CERTIFICATION

Document Identification: ***Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant,*** **DOE/OR/07-2099&D2/R8**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

LATA Environmental Services of Kentucky, LLC

_____ _____

Mark J. Duff, Paducah Project Manager Date Signed

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. Department of Energy

_____ _____

Rachel H. Blumenfeld, Acting Site Lead Date Signed
Portsmouth/Paducah Project Office

DOE/OR/07-2099&D2/R8
Primary Document

Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant

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DOE/OR/07-2099&D2/R8
Primary Document

Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant

Date Issued—June 2013

U.S. DEPARTMENT OF ENERGY
Office of Environmental Management

Revised by
LATA Environmental Services of Kentucky, LLC
managing the
Environmental Remediation Activities at the
Paducah Gaseous Diffusion Plant
under contract DE-AC30-10CC40020

CLEARED FOR PUBLIC RELEASE

Both the Federal Facility Agreement for the Paducah Gaseous Diffusion Plant and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 require the U.S. Department of Energy to prepare and publish a community relations plan. Publication of this *Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant* meets those requirements.

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ACRONYMS

CAB	Citizens Advisory Board
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRP	Community Relations Plan
D&D	decontamination and decommissioning
DOE	U.S. Department of Energy
EE/CA	engineering evaluation/cost analysis
EIC	Environmental Information Center
EM	environmental management
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
FS	feasibility study
KEEC	Kentucky Energy and Environment Cabinet
KDFWR	Kentucky Department of Fish and Wildlife Resources
NCP	National Contingency Plan
PGDP	Paducah Gaseous Diffusion Plant
RCRA	Resource Conservation and Recovery Act
RI	remedial investigation
ROD	record of decision
SMP	Site Management Plan
SSAB	Site Specific Advisory Board
SWMU	solid waste management unit
TVA	Tennessee Valley Authority
USEC	United States Enrichment Corporation
WDA	waste disposal alternative
WKWMA	West Kentucky Wildlife Management Area

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1. OVERVIEW OF THE COMMUNITY RELATIONS PLAN

This Paducah Community Relations Plan (CRP) is a primary document of the Federal Facility Agreement (FFA) that directs the comprehensive remediation of the Paducah Gaseous Diffusion Plant (PGDP) site. The FFA governs the corrective action/response action process from site investigation through site remediation as agreed to by the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the Kentucky Energy and Environment Cabinet (KEEC) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Resource Conservation and Recovery Act (RCRA); Kentucky Revised Statute 224; and other laws and regulations identified in the FFA.

The Paducah CRP describes how DOE will provide opportunities for the public to become involved in FFA-related decisions at PGDP and outlines how the parties to the agreement will coordinate public participation prescribed by the FFA.

DOE is committed to fostering meaningful public involvement in environmental remediation decision making at the site. Interactive communications enable the public and other stakeholders to learn about the environmental program so they can provide input to the FFA parties.

At the same time, ongoing communications enhance DOE's ability to consider the public's interests in cleanup decisions. Stakeholders are individuals, groups, communities, and other entities in the public and private sectors that are interested in or affected by environmental activities and decisions.

1.1 COMMUNITY RELATIONS PLAN HIGHLIGHTS

The CRP contains information to place FFA-related public involvement processes in the context of the overall environmental management (EM) program at PGDP. The CRP includes these:

- A capsule summary of the PGDP and environmental issues;
- An overview of community demographics and past public involvement; and
- A summary of required avenues the FFA parties will use to disseminate information and to solicit and respond to public comments related to FFA activities, as well as discretionary information avenues the FFA parties may use.

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2. CAPSULE SITE SUMMARY

- A Brief History of the PGDP
- Environmental Challenges
- Long-Term Outlook for the PGDP

The PGDP reached its 50th anniversary of operation in October 2002 as the only operating uranium enrichment plant in the United States. With more than a half century of production behind it, the plant faces significant environmental cleanup challenges.

The PGDP was constructed to enrich uranium for use in nuclear weapons and later began supplying enriched uranium to the commercial nuclear industry. The original facilities still are in operation, albeit with substantial upgrading and refurbishment. The United States Enrichment Corporation (USEC), which Congress established through the Energy Policy Act of 1992, has leased the uranium enrichment production facilities from DOE since 1993. USEC has assumed responsibility for production and for environmental compliance activities directly associated with USEC enrichment operations.

DOE retains the non-leased facilities. DOE's responsibilities for the site include dealing with the environmental legacy of the Cold War era. DOE remains the owner of PGDP and manages the environment management program through various contractors.

2.1 ENVIRONMENTAL CHALLENGES

Past plant operations generated hazardous substances, some of which were released into the environment. One of the major contaminants found at the site is the once-commonly used degreaser trichloroethene (TCE). Spills, leaks, and other releases allowed large quantities of TCE to reach the regional groundwater aquifer. The aquifer was a source of drinking and agricultural water in the vicinity of the plant.

In response to questions from residents about the quality of their water, the Kentucky Division of Health Services sampled residential wells north of the plant in 1988. Discovery of TCE and technetium-99, a man-made radioactive element, in some wells, prompted DOE to immediately provide a temporary alternate water supply to affected residents and initiate a sitewide investigation into the nature and extent of off-site contamination. Additionally, DOE provided municipal water to the affected residents.

Following further environmental investigations of the entire site, PGDP was placed on the Superfund National Priorities List in 1994. In accordance with CERCLA requirements, DOE, EPA, and Kentucky entered into the FFA. The FFA is an interagency agreement to establish timetables, procedures, and documentation requirements for remediation of PGDP. The agreement provides for coordination of the cleanup programs and public involvement requirements of CERCLA and RCRA into one set of comprehensive requirements for site cleanup.

The PGDP annual Site Management Plan (SMP) outlines the strategic approach for achieving cleanup under the FFA. The strategy involves setting priorities for reducing risks as early as possible through remedial actions and removal actions and phasing remediation by dividing cleanup response actions into discrete units, called operable units, which are grouped by related media or activities—groundwater, surface water, soils, burial grounds, and decontamination and decommissioning (D&D). Contamination sources are ranked for study and cleanup on the basis of their potential to contribute to human health problems and/or off-site contamination.

Successful implementation of the PGDP EM program under the FFA depends on the expertise, communication, and coordination of several agencies and organizations. Major participants are these:

- DOE Headquarters EM—Responsible to the Secretary of Energy for accomplishing the DOE EM program nationally;

- The Portsmouth/Paducah Project Office—Responsible for accomplishing the EM program through management and oversight of the Department's contractors at the site;

- EPA Region 4—The federal regulatory entity that provides oversight related primarily to CERCLA and the FFA; and

- KEEC (through the Kentucky Department for Environmental Protection)—The Commonwealth's regulatory agency responsible for managing RCRA and other permitting issues in support of the FFA.

From the inception of environmental activities at the plant, DOE and the other FFA parties have made significant progress toward achieving cleanup goals, including the following:

- Imposing controls (fencing and posting) to restrict public access to contaminated areas in certain outfall ditches and surface water areas;

- Preventing off-site residential use of contaminated groundwater through implementation of an action that provides an alternative water supply to certain residences;

- Reducing TCE levels using a soil remediation technology at an on-site source area formerly used to drop-test uranium hexafluoride cylinders;

- Treating more than 3.1 billion gal of contaminated groundwater using two groundwater containment systems;

- Testing and further implementing direct heating technology for removing contamination from beneath operating plant buildings;

- Excavating soil with high concentrations of polychlorinated biphenyls (PCBs) in on-site areas to reduce off-site migration and potential direct-contact risks to plant workers;

- Completing the Drum Mountain (containing contaminated scrap metal) removal action;

- Removing petroleum-contaminated soil from Solid Waste Management Unit (SWMU) 193 to eliminate a potential source of groundwater contamination;

- Removing more than 30,500 tons of scrap metal stored outdoors;

- Completing remediation of the North-South Diversion Ditch within the plant area, which permanently eliminated runoff from the ditch as a potential carrier of contamination outside the plant fence;

- Removing unusable inactive facilities;

- Selecting a remedial action and implementing a treatment system for remediation of the C-400 area, which is a major source of TCE contamination;

- Completing CERCLA five-year reviews to ensure that remedial actions taken remain protective of human health and the environment and continue to function as designed; and

- Completing RCRA inspections/reviews.

2.2 LONG-TERM OUTLOOK FOR THE PADUCAH GASEOUS DIFFUSION PLANT

The aforementioned actions are steps in reducing site risks. While no imminent threats currently exist, several major challenges remain. These challenges include PCBs and radionuclides in creeks and soil, off-site organic compound plumes, burial grounds, and on-site sources of groundwater contamination. The SMP outlines a strategy for addressing these challenges and for achieving significant reduction of potential risks at the site.

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3. COMMUNITY PROFILE

- Site and Community Overview
- A History of Public Involvement

Since beginning a formal program of environmental cleanup work at the PGDP in the late 1980s, DOE has continually turned to stakeholders for input. The community, with a history of involved citizenry, responded with immediate interest and feedback through personal contacts, letters, and public meetings.

The PGDP is situated on a 3,556-acre parcel of DOE-owned property in McCracken County in western Kentucky, approximately 10 miles west of the city of Paducah and 3.5 miles south of the Ohio River. The primary operations associated with the enrichment process are located on approximately 650 acres within the plant area. Of the remaining DOE-owned acreage, 1,986 acres are leased to the Kentucky Department for Fish and Wildlife Resources (KDFWR) as part of the West Kentucky Wildlife Management Area (WKWMA).

The area surrounding the PGDP is predominantly rural. The area is lightly populated, with private residences and farms dotting rural roads around the plant. Some private residences are located adjacent to the DOE property boundary and WKWMA, though no private residences exist on DOE property. The closest communities to the plant are the unincorporated communities of Grahamville (about 1 mile east) and Heath (about 1 mile southeast). The West McCracken Water District supplies municipal water to portions of these communities. The closest towns with universal public water supplies are Kevil, Kentucky (about three miles southwest), and Metropolis, Illinois (about four miles northeast, across the Ohio River). The figures included in this chapter depict the plant site itself and the location of the plant site in relation to the groundwater plume (Figure 1); local communities, roads, schools, playgrounds, community gathering areas (Figure 2); wetlands, streams, and other surface water features (Figure 3); the WKWMA (Figures 1, 2, and 3); and the area of potential habitat for the Indiana bat, a federally listed endangered species (Figure 4).

The plant is a significant regional employer, providing work for approximately 1,800 people from about 20 counties in four states (Kentucky, Illinois, Missouri, and Tennessee). The population of Paducah, based on the 2010 U.S. census, was 25,024. The population of McCracken County (248.74 square miles), according to the April 2010 census, is about 65,600.

The Tennessee Valley Authority's Shawnee Fossil Plant, adjacent to the northern border of the DOE site, is the only other major industrial facility in the immediate area. The Honeywell Metropolis Works, located across the Ohio River in Metropolis, Illinois, produces feed material for the PGDP and other uranium enrichment facilities abroad.

When groundwater contamination was discovered in residential water wells near PGDP in 1988, DOE instituted a response action to provide municipal water to certain properties free of charge. The properties to which DOE provides municipal water are located in the Water Policy area, depicted in Figure 1. The plant also designated a contact person to handle all telephone inquiries and make personal visits to concerned residents.

These efforts led to the issuance of the first CRP for PGDP in 1989. The plan was revised substantially in 1998 to meet the requirements of the FFA and was revised in 2005, 2008, 2009, and again in 2011. Community stakeholders in the Paducah area began working with DOE in 1986 to formalize ways to access information and provide input on environmental activities at the PGDP. These

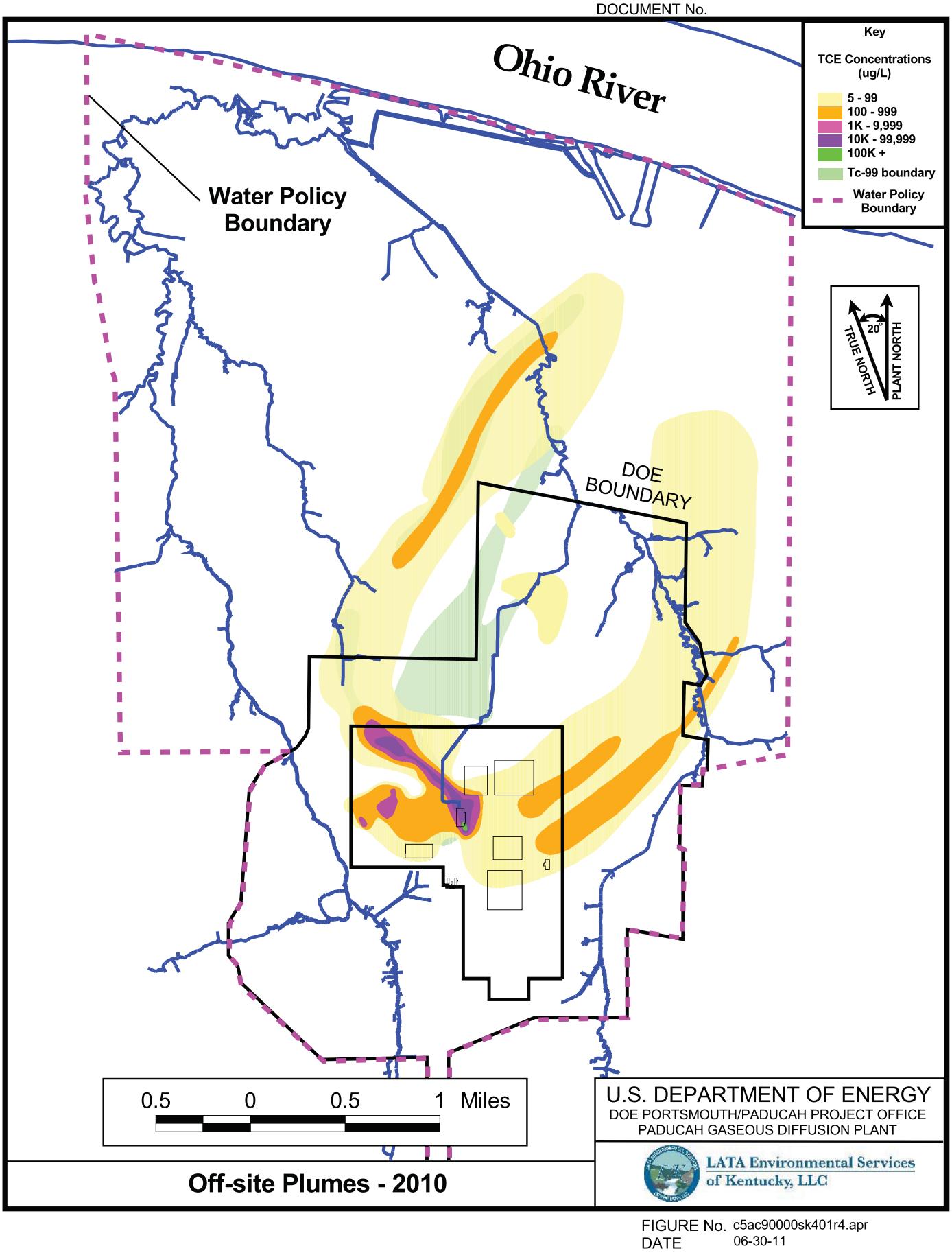
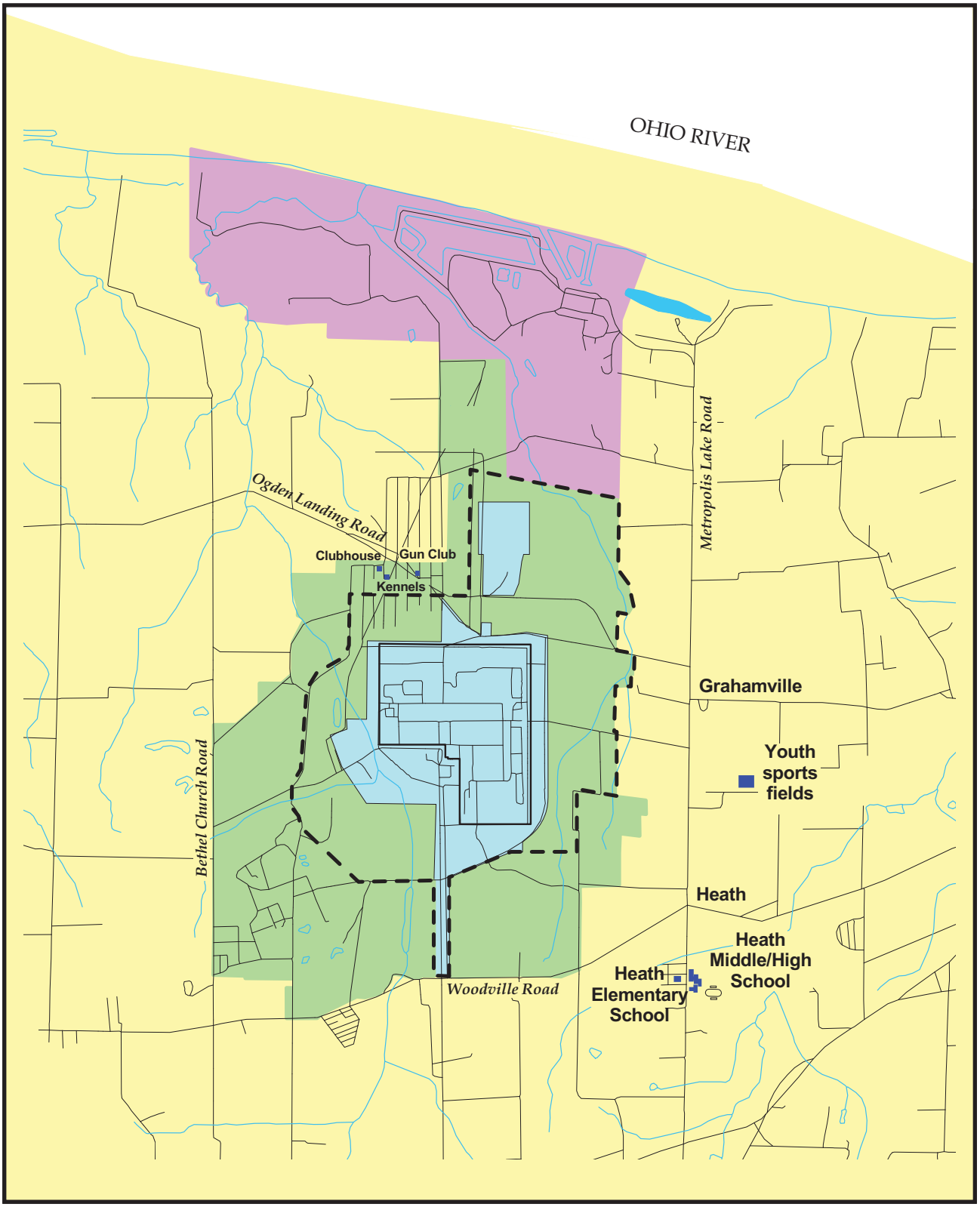


