	NA	No
Alpha Chlordane	9.70E-02	2.08E+00	No	NA	NA	No
Anthracene	1.40E+00	3.79E+03	No	NA	NA	No
1,2-Benzenedicarboxylic Acid	2.43E-01	1.12E+04	No	NA	NA	No
Benzenemethanol	ND	NA	NA	NA	NA	No
Benzo(ghi)perylene	ND	NA	NA	NA	NA	No
Benzoic Acid	ND	NA	NA	NA	NA	No

**Table D.3. Action Level Comparison for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)
(Continued)**

Analyte	Concentration Detected	No Action Level	Exceeds No Action Level	Background	Exceeds Background	Selected as COPC
	(mg/kg) or (pCi/g)	(mg/kg) or (pCi/g)	Yes or No	(mg/kg) or (pCi/g)	Yes or No	Yes or No
Bis(2-chloroisopropyl) ether	ND	NA	NA	NA	NA	No
Bis(2-ethylhexyl)phthalate	9.20E-01	8.84E+00	No	NA	NA	No
Bromodichloromethane	ND	NA	NA	NA	NA	No
Bromoform	ND	NA	NA	NA	NA	No
Bromomethane	ND	NA	NA	NA	NA	No
4-Bromophenyl phenyl ether	ND	NA	NA	NA	NA	No
2-Butanone	ND	NA	NA	NA	NA	No
Butyl benzyl phthalate	2.70E+00	2.71E+03	No	NA	NA	No
Carbon disulfide	ND	NA	NA	NA	NA	No
Carbon Tetrachloride	ND	NA	NA	NA	NA	No
4-Chlorobenzenamine	ND	NA	NA	NA	NA	No
Chlorobenzene	ND	NA	NA	NA	NA	No
Chloroethane	ND	NA	NA	NA	NA	No
Chloroform	ND	NA	NA	NA	NA	No
Chloromethane	ND	NA	NA	NA	NA	No
4-Chloro-3-methylphenol	ND	NA	NA	NA	NA	No
4-Chlorophenyl phenyl ether	ND	NA	NA	NA	NA	No
2-Chloronaphthalene	ND	NA	NA	NA	NA	No
2-Chlorophenol	ND	NA	NA	NA	NA	No
cis-1,3-Dichloropropene	ND	NA	NA	NA	NA	No
Cyanide	ND	NA	NA	NA	NA	No
4,4'-DDD	ND	NA	NA	NA	NA	No
4,4'-DDE	ND	NA	NA	NA	NA	No
4,4'-DDT	3.20E-02	3.59E+00	No	NA	NA	No
Dibenzofuran	ND	NA	NA	NA	NA	No
Dibromochloromethane	ND	NA	NA	NA	NA	No
1,2-Dichlorobenzene	ND	NA	NA	NA	NA	No
1,3-Dichlorobenzene	ND	NA	NA	NA	NA	No
1,4-Dichlorobenzene	ND	NA	NA	NA	NA	No
3,3-Dichlorobenzidine	ND	NA	NA	NA	NA	No
1,1-Dichloroethane	ND	NA	NA	NA	NA	No
1,2-Dichloroethane	ND	NA	NA	NA	NA	No
1,1-Dichloroethene	ND	NA	NA	NA	NA	No
1,2-Dichloroethene	ND	NA	NA	NA	NA	No
2,4-Dichloropheno	ND	NA	NA	NA	NA	No

