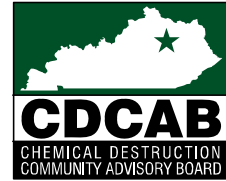


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Recommendations of the KY CDCAB to ACWA on
Design Consideration # 34:
Off-site Shipment of Agent and Energetic Hydrolysate

Recommendation:

All agent and energetic hydrolysate generated at the BGCAPP should be treated on site via the secondary treatment process identified in the 2003 Record of Decision - SCWO.

Basis for Recommendation:

- 1) Historical and current controversy associated with transportation of such waste through communities, including the generating community;
- 2) Historical and current controversy associated with treatment of such waste at potential reception communities;
- 3) Significant uncertainties surrounding the capability to safely transport such waste;
- 4) Significant uncertainties surrounding the capability to safely treat such waste at commercial facilities;
- 5) Government and community acceptability of the proposed preferred hydrolysate treatment contained in the BCAPP Record of Decision (i.e. SCWO);
- 6) Negative local economic impact of off site vs. on site treatment;
- 7) Considerable uncertainty regarding the actual cost reduction, as the Program has not articulated specific savings. The preliminary analysis of potential savings does not reflect a "significant" enough cost reduction when weighed against the issues identified above.