Figure 1. Groundwater Contamination

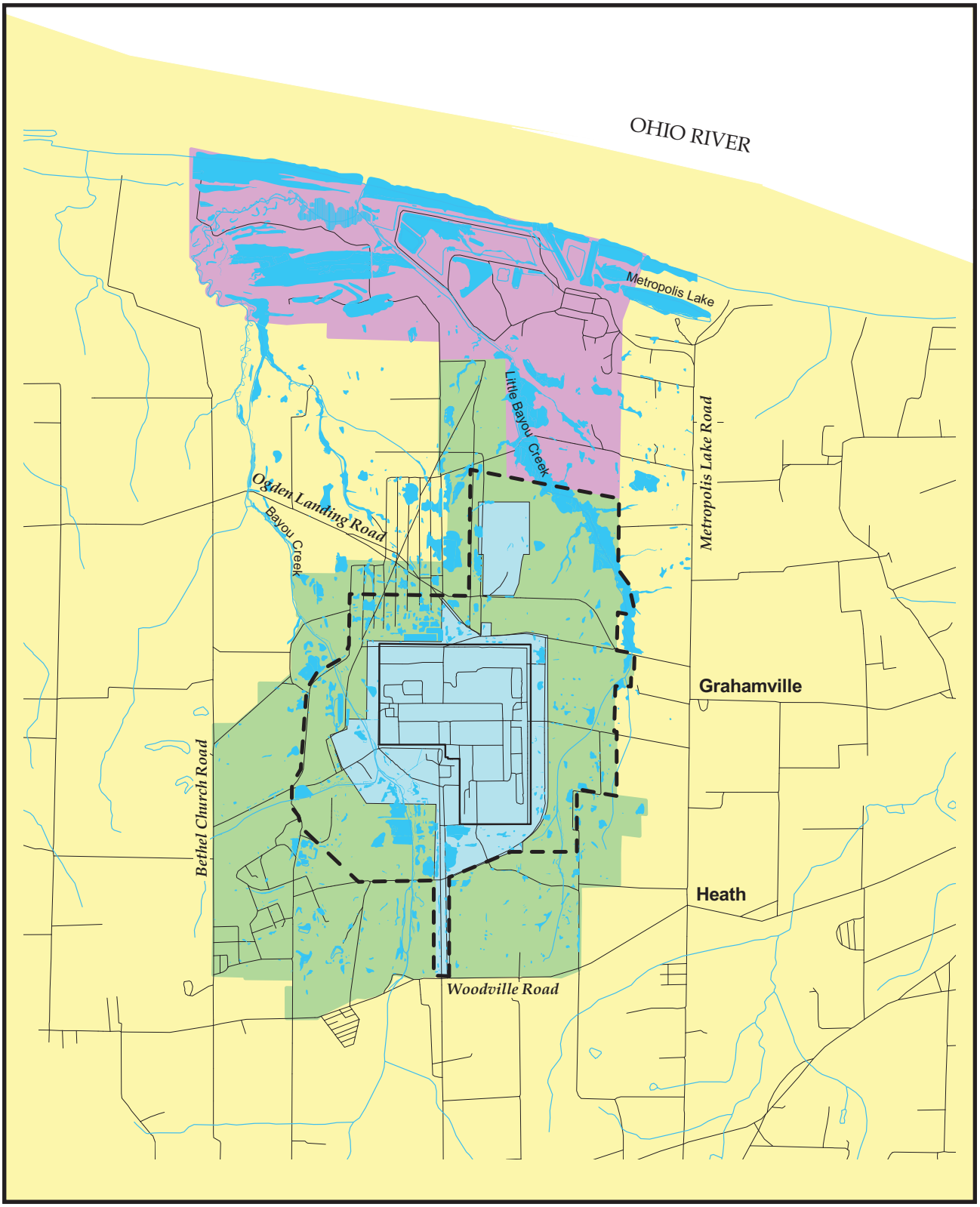


2000 0 2000 4000 Feet

STREAMS
ROADS
Controlled Access Area
DOE Boundary

Community Gathering Areas
DOE owned Industrial Area
WKWMA
TVA BOUNDARY
Rural Residential/Agriculture

Figure 2. Local Communities and Community Gathering Areas

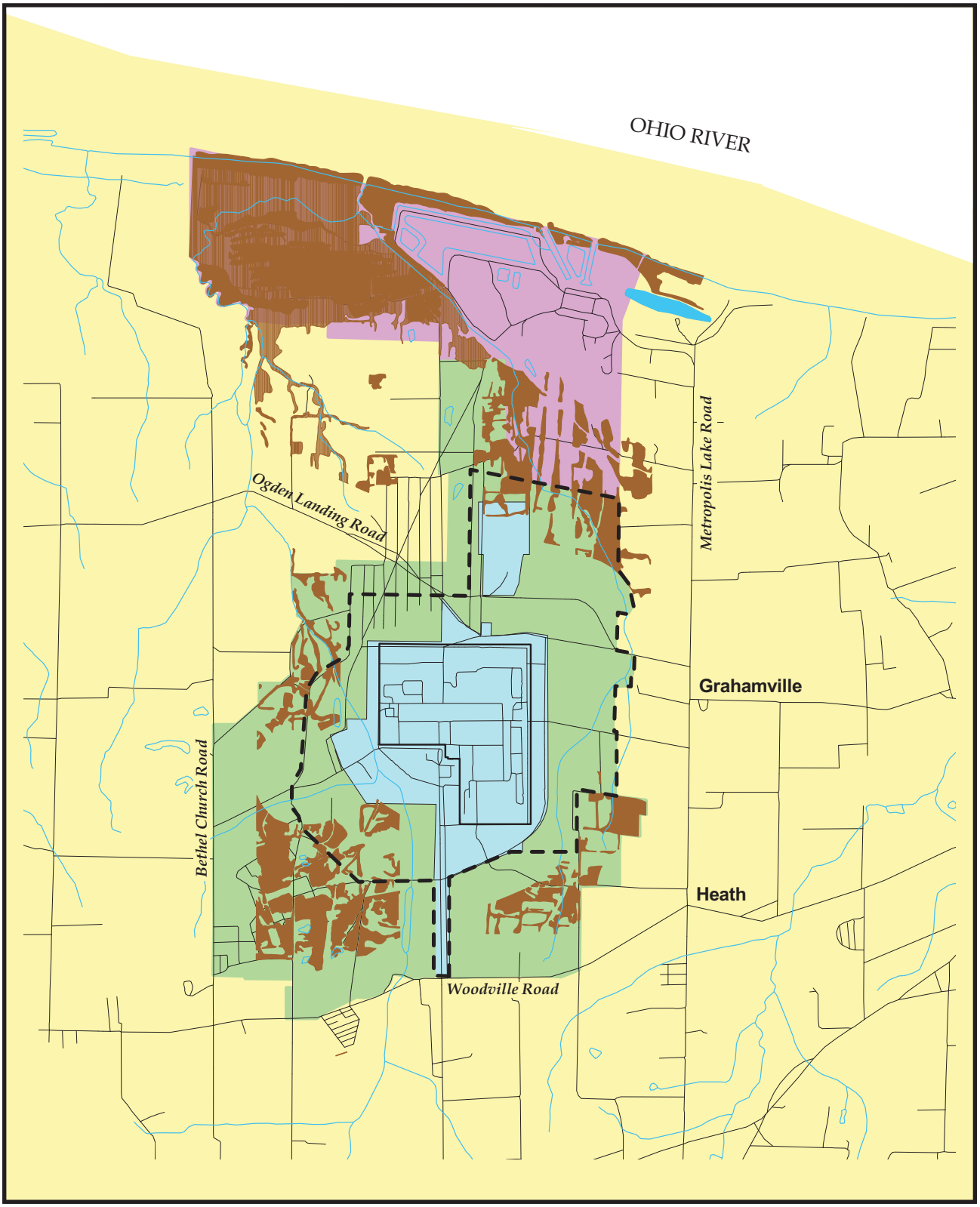


2000 0 2000 4000 Feet

STREAMS
ROADS
Controlled Access Area

Wetlands
DOE owned Industrial Area
WKWMA
TVA BOUNDARY
Rural Residential/Agriculture

Figure 3. Wetlands and Streams



Potential Sensitive Species Habitat

2000 0 2000 4000 Feet

STREAMS
ROADS
Controlled Access Area
DOE Boundary

Indiana Bat Habitat
DOE owned Industrial Area
WKWMA
TVA BOUNDARY
Rural Residential/Agriculture

Figure 4. Potential Indiana Bat

activities included an Environmental Advisory Committee (active from 1986 to 1997) and the Neighborhood Council (chartered in 1992).

Many DOE cleanup sites across the country have formed local stakeholder boards to serve as forums for dialogue on planning and decision making among representatives from the community, DOE, and regulatory agencies. In 1994, DOE's Office of EM established the Site Specific Advisory Board (SSAB) program under the Federal Advisory Committee Act. The Paducah Citizens Advisory Board (CAB) was chartered under the SSAB program in 1996.

Funded by DOE, the CAB provides independent advice and recommendations on cleanup activities at the PGDP. CAB members represent a broad spectrum of the community with diverse perspectives and experiences. Nonvoting, ex-officio members include representatives from DOE's Portsmouth/Paducah Project Office, EPA, KEEC (represented by the Kentucky Division of Waste Management), KDFWR, and Kentucky Department for Public Health. These members advise the CAB on their agencies' policies and perspectives related to PGDP cleanup.

All CAB meetings are open to the public and present an opportunity for the board members and general public to obtain information, ask questions, and interact with DOE and PGDP personnel. Through the CAB, DOE gains valuable input on FFA-related cleanup and other PGDP issues to consider in making decisions.

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 camping, canoeing, hunting deer and small game, field trials for dogs and horses, trail riding, fishing, and skeet and target shooting.

Formal interviews to assess the community's level of knowledge, perceptions, and concerns regarding environmental issues and activities at PGDP have been conducted several times since the public involvement program began, including a round of interviews during development of earlier CRPs. The most recent formal interviews were conducted in 2002, when DOE convened three focus groups to help determine community concerns and suggestions regarding the CRP. These groups represented plant neighbors, educators from elementary to college levels, local elected officials, representatives of the regional business community, and the Paducah CAB.

In general, the focus groups reflected concerns about the overall pace of environmental cleanup at the site and the long-term resolution of the groundwater contamination. In response to these concerns, the FFA parties have developed new strategies that focus on accelerating cleanup actions to provide risk reduction at the major sources of off-site groundwater contamination. These strategies are reflected in the SMP, which is periodically updated, and is available for public review at the Environmental Information Center (EIC) (see Chapter 4 for more information about the EIC). The SMP is the principal blueprint for scheduling and implementing investigation and cleanup activities at the site, including activities to address groundwater contamination.

Focus group participants were generally aware of DOE communications methods and felt the agency was doing a good job of disseminating information, especially through public meetings. The suggestions for improving future communication centered on the use of new technologies, such as interactive kiosks, interactive video programs for students, and traveling tabletop displays. Other suggestions for improved communications included increased use of traditional methods, such as mailing lists, speakers' bureaus, newsletters, and flyers.

DOE has communicated regularly with local citizens groups, individual citizens, and community leaders through recurring briefings and meetings. DOE also reviews and responds to public comments submitted in relation to response actions.

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4. PUBLIC PARTICIPATION ACTIVITIES UNDER THE PADUCAH FFA

The following chapter describes how the FFA parties strive to provide information about PGDP cleanup and involve the public in the decision making process for Paducah's FFA-related response actions. This chapter addresses the various ways to receive information from and provide comments to DOE, EPA, and Kentucky about Paducah site activities and presents information about other public organizations that closely follow Paducah site issues and how the FFA parties work with them. This chapter also provides an overview of the decision making process under the FFA and related points for public involvement in that process.

4.1 INFORMATION RESOURCES AND PUBLIC INVOLVEMENT

4.1.1 Information Resources

A number of resources are available to inform the public about actions being conducted under the provisions of the FFA.

4.1.1.1 Contact information

Appendix A of this CRP sets forth contact information (e.g., addresses, telephone numbers, Web sites) for key government officials/agencies and stakeholder organizations that have an interest in or are affected by PGDP activities. The information in Appendix A is maintained as a separate fact sheet that is updated periodically. This fact sheet is available to the public at the EIC.

4.1.1.2 Key Web sites

Provided below are key Web sites associated with information resources and public involvement.

- Department of Energy: www.energy.gov
- Department of Energy, Portsmouth/Paducah Project Office: www.pppo.energy.gov
- Environmental Information Center: www.pppo.energy.gov/pad_eic.html
- Environmental Protection Agency: www.epa.gov
- Kentucky Department for Environmental Protection: www.dep.ky.gov
- Paducah Citizens Advisory Board: www.pgdpcab.org
- Paducah EIC Online Document Repository: www.paducaheic.com

4.1.1.3 Mailing lists

DOE maintains a list of people who are interested in receiving information by mail and periodically advertises the availability of this list. Sign-up sheets are provided routinely at public meetings for those who wish to be added to the mailing list. The mailing list contains both street and e-mail addresses (if provided). The list is maintained in an electronic database and is updated regularly. The mailing list is used to distribute informational material as appropriate. Those interested in being added to the distribution list can call 1-270-441-5338.

4.1.1.4 Publications

The FFA parties strive to improve the readability of site publications, including fact sheets, public presentations, and informational displays. Providing accurate, current, and readable material is essential in aiding the public to participate in the site's decision making process. Publications related to the Paducah site include the following:

- Meeting Summaries—Written summaries of certain public meetings are available at the EIC.

- Comment Response Summaries—When required by the National Contingency Plan (NCP)/FFA and/or RCRA for certain documents, DOE (or other FFA party, as appropriate) prepares a written response to significant comments received during public comment periods within 30 days of the end of period. For CERCLA actions, this Responsiveness Summary is included as part of the Record of Decision (ROD) and is available at the EIC and at the McCracken County Public Library once the ROD is signed.

- Fact Sheets—These provide information on site issues, cleanup activities, and projects. Fact sheets are available on a number of projects. Copies of these fact sheets are available through the EIC.

4.1.1.5 Site tours

Because of security restrictions, tours of the site are available only on a limited basis consistent with DOE security and programmatic needs. There are no scheduled public site visits. Upon request, DOE has provided tours of areas of interest to certain stakeholder groups, such as Congressional representatives and local and national media.

4.1.1.6 News media activities

To keep the public informed, the FFA parties conduct a variety of activities to provide the media with timely and accurate information about the Paducah site cleanup activities. Information is distributed through news conferences, news releases, public service announcements, editorial board presentations, contact with individual reporters and editors, and providing media with photos and video for their use.

4.1.1.7 Information repositories

The NCP requires DOE to maintain a repository where public documents are stored and are available to people seeking information. DOE provides two convenient locations where people can go to learn more about the PGDP by reading official documents and other pertinent information about the site and FFA-related activities. One location is the EIC, which is the electronic home of the site's Administrative Record and other public documents related to DOE work at PGDP. This includes reports, work plans, meeting summaries, newsletters, fact sheets, and historical PGDP information. The center is generally open weekdays from 8 a.m. to 12 p.m. and is located at 115 Memorial Drive, Paducah, Kentucky 42001, 270-554-3004 or at the Web site—http://www.paducaheic.com.

Another location where selected public documents are available is the McCracken Public Library. Copies of documents issued for public comment and the Administrative Record File Index are located there. The McCracken County Public Library is at 555 Washington Street in Paducah. Call 270-442-2510 or go to www.mclib.net for hours of operation.

4.1.1.8 Administrative Records

The Administrative Record is the official body of documents that forms the basis for the selection of a particular response/corrective action. It contains the documents used in making cleanup decisions. As the lead agency at PGDP, DOE maintains the CERCLA Administrative Record for each response action and makes it available for public inspection at the EIC. The Administrative Record index and selected documents are available at the McCracken County Public Library. DOE publishes notices to announce the availability of a new Administrative Record File in a major local newspaper of general circulation (e.g., *The Paducah Sun*). Kentucky maintains an Administrative Record for the Kentucky RCRA hazardous waste permit in accordance with state law and the FFA.

4.1.2 Public Involvement Opportunities

A number of opportunities are available for public involvement in cleanup activities being undertaken at the Paducah site.

4.1.2.1 Public comment periods

During public comment periods, the public has the opportunity to comment on various FFA-related decision documents. The public is encouraged to provide input to the FFA decision making process during these formal public comment periods. Notification of document availability, a brief document description or summary, and announcement of each public comment period are published in a major local newspaper of general circulation (e.g., *The Paducah Sun*).

Announcements include the dates and duration of the comment period, how and where to submit comments, and contact information. Written comments received during the comment period are considered during the decision making process. All public comment periods will be determined in accordance with applicable state and federal requirements.

The duration of the comment period is prescribed by the NCP/FFA and/or RCRA. Usually the public comment period is established for 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law. When requested, the FFA parties will consider extending a public comment period as provided for under the law. To the extent practicable, a comment period required by the NCP/FFA for an action/document and a comment period required by the RCRA Permit for an equivalent action/document will be combined into a single public comment period that meets all applicable requirements.

When required by the NCP/FFA and/or RCRA for certain removal and remedial action documents, DOE (or other appropriate FFA party) prepares a written response (Responsiveness Summary) to significant comments. The Responsiveness Summary contains a summary of the comments received and DOE's responses. DOE endeavors to convey all information, both technical and nontechnical, in easily understood terms. To the extent practicable, a Responsiveness Summary required by the NCP for an action/document and a Responsiveness Summary required by the RCRA Permit for an equivalent action/document will be combined into a single responsiveness summary that meets all applicable requirements.

The Responsiveness Summary typically is issued as part of the appropriate response action document (e.g., Record of Decision for comments on the Proposed Plan). The Responsiveness Summary and documents available for public comment are maintained at Public Information Repositories. (See

Section 4.1.1.7 for more information.) As appropriate, response to comments also may be mailed to the person making the comment.

4.1.2.2 Public meetings

When it is the lead agency, DOE offers public meetings or informational workshops when required by the NCP/FFA and/or RCRA and at additional times that it deems appropriate. These meetings assist the public in obtaining information and making comments to DOE, EPA, and the Commonwealth of Kentucky. When the EPA or the Commonwealth of Kentucky is the lead agency for the comment period, EPA or the Commonwealth will plan, schedule, and prepare for public meetings. Kentucky is the lead agency in actions such as closure plan decisions, permit modifications, and permit renewal.

The Paducah EIC is the most frequently used location for public meetings. Meetings have been held at areas high schools, the local community college, or other public buildings. Representatives from DOE, EPA, and Kentucky attend these meetings. When required by the NCP/FFA and/or RCRA, DOE prepares a meeting summary for public meetings for which DOE is the lead agency and makes it available to the public at the EIC. To the extent practicable, a public meeting required by the FFA/NCP for an action/document and a public meeting required by the RCRA Permit for an equivalent action/document will be combined into a single public meeting that meets all applicable requirements.

To improve effectiveness and efficiency of these meetings, the FFA parties strive to provide information to the public about an upcoming public meeting at least one week prior to holding a public meeting.

4.1.2.3 Public notification process

To ensure stakeholders are notified of opportunities for public involvement, DOE uses a variety of methods to disseminate information to the public. If notice of a document, meeting, or other activity is required to be published in a major local newspaper of general circulation, the notice typically is published in *The Paducah Sun*. To the extent practicable, a notice required by the NCP for a document, meeting, or other activity and a notice required by the RCRA Permit for the equivalent document, meeting, or other activity will be combined into a single notice, meeting all applicable requirements.

In addition to the required legal notice, DOE may use other methods to announce public participation opportunities, including news releases, public service announcements, postcards, Web site postings, *Federal Register* notices, e-mail, or other public contact tools to inform stakeholders of the availability of a public comment period, document, or public meeting.

The FFA parties strive to create public notices that are readable, easy to understand, and provide clear information on when and how the public is invited to participate in the decision making process. Public comment period announcements include the dates of the comment period, how to submit comments, how to request a public meeting (if applicable), and who to contact for more information. Public meeting announcements include the date, time, and location of the meeting and who to contact for more information.