**Table D.3. Action Level Comparison for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)
(Continued)**

Analyte	Concentration Detected	No Action Level	Exceeds No Action Level	Background	Exceeds Background	Selected as COPC
	(mg/kg) or (pCi/g)	(mg/kg) or (pCi/g)	Yes or No	(mg/kg) or (pCi/g)	Yes or No	Yes or No
1,2-Dichloropropane	ND	NA	NA	NA	NA	No
trans-1,3-Dichloropropene	ND	NA	NA	NA	NA	No
Dieldrin	ND	NA	NA	NA	NA	No
Diethyl phthalate	ND	NA	NA	NA	NA	No
2,4-Dimethylphenol	ND	NA	NA	NA	NA	No
Di-n-butyl phthalate	1.62E+00	2.13E+03	No	NA	NA	No
Di-n-octylphthalate	ND	NA	NA	NA	NA	No
2,4-Dinitrophenol	ND	NA	NA	NA	NA	No
2,4-Dinitrotoluene	ND	NA	NA	NA	NA	No
2,6-Dinitrotoluene	ND	NA	NA	NA	NA	No
Endosulfan I	ND	NA	NA	NA	NA	No
Endosulfan II	ND	NA	NA	NA	NA	No
Endosulfan sulfate	ND	NA	NA	NA	NA	No
Endrin	ND	NA	NA	NA	NA	No
Endrin ketone	ND	NA	NA	NA	NA	No
Ethylbenzene	ND	NA	NA	NA	NA	No
Fluoranthene	1.90E+03	2.21E+02	Yes	NA	NA	Yes
Fluorene	3.30E-01	3.39E+02	No	NA	NA	No
Heptachlor	ND	NA	NA	NA	NA	No
Heptachlor Epoxide	ND	NA	NA	NA	NA	No
Hexachlorobenzene	ND	NA	NA	NA	NA	No
Hexachlorobutadiene	ND	NA	NA	NA	NA	No
Hexachlorocyclopentadiene	ND	NA	NA	NA	NA	No
Hexachloroethane	ND	NA	NA	NA	NA	No
2-Hexanone	ND	NA	NA	NA	NA	No
Isophorone	ND	NA	NA	NA	NA	No
Lindane	ND	NA	NA	NA	NA	No
Methoxychlor	ND	NA	NA	NA	NA	No
2-Methyl-4,6-dinitrophenol	ND	NA	NA	NA	NA	No
4-Methyl-2-pentanone	ND	NA	NA	NA	NA	No
2-Methylnaphthalene	ND	NA	NA	NA	NA	No
2-Methylphenol	ND	NA	NA	NA	NA	No
4-Methylphenol	ND	NA	NA	NA	NA	No
Methylene chloride	ND	NA	NA	NA	NA	No
Naphthalene	1.10E+00	2.36E+01	No	NA	NA	No
Nitrobenzene	ND	NA	NA	NA	NA	No

**Table D.3. Action Level Comparison for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)
(Continued)**

Analyte	Concentration Detected	No Action Level	Exceeds No Action Level	Background	Exceeds Background	Selected as COPC
	(mg/kg) or (pCi/g)	(mg/kg) or (pCi/g)	Yes or No	(mg/kg) or (pCi/g)	Yes or No	Yes or No
2-Nitrobenzenamine	ND	NA	NA	NA	NA	No
3-Nitrobenzenamine	ND	NA	NA	NA	NA	No
4-Nitrobenzenamine	ND	NA	NA	NA	NA	No
2-Nitrophenol	ND	NA	NA	NA	NA	No
4-Nitrophenol	ND	NA	NA	NA	NA	No
N-Nitroso-di-n-propylamine	ND	NA	NA	NA	NA	No
N-Nitrosodiphenylamine	ND	NA	NA	NA	NA	No
Pentachlorophenol	ND	NA	NA	NA	NA	No
Phenanthrene	1.89E+00	NA	NA	NA	NA	No
Phenol	5.60E-02	1.16E+04	No	NA	NA	No
Pyrene	1.79E+00	1.65E+02	No	NA	NA	No
Styrene	ND	NA	NA	NA	NA	No
1,1,2,2-Tetrachloroethane	ND	NA	NA	NA	NA	No
Tetrachloroethene	ND	NA	NA	NA	NA	No
Toluene	ND	NA	NA	NA	NA	No
Toxaphene	ND	NA	NA	NA	NA	No
1,2,4-Trichlorobenzene	ND	NA	NA	NA	NA	No
1,1,1-Trichloroethane	ND	NA	NA	NA	NA	No
1,1,2-Trichloroethane	ND	NA	NA	NA	NA	No
Trichloroethene	ND	NA	NA	NA	NA	No
2,4,5-Trichlorophenol	ND	NA	NA	NA	NA	No
2,4,6-Trichlorophenol	ND	NA	NA	NA	NA	No
Vinyl acetate	ND	NA	NA	NA	NA	No
Vinyl chloride	ND	NA	NA	NA	NA	No
Xylene, total	ND	NA	NA	NA	NA	No
PCB, Total	ND	NA	NA	NA	NA	No
PAHs	6.86E+00	2.12E-02	Yes	NA	NA	Yes
Radionuclides (pCi/g)						
Americium-241	1.70E-01	5.16E+00	No	NA	NA	No
Cesium-137	3.73E-02	8.58E-02	No	NA	NA	No
Cobalt-60	1.60E-02	1.77E-02	No	NA	NA	No
Neptunium-237	ND	NA	NA	NA	NA	No
Plutonium-238	ND	NA	NA	NA	NA	No
Plutonium-239	ND	NA	NA	NA	NA	No
Technetium-99	5.07E+01	3.62E+02	No	NA	NA	No
Thorium-230	8.90E-01	1.49E+01	No	NA	NA	No
Thorium-232	7.90E-01	1.35E+01	No	NA	NA	No

