



PADUCAH GASEOUS DIFFUSION PLANT CITIZENS ADVISORY BOARD

2000 McCracken Boulevard • Paducah, Kentucky 42001 • (270) 744-9010 • padssab@apex.net • www.oakridge.doe.gov/pgdpssab

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Consensus Recommendation

DATE: July 19, 2001
NUMBER: 01-3
TO: W. Don Seaborg, DOE
REGARDING: Site wide sediment controls

Background: The U.S. Department of Energy has agreed to implement a site wide sediment control plan, which will impact two outfalls (011 and 015) at the Paducah Gaseous Diffusion Plant. As part of the Federal Facility Agreement, DOE agreed that the site wide sediment control would be developed as a removal action with the following milestones: D1 Engineering Evaluation/Cost Analysis — June 30, 2001; D1 Action Memorandum — Nov. 1, 2001; Action Memorandum signed — Jan. 3, 2002; Construction Complete — September 2002.

There are 19 outfalls surrounding the PGDP. DOE owns four outfalls and the United States Enrichment Corporation owns 12. Two outfalls are identified in the EE/CA — one DOE and one USEC owned.

There are storm water management controls on four outfalls (002, 010, 011, 012). These controls do not function properly in very heavy rain events. In sampling activities, two outfalls exceed the toxicity levels noted in the Kentucky Division of Water's Kentucky Pollutant Discharge Elimination System Branch (KPDES) permit. One exceedence was the result of a naturally occurring biohazard. The second was caused by zinc runoff during the painting of DUF6 cylinders. That activity was halted and localized sediment controls were effectively installed.

Concerns:

The EE/CA for outfalls 011 and 015 are not site wide.

The sedimentation basins do not address dissolved pollutants.

Surface water represents one of the most immediate threats to the general public.

DOE, Kentucky and EPA cannot agree on acceptable levels for pollutants or a course of action.

Recommendation:

1. DOE, working with Kentucky and EPA, should establish human health and ecological risk-based, fair, just and equal numerical values for potential contaminants in surface water discharges.
2. DOE, using the parameters established in this recommendation, should develop a site wide surface water management plan addressing all outfalls by December 2002.
3. Included in the surface management plan should be:
 1. Separation of combined sewers.
 2. Suspended and dissolved treatment alternatives selected.
 3. Use of localized controls.
 4. New industries such as, but not limited to, UF6 and metals recovery should be made responsible for surface water in their operating area.
 5. A comprehensive monitoring plan.

DOE RESPONSE REQUESTED BY: August 19, 2001