4.1.2.4 Technical Assistance Grants

Grants are available through EPA to provide resources for community groups to hire technical advisors who can assist them in interpreting technical information about the site. EPA provides DOE with current information regarding the Technical Assistance Grant program, which DOE then makes available to the public through the EIC. Information is placed in the EIC within 30 days of receipt from EPA.

4.1.2.5 Community interviews

The NCP requires that DOE, in certain circumstances, interview local officials, community residents, public interest groups, or other interested or affected parties to obtain comment about their concerns and information needs. DOE conducts these interviews, as required, and uses public meetings, CAB meetings, and public comment periods as mechanisms to query the community about its concerns and information/public participation needs.

4.1.2.6 Special events

As appropriate, DOE may conduct special events or meetings on specific issues or topics that may relate to FFA cleanup actions, as well as for other aspects of DOE's EM program. DOE also may offer speakers to provide presentations on requested topics for stakeholder groups such as civic organizations, local businesses, trade associations, and schools.

4.1.2.7 Community Relations Plan updates

The CRP is the public's roadmap to involvement in EM decisions at PGDP. The document addresses how various environmental laws are coordinated through the FFA and at what point the public has the opportunity to comment. The document will be updated at the request of any FFA party, but no more often than once every two years. Updates will be based on information collected through public interviews, which may include informal discussions, formal focus groups, discussions at CAB meetings, other communication, and other relevant factors. The types of public involvement activities used to obtain information for CRP updates are included in Appendix B.

The CRP, including any updates, will be made available for public review in the EIC.

4.1.2.8 Other community relations activities

At DOE discretion, additional community outreach methods may be used to provide the public with information about projects and activities and to solicit comment. These activities could include additional publications, site tours, news media activities, local government interaction, civic group presentations, etc.

4.1.3 Stakeholder Organizations

4.1.3.1 Citizens Advisory Board

The CAB provides independent advice and recommendations on cleanup activities at PGDP. Participation as a member of the CAB or simply in CAB meetings is another mechanism for public involvement in PGDP cleanup activities. Meetings of the CAB and its task forces and committees are open to members of the public to acquire information and make comments on topics within the CAB's scope. The public is invited to all CAB meetings and notice is given to area media in advance of each meeting and posted on the CAB's Web site, www.pgdpcab.energy.gov. Public comment periods are routinely included on the board's meeting agenda. If you are interested in applying to become a member of the CAB, please contact the CAB office (see Appendix A for contact information).

Provides the CAB with relevant information and to obtain CAB input regarding environmental response actions, DOE does the following:

- Attends, on a regular basis, CAB board meetings and disseminates information through DOE project updates and presentations targeted to specific issues or actions planned at PGDP;

- Attends, as appropriate, CAB task force meetings to provide technical information, either upon request by CAB members or as determined by the response action cycle; and

- Responds to CAB recommendations in writing to inform the CAB whether the recommendation is accepted and to explain the DOE's decision regarding the recommendation.

For more information about the CAB, please see the discussion in Chapter 3.

4.1.3.2 Government agencies

DOE shares the Paducah environmental public involvement stage with state and local boards and agencies and with several citizen groups and organizations. Two regulatory agencies participate in EM decisions at the PGDP: KEEC and EPA. The working relationships among DOE, KEEC, and EPA for cleanup actions at the PGDP are addressed in the FFA for the PGDP.

EPA Region 4 is based in Atlanta, Georgia. Aside from its official reviews of DOE decision documents, EPA publishes a considerable amount of information on a broad range of topics.

Much of this information is available through the main EPA Web site, www.epa.gov.

Contact information for EPA:

U.S. Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3415
EPA Hotline: (800) 241-1745
EPA Public Affairs Fax Number: (404) 562-8335
Web site: www.epa.gov/region4

The KEEC is responsible for a wide range issues and programs for the Commonwealth of Kentucky. Contact information for the KEEC:

Kentucky Energy and Environment Cabinet
Department for Environmental Protection
300 Fair Oaks Lane
Frankfort, KY 40601
Phone: (502) 564-2150
Fax: (502) 564-4245
Web site: www.eec.ky.gov

Many people receive information about the Paducah site from elected or appointed officials, and DOE strives to keep these officials informed through briefings, publications, mailings. The FFA parties strive to respond to questions from officials and other agencies in a timely fashion.

Additional government agencies, officials, and organizations that may have an interest in PGDP cleanup and other PGDP activities are listed in Appendix A, along with related contact information.

4.1.3.3 Other stakeholder organizations

A variety of other stakeholder groups have an interest in PGDP activities, including these:

- Active Citizens for Truth
- Associated General Contractors
- Agency for Toxic Substances and Disease Registry
- Ballard County Chamber of Commerce
- Ballard County
- City of Kevil
- City of Paducah
- Coalition for Health Concerns
- Paducah Economic Development Council
- Indigenous Peoples Environmental Network
- Kentucky Department of Fish and Wildlife Resources
- Kentucky Department for Public Health—Radiation Health Branch
- McCracken County
- Paducah Area Chamber of Commerce
- Paducah Area Community Reuse Organization
- Purchase Area Development District
- Purchase District Health Department
- Regional Association of Concerned Environmentalists
- Security Police and Fire Professionals of America, Local 101
- Tennessee Valley Authority
- United States Enrichment Corporation
- United Steelworkers of America, Local 550
- University of Kentucky
- West Kentucky Community and Technical College
- West Kentucky Wildlife Management Area
- West McCracken Water District

4.2 DECISION MAKING AND PUBLIC INVOLVEMENT

- FFA Modifications
- Removal Actions
- Remedial Actions
- Coordination of CERCLA and RCRA

This chapter addresses decisions made within the scope of the Paducah FFA and related public involvement opportunities. The FFA establishes a procedural framework and schedule for developing, implementing, and monitoring appropriate cleanup actions at the Paducah site in accordance with CERCLA, RCRA, PGDP's RCRA hazardous waste permit, and state law, including corrective action provisions.

Public involvement and public comment opportunities in decisions made under the FFA vary according to the kind of decision being made. Key decisions that are made under the FFA include: major FFA modifications; emergency removal actions; time critical removal actions; non-time critical removal actions; interim remedial actions; and final remedial actions. This chapter describes the process under the FFA and opportunities for public involvement for each of these decisions. This chapter also describes the process that is followed to coordinate CERCLA and RCRA requirements.

4.2.1 FFA Modifications

There may be instances when the FFA parties identify the need to modify the FFA. The FFA may be modified with the agreement of all of the FFA parties. Modifying the FFA means changing the text of the FFA and/or its appendices. Modifications may be designated either as minor or major. Any FFA party may designate a proposed modification as a major modification. If any FFA party disagrees with the designation of a modification as "major," it may invoke dispute resolution pursuant to the provisions of FFA Section XXV. Minor modifications can be made informally upon consent of the FFA parties and do not require public review and comment. Major modifications are required to be in writing and are effective upon the date they are signed by EPA, which is the last signatory on such modifications.

Although the FFA does not require public review and comment for major modifications, the parties to the FFA have agreed that major modifications of the FFA and/or its appendices will be subject to a 30-day public comment period prior to finalization.

The decision process and public participation opportunities for major modifications are described below:

- The proposing party proposes a major modification of the FFA.
- When all FFA parties support the modification, then the following actions are taken:
  - — The proposing party submits the modification to the EIC;
  - — In a major local newspaper of general circulation (e.g., *The Paducah Sun*), the proposing party publishes a notice providing a brief description of the proposed modification and announcing the availability of the proposed modification in the EIC and a 30-day public comment period; and
  - — The FFA parties consider public comment, as appropriate.
- If the FFA parties agree on the modification after considering public comment, then
  - (1) The parties sign a FFA Modification Form effecting the modification. The updated version of the FFA will be maintained at the EIC;
  - (2) The major modification of the FFA will be placed in the EIC for public review; and
  - (3) DOE notifies the public in a major newspaper of general circulation (e.g., *The Paducah Sun*) that a major modification to the FFA has been made and is available at the EIC.

Figure 5 summarizes the process for major FFA modifications.

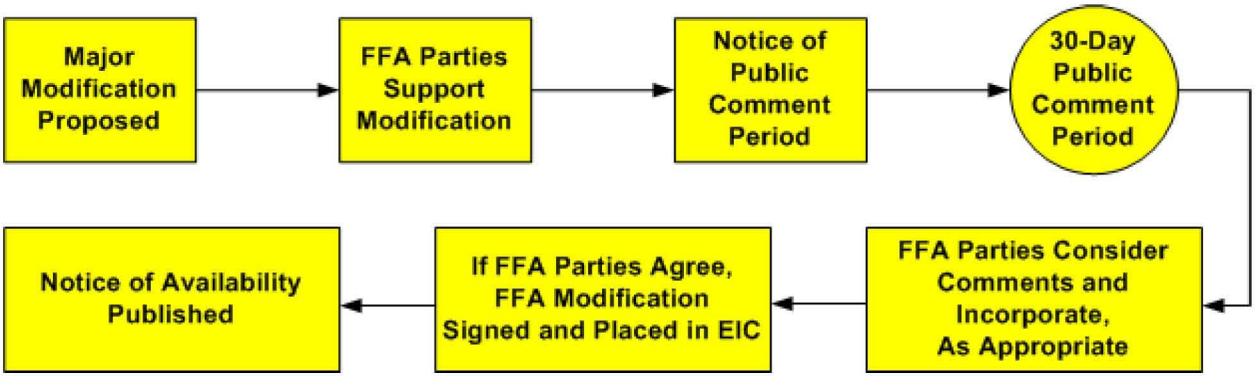

Figure 5. Major FFA Modification

4.2.2 Removal Actions

Federal regulation (40 *CFR* § 300.5) defines a removal action as, "the cleanup or removal of released hazardous substances from the environment; such actions as may be necessary taken in the event of the threat of release of hazardous substances into the environment; such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances; the disposal of removed material; or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare of the United States or to the environment, which may otherwise result from a release or threat of release." The FFA also outlines the decision and public involvement process for removal actions. Removal actions can include, but are not limited to, one or more of the following activities:

- Fences, warning signs, or other security or site control precautions—where humans or animals have access to the release.

- Drainage controls, for example, runoff or run-on diversion, where needed, to reduce migration of hazardous substances, pollutants, or contaminants off-site or to prevent precipitation or runoff from other sources (e.g., flooding) from entering the release area.

- Stabilization of berms, dikes, or impoundments or drainage or closing of lagoons, where needed, to maintain the integrity of the structures.

- Caps on contaminated soils or sludges, where needed, to reduce migration of hazardous substances, pollutants, or contaminants into soil, ground or surface water, or air. Use of chemicals and other materials to retard the spread of the release or to mitigate its effects—where the use of such chemicals will reduce the spread of the release.

- Excavation, consolidation, or removal of highly contaminated soils from drainage or other areas—where such actions will reduce the spread of, or direct contact with, the contamination.

- Removal of drums, barrels, tanks, or other bulk containers that contain or may contain hazardous substances or pollutants or contaminants—where it will reduce the likelihood of spillage; leakage; exposure to humans, animals, or the food chain; or fire or explosion.

- Containment, treatment, disposal, or incineration of hazardous materials, where needed, to reduce the likelihood of human, animal, or food chain exposure.

- Provision of an alternative water supply—where immediately necessary to reduce exposure to contaminated household water and continuing until such time as local authorities can provide a permanent remedy.

Pursuant to Section X.B of the FFA, removal actions are initiated by the submittal of a Removal Notification to EPA and KEEC for their review and approval. The notification includes pertinent information, including a description of the factors considered in determining the appropriateness of the removal action.

There are three types of removal actions:

(1) Emergency/imminent hazard removal actions
(2) Time-critical removal actions
(3) Non-time-critical removal actions

These categories of removal actions are based on the type of situation, the urgency of the threat of release, and the time frame in which the action must be initiated. Community involvement requirements for all three categories of removal actions can be found at 40 *CFR* § 300.415(n). (NOTE: The 1998 FFA contains an outdated citation.)

The public can gain more information about a removal action by reviewing the Administrative Record for the removal action, which is available at the EIC, and by contacting the designated DOE spokesperson for the removal action. The designated spokesperson for removal actions will be the DOE Paducah Site Lead. In accordance with the NCP, the spokesperson informs the public and others about removal actions taken and serves as a point of contact for community members. Contact information for the DOE Paducah Site Lead is available in Appendix A. For removal actions that extend beyond 120 days, DOE conducts community interviews (see Section 1 of this chapter for information on community interviews). This CRP satisfies the requirements for the lead agency to prepare a CRP for removal actions that extend beyond 120 days.

4.2.2.1 Emergency/imminent hazard removal actions

Emergency/imminent hazard removal actions are taken in response to imminent and substantial endangerment to human health or the environment, such as when there is a release that requires on-site activities to begin within hours or days. Public information activities during an emergency/imminent hazard removal action typically are handled under emergency response procedures and are intended to be very streamlined in nature.

Figure 6 highlights some of the key points in the FFA process for implementing an Emergency/Imminent Hazard Removal Action.

4.2.2.2 Emergency removal action

When an emergency/imminent hazard removal action is proposed, DOE provides EPA and the KEEC with a removal notification for their review and approval, unless development, review, and approval of the removal notification would be impractical, considering the exigencies of the situation. In cases in which a release at the site could cause imminent and substantial endangerment to public health or welfare of the environment, DOE proceeds as soon as possible with the removal action and notifies EPA and KEEC in accordance with applicable provisions of the FFA, NCP, and PGDP's RCRA hazardous waste

permit. A description of the emergency and the technical specifications for the removal action, including any further action needed to complete the removal action, are submitted in writing to EPA and KEEC within 15 days of the release.

Information about emergency removal actions can be obtained by reviewing the Administrative Record, which will be placed in the EIC, and by contacting the agency spokesperson (see the previous discussions about the availability of the Administrative Record and about the agency spokesperson).

4.2.2.3 Time-critical removal actions

Pursuant to Section X.D of the FFA, time-critical removal actions are taken in response to releases or potential releases, requiring on-site action when there is less than six months to plan for the actions. Key points in the FFA decision and public involvement processes for time-critical removal actions are summarized in Figure 6.

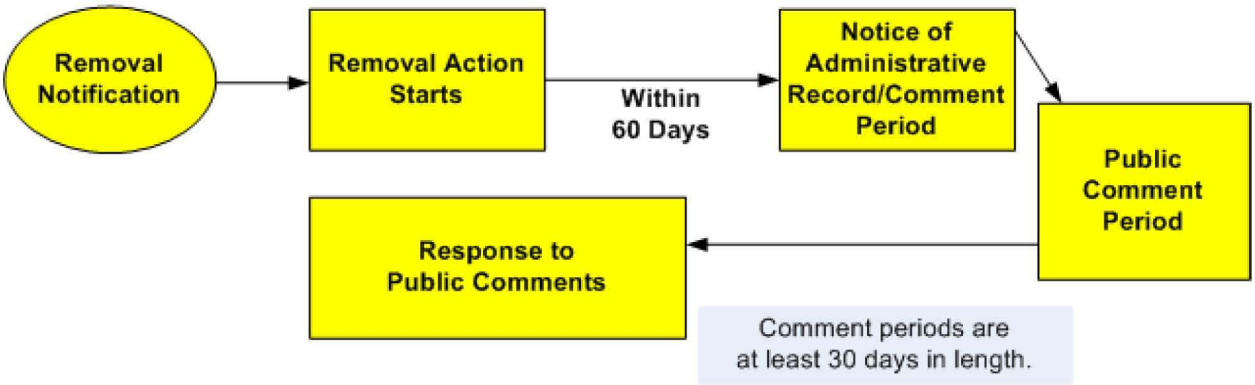

Figure 6. Time-Critical Removal Action

When such a removal action is proposed, DOE provides EPA and the KEEC with a removal notification for their review and approval. Upon approval, DOE initiates the removal action. DOE publishes a notice of availability of the Administrative Record and comment period for the selected removal action within sixty days of initiating the removal action. Within 30 days of the close of the comment period, DOE responds to comments in a written Responsiveness Summary, which is reviewed and approved by EPA and KEEC and included in the Administrative Record.

Time-critical removal actions have three principal public involvement points.

(1) Notice and Availability of Administrative Record—Within 60 days of the start of an on-site removal activity, DOE makes the Administrative Record available to the public at the EIC and issues a notice announcing the availability of the Administrative Record and the start of a public comment period. This notice is to be published in a major local newspaper of general circulation.

(2) Public Comment Period—Usually the public comment period is established for 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law.

(3) Response to Significant Comments—DOE prepares a written response to significant comments received during the comment period within 30 days of the end of the comment period. The comment response summary and the removal notification are submitted to EPA and Kentucky for review and approval in accordance with the FFA and are included in the Administrative Record.

Additional information about time-critical removal actions at PGDP can be obtained by contacting the agency spokesperson (see the previous discussions about the agency spokesperson).

4.2.2.4 Non-time-critical removal actions

Pursuant to Section X.E of the FFA, non-time-critical removal actions are taken when a removal action is determined to be appropriate, but a planning period of at least six months is available before on-site activities begin. Key points in the FFA decision and public involvement processes for non-time-critical removal actions are summarized in Figure 7. When a non-time critical removal action is proposed, DOE provides EPA and the KEEC with a removal notification for their review and approval. Upon approval of the notification, DOE prepares an engineering evaluation/cost analysis (EE/CA), which is an analysis of removal alternatives for EPA and KEEC approval, to evaluate removal alternatives. DOE makes the removal notification, the EE/CA, and the Administrative Record available for public comment in accordance with the NCP. Following public comment, DOE prepares an action memorandum (documenting the removal action to be taken), including a summary of responses to significant public comments, and a removal action work plan for EPA and KEEC approval. DOE commences the removal action following EPA and KEEC approval of the removal action work plan.

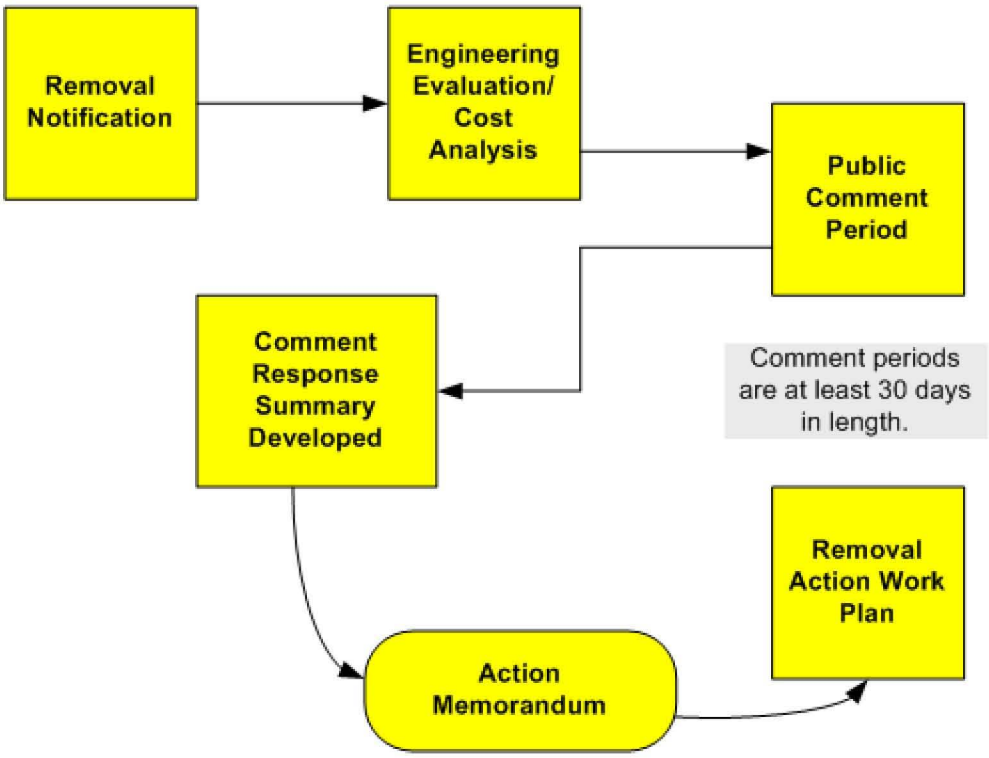

Figure 7. Non-Time-Critical Removal Actions

Non-time-critical removal actions have four principal public involvement points.