**Table D.3. Action Level Comparison for Soil/Sludge for C-410-B HF Neutralization Lagoon (SWMU 19)
(Continued)**

Analyte	Concentration Detected	No Action Level	Exceeds No Action Level	Background	Exceeds Background	Selected as COPC
	(mg/kg) or (pCi/g)	(mg/kg) or (pCi/g)	Yes or No	(mg/kg) or (pCi/g)	Yes or No	Yes or No
Uranium-234	4.50E+01	1.98E+01	Yes	2.50E+00	Yes	Yes
Uranium-235	7.67E-01	3.95E-01	Yes	1.40E-01	Yes	Yes
Uranium-238	4.80E+01	1.71E+00	Yes	1.20E+00	Yes	Yes

ND = not detected
NA = not applicable

Table D.4 Action Level Comparison for Accumulated Rainwater in C-403 Neutralization Tank (SWMU 40)

Analyte	Concentration Detected (mg/L) or (pCi/L)	No Action Level (mg/L) or (pCi/L)	Exceeds No Action Level Yes or No	Background (mg/L) or (pCi/L)	Exceeds Background Yes or No	Selected as COPC Yes or No
Metals (mg/L)						
Arsenic	ND	NA	NA	NA	NA	No
Barium	1.20E+00	4.48E+00	No	NA	NA	No
Cadmium	2.40E-02	4.57E-03	Yes	NA	NA	Yes
Chromium	1.90E-04	6.86E+00	No	NA	NA	No
Lead	ND	NA	NA	NA	NA	No
Mercury	ND	NA	NA	NA	NA	No
Nickel	3.90E+00	4.94E+00	No	NA	NA	No
Selenium	9.50E-02	2.01E+00	No	NA	NA	No
Silver	ND	NA	NA	NA	NA	No
Uranium	1.07E+00	4.66E-01	Yes	NA	NA	Yes
Organic Compounds (mg/L)						
1,2-Dichlorobenzene	ND	NA	NA	NA	NA	No
1,2-Dichloroethane	ND	NA	NA	NA	NA	No
1,4-Dichlorobenzene	ND	NA	NA	NA	NA	No
2,4,5-Trichlorophenol	ND	NA	NA	NA	NA	No
2,4,6-Trichlorophenol	ND	NA	NA	NA	NA	No
2,4-D	ND	NA	NA	NA	NA	No
2,4-Dinitrotoluene	ND	NA	NA	NA	NA	No
2-Butanone	ND	NA	NA	NA	NA	No
2-Methylphenol	ND	NA	NA	NA	NA	No
4-Methylphenol	ND	NA	NA	NA	NA	No
Benzene	ND	NA	NA	NA	NA	No
Carbon Tetrachloride	ND	NA	NA	NA	NA	No
Chlorobenzene	ND	NA	NA	NA	NA	No
Chloroform	ND	NA	NA	NA	NA	No
Endrin	2.00E-03	3.43E-04	Yes	NA	NA	Yes
Heptachlor Epoxide	1.00E-03	3.68E-05	Yes	NA	NA	Yes
Hexachlorobenzene	ND	NA	NA	NA	NA	No
Hexachlorobutadiene	ND	NA	NA	NA	NA	No
Hexachloroethane	ND	NA	NA	NA	NA	No
Methoxychlor	1.00E-02	1.14E-01	No	NA	NA	No
Nitrobenzene	ND	NA	NA	NA	NA	No
Aroclor-1260	8.70E+00	5.24E-05	Yes	NA	NA	Yes
Aroclor-1268	8.90E+00	NA	NA	NA	NA	No
PCB-TOTAL	1.76E+01	1.65E-04	Yes	NA	NA	Yes
Pentachlorophenol	ND	NA	NA	NA	NA	No
Pentachlorophenol	ND	NA	NA	NA	NA	No
Pyridine	ND	NA	NA	NA	NA	No

**Table D.4 Action Level Comparison for Accumulated Rainwater in C-403 Neutralization Tank (SWMU 40)
(Continued)**

Analyte	Concentration Detected (mg/L) or (pCi/L)	No Action Level (mg/L) or (pCi/L)	Exceeds No Action Level Yes or No	Background (mg/L) or (pCi/L)	Exceeds Background Yes or No	Selected as COPC Yes or No
Toxaphene	2.00E-02	7.76E-04	Yes	NA	NA	Yes
Trichloroethene	1.70E+00	2.18E-02	Yes	NA	NA	Yes
Radionuclides (pCi/L)						
Pu-239	1.80E-03	NA	NA	NA	NA	No
Np-237	2.88E-02	NA	NA	NA	NA	No
Tc-99	1.80E-02	NA	NA	NA	NA	No
Th-230	1.76E-02	NA	NA	NA	NA	No

