

West Lake Landfill Operable Unit 1 Remediation Timeline Evaluation

April 2025

Operable Unit 1 is nearing completion of the Remedial Design phase of the Superfund process. EPA is overseeing the potentially responsible parties' preparation of the Remedial Design to implement the remedy.

This timeline evaluation detailed below cuts nearly two years off of the initial draft timeline presented by PRP consultants for the West Lake site to expedite the cleanup from a May 2029 excavation start date to a 2027 excavation start date.

While progress is dependent upon the resolution of all current comments, this improvement in timeline is the result of a restructured approach that will allow PRP's to handle more work while EPA conducts confirmation sampling earlier and allows some post-remediation plans to be submitted during the construction phase. The agency has also committed to faster review turnarounds. This strategic restructure of the process will save substantial time by reducing the need for design changes.

- i. EPA recently provided comments on the 90% Remedial Design to the PRPs. The draft 100% Remedial Design will be submitted in October 2025.
 - ii. The next deliverable due to EPA as part of this process will be the 100% Remedial Design Updated Drawings based on confirmation sampling, which is projected to be submitted in March 2026.
 - iii. The 100% Remedial Design, including the updated drawings, will be reviewed, revised, and approved by approximately May 2026. Once this document is finalized, the site will be ready to move into the Remedial Action phase in mid to late 2026 where cleanup actions (excavation, offsite disposal, engineered cover installation) can occur.
 - iv. In the Remedial Action phase, there are several actions required before excavation can begin, including hiring contractors, writing the Remedial Action Workplan, and preparing the site for remedial action work. The contracting process is conducted by the PRPs but is expected to begin shortly after confirmation sampling is complete around the end of 2025 and end with hiring a Remedial Action contractor by February 2027, rather than July 2027. The complete Remedial Action Workplan is anticipated to be completed by July 2027 instead of February 2028. Site preparation and PRP mobilization has been accelerated from May 2029 to September 2027.
 - v. EPA is currently negotiating an enforceable order, referred to as a Consent Decree, with the PRPs, to perform the Remedial Action. EPA's goal is to reach agreement no later than approval of the 100% Remedial Design. If EPA is unable to reach an agreement, the agency can issue an order requiring the PRPs to perform the work.
- Projections from the PRPs previously estimated the start of excavation in mid-2029. The EPA and the PRPs have been working to find ways to accelerate completion of the Remedial Design and the start of the cleanup actions, including potentially initiating pre-excavation confirmation sampling while the Remedial Design is being completed. Conducting confirmation sampling during the Remedial Design phase accelerates the completion of that activity from July 2028 to March 2026.
 - As a result of this work, the start of excavation is projected to be accelerated by approximately 12 to 18 months and begin as soon as late 2027 as noted above. This time savings is due to the PRPs and the EPA completing key tasks concurrently and identifying document review efficiencies. This accelerated timeline is tentative and subject to change based on the barriers, needs, and assumptions listed below.

- EPA is confident that the potential for any exposure to radiological contaminants from this site is currently extremely low due to the engineering and institutional controls.
- A. Barriers**
- vi. The PRPs have not yet agreed to perform the Remedial Action in a Consent Decree which will include the enforceable schedule to perform remedial work.
 - vii. It is uncertain how much time the PRPs will need to revise design documents to address EPA comments and receive 100% Remedial Design approval, however, the Remedial Design will be completed by the second half of 2026.
It will take time for the PRPs to complete Remedial Action contracting, confirmation sampling, and site preparation before excavation with off-site disposal begins. The site is expected to enter Remedial Action beginning in 2027.
- B. Needs**
- i. EPA staffing resources are needed to expedite document review times and eventual oversight of the remedial action. Anticipated staffing needs include four technical staff: a project manager with radiation experience, a landfill expert, and two technical staff with construction experience.
- C. Assumptions**
- i. The PRPs submit work products that address the EPA comments that can quickly move toward approval.
 - ii. The PRPs complete pre-excavation confirmation sampling in 2025.
 - iii. Cost and time savings are achieved through the ongoing process review and technical collaboration meetings between the PRPs and EPA Region 7.