(1) Information Repository/Administrative Record Establishment and Notification—DOE makes the Administrative Record available for public review at the EIC at specific times in relation to the EE/CA and issues a notice of the Administrative Record's availability in a major newspaper of general circulation.

(2) Notice of Availability/Description of the EE/CA—DOE publishes a notice of availability and a brief description of the EE/CA in a major local newspaper of general circulation.

(3) Public Comment Period—Upon completion of the EE/CA, DOE usually establishes a public comment period of 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law. Upon timely request, DOE, as lead agency, will extend the public comment period by a minimum of 15 additional days in accordance with 40 *CFR* § 300.415(n)(4)(iii).

(4) Responsiveness Summary—DOE prepares a written response to significant comments within 30 days of the close of the comment period and make this responsiveness summary available to the public in the information repository. This summary is included in the action memorandum and is available as part of the Administrative Record.

Additional information about non-time-critical removal actions can be obtained by contacting the agency spokesperson (see the previous discussions about the agency spokesperson on page 25).

4.2.3 Remedial Actions

Remedial action means those actions taken instead of, or in addition to, removal actions in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release so that they do not migrate to cause substantial danger to present or future public health or welfare of the environment. In contrast to final remedial actions, interim remedial actions are temporary or non-final actions performed in anticipation of a subsequent final remedy decision.

Figure 8 depicts the key steps in the decision and public involvement process for remedial actions under the FFA. The CERCLA remedial process typically includes the following pertinent steps:

- Remedial Investigation (RI)—An RI, conducted by DOE and subject to review and approved by EPA and KEEC under the FFA, determines the nature and extent of the problem presented by the release.

- Feasibility Study (FS)—The lead agency conducts an FS to develop and evaluate options for remedial action. The FS is subject to review and approval by EPA and KEEC under the FFA. The RI and FS are collectively referred to as the "RI/FS."

- Proposed Plan—Identifies the preferred alternative from those options developed in the FS. The proposed plan is subject to review and approval by and EPA and KEEC under the FFA. The proposed plan also is subject to public review and comment.

- ROD—After completing the RI/FS and publishing the preferred alternative in the proposed plan for public comment, the appropriate cleanup option usually is selected by DOE and EPA, with concurrence from KEEC. A public document known as the ROD is issued and made available to the public for review.

- If the remedial action is accompanied by a modification of the RCRA hazardous waste permit, a 45-day public comment period is provided. For other remedial actions, the comment period normally is established at 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law. DOE, as lead agency, in accordance with the *CFR*, will extend comment periods upon timely request.

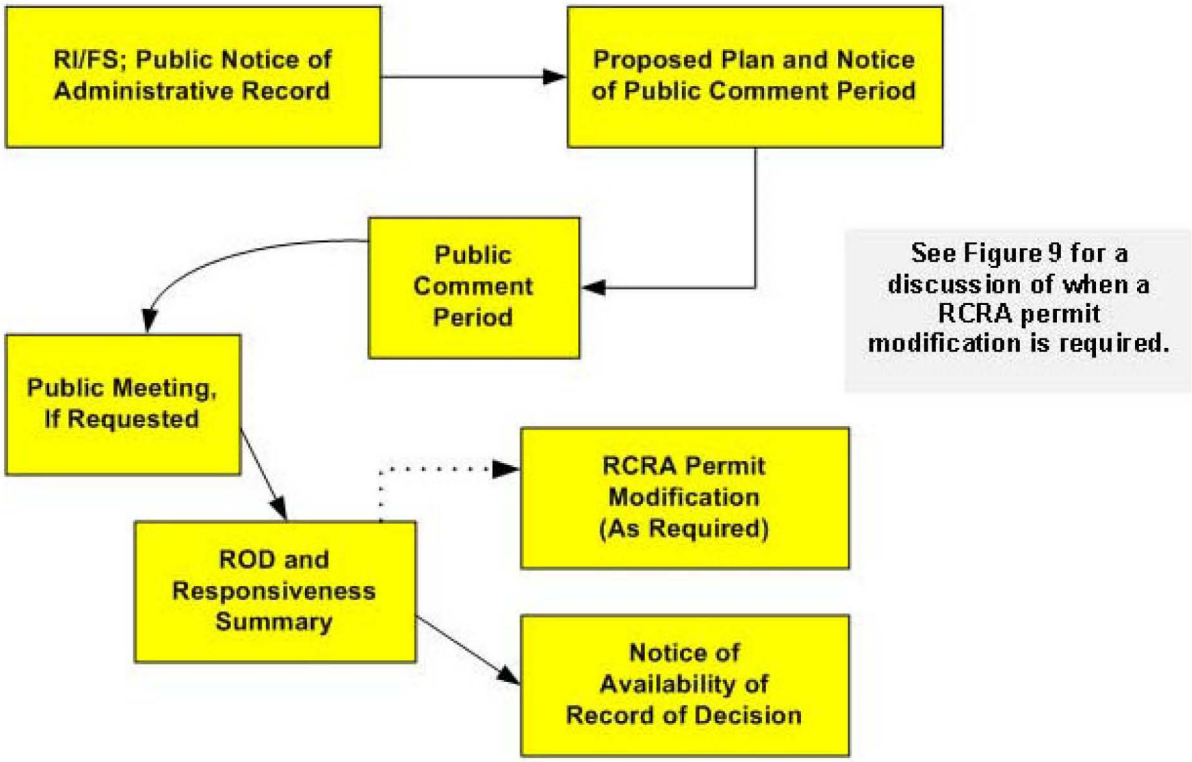

Figure 8. Interim Remedial Actions/Final Remedial Actions

- Remedial Design—The remedial design includes the technical analysis and procedures that follow the selection of a remedy for a site. The remedial design is subject to review and approval of EPA and KEEC under the FFA.

- Remedial Action—The remedial action involves the actual construction or implementation of a cleanup. In certain circumstances, if a hazardous substance will remain at the site, a review of the remedial action is required five years after remedy implementation. This review evaluates the continued protectiveness of the remedial action.

In remedial actions, there are opportunities for the public to gain information and make comments. Many of these are triggered by the completion of certain steps in the process.

- Upon Commencement of the RI: Administrative Record Notification—DOE publishes a notice of availability of the administrative record in a major local newspaper of general circulation (e.g., *The Paducah Sun*).

- Upon Completion of the FS and Proposed Plan: Proposed Plan Notification and Analysis—DOE publishes a notice of the availability of the proposed plan, including a brief summary in a major local newspaper of general circulation. The notice announces a comment period for the document.

- Public Comment Period on the Proposed Plan—DOE usually establishes a public comment period of 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with

applicable law. Upon timely request, DOE, as lead agency, will extend the public comment period by a minimum of 30 additional days in accordance with 40 *CFR* § 300.430(f)(3)(i)(C).

- Public Meeting—DOE provides an opportunity for a public meeting during the comment period. Typically, meeting opportunities are announced with the notice of the comment period. If a transcript of the public meeting is made, a copy of the transcript will be placed in the EIC for public review.

- Significant Changes—After publication of the proposed plan and prior to adoption of the selected remedy in the ROD, if new information is made available that significantly changes the basic features of the remedy with respect to scope, performance, or cost, such that the remedy significantly differs from the original proposal and supporting analysis and information, DOE, as the lead agency, either includes a discussion of the significant changes and the reasons for the changes in the ROD if the changes could be reasonably anticipated by the public or seeks additional public comment on a revised proposed plant if the change could not have been reasonably anticipated, in accordance with 40 *CFR* § 300.430(f)(3)(ii).

- Availability of ROD—DOE announces the availability of the ROD for public review and places the ROD in the EIC. Final remedy selection is incorporated into the ROD. The ROD includes a written summary of significant comments and any significant new data submitted during the comment period, and DOE's response to such comments and data.

Community involvement requirements for remedial actions can be found at 40 *CFR* § 300.430. Additional information about the community relations activities that take place during the remedial design/remedial action stage may be found in 40 *CFR* § 300.435(c).

4.3 COORDINATION OF CERCLA AND RCRA

RCRA was passed in 1976 to address management of the country's huge volume of solid waste. The law requires that EPA or authorized states regulate the management of hazardous waste, which includes certain waste solvents, batteries, and many other waste materials deemed potentially harmful to human health and the environment.

RCRA Subtitle C establishes requirements for generation, transportation, and treatment, storage, and disposal of hazardous wastes; regulates closure for inactive facilities; requires corrective actions for hazardous wastes and/or hazardous constituents originating in SWMUs; and provides for interim corrective measures, if necessary, to respond to immediate threats to public health or the environment.

Kentucky is authorized by EPA to administer the RCRA Subtitle C hazardous waste program, including issuance of permits for storage, treatment, and/or disposal of hazardous waste. The permit addresses treatment and storage facilities that actively manage hazardous wastes, post-closure monitoring of the closed landfill, and corrective actions for releases from SWMUs and areas of concerns. RCRA requires a study and decision making process for SWMU corrective actions that is similar to the CERCLA remedial action process. The Diagram of RCRA/CERCLA Processes in Figure 9 illustrates the similarities in the two processes.

Under the FFA, the FFA parties have designated each of the CERCLA remedial action documents referenced in Figure 9 (except for the ROD) to be the equivalent of their counterpart RCRA corrective action documents. Thus, one document is intended to satisfy both RCRA and CERCLA cleanup requirements, consistent with the intention of the FFA parties that compliance with the terms of the FFA will be deemed compliant with CERCLA and RCRA requirements.

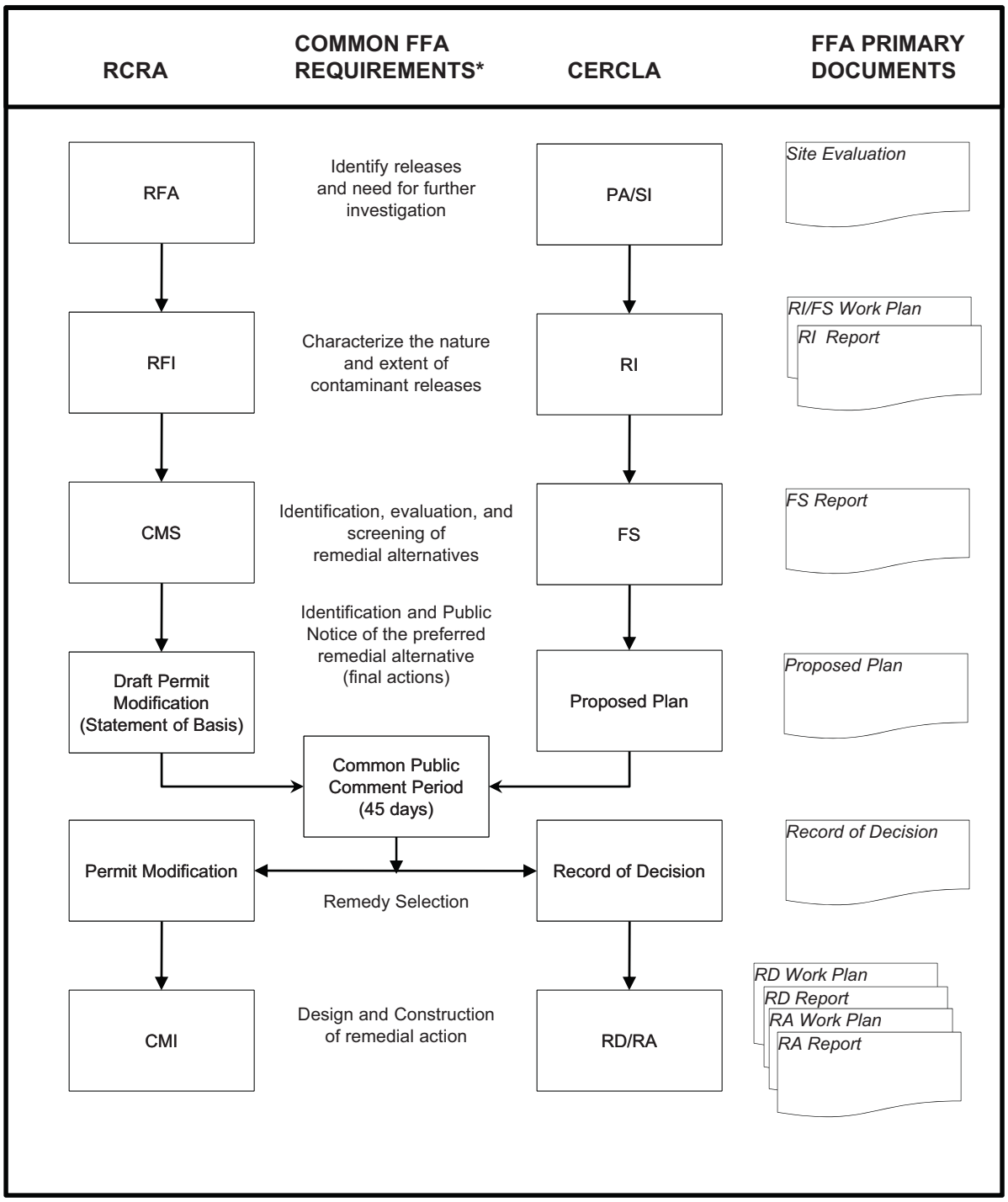

Figure 9. Diagram of Coordination of CERCLA and RCRA Process in Final Remedial Actions

It is the intent of the FFA parties that the public involvement processes for remedial/corrective actions that are incorporated into the RCRA hazardous waste permit will be coordinated with one common public notice of the proposed plan/draft permit modification, one common public comment period of 45 days, and one common public meeting (as necessary). Accordingly, there is no second comment period or public meeting when Kentucky modifies the RCRA hazardous waste permit.

For any final action, Kentucky will modify the RCRA hazardous waste permit at the time of its concurrence on the ROD. Kentucky appends RODs, including interim RODs, to the RCRA hazardous waste permit. A permit modification is not required at the time of Kentucky's concurrence on an interim ROD, and Interim ROD summaries may be appended at the time of any future modification of the permit.

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APPENDIX A

KEY CONTACTS FOR THE PADUCAH GASEOUS DIFFUSION PLANT

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KEY CONTACTS
FOR THE PADUCAH GASEOUS DIFFUSION PLANT

(For a current version of this list, please call 270-441-5338, or visit the EIC.)

United States Senate and House of Representatives

U.S. Senator Mitch McConnell
317-A Russell Senate Office Building
Washington, DC 20510-1702
(202) 224-2541
Fax: (202) 224-2499
http://www.mcconnell.senate.gov/public/index.cfm?p=contact

Martie Wiles, Field Representative
U.S. Senator Mitch McConnell's Office
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Paducah, KY 42001
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Fax: (270) 443-3102
martie.wiles@mcconnell.senate.gov

U.S. Senator Rand Paul
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Washington, DC 20510
(202) 224-4343
http://paul.senate.gov

Jim Milliman, State Director
U.S. Senator Rand Paul's Office
600 Dr. Martin Luther King, Jr. Place
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Fax: (502) 582-5344

Rachel McCubbin, Deputy State Director
U.S. Senator Rand Paul's Office
1100 South Main Street, Suite 12
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(270) 885-1212
Fax: (270) 881-3975
rachel_mccubbin@paul.senate.gov

Christina Peterson, Field Representative
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1100 South Main Street, Suite 12
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christina_peterson@paul.senate.gov

U.S. Representative Ed Whitfield
2368 Rayburn House Office Building
Washington, DC 20515-0236
(202) 225-3115
Fax: (202) 225-3547
http://whitfield.house.gov/contact-ed/

Janece Everett, Field Representative
U.S. Representative Ed Whitfield's Office
100 Fountain Avenue, Suite 104
Paducah, KY 42001
(270) 442-6901
Fax: (270) 442-6805
janece.everett@mail.house.gov

Committee on Energy and Commerce
Subcommittee on Energy and Power
U.S. Representative Ed Whitfield, Chairman
2368 Rayburn House Office Building
Washington, DC 20515-0236
(202) 225-3115
Fax: (202) 225-3547
http://whitfield.house.gov/contact-ed/

Committee on Appropriations
Subcommittee on Energy and Water
U.S. Representative Rodney Frelinghuysen, Chairman
2369 Rayburn House Office Building
Washington, DC 20515-3011
(202) 225-5034

Committee on Appropriations
Energy and Water Development Subcommittee
U.S. Senator Dianne Feinstein, Chairman
331 Hart Senate Office Building
Washington, DC 20510
(202) 224-3841
Fax: (202) 228-3954

Committee on Armed Services
(Authorizing Committee)
U.S. Representative Buck McKeon, Chairman
2120 Rayburn House Office Building
Washington, DC 20515-0552
(202) 225-4151
Fax: (202) 225-0858

Kentucky Governor

Governor Steve Beshear
Office of the Governor
700 Capitol Avenue
Frankfort, KY 40601
(502) 564-2611
Fax: (502) 564-2517
www.governor.ky.gov

Kentucky State Senate and House of Representatives

	Local Address	Counties Represented
Senator Stan Humphries District 1 702 Capitol Avenue, Annex Room 209 Frankfort, KY 40601 (502) 564-8100, ext. 870 Fax: (502) 564-6543 stan.humphries@lrc.ky.gov	763 Sinking Fork Road Cadiz, KY 42211 (270) 522- 0195	Calloway, Carlisle, Fulton, Graves, Hickman, Lyon, Trigg
Senator Bob Leeper District 2 702 Capitol Avenue, Annex Room 252 Frankfort, KY 40601 (502) 564-8100, ext. 712 Fax: (502) 564-6543 bob.leeper@lrc.ky.gov	229 S Friendship Road Paducah, KY 42003 (270) 554-2771	Ballard, Marshall, McCracken
Representative Steven Rudy District 1 702 Capitol Avenue, Annex Room 413E Frankfort, KY 40601 (502) 564-8100, ext. 637 Fax: (502) 564-6543 steven.rudy@lrc.ky.gov	3430 Blueridge Drive West Paducah, KY 42086 (270) 744-8137	Ballard, Carlisle, Fulton, Hickman, McCracken

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Department of Energy: www.energy.gov

Department of Energy Portsmouth/Paducah Project Office: http://www.pppo.energy.gov/

Environmental Information Center: http://www.pppo.energy.gov/pad_eic.html

Environmental Protection Agency: www.epa.gov

Kentucky Department for Environmental Protection: www.eec.ky.gov/

Paducah Citizens Advisory Board: www.pgdpcab.org/

Paducah Environmental Information Center Online Document Repository: www.paducaheic.com

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APPENDIX B

PUBLIC INVOLVEMENT HISTORY

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PUBLIC INVOLVEMENT HISTORY

Since beginning a formal program of environmental work at Paducah in the late 1980s, the U.S. Department of Energy (DOE) has continually turned to stakeholders for input. The community, with a history of involved citizenry, responded with immediate interest and comment through personal contacts, letters, and public meetings.