ND = not detected
NA = not applicable

**Table D.5 Action Level Comparison for Accumulated Rainwater in C-410-B HF Neutralization Lagoon
(SWMU 19)**

Analyte	Concentration Detected (mg/L) or (pCi/L)	No Action Level (mg/L) or (pCi/L)	Exceeds No Action Level Yes or No	Background (mg/L) or (pCi/L)	Exceeds Background Yes or No	Selected as COPC Yes or No
Metals (mg/L)						
Antimony	1.09E+00	7.31E-03	Yes	NA	NA	Yes
Arsenic	ND	NA	NA	NA	NA	No
Barium	4.69E-02	4.48E+00	No	NA	NA	No
Beryllium	ND	NA	NA	NA	NA	No
Cadmium	ND	NA	NA	NA	NA	No
Calcium	3.92E+01	NA	NA	NA	NA	No
Chromium	3.31E+00	6.86E+00	No	NA	NA	No
Copper	1.35E-02	1.01E+01	No	NA	NA	No
Iron	2.73E-01	4.11E+01	No	NA	NA	No
Lead	1.65E+00	1.50E-02	Yes	NA	NA	Yes
Magnesium	1.12E+00	NA	NA	NA	NA	No
Mercury	ND	NA	NA	NA	NA	No
Nickel	8.43E-01	4.94E+00	No	NA	NA	No
Potassium	1.21E+00	NA	NA	NA	NA	No
Selenium	1.10E-03	2.01E+00	No	NA	NA	No
Silver	ND	NA	NA	NA	NA	No
Sodium	1.40E+00	NA	NA	NA	NA	No
Thallium	ND	NA	NA	NA	NA	No
Vanadium	ND	NA	NA	NA	NA	No
Zinc	8.62E-02	5.48E+01	No	NA	NA	No
Organics (mg/L)						
1,1,1-Trichloroethane	1.00E-03	1.69E+00	No	NA	NA	No
1,1,2,2-Tetrachloroethane	ND	NA	NA	NA	NA	No
1,1,2-Trichloroethane	ND	NA	NA	NA	NA	No
1,1-Dichloroethane	ND	NA	NA	NA	NA	No
1,2,4-Trichlorobenzene	ND	NA	NA	NA	NA	No
1,2-Dichlorobenzene	ND	NA	NA	NA	NA	No
1,2-Dichloroethane	ND	NA	NA	NA	NA	No
1,2-Dichloropropane	ND	NA	NA	NA	NA	No
1,4-Dichlorobenzene	ND	NA	NA	NA	NA	No
2,4,5-Trichlorophenol	ND	NA	NA	NA	NA	No
2,4-Dimethylphenol	ND	NA	NA	NA	NA	No
2,4-Dinitrotoluene	ND	NA	NA	NA	NA	No
2-Butanone	ND	NA	NA	NA	NA	No
2-Chloronaphthalene	ND	NA	NA	NA	NA	No
2-Chlorophenol	2.00E-03	6.93E-02	No	NA	NA	No

Table D.5 Action Level Comparison for Accumulated Rainwater in C-410-B HF Neutralization Lagoon (SWMU 19) (Continued)