Since then, DOE has added additional methods to involve citizens in its decision making process, such as the creation of the Paducah Citizens Advisory Board (CAB) and the opening of the Environmental Information Center (EIC).

DOE environmental management (EM) continues to study its sites and to develop new remediation and waste-handling methods. As a result, the public involvement program must keep pace with the changing needs for different types of environmental decision making. As the program evolves, the public will have new ways to add their voices to decision making. Advances in communications technology provide new opportunities for public involvement, such as electronic mail, internet research, and video conferencing.

PUBLIC INVOLVEMENT CHRONOLOGY

Since the last revision of the Community Relations Plan in 1998, the partnership between DOE and its stakeholders has produced many examples of beneficial collaboration on EM decision making. Highlights are provided below.

1998 Public Involvement

- An issue of the site's informational bulletin was published.
- The CAB conducted 11 board meetings and one special meeting.

1999 Public Involvement

- The CAB held 11 board meetings and one special meeting.
- A general information workshop was conducted in July.
- A public meeting was held in August on the topic of transuranic contamination at Paducah.
- The Secretary of Energy spoke at a September public meeting about transuranics contamination.

2000 Public Involvement

- The CAB held 11 board meetings and two special meetings.

- Paducah staff participated in several meetings sponsored by DOE and other organizations.

- The Secretary of Energy, the Assistant Secretary for EM, and the Assistant Secretary for Environment, Safety, and Health held January meetings on budget proposals for Paducah cleanup and health studies.

- In February, a community meeting was held to discuss the final results of a DOE Headquarters investigation into environmental safety and health at the plant.

- A meeting soliciting public comment on the Paducah Groundwater Operable Unit Feasibility Study was held in July.

- A meeting to discuss off-site contamination and the Paducah Waste Disposition National Environmental Policy Act environmental assessment was conducted in October.

- In November, DOE participated in a jointly sponsored meeting with the U.S. Environmental Protection Agency (EPA) and the Commonwealth of Kentucky regarding remedial action alternatives for the North-South Diversion Ditch.

- In December, a meeting was held to discuss RCRA permit modifications.

- The EIC Web site came on line in December.

- DOE participated in several outreach efforts during 2000, including the meetings of civic groups and community organizations.

2001 Public Involvement

- The DOE EIC was moved to a more central location in Paducah. The move allowed the center to expand hours and provide four public-use computer terminals.

- The Paducah CAB established task forces to more closely examine DOE cleanup work at the site.

- The CAB held 11 regular meetings and several task force and committee meetings.

- CABFare, the newsletter of the Paducah CAB, was published for the first time.

2002 Public Involvement

- The full CAB met 11 times, with an additional 38 task force meetings.

- Regulatory-required public meetings were held regarding the following projects: scrap metal removal, North-South Diversion Ditch, C-720, C-410 decontamination and decommissioning (D&D), waste disposition, and potentially reusable uranium materials.

- Other public meetings were held on the fiscal year 2003 budget for EM, DOE's plans for accelerated cleanup, and the annual site environmental report.

- The Assistant Secretary of Energy for EM held two meetings, one in person, and the other by videoconference. The CAB and the public were invited.

- Several site tours were conducted for CAB members, government and community leaders, and DOE and its regulators.

2003 Public Involvement

- The CAB held 11 regular meetings and 35 task force and subcommittee meetings.

- The addendum to the waste disposition environmental assessment was the subject of a May public meeting.

- The General Accounting Office visited Paducah for a June status meeting on cleanup work at Paducah Gaseous Diffusion Plant (PGDP).

- In September, the Paducah CAB hosted the national EM Site Specific Advisory Board (SSAB) Chairs Meeting.

- DOE staff also briefed groups in Paducah and other communities in Kentucky and Tennessee on the status of work at Paducah.

- The CAB published its first annual report.

2004 Public Involvement

- In 2004, DOE held major public meetings in several cities, including Paducah, to discuss the Environmental Impact Statement for the Depleted Uranium Hexafluoride Conversion Facilities to be built at Paducah and Portsmouth, Ohio.

- DOE launched a series of public meetings and workshops to discuss a major review of environmental work intended to assure that site cleanup plans are consistent with anticipated end use of DOE facilities. Ranging from major public meetings to small-group presentations in response to specific requests, DOE brought many members of the public in to the process to develop an end-state vision for the PGDP site. In addition, the CAB chair met with several community organizations about the end-state effort, providing additional input to the process.

- The full CAB met 11 times and task forces held 53 meetings.

- The CAB published its second annual report.

- DOE briefed community leaders on site activities to assist them in setting community priorities for 2005.

2005 Public Involvement

- DOE held ongoing discussions and a public meeting regarding the End State Vision for PGDP.

- The Secretary of Energy visited Paducah and held a news conference.

- DOE invited members of the community to a signing of a groundwater remediation record of decision. DOE, Kentucky, and EPA officials were present to sign the document.

- The Assistant Secretary for EM met with members of the CAB.

- DOE conducted a detailed plant tour for community leaders and CAB members.

- DOE briefed community leaders on site activities to assist them in setting community priorities for 2006.

- The full CAB met 11 times and task forces and subcommittees held more than 50 meetings.

- The CAB published its third annual report.

2006 Public Involvement

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs and others.
- DOE briefed community leaders on site activities to assist them in setting community priorities for 2007.
- The full CAB met 11 times and task forces and subcommittees held more than 30 meetings.
- The CAB published a report for the 2005 and 2006 years.

2007 Public Involvement

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.
- DOE briefed community leaders about site activities to assist them in setting community priorities for 2008.
- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including the site management plan, surface water, soil piles, C-400 interim remedial action, the Southwest Plume, environmental indicators, waste disposal options, the community relations plan, and end use of the site.
- DOE also conducted public involvement activities for projects not conducted under the scope of the FFA, such as conducting a site tour and holding discussions with community groups regarding the potential recycling of nickel ingots and hosting a public meeting to discuss a congressionally funded study on the feasibility of buying private land near the site.

2008 Public Involvement

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.
- DOE conducted a public meeting on modifications to its RCRA permit.
- DOE conducted a public information exchange to update the community on the ongoing environmental remediation projects.
- DOE briefed community leaders about site activities to assist them in setting community priorities for 2009.
- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including public involvement activities, groundwater remediation, the Southwest Plume, waste disposal options, end use of the site, radiological surveys, soil and rubble areas, burial grounds, green remediation, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Five-Year Review, and an engineering evaluation/cost analysis (EE/CA) for inactive facility demolition.

- DOE also conducted public involvement activities for projects not conducted under the scope of the FFA, such as hosting a public meeting to discuss an environmental impact statement (EIS) for the Global Nuclear Energy partnership project and issuing for public comment an EIS on the nickel recycling.

2009 Public Involvement

- DOE conducted a public information exchange to update the community on the waste disposal options project and began planning for another exchange in the first quarter of 2010 to provide additional information and seek additional comment.

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2010.

- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including waste disposal options, end use of the site, environmental monitoring programs, the Southwest Plume, landfill operations, surface water remedial actions, groundwater remedial actions, soils removal and remedial action, facility D&D, waste disposal, DOE Material Storage Areas, and burial grounds.

- The CAB, with DOE assistance, continued its scenario planning efforts to help arrive at recommendations for an end use for the site.

- Two EE/CAs were issued for public comment, one for the removal of "hot spots" in plant creeks and ditches, the other for the removal of two facilities with contaminated soils.

2010 Public Involvement

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2010 and 2011.

- DOE coordinated a public meeting for the National Institute of Occupational Safety and Heath to present health findings of a recent study.

- DOE coordinated two forums for the Kentucky Research Consortium for Energy and the Environment to discuss future site scenarios.

- The CAB, with DOE assistance, continued its scenario planning efforts to help arrive at recommendations for an end use for the site.

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.

2011 Public Involvement

- DOE conducted a public information exchange to update the community on the waste disposal alternatives (WDA) project.

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2011.

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.

- DOE received positive media coverage on workforce employees and project accomplishments.

- DOE hosted a regional science bowl competition for middle and high school students.

- DOE, along with CAB, hosted the 2011 Eco-Fair for 600 middle school students in McCracken and Ballard Counties.

- DOE, with support from the remediation contractor, conducted a science outreach program for 25 sixth, seventh, and eighth graders involved in the Gifted and Talented Program at Heath Middle School.

- The CAB Vice Chair made a presentation to approximately 160 Rotary Club members to educate them on the CAB's role at the site, as well as DOE and various contractor missions at the site.

- DOE worked with state and federal regulators to hold a public comment period for a proposed plan regarding Southwest Plume source cleanup.

2012 Public Involvement

- The CAB hosted a two-day national DOE SSAB Chairs Meeting at which DOE EM Senior Advisor Dave Huizenga held roundtable discussions with the chairs the challenges of best using cleanup dollars.

- In conjunction with the chairs meeting, DOE held Paducah Site tours for Mr. Huizenga and SSAB chairs, focusing on best use of cleanup funding.

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2012-2013.

- DOE issued a record of decision and subsequent press release regarding Southwest Plume source cleanup.

- DOE and the Paducah remediation contractor participated in the Jackson Purchase Foundation Water Conference presenting an overview of the Paducah Remediation Program.

- DOE and the remediation contractor worked with the Kentucky Division of Waste Management to hold a public comment period and public meeting regarding changes to DOE's Hazardous Waste Facility Permit.

- DOE provided a tour of potential WDA sites for CAB members and worked with the CAB WDA subcommittee to develop public workshop briefing materials for the WDA Remedial Investigation/Feasibility Study process.

- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including WDA, end use of the site, inactive facilities removal, and cleanup of groundwater, surface water, soils, and burial grounds.

- The CAB, with DOE assistance, continued its scenario planning efforts to help develop recommendations for an end use for the site.

- DOE held a two-day Industry Day workshop, including a site tour, with private industry and public economic development officials to determine the nature of private industry interest in the Paducah Site after United States Enrichment Corporation (USEC) ceases uranium enrichment operations.
- DOE conducted plant tours and briefings for community leaders, Paducah Area Chamber of Commerce representatives, senior DOE headquarters officials, members of congressional staffs, and others.
- DOE and its prime Paducah contractors supported the Feds Feed Families Program by raising funds to restock the shelves of six Paducah service organizations that help the hungry.
- The remediation contractor raised funds for three key charitable causes: Salvation Army Angel Tree, American Cancer Society's Relay for Life, and United Way.
- DOE received positive media coverage on workforce employees and cleanup accomplishments.
- DOE hosted a regional science bowl competition for middle and high school students.
- DOE held Paducah Site tour for the Kentucky Energy and Environmental Cabinet Secretary, Dr. Len Peters.
- The CAB and DOE, with help from the remediation contractor, hosted the 3rd Annual 2012 Eco Fair for nearly 500 sixth-graders from Lone Oak, Heath, and St. Mary Middle Schools in McCracken County.
- DOE, with support from the remediation contractor, conducted a mentoring program for about 50 Gifted and Talented Program science students at Heath and Lone Oak middle schools.
- DOE hosted Kentucky Labor Cabinet Secretary Mark Brown for Governor's Safety and Health Award presentations to DOE's three Paducah prime contractors for outstanding safety performance.
- The Paducah remediation contractor launched PEGASIS, an enhanced geographic mapping tool, affording public access via the Internet to environmental sampling data at the Paducah site.
- DOE and the Paducah remediation contractor hosted 19 Kentucky Governor's Scholars Program students for a presentation and tour of the Paducah Site, focusing on environmental cleanup and waste management.

PUBLIC INVOLVEMENT IN THIS PLAN

Early revisions of this plan were aided by input from the Paducah CAB and three focus groups. A Business and Education Focus Group brought together representatives of the regional business community, educators from elementary to college levels, and local elected officials. A Plant Neighbors Focus Group provided input from individuals living near PGDP. Members of the Paducah CAB volunteered their services to form the third focus group.

The focus groups provided feedback to DOE on several aspects of communication with stakeholders. The three groups were asked, in particular, for input on the effectiveness of various avenues of stakeholder communication used by DOE and for their suggestions on other efforts that might be made to improve communication.

The focus groups last met in late 2002. Efforts have been made to implement suggestions from the focus groups: improve communication, circulate phone numbers for information more widely, and place more programmatic information in lay terminology on the Internet. DOE will continue its efforts to keep stakeholders aware of ongoing projects and obtain their insights into its cleanup and waste management programs.

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Primary Document

Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant

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Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant

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Office of Environmental Management

Revised by
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Both the Federal Facility Agreement for the Paducah Gaseous Diffusion Plant and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 require the U.S. Department of Energy to prepare and publish a community relations plan. Publication of this *Community Relations Plan under the Federal Facility Agreement at the U.S. Department of Energy Paducah Gaseous Diffusion Plant* meets those requirements.

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ACRONYMS

CAB	Citizens Advisory Board
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CRP	Community Relations Plan
D&D	decontamination and decommissioning
DOE	U.S. Department of Energy
EE/CA	engineering evaluation/cost analysis
EIC	Environmental Information Center
EM	environmental management
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
FS	feasibility study
KEEC	Kentucky Energy and Environment Cabinet
KDFWR	Kentucky Department of Fish and Wildlife Resources
NCP	National Contingency Plan
PGDP	Paducah Gaseous Diffusion Plant
RCRA	Resource Conservation and Recovery Act
RI	remedial investigation
ROD	record of decision
SMP	Site Management Plan
SSAB	Site Specific Advisory Board
SWMU	solid waste management unit
TVA	Tennessee Valley Authority
USEC	United States Enrichment Corporation
WDA	waste disposal alternative
WKWMA	West Kentucky Wildlife Management Area

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1. OVERVIEW OF THE COMMUNITY RELATIONS PLAN

This Paducah Community Relations Plan (CRP) is a primary document of the Federal Facility Agreement (FFA) that directs the comprehensive remediation of the Paducah Gaseous Diffusion Plant (PGDP) site. The FFA governs the corrective action/response action process from site investigation through site remediation as agreed to by the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the Kentucky Energy and Environment Cabinet (KEEC) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); the Resource Conservation and Recovery Act (RCRA); Kentucky Revised Statute 224; and other laws and regulations identified in the FFA.

The Paducah CRP describes how DOE will provide opportunities for the public to become involved in FFA-related decisions at PGDP and outlines how the parties to the agreement will coordinate public participation prescribed by the FFA.

DOE is committed to fostering meaningful public involvement in environmental remediation decision making at the site. Interactive communications enable the public and other stakeholders to learn about the environmental program so they can provide input to the FFA parties.

At the same time, ongoing communications enhance DOE's ability to consider the public's interests in cleanup decisions. Stakeholders are individuals, groups, communities, and other entities in the public and private sectors that are interested in or affected by environmental activities and decisions.

1.1 COMMUNITY RELATIONS PLAN HIGHLIGHTS

The CRP contains information to place FFA-related public involvement processes in the context of the overall environmental management (EM) program at PGDP. The CRP includes these:

- A capsule summary of the PGDP and environmental issues;
- An overview of community demographics and past public involvement; and
- A summary of required avenues the FFA parties will use to disseminate information and to solicit and respond to public comments related to FFA activities, as well as discretionary information avenues the FFA parties may use.

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2. CAPSULE SITE SUMMARY

- A Brief History of the PGDP
- Environmental Challenges
- Long-Term Outlook for the PGDP

The PGDP reached its 50th anniversary of operation in October 2002 as the only operating uranium enrichment plant in the United States. With more than a half century of production behind it, the plant faces significant environmental cleanup challenges.

The PGDP was constructed to enrich uranium for use in nuclear weapons and later began supplying enriched uranium to the commercial nuclear industry. The original facilities still are in operation, albeit with substantial upgrading and refurbishment. The United States Enrichment Corporation (USEC), which Congress established through the Energy Policy Act of 1992, has leased the uranium enrichment production facilities from DOE since 1993. USEC has assumed responsibility for production and for environmental compliance activities directly associated with USEC enrichment operations.

DOE retains the non-leased facilities. DOE's responsibilities for the site include dealing with the environmental legacy of the Cold War era. DOE remains the owner of PGDP and manages the environment management program through various contractors.

2.1 ENVIRONMENTAL CHALLENGES

Past plant operations generated hazardous substances, some of which were released into the environment. One of the major contaminants found at the site is the once-commonly used degreaser trichloroethene (TCE). Spills, leaks, and other releases allowed large quantities of TCE to reach the regional groundwater aquifer. The aquifer was a source of drinking and agricultural water in the vicinity of the plant.

In response to questions from residents about the quality of their water, the Kentucky Division of Health Services sampled residential wells north of the plant in 1988. Discovery of TCE and technetium-99, a man-made radioactive element, in some wells, prompted DOE to immediately provide a temporary alternate water supply to affected residents and initiate a sitewide investigation into the nature and extent of off-site contamination. Additionally, DOE provided municipal water to the affected residents.

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Following further environmental investigations of the entire site, PGDP was placed on the Superfund National Priorities List in 1994. In accordance with CERCLA requirements, DOE, EPA, and Kentucky entered into the FFA. The FFA is an interagency agreement to establish timetables, procedures, and documentation requirements for remediation of PGDP. The agreement provides for coordination of the cleanup programs and public involvement requirements of CERCLA and RCRA into one set of comprehensive requirements for site cleanup.

The PGDP annual Site Management Plan (SMP) outlines the strategic approach for achieving cleanup under the FFA. The strategy involves setting priorities for reducing risks as early as possible through remedial actions and removal actions and phasing remediation by dividing cleanup response actions into discrete units, called operable units, which are grouped by related media or activities—groundwater, surface water, soils, burial grounds, and decontamination and decommissioning (D&D). Contamination sources are ranked for study and cleanup on the basis of their potential to contribute to human health problems and/or off-site contamination.

Successful implementation of the PGDP EM program under the FFA depends on the expertise, communication, and coordination of several agencies and organizations. Major participants are these:

- DOE Headquarters EM—Responsible to the Secretary of Energy for accomplishing the DOE EM program nationally;
- The Portsmouth/Paducah Project Office—Responsible for accomplishing the EM program through management and oversight of the Department's contractors at the site;
- EPA Region 4—The federal regulatory entity that provides oversight related primarily to CERCLA and the FFA; and
- KEEC (through the Kentucky Department for Environmental Protection)—The Commonwealth's regulatory agency responsible for managing RCRA and other permitting issues in support of the FFA.

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From the inception of environmental activities at the plant, DOE and the other FFA parties have made significant progress toward achieving cleanup goals, including the following:

- Imposing controls (fencing and posting) to restrict public access to contaminated areas in certain outfall ditches and surface water areas;
- Preventing off-site residential use of contaminated groundwater through implementation of an action that provides an alternative water supply to certain residences;
- Reducing TCE levels using a soil remediation technology at an on-site source area formerly used to drop-test uranium hexafluoride cylinders;
- Treating more than 3.1 billion gal of contaminated groundwater using two groundwater containment systems;
- Testing and further implementing direct heating technology for removing contamination from beneath operating plant buildings;
- Excavating soil with high concentrations of polychlorinated biphenyls (PCBs) in on-site areas to reduce off-site migration and potential direct-contact risks to plant workers;
- Completing the Drum Mountain (containing contaminated scrap metal) removal action;
- Removing petroleum-contaminated soil from Solid Waste Management Unit (SWMU) 193 to eliminate a potential source of groundwater contamination;
- Removing more than 30,500 tons of scrap metal stored outdoors;
- Completing remediation of the North-South Diversion Ditch within the plant area, which permanently eliminated runoff from the ditch as a potential carrier of contamination outside the plant fence;
- Removing unusable inactive facilities;
- Selecting a remedial action and implementing a treatment system for remediation of the C-400 area, which is a major source of TCE contamination;

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- Completing CERCLA five-year reviews to ensure that remedial actions taken remain protective of human health and the environment and continue to function as designed; and

- Completing RCRA inspections/reviews.

2.2 LONG-TERM OUTLOOK FOR THE PADUCAH GASEOUS DIFFUSION PLANT

The aforementioned actions are steps in reducing site risks. While no imminent threats currently exist, several major challenges remain. These challenges include PCBs and radionuclides in creeks and soil, off-site organic compound plumes, burial grounds, and on-site sources of groundwater contamination. The SMP outlines a strategy for addressing these challenges and for achieving significant reduction of potential risks at the site.

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3. COMMUNITY PROFILE

- Site and Community Overview
- A History of Public Involvement

Since beginning a formal program of environmental cleanup work at the PGDP in the late 1980s, DOE has continually turned to stakeholders for input. The community, with a history of involved citizenry, responded with immediate interest and feedback through personal contacts, letters, and public meetings.

The PGDP is situated on a 3,556-acre parcel of DOE-owned property in McCracken County in western Kentucky, approximately 10 miles west of the city of Paducah and 3.5 miles south of the Ohio River. The primary operations associated with the enrichment process are located on approximately 650 acres within the plant area. Of the remaining DOE-owned acreage, 1,986 acres are leased to the Kentucky Department for Fish and Wildlife Resources (KDFWR) as part of the West Kentucky Wildlife Management Area (WKWMA).

The area surrounding the PGDP is predominantly rural. The area is lightly populated, with private residences and farms dotting rural roads around the plant. Some private residences are located adjacent to the DOE property boundary and WKWMA, though no private residences exist on DOE property. The closest communities to the plant are the unincorporated communities of Grahamville (about 1 mile east) and Heath (about 1 mile southeast). The West McCracken Water District supplies municipal water to portions of these communities. The closest towns with universal public water supplies are Kevil, Kentucky (about three miles southwest), and Metropolis, Illinois (about four miles northeast, across the Ohio River). The figures included in this chapter depict the plant site itself and the location of the plant site in relation to the groundwater plume (Figure 1); local communities, roads, schools, playgrounds, community gathering areas (Figure 2); wetlands, streams, and other surface water features (Figure 3); the WKWMA (Figures 1, 2, and 3); and the area of potential habitat for the Indiana bat, a federally listed endangered species (Figure 4).

The plant is a significant regional employer, providing work for approximately 1,800 people from about 20 counties in four states (Kentucky, Illinois, Missouri, and Tennessee). The population of Paducah, based on the 2010 U.S. census, was 25,024. The population of McCracken County (248.74 square miles), according to the April 2010 census, is about 65,600.

The Tennessee Valley Authority's Shawnee Fossil Plant, adjacent to the northern border of the DOE site, is the only other major industrial facility in the immediate area. The Honeywell Metropolis Works, located across the Ohio River in Metropolis, Illinois, produces feed material for the PGDP and other uranium enrichment facilities abroad.

When groundwater contamination was discovered in residential water wells near PGDP in 1988, DOE instituted a response action to provide municipal water to certain properties free of charge. The properties to which DOE provides municipal water are located in the Water Policy area, depicted in Figure 1. The plant also designated a contact person to handle all telephone inquiries and make personal visits to concerned residents.

These efforts led to the issuance of the first CRP for PGDP in 1989. The plan was revised substantially in 1998 to meet the requirements of the FFA and was revised in 2005, 2008, 2009, and again in 2011. Community stakeholders in the Paducah area began working with DOE in 1986 to formalize ways to access information and provide input on environmental activities at the PGDP. These

Figure 1. Groundwater Contamination

Figure 2. Local Communities and Community Gathering Areas

Figure 3. Wetlands and Streams

Figure 4. Potential Indiana Bat Habitat

activities included an Environmental Advisory Committee (active from 1986 to 1997) and the Neighborhood Council (chartered in 1992).

Many DOE cleanup sites across the country have formed local stakeholder boards to serve as forums for dialogue on planning and decision making among representatives from the community, DOE, and regulatory agencies. In 1994, DOE's Office of EM established the Site Specific Advisory Board (SSAB) program under the Federal Advisory Committee Act. The Paducah Citizens Advisory Board (CAB) was chartered under the SSAB program in 1996.

Funded by DOE, the CAB provides independent advice and recommendations on cleanup activities at the PGDP. CAB members represent a broad spectrum of the community with diverse perspectives and experiences. Nonvoting, ex-officio members include representatives from DOE's Portsmouth/Paducah Project Office, EPA, KEEC (represented by the Kentucky Division of Waste Management), KDFWR, and Kentucky Department for Public Health. These members advise the CAB on their agencies' policies and perspectives related to PGDP cleanup.

All CAB meetings are open to the public and present an opportunity for the board members and general public to obtain information, ask questions, and interact with DOE and PGDP personnel. Through the CAB, DOE gains valuable input on FFA-related cleanup and other PGDP issues to consider in making decisions.

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 camping, canoeing, hunting deer and small game, field trials for dogs and horses, trail riding, fishing, and skeet and target shooting.

Formal interviews to assess the community's level of knowledge, perceptions, and concerns regarding environmental issues and activities at PGDP have been conducted several times since the public involvement program began, including a round of interviews during development of earlier CRPs. The most recent formal interviews were conducted in 2002, when DOE convened three focus groups to help determine community concerns and suggestions regarding the CRP. These groups represented plant neighbors, educators from elementary to college levels, local elected officials, representatives of the regional business community, and the Paducah CAB.

In general, the focus groups reflected concerns about the overall pace of environmental cleanup at the site and the long-term resolution of the groundwater contamination. In response to these concerns, the FFA parties have developed new strategies that focus on accelerating cleanup actions to provide risk reduction at the major sources of off-site groundwater contamination. These strategies are reflected in the SMP, which is periodically updated, and is available for public review at the Environmental Information Center (EIC) (see Chapter 4 for more information about the EIC). The SMP is the principal blueprint for scheduling and implementing investigation and cleanup activities at the site, including activities to address groundwater contamination.

Focus group participants were generally aware of DOE communications methods and felt the agency was doing a good job of disseminating information, especially through public meetings. The suggestions for improving future communication centered on the use of new technologies, such as interactive kiosks, interactive video programs for students, and traveling tabletop displays. Other suggestions for improved communications included increased use of traditional methods, such as mailing lists, speakers' bureaus, newsletters, and flyers.

DOE has communicated regularly with local citizens groups, individual citizens, and community leaders through recurring briefings and meetings. DOE also reviews and responds to public comments submitted in relation to response actions.

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4. PUBLIC PARTICIPATION ACTIVITIES UNDER THE PADUCAH FFA

The following chapter describes how the FFA parties strive to provide information about PGDP cleanup and involve the public in the decision making process for Paducah's FFA-related response actions. This chapter addresses the various ways to receive information from and provide comments to DOE, EPA, and Kentucky about Paducah site activities and presents information about other public organizations that closely follow Paducah site issues and how the FFA parties work with them. This chapter also provides an overview of the decision making process under the FFA and related points for public involvement in that process.

4.1 INFORMATION RESOURCES AND PUBLIC INVOLVEMENT

4.1.1 Information Resources

A number of resources are available to inform the public about actions being conducted under the provisions of the FFA.

4.1.1.1 Contact information

Appendix A of this CRP sets forth contact information (e.g., addresses, telephone numbers, Web sites) for key government officials/agencies and stakeholder organizations that have an interest in or are affected by PGDP activities. The information in Appendix A is maintained as a separate fact sheet that is updated periodically. This fact sheet is available to the public at the EIC.

4.1.1.2 Key Web sites

Provided below are key Web sites associated with information resources and public involvement.

- Department of Energy: www.energy.gov
- Department of Energy, Portsmouth/Paducah Project Office: www.pppo.energy.gov
- Environmental Information Center: www.pppo.energy.gov/pad_eic.html
- Environmental Protection Agency: www.epa.gov
- Kentucky Department for Environmental Protection: www.dep.ky.gov
- Paducah Citizens Advisory Board: www.pgdpcab.org
- Paducah EIC Online Document Repository: www.paducaheic.com

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4.1.1.3 Mailing lists

DOE maintains a list of people who are interested in receiving information by mail and periodically advertises the availability of this list. Sign-up sheets are provided routinely at public meetings for those who wish to be added to the mailing list. The mailing list contains both street and e-mail addresses (if provided). The list is maintained in an electronic database and is updated regularly. The mailing list is used to distribute informational material as appropriate. Those interested in being added to the distribution list can call 1-270-441-5338.

4.1.1.4 Publications

The FFA parties strive to improve the readability of site publications, including fact sheets, public presentations, and informational displays. Providing accurate, current, and readable material is essential in aiding the public to participate in the site's decision making process. Publications related to the Paducah site include the following:

- Meeting Summaries—Written summaries of certain public meetings are available at the EIC.

- Comment Response Summaries—When required by the National Contingency Plan (NCP)/FFA and/or RCRA for certain documents, DOE (or other FFA party, as appropriate) prepares a written response to significant comments received during public comment periods within 30 days of the end of period. For CERCLA actions, this Responsiveness Summary is included as part of the Record of Decision (ROD) and is available at the EIC and at the McCracken County Public Library once the ROD is signed.

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- Fact Sheets—These provide information on site issues, cleanup activities, and projects. Fact sheets are available on a number of projects. Copies of these fact sheets are available through the EIC.

4.1.1.5 Site tours

Because of security restrictions, tours of the site are available only on a limited basis consistent with DOE security and programmatic needs. There are no scheduled public site visits. Upon request, DOE has provided tours of areas of interest to certain stakeholder groups, such as Congressional representatives and local and national media.

4.1.1.6 News media activities

To keep the public informed, the FFA parties conduct a variety of activities to provide the media with timely and accurate information about the Paducah site cleanup activities. Information is distributed through news conferences, news releases, public service announcements, editorial board presentations, contact with individual reporters and editors, and providing media with photos and video for their use.

4.1.1.7 Information repositories

The NCP requires DOE to maintain a repository where public documents are stored and are available to people seeking information. DOE provides two convenient locations where people can go to learn more about the PGDP by reading official documents and other pertinent information about the site and FFA-related activities. One location is the EIC, which is the electronic home of the site's Administrative Record and other public documents related to DOE work at PGDP. This includes reports, work plans, meeting summaries, newsletters, fact sheets, and historical PGDP information. The center is generally open weekdays from 8 a.m. to 12 p.m. and is located at 115 Memorial Drive, Paducah, Kentucky 42001, 270-554-3004 or at the Web site—http://www.paducaheic.com.

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Another location where selected public documents are available is the McCracken Public Library. Copies of documents issued for public comment and the Administrative Record File Index are located there. The McCracken County Public Library is at 555 Washington Street in Paducah. Call 270-442-2510 or go to www.mclib.net for hours of operation.

4.1.1.8 Administrative Records

The Administrative Record is the official body of documents that forms the basis for the selection of a particular response/corrective action. It contains the documents used in making cleanup decisions. As the lead agency at PGDP, DOE maintains the CERCLA Administrative Record for each response action and makes it available for public inspection at the EIC. The Administrative Record index and selected documents are available at the McCracken County Public Library. DOE publishes notices to announce the availability of a new Administrative Record File in a major local newspaper of general circulation (e.g., *The Paducah Sun*). Kentucky maintains an Administrative Record for the Kentucky RCRA hazardous waste permit in accordance with state law and the FFA.

4.1.2 Public Involvement Opportunities

A number of opportunities are available for public involvement in cleanup activities being undertaken at the Paducah site.

4.1.2.1 Public comment periods

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During public comment periods, the public has the opportunity to comment on various FFA-related decision documents. The public is encouraged to provide input to the FFA decision making process during these formal public comment periods. Notification of document availability, a brief document description or summary, and announcement of each public comment period are published in a major local newspaper of general circulation (e.g., *The Paducah Sun*).

Announcements include the dates and duration of the comment period, how and where to submit comments, and contact information. Written comments received during the comment period are considered during the decision making process. All public comment periods will be determined in accordance with applicable state and federal requirements.

The duration of the comment period is prescribed by the NCP/FFA and/or RCRA. Usually the public comment period is established for 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law. When requested, the FFA parties will consider extending a public comment period as provided for under the law. To the extent practicable, a comment period required by the NCP/FFA for an action/document and a comment period required by the RCRA Permit for an equivalent action/document will be combined into a single public comment period that meets all applicable requirements.

When required by the NCP/FFA and/or RCRA for certain removal and remedial action documents, DOE (or other appropriate FFA party) prepares a written response (Responsiveness Summary) to significant comments. The Responsiveness Summary contains a summary of the comments received and DOE's responses. DOE endeavors to convey all information, both technical and nontechnical, in easily understood terms. To the extent practicable, a Responsiveness Summary required by the NCP for an action/document and a Responsiveness Summary required by the RCRA Permit for an equivalent action/document will be combined into a single responsiveness summary that meets all applicable requirements.

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The Responsiveness Summary typically is issued as part of the appropriate response action document (e.g., Record of Decision for comments on the Proposed Plan). The Responsiveness Summary and documents available for public comment are maintained at Public Information Repositories. (See

Section 4.1.1.7 for more information.) As appropriate, response to comments also may be mailed to the person making the comment.

4.1.2.2 Public meetings

When it is the lead agency, DOE offers public meetings or informational workshops when required by the NCP/FFA and/or RCRA and at additional times that it deems appropriate. These meetings assist the public in obtaining information and making comments to DOE, EPA, and the Commonwealth of Kentucky. When the EPA or the Commonwealth of Kentucky is the lead agency for the comment period, EPA or the Commonwealth will plan, schedule, and prepare for public meetings. Kentucky is the lead agency in actions such as closure plan decisions, permit modifications, and permit renewal.

The Paducah EIC is the most frequently used location for public meetings. Meetings have been held at areas high schools, the local community college, or other public buildings. Representatives from DOE, EPA, and Kentucky attend these meetings. When required by the NCP/FFA and/or RCRA, DOE prepares a meeting summary for public meetings for which DOE is the lead agency and makes it available to the public at the EIC. To the extent practicable, a public meeting required by the FFA/NCP for an action/document and a public meeting required by the RCRA Permit for an equivalent action/document will be combined into a single public meeting that meets all applicable requirements.

To improve effectiveness and efficiency of these meetings, the FFA parties strive to provide information to the public about an upcoming public meeting at least one week prior to holding a public meeting.

4.1.2.3 Public notification process

To ensure stakeholders are notified of opportunities for public involvement, DOE uses a variety of methods to disseminate information to the public. If notice of a document, meeting, or other activity is required to be published in a major local newspaper of general circulation, the notice typically is published in *The Paducah Sun*. To the extent practicable, a notice required by the NCP for a document, meeting, or other activity and a notice required by the RCRA Permit for the equivalent document, meeting, or other activity will be combined into a single notice, meeting all applicable requirements.

In addition to the required legal notice, DOE may use other methods to announce public participation opportunities, including news releases, public service announcements, postcards, Web site postings, *Federal Register* notices, e-mail, or other public contact tools to inform stakeholders of the availability of a public comment period, document, or public meeting.

The FFA parties strive to create public notices that are readable, easy to understand, and provide clear information on when and how the public is invited to participate in the decision making process. Public comment period announcements include the dates of the comment period, how to submit comments, how to request a public meeting (if applicable), and who to contact for more information. Public meeting announcements include the date, time, and location of the meeting and who to contact for more information.

4.1.2.4 Technical Assistance Grants

Grants are available through EPA to provide resources for community groups to hire technical advisors who can assist them in interpreting technical information about the site. EPA provides DOE with current information regarding the Technical Assistance Grant program, which DOE then makes available to the public through the EIC. Information is placed in the EIC within 30 days of receipt from EPA.

4.1.2.5 Community interviews

The NCP requires that DOE, in certain circumstances, interview local officials, community residents, public interest groups, or other interested or affected parties to obtain comment about their concerns and information needs. DOE conducts these interviews, as required, and uses public meetings, CAB meetings, and public comment periods as mechanisms to query the community about its concerns and information/public participation needs.

4.1.2.6 Special events

As appropriate, DOE may conduct special events or meetings on specific issues or topics that may relate to FFA cleanup actions, as well as for other aspects of DOE's EM program. DOE also may offer speakers to provide presentations on requested topics for stakeholder groups such as civic organizations, local businesses, trade associations, and schools.

4.1.2.7 Community Relations Plan updates

The CRP is the public's roadmap to involvement in EM decisions at PGDP. The document addresses how various environmental laws are coordinated through the FFA and at what point the public has the opportunity to comment. The document will be updated at the request of any FFA party, but no more often than once every two years. Updates will be based on information collected through public interviews, which may include informal discussions, formal focus groups, discussions at CAB meetings, other communication, and other relevant factors. The types of public involvement activities used to obtain information for CRP updates are included in Appendix B.

The CRP, including any updates, will be made available for public review in the EIC.

4.1.2.8 Other community relations activities

At DOE discretion, additional community outreach methods may be used to provide the public with information about projects and activities and to solicit comment. These activities could include additional publications, site tours, news media activities, local government interaction, civic group presentations, etc.

4.1.3 Stakeholder Organizations

4.1.3.1 Citizens Advisory Board

The CAB provides independent advice and recommendations on cleanup activities at PGDP. Participation as a member of the CAB or simply in CAB meetings is another mechanism for public involvement in PGDP cleanup activities. Meetings of the CAB and its task forces and committees are open to members of the public to acquire information and make comments on topics within the CAB's scope. The public is invited to all CAB meetings and notice is given to area media in advance of each meeting and posted on the CAB's Web site, www.pgdpcab.energy.gov. Public comment periods are routinely included on the board's meeting agenda. If you are interested in applying to become a member of the CAB, please contact the CAB office (see Appendix A for contact information).

Provides the CAB with relevant information and to obtain CAB input regarding environmental response actions, DOE does the following:

- Attends, on a regular basis, CAB board meetings and disseminates information through DOE project updates and presentations targeted to specific issues or actions planned at PGDP;

- Attends, as appropriate, CAB task force meetings to provide technical information, either upon request by CAB members or as determined by the response action cycle; and

- Responds to CAB recommendations in writing to inform the CAB whether the recommendation is accepted and to explain the DOE's decision regarding the recommendation.

For more information about the CAB, please see the discussion in Chapter 3.

4.1.3.2 Government agencies

DOE shares the Paducah environmental public involvement stage with state and local boards and agencies and with several citizen groups and organizations. Two regulatory agencies participate in EM decisions at the PGDP: KEEC and EPA. The working relationships among DOE, KEEC, and EPA for cleanup actions at the PGDP are addressed in the FFA for the PGDP.

EPA Region 4 is based in Atlanta, Georgia. Aside from its official reviews of DOE decision documents, EPA publishes a considerable amount of information on a broad range of topics.

Much of this information is available through the main EPA Web site, www.epa.gov.

Contact information for EPA:

U.S. Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3415
EPA Hotline: (800) 241-1745
EPA Public Affairs Fax Number: (404) 562-8335
Web site: www.epa.gov/region4

The KEEC is responsible for a wide range issues and programs for the Commonwealth of Kentucky. Contact information for the KEEC:

Kentucky Energy and Environment Cabinet
Department for Environmental Protection
300 Fair Oaks Lane
Frankfort, KY 40601
Phone: (502) 564-2150
Fax: (502) 564-4245
Web site: www.eec.ky.gov

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Many people receive information about the Paducah site from elected or appointed officials, and DOE strives to keep these officials informed through briefings, publications, mailings. The FFA parties strive to respond to questions from officials and other agencies in a timely fashion.