Analyte	Concentration Detected (mg/L) or (pCi/L)	No Action Level (mg/L) or (pCi/L)	Exceeds No Action Level Yes or No	Background (mg/L) or (pCi/L)	Exceeds Background Yes or No	Selected as COPC Yes or No
2-Hexanone	ND	NA	NA	NA	NA	No
2-Methyl-4,6-dinitrophenol	ND	NA	NA	NA	NA	No
2-Methylnaphthalene	ND	NA	NA	NA	NA	No
2-Methylphenol	ND	NA	NA	NA	NA	No
2-Nitrobenzenamine	ND	NA	NA	NA	NA	No
2-Nitrophenol	ND	NA	NA	NA	NA	No
3,3'-Dichlorobenzidine	ND	NA	NA	NA	NA	No
3-Nitrobenzenamine	ND	NA	NA	NA	NA	No
4,4'-DDT	ND	NA	NA	NA	NA	No
4-Bromophenyl phenyl ether	ND	NA	NA	NA	NA	No
4-Chloro-3-methylphenol	2.00E-03	NA	NA	NA	NA	No
4-Chlorobenzenamine	ND	NA	NA	NA	NA	No
4-Chlorophenyl phenyl ether	ND	NA	NA	NA	NA	No
4-Methyl-2-pentanone	ND	NA	NA	NA	NA	No
4-Methylphenol	ND	NA	NA	NA	NA	No
4-Nitrobenzenamine	5.00E-02	NA	NA	NA	NA	No
4-Nitrophenol	ND	NA	NA	NA	NA	No
Acenaphthene	ND	NA	NA	NA	NA	No
Acenaphthylene	ND	NA	NA	NA	NA	No
Acetone	ND	NA	NA	NA	NA	No
Aldrin	ND	NA	NA	NA	NA	No
alpha-BHC	ND	NA	NA	NA	NA	No
alpha-Chlordane	ND	NA	NA	NA	NA	No
4-Chlorobenzenamine	ND	NA	NA	NA	NA	No
4-Chlorophenyl phenyl ether	ND	NA	NA	NA	NA	No
4-Methyl-2-pentanone	ND	NA	NA	NA	NA	No
4-Methylphenol	ND	NA	NA	NA	NA	No
4-Nitrobenzenamine	ND	NA	NA	NA	NA	No
4-Nitrophenol	ND	NA	NA	NA	NA	No
Acenaphthene	ND	NA	NA	NA	NA	No
Acenaphthylene	ND	NA	NA	NA	NA	No
Acetone	ND	NA	NA	NA	NA	No
Aldrin	ND	NA	NA	NA	NA	No
alpha-BHC	ND	NA	NA	NA	NA	No

**Table D.5 Action Level Comparison for Accumulated Rainwater in C-410-B HF Neutralization Lagoon
(SWMU 19) (Continued)**

Analyte	Concentration Detected (mg/L) or (pCi/L)	No Action Level (mg/L) or (pCi/L)	Exceeds No Action Level Yes or No	Background (mg/L) or (pCi/L)	Exceeds Background Yes or No	Selected as COPC Yes or No
alpha-Chlordane	ND	NA	NA	NA	NA	No
Anthracene	ND	NA	NA	NA	NA	No
Benz(a)anthracene	ND	NA	NA	NA	NA	No
Benzene	ND	NA	NA	NA	NA	No
Benzenemethanol	ND	NA	NA	NA	NA	No
Benzo(a)pyrene	ND	NA	NA	NA	NA	No
Benzo(b)fluoranthene	ND	NA	NA	NA	NA	No
Benzo(ghi)perylene	ND	NA	NA	NA	NA	No
Benzo(k)fluoranthene	ND	NA	NA	NA	NA	No
Benzoic acid	ND	NA	NA	NA	NA	No
beta-BHC	ND	NA	NA	NA	NA	No
Bis(2-chloroethoxy)methane	ND	NA	NA	NA	NA	No
Bis(2-chloroethyl) ether	ND	NA	NA	NA	NA	No
Bis(2-chloroisopropyl) ether	ND	NA	NA	NA	NA	No
Bis(2-ethylhexyl)phthalate	1.00E-03	1.51E-02	No	NA	NA	No
Bromodichloromethane	ND	NA	NA	NA	NA	No
Bromoform	ND	NA	NA	NA	NA	No
Bromomethane	ND	NA	NA	NA	NA	No
Butyl benzyl phthalate	ND	NA	NA	NA	NA	No
Carbon disulfide	3.90E-02	2.40E+00	No	NA	NA	No
Carbon tetrachloride	ND	NA	NA	NA	NA	No
Chlorobenzene	ND	NA	NA	NA	NA	No
Chloroethane	ND	NA	NA	NA	NA	No
Chloroform	ND	NA	NA	NA	NA	No
Chloromethane	ND	NA	NA	NA	NA	No
Chrysene	ND	NA	NA	NA	NA	No
cis-1,3-Dichloropropene	ND	NA	NA	NA	NA	No
Cyanide	ND	NA	NA	NA	NA	No
delta-BHC	ND	NA	NA	NA	NA	No
Dibenz(a,h)anthracene	ND	NA	NA	NA	NA	No
Isophorone	ND	NA	NA	NA	NA	No
Lindane	ND	NA	NA	NA	NA	No
Methoxychlor	ND	NA	NA	NA	NA	No
Methylene chloride	ND	NA	NA	NA	NA	No
Naphthalene	ND	NA	NA	NA	NA	No
Nitrobenzene	ND	NA	NA	NA	NA	No

**Table D.5 Action Level Comparison for Accumulated Rainwater in C-410-B HF Neutralization Lagoon
(SWMU 19) (Continued)**