Additional government agencies, officials, and organizations that may have an interest in PGDP cleanup and other PGDP activities are listed in Appendix A, along with related contact information.

4.1.3.3 Other stakeholder organizations

A variety of other stakeholder groups have an interest in PGDP activities, including these:

- Active Citizens for Truth
- Associated General Contractors
- Agency for Toxic Substances and Disease Registry
- Ballard County Chamber of Commerce
- Ballard County
- City of Kevil
- City of Paducah
- Coalition for Health Concerns
- Paducah Economic Development Council
- Indigenous Peoples Environmental Network
- Kentucky Department of Fish and Wildlife Resources
- Kentucky Department for Public Health—Radiation Health Branch
- McCracken County
- Paducah Area Chamber of Commerce
- Paducah Area Community Reuse Organization
- Purchase Area Development District
- Purchase District Health Department
- Regional Association of Concerned Environmentalists
- Security Police and Fire Professionals of America, Local 101
- Tennessee Valley Authority
- United States Enrichment Corporation
- United Steelworkers of America, Local 550
- University of Kentucky
- West Kentucky Community and Technical College
- West Kentucky Wildlife Management Area
- West McCracken Water District

4.2 DECISION MAKING AND PUBLIC INVOLVEMENT

- FFA Modifications
- Removal Actions
- Remedial Actions
- Coordination of CERCLA and RCRA

This chapter addresses decisions made within the scope of the Paducah FFA and related public involvement opportunities. The FFA establishes a procedural framework and schedule for developing, implementing, and monitoring appropriate cleanup actions at the Paducah site in accordance with CERCLA, RCRA, PGDP's RCRA hazardous waste permit, and state law, including corrective action provisions.

Public involvement and public comment opportunities in decisions made under the FFA vary according to the kind of decision being made. Key decisions that are made under the FFA include: major FFA modifications; emergency removal actions; time critical removal actions; non-time critical removal actions; interim remedial actions; and final remedial actions. This chapter describes the process under the FFA and opportunities for public involvement for each of these decisions. This chapter also describes the process that is followed to coordinate CERCLA and RCRA requirements.

4.2.1 FFA Modifications

There may be instances when the FFA parties identify the need to modify the FFA. The FFA may be modified with the agreement of all of the FFA parties. Modifying the FFA means changing the text of the FFA and/or its appendices. Modifications may be designated either as minor or major. Any FFA party may designate a proposed modification as a major modification. If any FFA party disagrees with the designation of a modification as "major," it may invoke dispute resolution pursuant to the provisions of FFA Section XXV. Minor modifications can be made informally upon consent of the FFA parties and do not require public review and comment. Major modifications are required to be in writing and are effective upon the date they are signed by EPA, which is the last signatory on such modifications.

Although the FFA does not require public review and comment for major modifications, the parties to the FFA have agreed that major modifications of the FFA and/or its appendices will be subject to a 30-day public comment period prior to finalization.

The decision process and public participation opportunities for major modifications are described below:

- The proposing party proposes a major modification of the FFA.
- When all FFA parties support the modification, then the following actions are taken:
  - The proposing party submits the modification to the EIC;
  - In a major local newspaper of general circulation (e.g., *The Paducah Sun*), the proposing party publishes a notice providing a brief description of the proposed modification and announcing the availability of the proposed modification in the EIC and a 30-day public comment period; and
  - The FFA parties consider public comment, as appropriate.
- If the FFA parties agree on the modification after considering public comment, then
  (1) The parties sign a FFA Modification Form effecting the modification. The updated version of the FFA will be maintained at the EIC;
  (2) The major modification of the FFA will be placed in the EIC for public review; and
  (3) DOE notifies the public in a major newspaper of general circulation (e.g., *The Paducah Sun*) that a major modification to the FFA has been made and is available at the EIC.

Figure 5 summarizes the process for major FFA modifications.

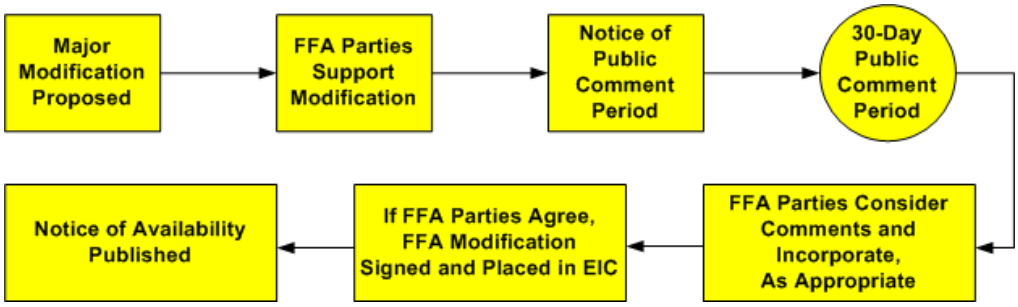

Figure 5. Major FFA Modification

4.2.2 Removal Actions

Federal regulation (40 *CFR* § 300.5) defines a removal action as, "the cleanup or removal of released hazardous substances from the environment; such actions as may be necessary taken in the event of the threat of release of hazardous substances into the environment; such actions as may be necessary to monitor, assess, and evaluate the release or threat of release of hazardous substances; the disposal of removed material; or the taking of such other actions as may be necessary to prevent, minimize, or mitigate damage to the public health or welfare of the United States or to the environment, which may otherwise result from a release or threat of release." The FFA also outlines the decision and public involvement process for removal actions. Removal actions can include, but are not limited to, one or more of the following activities:

- Fences, warning signs, or other security or site control precautions—where humans or animals have access to the release.

- Drainage controls, for example, runoff or run-on diversion, where needed, to reduce migration of hazardous substances, pollutants, or contaminants off-site or to prevent precipitation or runoff from other sources (e.g., flooding) from entering the release area.

- Stabilization of berms, dikes, or impoundments or drainage or closing of lagoons, where needed, to maintain the integrity of the structures.

- Caps on contaminated soils or sludges, where needed, to reduce migration of hazardous substances, pollutants, or contaminants into soil, ground or surface water, or air. Use of chemicals and other materials to retard the spread of the release or to mitigate its effects—where the use of such chemicals will reduce the spread of the release.

- Excavation, consolidation, or removal of highly contaminated soils from drainage or other areas—where such actions will reduce the spread of, or direct contact with, the contamination.

- Removal of drums, barrels, tanks, or other bulk containers that contain or may contain hazardous substances or pollutants or contaminants—where it will reduce the likelihood of spillage; leakage; exposure to humans, animals, or the food chain; or fire or explosion.

- Containment, treatment, disposal, or incineration of hazardous materials, where needed, to reduce the likelihood of human, animal, or food chain exposure.

- Provision of an alternative water supply—where immediately necessary to reduce exposure to contaminated household water and continuing until such time as local authorities can provide a permanent remedy.

Pursuant to Section X.B of the FFA, removal actions are initiated by the submittal of a Removal Notification to EPA and KEEC for their review and approval. The notification includes pertinent information, including a description of the factors considered in determining the appropriateness of the removal action.

There are three types of removal actions:

(1) Emergency/imminent hazard removal actions
(2) Time-critical removal actions
(3) Non-time-critical removal actions

These categories of removal actions are based on the type of situation, the urgency of the threat of release, and the time frame in which the action must be initiated. Community involvement requirements for all three categories of removal actions can be found at 40 *CFR* § 300.415(n). (NOTE: The 1998 FFA contains an outdated citation.)

The public can gain more information about a removal action by reviewing the Administrative Record for the removal action, which is available at the EIC, and by contacting the designated DOE spokesperson for the removal action. The designated spokesperson for removal actions will be the DOE Paducah Site Lead. In accordance with the NCP, the spokesperson informs the public and others about removal actions taken and serves as a point of contact for community members. Contact information for the DOE Paducah Site Lead is available in Appendix A. For removal actions that extend beyond 120 days, DOE conducts community interviews (see Section 1 of this chapter for information on community interviews). This CRP satisfies the requirements for the lead agency to prepare a CRP for removal actions that extend beyond 120 days.

4.2.2.1 Emergency/imminent hazard removal actions

Emergency/imminent hazard removal actions are taken in response to imminent and substantial endangerment to human health or the environment, such as when there is a release that requires on-site activities to begin within hours or days. Public information activities during an emergency/imminent hazard removal action typically are handled under emergency response procedures and are intended to be very streamlined in nature.

Figure 6 highlights some of the key points in the FFA process for implementing an Emergency/Imminent Hazard Removal Action.

4.2.2.2 Emergency removal action

When an emergency/imminent hazard removal action is proposed, DOE provides EPA and the KEEC with a removal notification for their review and approval, unless development, review, and approval of the removal notification would be impractical, considering the exigencies of the situation. In cases in which a release at the site could cause imminent and substantial endangerment to public health or welfare of the environment, DOE proceeds as soon as possible with the removal action and notifies EPA and KEEC in accordance with applicable provisions of the FFA, NCP, and PGDP's RCRA hazardous waste

permit. A description of the emergency and the technical specifications for the removal action, including any further action needed to complete the removal action, are submitted in writing to EPA and KEEC within 15 days of the release.

Information about emergency removal actions can be obtained by reviewing the Administrative Record, which will be placed in the EIC, and by contacting the agency spokesperson (see the previous discussions about the availability of the Administrative Record and about the agency spokesperson).

4.2.2.3 Time-critical removal actions

Pursuant to Section X.D of the FFA, time-critical removal actions are taken in response to releases or potential releases, requiring on-site action when there is less than six months to plan for the actions. Key points in the FFA decision and public involvement processes for time-critical removal actions are summarized in Figure 6.

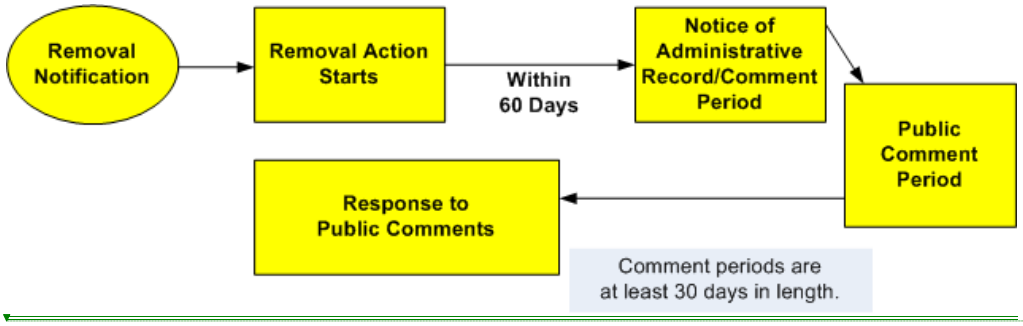

Figure 6. Time-Critical Removal Action

When such a removal action is proposed, DOE provides EPA and the KEEC with a removal notification for their review and approval. Upon approval, DOE initiates the removal action. DOE publishes a notice of availability of the Administrative Record and comment period for the selected removal action within sixty days of initiating the removal action. Within 30 days of the close of the comment period, DOE responds to comments in a written Responsiveness Summary, which is reviewed and approved by EPA and KEEC and included in the Administrative Record.

Time-critical removal actions have three principal public involvement points.

(1) Notice and Availability of Administrative Record—Within 60 days of the start of an on-site removal activity, DOE makes the Administrative Record available to the public at the EIC and issues a notice announcing the availability of the Administrative Record and the start of a public comment period. This notice is to be published in a major local newspaper of general circulation.

(2) Public Comment Period—Usually the public comment period is established for 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law.

(3) Response to Significant Comments—DOE prepares a written response to significant comments received during the comment period within 30 days of the end of the comment period. The comment response summary and the removal notification are submitted to EPA and Kentucky for review and approval in accordance with the FFA and are included in the Administrative Record.

Removal Notification

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Additional information about time-critical removal actions at PGDP can be obtained by contacting the agency spokesperson (see the previous discussions about the agency spokesperson).

4.2.2.4 Non-time-critical removal actions

Pursuant to Section X.E of the FFA, non-time-critical removal actions are taken when a removal action is determined to be appropriate, but a planning period of at least six months is available before on-site activities begin. Key points in the FFA decision and public involvement processes for non-time-critical removal actions are summarized in Figure 7. When a non-time critical removal action is proposed, DOE provides EPA and the KEEC with a removal notification for their review and approval. Upon approval of the notification, DOE prepares an engineering evaluation/cost analysis (EE/CA), which is an analysis of removal alternatives for EPA and KEEC approval, to evaluate removal alternatives. DOE makes the removal notification, the EE/CA, and the Administrative Record available for public comment in accordance with the NCP. Following public comment, DOE prepares an action memorandum (documenting the removal action to be taken), including a summary of responses to significant public comments, and a removal action work plan for EPA and KEEC approval. DOE commences the removal action following EPA and KEEC approval of the removal action work plan.

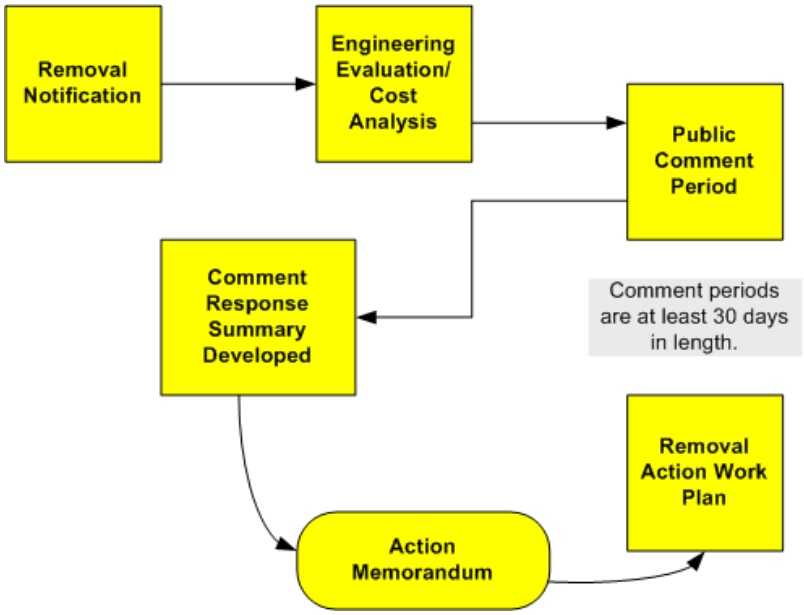

Figure 7. Non-Time-Critical Removal Actions

Non-time-critical removal actions have four principal public involvement points.

(1) Information Repository/Administrative Record Establishment and Notification—DOE makes the Administrative Record available for public review at the EIC at specific times in relation to the EE/CA and issues a notice of the Administrative Record's availability in a major newspaper of general circulation.

(2) Notice of Availability/Description of the EE/CA—DOE publishes a notice of availability and a brief description of the EE/CA in a major local newspaper of general circulation.

(3) Public Comment Period—Upon completion of the EE/CA, DOE usually establishes a public comment period of 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law. Upon timely request, DOE, as lead agency, will extend the public comment period by a minimum of 15 additional days in accordance with 40 *CFR* § 300.415(n)(4)(iii).

(4) Responsiveness Summary—DOE prepares a written response to significant comments within 30 days of the close of the comment period and make this responsiveness summary available to the public in the information repository. This summary is included in the action memorandum and is available as part of the Administrative Record.

Additional information about non-time-critical removal actions can be obtained by contacting the agency spokesperson (see the previous discussions about the agency spokesperson on page 25).

4.2.3 Remedial Actions

Remedial action means those actions taken instead of, or in addition to, removal actions in the event of a release or threatened release of a hazardous substance into the environment, to prevent or minimize the release so that they do not migrate to cause substantial danger to present or future public health or welfare of the environment. In contrast to final remedial actions, interim remedial actions are temporary or non-final actions performed in anticipation of a subsequent final remedy decision.

Figure 8 depicts the key steps in the decision and public involvement process for remedial actions under the FFA. The CERCLA remedial process typically includes the following pertinent steps:

- Remedial Investigation (RI)—An RI, conducted by DOE and subject to review and approved by EPA and KEEC under the FFA, determines the nature and extent of the problem presented by the release.

- Feasibility Study (FS)—The lead agency conducts an FS to develop and evaluate options for remedial action. The FS is subject to review and approval by EPA and KEEC under the FFA. The RI and FS are collectively referred to as the "RI/FS."

- Proposed Plan—Identifies the preferred alternative from those options developed in the FS. The proposed plan is subject to review and approval by and EPA and KEEC under the FFA. The proposed plan also is subject to public review and comment.

- ROD—After completing the RI/FS and publishing the preferred alternative in the proposed plan for public comment, the appropriate cleanup option usually is selected by DOE and EPA, with concurrence from KEEC. A public document known as the ROD is issued and made available to the public for review.

- If the remedial action is accompanied by a modification of the RCRA hazardous waste permit, a 45-day public comment period is provided. For other remedial actions, the comment period normally is established at 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with applicable law. DOE, as lead agency, in accordance with the *CFR*, will extend comment periods upon timely request.

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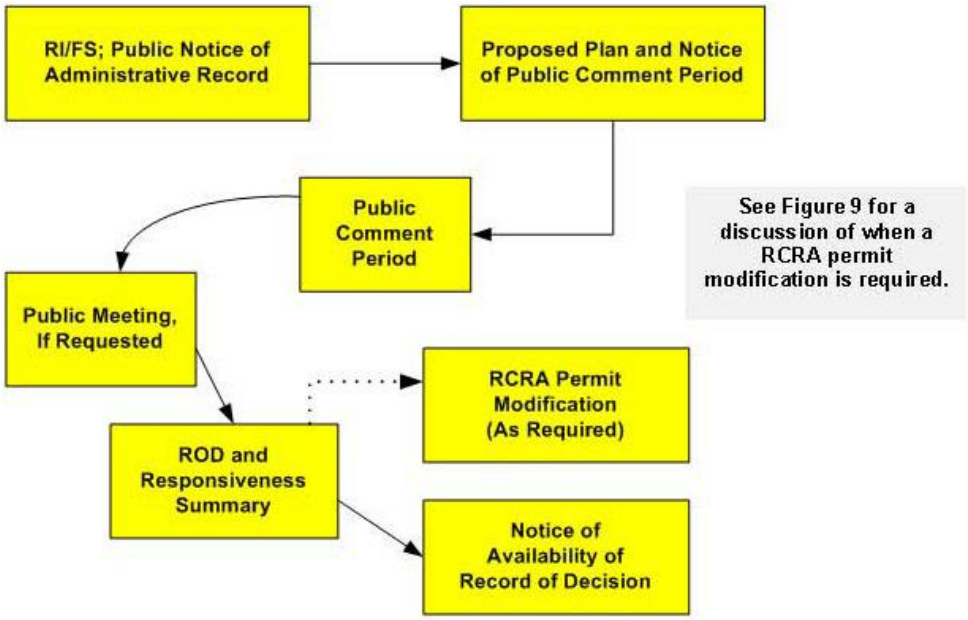

Figure 8. Interim Remedial Actions/Final Remedial Actions

- Remedial Design—The remedial design includes the technical analysis and procedures that follow the selection of a remedy for a site. The remedial design is subject to review and approval of EPA and KEEC under the FFA.

- Remedial Action—The remedial action involves the actual construction or implementation of a cleanup. In certain circumstances, if a hazardous substance will remain at the site, a review of the remedial action is required five years after remedy implementation. This review evaluates the continued protectiveness of the remedial action.

In remedial actions, there are opportunities for the public to gain information and make comments. Many of these are triggered by the completion of certain steps in the process.