Analyte	Concentration Detected (mg/L) or (pCi/L)	No Action Level (mg/L) or (pCi/L)	Exceeds No Action Level Yes or No	Background (mg/L) or (pCi/L)	Exceeds Background Yes or No	Selected as COPC Yes or No
N-Nitroso-di-n-propylamine	ND	NA	NA	NA	NA	No
N-Nitrosodiphenylamine	ND	NA	NA	NA	NA	No
Aroclor -1016	ND	NA	NA	NA	NA	No
Aroclor -1221	ND	NA	NA	NA	NA	No
Aroclor -1232	ND	NA	NA	NA	NA	No
Aroclor -1242	ND	NA	NA	NA	NA	No
Aroclor -1248	ND	NA	NA	NA	NA	No
Aroclor -1254	ND	NA	NA	NA	NA	No
Aroclor -1260	ND	NA	NA	NA	NA	No
Pentachlorophenol	ND	NA	NA	NA	NA	No
Phenanthrene	ND	NA	NA	NA	NA	No
Phenol	ND	NA	NA	NA	NA	No
Pyrene	5.00E-03	2.66E-02	No	NA	NA	No
Styrene	ND	NA	NA	NA	NA	No
Tetrachloroethene	ND	NA	NA	NA	NA	No
Toluene	ND	NA	NA	NA	NA	No
Total Xylene	ND	NA	NA	NA	NA	No
Toxaphene	ND	NA	NA	NA	NA	No
trans-1,3-Dichloropropene	ND	NA	NA	NA	NA	No
Trichloroethene	ND	NA	NA	NA	NA	No
Vinyl acetate	ND	NA	NA	NA	NA	No
Vinyl chloride	ND	NA	NA	NA	NA	No
Radionuclides (pCi/L)						
Neptunium-237	ND	NA	NA	NA	NA	No
Plutonium-239	ND	NA	NA	NA	NA	No
Technetium-99	6.90E+02	NA	NA	NA	NA	No
Thorium-230	1.50E-01	NA	NA	NA	NA	No
Uranium-238	2.10E+02	NA	NA	NA	NA	No

ND = not detected
NA = not applicable

Table D.6 Dose Action Level Comparison for Soil/Sludge

Analyte	Concentration Detected (pCi/L)	Dose Based Screening Level 25 mrem/yr	Dose Based Screening Level^a 15 mrem/yr	Exceeds Dose Based Screening Level Yes or No
C-218 Outdoor Firing Range (SWMU 181)-Soil/Sediment				
Technetium-99	1.70E+01	6.06E+05	3.64E+05	No
C-403 Neutralization Tank (SWMU 40)-Soil/Sediment				
Neptunium-237	3.89E+01	9.75E+01	5.85E+01	No
Plutonium-239	2.19E+00	5.63E+02	3.74E+02	No
Technetium-99	2.30E+01	6.06E+05	3.64E+05	No
Thorium-230	2.38E+01	3.51E+03	2.11E+03	No
Uranium-235	1.45E+03	1.77E+02	1.06E+02	Yes
C-410-B HF Neutralization Lagoon (SWMU 19)-Soil/Sediment				
Americium-241	1.70E-01	4.67E+02	2.80E+02	No
Cesium-137	3.73E-02	4.01E+01	2.41E+01	No
Cobalt-60	1.60E-02	8.45E+00	5.07E+00	No
Neptunium-237	ND	9.75E+01	5.85E+01	NA
Plutonium-238	ND	6.24E+02	3.74E+02	NA
Plutonium-239	ND	5.63E+02	3.38E+02	NA
Technetium-99	5.07E+01	6.06E+05	3.64E+05	No
Thorium-230	8.90E-01	8.01E+00	2.11E+03	No
Thorium-232	7.90E-01	7.52E+02	4.35E+02	No
Uranium-234	4.50E+01	6.88E+03	4.13E+03	No
Uranium-235	7.67E-01	1.77E+02	1.06E+02	No
Uranium-238	4.80E+01	8.80E+02	5.28E+02	No

^aDose-based screening level at 15 mrem/yr is included for comparison purposes only.

Table D.7 Dose Action Level Comparison for Accumulated Rainwater

Analyte	Concentration Detected	Dose Based Screening Level	Dose Based Screening Level ^a	Exceeds Dose Based Screening Level
	(pCi/L)	25 mrem/yr	15 mrem/yr	Yes or No
C-403 Neutralization Tank (SWMU 40)- Accumulated Rainwater				
Plutonium-239	1.80E-03	NA	NA	NA
Neptunium-237	2.88E-02	NA	NA	NA
Technetium-99	1.80E-02	NA	NA	NA
Thorium-230	1.76E-02	NA	NA	NA
C-410-B HF Neutralization Lagoon (SWMU 19)- Accumulated Rainwater				
Neptunium-237	ND	NA	NA	NA
Plutonium-239	ND	NA	NA	NA
Technetium-99	6.90E+02	NA	NA	NA
Thorium-230	1.50E-01	NA	NA	NA
Uranium-238	2.10E+02	NA	NA	NA

^aDose-based screening level at 15 mrem/yr is included for comparison purposes only.