- Upon Commencement of the RI: Administrative Record Notification—DOE publishes a notice of availability of the administrative record in a major local newspaper of general circulation (e.g., *The Paducah Sun*).

- Upon Completion of the FS and Proposed Plan: Proposed Plan Notification and Analysis—DOE publishes a notice of the availability of the proposed plan, including a brief summary in a major local newspaper of general circulation. The notice announces a comment period for the document.

- Public Comment Period on the Proposed Plan—DOE usually establishes a public comment period of 45 days. Depending on the circumstances, including the urgency of the situation and programmatic needs, a shorter comment period (e.g., 30 days) may be established to the extent consistent with

applicable law. Upon timely request, DOE, as lead agency, will extend the public comment period by a minimum of 30 additional days in accordance with 40 *CFR* § 300.430(f)(3)(i)(C).

- Public Meeting—DOE provides an opportunity for a public meeting during the comment period. Typically, meeting opportunities are announced with the notice of the comment period. If a transcript of the public meeting is made, a copy of the transcript will be placed in the EIC for public review.

- Significant Changes—After publication of the proposed plan and prior to adoption of the selected remedy in the ROD, if new information is made available that significantly changes the basic features of the remedy with respect to scope, performance, or cost, such that the remedy significantly differs from the original proposal and supporting analysis and information, DOE, as the lead agency, either includes a discussion of the significant changes and the reasons for the changes in the ROD if the changes could be reasonably anticipated by the public or seeks additional public comment on a revised proposed plant if the change could not have been reasonably anticipated, in accordance with 40 *CFR* § 300.430(f)(3)(ii).

- Availability of ROD—DOE announces the availability of the ROD for public review and places the ROD in the EIC. Final remedy selection is incorporated into the ROD. The ROD includes a written summary of significant comments and any significant new data submitted during the comment period, and DOE's response to such comments and data.

Community involvement requirements for remedial actions can be found at 40 *CFR* § 300.430. Additional information about the community relations activities that take place during the remedial design/remedial action stage may be found in 40 *CFR* § 300.435(c).

4.3 COORDINATION OF CERCLA AND RCRA

RCRA was passed in 1976 to address management of the country's huge volume of solid waste. The law requires that EPA or authorized states regulate the management of hazardous waste, which includes certain waste solvents, batteries, and many other waste materials deemed potentially harmful to human health and the environment.

RCRA Subtitle C establishes requirements for generation, transportation, and treatment, storage, and disposal of hazardous wastes; regulates closure for inactive facilities; requires corrective actions for hazardous wastes and/or hazardous constituents originating in SWMUs; and provides for interim corrective measures, if necessary, to respond to immediate threats to public health or the environment.

Kentucky is authorized by EPA to administer the RCRA Subtitle C hazardous waste program, including issuance of permits for storage, treatment, and/or disposal of hazardous waste. The permit addresses treatment and storage facilities that actively manage hazardous wastes, post-closure monitoring of the closed landfill, and corrective actions for releases from SWMUs and areas of concerns. RCRA requires a study and decision making process for SWMU corrective actions that is similar to the CERCLA remedial action process. The Diagram of RCRA/CERCLA Processes in Figure 9 illustrates the similarities in the two processes.

Under the FFA, the FFA parties have designated each of the CERCLA remedial action documents referenced in Figure 9 (except for the ROD) to be the equivalent of their counterpart RCRA corrective action documents. Thus, one document is intended to satisfy both RCRA and CERCLA cleanup requirements, consistent with the intention of the FFA parties that compliance with the terms of the FFA will be deemed compliant with CERCLA and RCRA requirements.

Figure 9. Diagram of Coordination of CERCLA and RCRA Process in Final Remedial Actions

It is the intent of the FFA parties that the public involvement processes for remedial/corrective actions that are incorporated into the RCRA hazardous waste permit will be coordinated with one common public notice of the proposed plan/draft permit modification, one common public comment period of 45 days, and one common public meeting (as necessary). Accordingly, there is no second comment period or public meeting when Kentucky modifies the RCRA hazardous waste permit.

For any final action, Kentucky will modify the RCRA hazardous waste permit at the time of its concurrence on the ROD. Kentucky appends RODs, including interim RODs, to the RCRA hazardous waste permit. A permit modification is not required at the time of Kentucky's concurrence on an interim ROD, and Interim ROD summaries may be appended at the time of any future modification of the permit.

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APPENDIX A

KEY CONTACTS FOR THE PADUCAH GASEOUS DIFFUSION PLANT

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KEY CONTACTS
FOR THE PADUCAH GASEOUS DIFFUSION PLANT

(For a current version of this list, please call 270-441-5338, or visit the EIC.)

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Subcommittee on Energy and Water
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Committee on Appropriations
Energy and Water Development Subcommittee
U.S. Senator Dianne Feinstein, Chairman
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Committee on Armed Services
(Authorizing Committee)
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Representative Steven Rudy District 1 702 Capitol Avenue, Annex Room 413E Frankfort, KY 40601 (502) 564-8100, ext. 637 Fax: (502) 564-6543 steven.rudy@lrc.ky.gov	3430 Blueridge Drive West Paducah, KY 42086 (270) 744-8137	Ballard, Carlisle, Fulton, Hickman, McCracken

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Representative Gerald Watkins District 3 702 Capitol Avenue, Annex Room 332A Frankfort, KY 40601 (502) 564-8100, ext. 634 Fax: (502) 564-6543 gerald.watkins@lrc.ky.gov	4317 Pines Road Paducah, KY 42001 (270) 442-0179	McCracken
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Representative Will Coursey District 6 702 Capitol Avenue, Annex Room 351A Frankfort, KY 40601 Work: (270) 252-1278 (502) 564-8100, ext. Fax: (502) 564-6543 will.coursey@lrc.ky.gov	285 Oak Level Elva Road Symsonia, KY 42082 (270) 851-4433	Lyon, Marshall, McCracken

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DOE Environmental Information Center
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(270) 554-6979
Fax: (270) 554-6987
paducaheic@bellsouth.net
Hours: Monday—Friday, 8:00 a.m. to 12:00 p.m.
www.pppo.energy.gov/pad_eic.html

Key Web Sites

Department of Energy: www.energy.gov

Department of Energy Portsmouth/Paducah Project Office: http://www.pppo.energy.gov/

Environmental Information Center: http://www.pppo.energy.gov/pad_eic.html

Environmental Protection Agency: www.epa.gov

Kentucky Department for Environmental Protection: www.eec.ky.gov/

Paducah Citizens Advisory Board: www.pgdpcab.org/

Paducah Environmental Information Center Online Document Repository: www.paducaheic.com

Deleted: Center for Environmental Management Information¶
P.O. Box 23769¶
Washington, DC 20026¶
1-800-7-EM DATA¶
http://www.em.doe.gov/bemr/BEMRPages/feedback.aspx¶
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APPENDIX B

PUBLIC INVOLVEMENT HISTORY

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PUBLIC INVOLVEMENT HISTORY

Since beginning a formal program of environmental work at Paducah in the late 1980s, the U.S. Department of Energy (DOE) has continually turned to stakeholders for input. The community, with a history of involved citizenry, responded with immediate interest and comment through personal contacts, letters, and public meetings.

Since then, DOE has added additional methods to involve citizens in its decision making process, such as the creation of the Paducah Citizens Advisory Board (CAB) and the opening of the Environmental Information Center (EIC).

DOE environmental management (EM) continues to study its sites and to develop new remediation and waste-handling methods. As a result, the public involvement program must keep pace with the changing needs for different types of environmental decision making. As the program evolves, the public will have new ways to add their voices to decision making. Advances in communications technology provide new opportunities for public involvement, such as electronic mail, internet research, and video conferencing.

PUBLIC INVOLVEMENT CHRONOLOGY

Since the last revision of the Community Relations Plan in 1998, the partnership between DOE and its stakeholders has produced many examples of beneficial collaboration on EM decision making. Highlights are provided below.

1998 Public Involvement

- An issue of the site's informational bulletin was published.
- The CAB conducted 11 board meetings and one special meeting.

1999 Public Involvement

- The CAB held 11 board meetings and one special meeting.
- A general information workshop was conducted in July.
- A public meeting was held in August on the topic of transuranic contamination at Paducah.
- The Secretary of Energy spoke at a September public meeting about transuranics contamination.

2000 Public Involvement

- The CAB held 11 board meetings and two special meetings.
- Paducah staff participated in several meetings sponsored by DOE and other organizations.
- The Secretary of Energy, the Assistant Secretary for EM, and the Assistant Secretary for Environment, Safety, and Health held January meetings on budget proposals for Paducah cleanup and health studies.
- In February, a community meeting was held to discuss the final results of a DOE Headquarters investigation into environmental safety and health at the plant.

- A meeting soliciting public comment on the Paducah Groundwater Operable Unit Feasibility Study was held in July.

- A meeting to discuss off-site contamination and the Paducah Waste Disposition National Environmental Policy Act environmental assessment was conducted in October.

- In November, DOE participated in a jointly sponsored meeting with the U.S. Environmental Protection Agency (EPA) and the Commonwealth of Kentucky regarding remedial action alternatives for the North-South Diversion Ditch.

- In December, a meeting was held to discuss RCRA permit modifications.

- The EIC Web site came on line in December.

- DOE participated in several outreach efforts during 2000, including the meetings of civic groups and community organizations.

2001 Public Involvement

- The DOE EIC was moved to a more central location in Paducah. The move allowed the center to expand hours and provide four public-use computer terminals.

- The Paducah CAB established task forces to more closely examine DOE cleanup work at the site.

- The CAB held 11 regular meetings and several task force and committee meetings.

- CABFare, the newsletter of the Paducah CAB, was published for the first time.

2002 Public Involvement

- The full CAB met 11 times, with an additional 38 task force meetings.

- Regulatory-required public meetings were held regarding the following projects: scrap metal removal, North-South Diversion Ditch, C-720, C-410 decontamination and decommissioning (D&D), waste disposition, and potentially reusable uranium materials.

- Other public meetings were held on the fiscal year 2003 budget for EM, DOE's plans for accelerated cleanup, and the annual site environmental report.

- The Assistant Secretary of Energy for EM held two meetings, one in person, and the other by videoconference. The CAB and the public were invited.

- Several site tours were conducted for CAB members, government and community leaders, and DOE and its regulators.

2003 Public Involvement

- The CAB held 11 regular meetings and 35 task force and subcommittee meetings.

- The addendum to the waste disposition environmental assessment was the subject of a May public meeting.

- The General Accounting Office visited Paducah for a June status meeting on cleanup work at Paducah Gaseous Diffusion Plant (PGDP).

- In September, the Paducah CAB hosted the national EM Site Specific Advisory Board (SSAB) Chairs Meeting.

- DOE staff also briefed groups in Paducah and other communities in Kentucky and Tennessee on the status of work at Paducah.

- The CAB published its first annual report.

2004 Public Involvement

- In 2004, DOE held major public meetings in several cities, including Paducah, to discuss the Environmental Impact Statement for the Depleted Uranium Hexafluoride Conversion Facilities to be built at Paducah and Portsmouth, Ohio.

- DOE launched a series of public meetings and workshops to discuss a major review of environmental work intended to assure that site cleanup plans are consistent with anticipated end use of DOE facilities. Ranging from major public meetings to small-group presentations in response to specific requests, DOE brought many members of the public in to the process to develop an end-state vision for the PGDP site. In addition, the CAB chair met with several community organizations about the end-state effort, providing additional input to the process.

- The full CAB met 11 times and task forces held 53 meetings.

- The CAB published its second annual report.

- DOE briefed community leaders on site activities to assist them in setting community priorities for 2005.

2005 Public Involvement

- DOE held ongoing discussions and a public meeting regarding the End State Vision for PGDP.

- The Secretary of Energy visited Paducah and held a news conference.

- DOE invited members of the community to a signing of a groundwater remediation record of decision. DOE, Kentucky, and EPA officials were present to sign the document.

- The Assistant Secretary for EM met with members of the CAB.

- DOE conducted a detailed plant tour for community leaders and CAB members.

- DOE briefed community leaders on site activities to assist them in setting community priorities for 2006.

- The full CAB met 11 times and task forces and subcommittees held more than 50 meetings.

- The CAB published its third annual report.

2006 Public Involvement

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs and others.
- DOE briefed community leaders on site activities to assist them in setting community priorities for 2007.
- The full CAB met 11 times and task forces and subcommittees held more than 30 meetings.
- The CAB published a report for the 2005 and 2006 years.

2007 Public Involvement

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.
- DOE briefed community leaders about site activities to assist them in setting community priorities for 2008.
- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including the site management plan, surface water, soil piles, C-400 interim remedial action, the Southwest Plume, environmental indicators, waste disposal options, the community relations plan, and end use of the site.
- DOE also conducted public involvement activities for projects not conducted under the scope of the FFA, such as conducting a site tour and holding discussions with community groups regarding the potential recycling of nickel ingots and hosting a public meeting to discuss a congressionally funded study on the feasibility of buying private land near the site.

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2008 Public Involvement

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.
- DOE conducted a public meeting on modifications to its RCRA permit.
- DOE conducted a public information exchange to update the community on the ongoing environmental remediation projects.
- DOE briefed community leaders about site activities to assist them in setting community priorities for 2009.
- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including public involvement activities, groundwater remediation, the Southwest Plume, waste disposal options, end use of the site, radiological surveys, soil and rubble areas, burial grounds, green remediation, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Five-Year Review, and an engineering evaluation/cost analysis (EE/CA) for inactive facility demolition.

- DOE also conducted public involvement activities for projects not conducted under the scope of the FFA, such as hosting a public meeting to discuss an environmental impact statement (EIS) for the Global Nuclear Energy partnership project and issuing for public comment an EIS on the nickel recycling.

2009 Public Involvement

- DOE conducted a public information exchange to update the community on the waste disposal options project and began planning for another exchange in the first quarter of 2010 to provide additional information and seek additional comment.

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2010.

- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including waste disposal options, end use of the site, environmental monitoring programs, the Southwest Plume, landfill operations, surface water remedial actions, groundwater remedial actions, soils removal and remedial action, facility D&D, waste disposal, DOE Material Storage Areas, and burial grounds.

- The CAB, with DOE assistance, continued its scenario planning efforts to help arrive at recommendations for an end use for the site.

- Two EE/CAs were issued for public comment, one for the removal of "hot spots" in plant creeks and ditches, the other for the removal of two facilities with contaminated soils.

2010 Public Involvement

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2010 and 2011.

- DOE coordinated a public meeting for the National Institute of Occupational Safety and Heath to present health findings of a recent study.

- DOE coordinated two forums for the Kentucky Research Consortium for Energy and the Environment to discuss future site scenarios.

- The CAB, with DOE assistance, continued its scenario planning efforts to help arrive at recommendations for an end use for the site.

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.

2011 Public Involvement

- DOE conducted a public information exchange to update the community on the waste disposal alternatives (WDA) project.

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2011.

- DOE conducted plant tours and briefings for community leaders, members of congressional staffs, and others.

- DOE received positive media coverage on workforce employees and project accomplishments.

- DOE hosted a regional science bowl competition for middle and high school students.

- DOE, along with CAB, hosted the 2011 Eco-Fair for 600 middle school students in McCracken and Ballard Counties.

- DOE, with support from the remediation contractor, conducted a science outreach program for 25 sixth, seventh, and eighth graders involved in the Gifted and Talented Program at Heath Middle School.

- The CAB Vice Chair made a presentation to approximately 160 Rotary Club members to educate them on the CAB's role at the site, as well as DOE and various contractor missions at the site.

- DOE worked with state and federal regulators to hold a public comment period for a proposed plan regarding Southwest Plume source cleanup.

2012 Public Involvement

- The CAB hosted a two-day national DOE SSAB Chairs Meeting at which DOE EM Senior Advisor Dave Huizenga held roundtable discussions with the chairs the challenges of best using cleanup dollars.

- In conjunction with the chairs meeting, DOE held Paducah Site tours for Mr. Huizenga and SSAB chairs, focusing on best use of cleanup funding.

- DOE briefed community leaders about site activities to assist them in setting community priorities for 2012-2013.

- DOE issued a record of decision and subsequent press release regarding Southwest Plume source cleanup.

- DOE and the Paducah remediation contractor participated in the Jackson Purchase Foundation Water Conference presenting an overview of the Paducah Remediation Program.

- DOE and the remediation contractor worked with the Kentucky Division of Waste Management to hold a public comment period and public meeting regarding changes to DOE's Hazardous Waste Facility Permit.

- DOE provided a tour of potential WDA sites for CAB members and worked with the CAB WDA subcommittee to develop public workshop briefing materials for the WDA Remedial Investigation/Feasibility Study process.

- At monthly meetings of the CAB and its task forces and committees, DOE provided briefings and discussions on various projects, including WDA, end use of the site, inactive facilities removal, and cleanup of groundwater, surface water, soils, and burial grounds.

- The CAB, with DOE assistance, continued its scenario planning efforts to help develop recommendations for an end use for the site.

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- DOE held a two-day Industry Day workshop, including a site tour, with private industry and public economic development officials to determine the nature of private industry interest in the Paducah Site after United States Enrichment Corporation (USEC) ceases uranium enrichment operations.

- DOE conducted plant tours and briefings for community leaders, Paducah Area Chamber of Commerce representatives, senior DOE headquarters officials, members of congressional staffs, and others.

- DOE and its prime Paducah contractors supported the Feds Feed Families Program by raising funds to restock the shelves of six Paducah service organizations that help the hungry.

- The remediation contractor raised funds for three key charitable causes: Salvation Army Angel Tree, American Cancer Society's Relay for Life, and United Way.

- DOE received positive media coverage on workforce employees and cleanup accomplishments.

- DOE hosted a regional science bowl competition for middle and high school students.

- DOE held Paducah Site tour for the Kentucky Energy and Environmental Cabinet Secretary, Dr. Len Peters.

- The CAB and DOE, with help from the remediation contractor, hosted the 3rd Annual 2012 Eco Fair for nearly 500 sixth-graders from Lone Oak, Heath, and St. Mary Middle Schools in McCracken County.

- DOE, with support from the remediation contractor, conducted a mentoring program for about 50 Gifted and Talented Program science students at Heath and Lone Oak middle schools.

- DOE hosted Kentucky Labor Cabinet Secretary Mark Brown for Governor's Safety and Health Award presentations to DOE's three Paducah prime contractors for outstanding safety performance.

- The Paducah remediation contractor launched PEGASIS, an enhanced geographic mapping tool, affording public access via the Internet to environmental sampling data at the Paducah site.

- DOE and the Paducah remediation contractor hosted 19 Kentucky Governor's Scholars Program students for a presentation and tour of the Paducah Site, focusing on environmental cleanup and waste management.

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PUBLIC INVOLVEMENT IN THIS PLAN

Early revisions of this plan were aided by input from the Paducah CAB and three focus groups. A Business and Education Focus Group brought together representatives of the regional business community, educators from elementary to college levels, and local elected officials. A Plant Neighbors Focus Group provided input from individuals living near PGDP. Members of the Paducah CAB volunteered their services to form the third focus group.

The focus groups provided feedback to DOE on several aspects of communication with stakeholders. The three groups were asked, in particular, for input on the effectiveness of various avenues of stakeholder communication used by DOE and for their suggestions on other efforts that might be made to improve communication.

The focus groups last met in late 2002. Efforts have been made to implement suggestions from the focus groups: improve communication, circulate phone numbers for information more widely, and place more programmatic information in lay terminology on the Internet. DOE will continue its efforts to keep stakeholders aware of ongoing projects and obtain their insights into its cleanup and waste management programs.