APPENDIX E
CLEANUP GOALS

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E.1 CLEANUP GOALS

Several COPCs were identified in Section 1.6, “Streamlined Risk Evaluation” The detected concentrations for these COPCs exceeded no action levels taken from the Risk Methods Document (DOE 2001), and it was determined that unacceptable human health risks could exist at each of the three inactive facilities. Based on the comparative analysis from Section 4, “Analysis of Alternatives,” Alternative 3 - “Excavation and Interim Institutional Controls,” was the recommended removal action alternative. Under this alternative, C-403 Neutralization Tank (SWMU 40) and C-410-B HF Neutralization Lagoon (SWMU 19) will be removed to their respective SWMU boundaries; therefore, cleanup levels for these inactive facilities are not applicable. For the C-218 Firing Range (SWMU 181), the focus of the removal action is lead contaminated soil. As a result, cleanup goals for lead at the C-218 Firing Range (SWMU 181) were developed. Appendix E is included to give the risk manager the details associated with the development of the cleanup goals for the C-218 Outdoor Firing Range (SWMU 181) and a summary of the final cleanup levels that were selected consistent with the preferred alternative presented in Section 5, “Recommended Removal Action Alternative.” It provides the rationale and backup information that supports the final cleanup levels necessary to meet set regulatory limits, dose, hazard, and risk levels.

E.1.1 Lead Exposure

Adverse effects on neurological development have been manifested from lead ingestion, especially among children. At the C-218 Outdoor Firing Range (SWMU 181), the lead concentration was measured at 14,880 mg/kg in one sample, which is one to two orders of magnitude above EPA guidelines for lead at commercial/industrial areas in soil (EPA 2003a). While no published risk factors are available for lead, EPA recommends a screening level for soil lead at commercial/industrial (i.e., nonresidential) sites of 800 mg/kg based on an analysis of the combined phases of the National Health and Nutrition Examination Survey (NHANES III) using the Adult Lead Model that provided a cleanup goal protective of adult workers (EPA 2007). The C-218 Outdoor Firing Range is located in area that is designated for industrial use, based on current land use associated with plant operations and the lease agreement with USEC. As a result, the screening level of 800 mg/kg from the EPA guidance document has been selected as the cleanup level for the current land use scenario.

While the selection of 800 mg/kg satisfies the primary objective of this removal action to reduce current risks to the industrial worker, consideration should be given to the location of the C-218 Firing Range and planning assumptions in the SMP that indicate recreational use reasonably could be expected in the future for this area once the plant ceases operation. Currently, there is no published EPA guidance documenting cleanup levels that correspond to a recreational use; however, EPA guidance does allow for a site-specific value to be calculated using the Integrated Exposure Uptake Biokinetic Model (IEUBK) (EPA 1994; EPA 2003b). In order to obtain a cleanup level appropriate for recreational use, this model was utilized to calculate a site-specific lead preliminary remediation goal (PRG) based on intermittent exposures to a recreational receptor. The recreational receptor was assumed to spend 42 days during the summer months and an additional 18 days over the fall/winter during hunting season. The combined exposure to the recreational receptor over the two seasons resulted in a total of 60 days per 8 months (i.e., 1.7 days per week). Time-weighted soil concentrations for input into the IEUBK were developed using a mean background value of 17 mg/kg for off-site exposure and varying on-site concentrations. Different values for the weighted soil concentration were run through the model iteratively to develop a PRG that met the EPA target of less than 5% probability of exceeding the 10 ug/dl blood lead level (EPA 2003b). The updated values for lead residue in food from the 2001 Food and Drug Administration Total Diet Study were used in the model, and the tap water concentration was modified to the mean background value for dissolved lead in RGA groundwater (9.8 ug/L). For the recommended scenario of the summer and fall

exposures combined, the site-specific PRG for lead in soil is 1,420 mg/kg for recreational use. This PRG represents an acceptable mean concentration in soil at the site.

The calculated site-specific cleanup level of 1,420 mg/kg for lead in soil for recreational use is higher than the EPA recommended screening level of 800 mg/kg lead in soil for the industrial land use scenario. As a result, the 800 mg/kg screening level has been selected as the cleanup level protective of both industrial and recreational exposures for this removal action. The selection of 800 mg/kg provides a basis for a no further action under the current and future land use scenarios.

E.1.2 Lead Modeling

The EPA lead model IEUBKWin32, version 1.0.264, was used to calculate a lead PRG based on intermittent exposures to a recreational receptor for 42 days of exposure over the summer months and an additional 18 days of exposure for the same receptor over the fall/winter months during hunting season. The combined exposure over the two seasons is 60 days per 8 months (1.7 days per week). Time-weighted soil concentrations for input into IEUBK were developed using 17 mg/kg (mean background value) for the off-site exposure and varying on-site concentrations to develop a PRG. The updated values for lead residue in food from the 2001 Food and Drug Administration Total Diet Study were used in the model, and the tap water concentration was changed to the mean background value for dissolved lead in RGA groundwater (9.8 ug/L). For the recommended scenario of the summer and fall exposures combined, the PRG is 1,420 mg/kg lead in site soil. This PRG represents an acceptable mean concentration in soil at the site.

The output from the model using a soil concentration of 1,420 mg/kg lead in site soil is shown in Table E.1. A probability distribution for this modeling run is illustrated in Figure E.1.

Table E.1 Calculated Blood Lead and Lead Uptakes

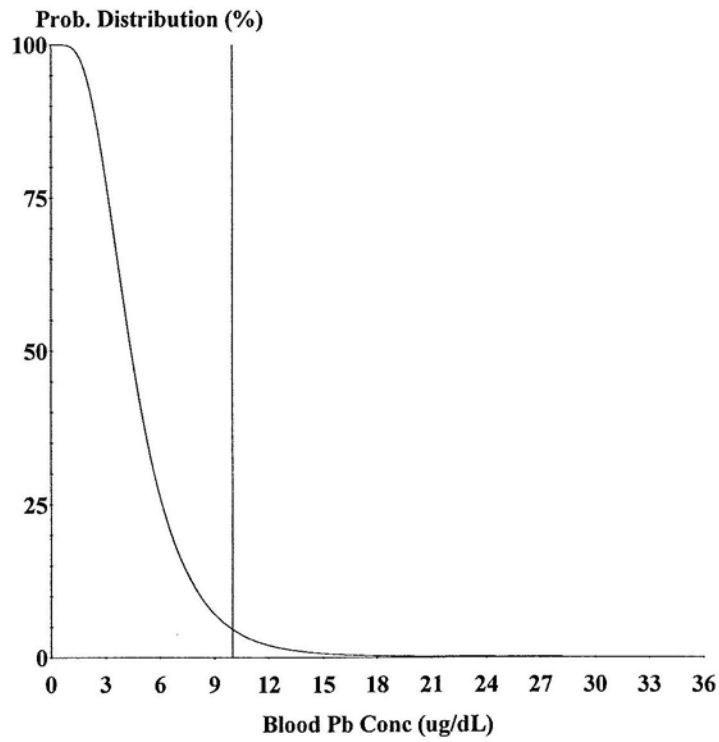
Age (Years)	Air ¹ (ug/day)	Diet ² (ug/day)	Water ³ (ug/day)	Soil+Dust ⁴ (ug/day)	Total (ug/day)	Blood Lead Concentration (ug/dL)
.5-1	0.021	1.422	0.882	6.854	9.179	4.9
1-2	0.034	1.148	2.164	10.681	14.027	5.8
2-3	0.062	1.287	2.286	10.850	14.485	5.4
3-4	0.067	1.247	2.365	11.011	14.690	5.1
4-5	0.067	1.221	2.521	8.380	12.188	4.3
5-6	0.093	1.295	2.686	7.619	11.693	3.7
6-7	0.093	1.421	2.747	7.236	11.498	3.3

¹ Daily intake of lead through inhalation (IEUBK default value).

² Daily intake of lead from food (2001 Food and Drug Administration Total Diet Study Values).

³ Daily intake of lead from water (based on PGDP mean concentration of lead in filtered RGA water of 9.8 ug/L).

⁴ Daily intake of lead from soil and dust combined based on weighted soil concentration of 17 mg/kg in off-site soil and 1,420 mg/kg in on-site soil.



Cutoff = 10.000 ug/dl
 Geo Mean = 4.611
 GSD = 1.600
 % Above = 4.976

Age Range = 0 to 84 months
 Time Step = Every 4 Hours
 Run Mode = Research
 Comment = PGDP at 1420 with water 9.8

Figure E.1 Probability Distribution Graph for a Lead Concentration in Soil at C-218 Firing Range (SWMU 181) of 1,420 mg/kg

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