



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 4**

**ATLANTA FEDERAL CENTER**

**61 FORSYTH STREET**

**ATLANTA, GEORGIA 30303-8960**

March 13, 2011

Mr. Reinhard Knerr  
Site Lead  
U.S. Department of Energy  
Paducah Site Office  
P.O. Box 1410  
Paducah, Kentucky 42001

Re: EPA Comments on DOE Letter "Paducah Federal Facility Agreement Integrated Priority List and Assessment of Budget Targets on Site Priorities" Dated February 15, 2012, for the Paducah Gaseous Diffusion Plant, Kentucky (PGDP)

Dear Mr. Knerr:

The U.S. Environmental Protection Agency, Region 4 has reviewed the subject document, which proposes a general list of priorities (the list) for work to be undertaken in FY 2014 at the Paducah Gaseous Diffusion Plant (PGDP). The work represented by Section 3.1 is composed of ongoing cleanup actions such as the C-400 Interim Remedial Action, and other work activities that support remedy selection and implementation at PGDP under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). These activities have associated enforceable milestones in FY 2014 under the current (FY 12) Site Management Plan (SMP), a primary document pursuant to XVIII.A of the Paducah Federal Facility Agreement (FFA). In addition, work to be conducted in FY 14 on other projects is critical to attainment of Outyear Enforceable Milestones (OEM) established under the PGDP Federal Facility Agreement (FFA). The Department of Energy (DOE) states in the February 15 letter that the funding projection for FY 14 provided by DOE Headquarters is insufficient to accomplish all the work in the list and that the OEM will be impacted by the current shortfall. While EPA understands that the current economic climate has resulted in reduced budget projections across the DOE complex, PGDP seems particularly hard hit because of the relatively small budget it gets compared to the larger sites. A small percentage cut in a small budget has a much larger effect on DOE's ability to meet its legal obligations than does a similar cut to much larger budgets such as those at Hanford, Oak Ridge, or the Savannah River Site. Notwithstanding the target funding projection provided by DOE Headquarters, the Portsmouth/Paducah Project Office is obligated under Section XVIII.D of the FFA and Executive Order 12088 to include in its budget request sufficient funding to support the milestones and commitments agreed to by all Parties in the FFA. In addition, the Parties have established certain expectations in the Community about the timely conduct of work at the Site, and DOE will be unable to meet these expectations absent sufficient funds.

With regard to the proposed order of projects, EPA agrees that DOE's proposal represents a reasonable prioritization by first maintaining forward progress on ongoing cleanup actions, moving selected remedies toward construction, and emphasizing progress towards a decision on whether to construct an onsite disposal cell. The latter decision is important because it has wide-ranging impact on future cost estimates and remedy selection.

EPA believes that DOE should continue to look very closely at its overall Site costs at PGDP to identify efficiencies that could result in additional funds being available for cleanup of actual environmental releases of contamination. If you have any questions concerning this matter, please feel free to call me at (404)562-8553.

Sincerely,

Wm. Turpin Ballard,  
Remedial Project Manager  
Federal Facilities Branch  
Superfund Division

ec: Todd Mullins, KDEP-Frankfort  
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PGDP CAB  
Arthur Collins, EPA-R4  
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EPA PROPOSED FY 2013 LIST OF FFA PRIORITIES  
AT THE PADUCAH GASEOUS DIFFUSION PLANT

Project	Rationale
C-400 IRA	This is an ongoing implementation of a high priority project to reduce and control a significant of ground water contamination. This project should not be slowed down due to lack of funding. Due to the nature of the project objectives additional work and funding will be required to meet the 2019 enforceable completion milestone for the Groundwater OU as a whole.
Burial Grounds Remedial	The Remedy for the burial grounds was on track to be selected in 2000-2001. Remedy selection been delayed time and again. Many of these units represent significant sources of both ground water contamination and direct contact exposure. At least three burial grounds are known to contain Principal Threat Waste. There is an enforceable milestone of 2019 for completion of the operable unit. Continuous, adequate, and stable funding is necessary to meet this milestone.
CERCLA Waste Disposal Facility	Although EPA disagrees with doing so, cleanup decisions are being delayed pending a decision under CERCLA on whether or not to construct an on-site disposal facility for waste from other CERCLA projects.
Southwest Plume Sources	This is another project that was ready for remedy selection circa 2001 after the WAG 23 Feasibility Study, and was put off. It has been the subject of 2 disputes in the last 3 years. The Parties are working on an expedited schedule towards remedy selection. These sources contain Principal Threat Waste and should be addressed as soon as possible. Funding is necessary to meet the 2019 enforceable completion milestone for the Groundwater OU as a whole.
C-340/410 D&D	These buildings were to be taken down using ARRA funds, supplemented by base funding, by the end of FY11. Now the project is moving into 2013 using base funds alone. There is no near-term milestone for completion (FY 2017). Although the project should be completed, there is no identified environmental release from either facility that warrants a higher priority than proposed here. Ongoing S&M will ensure facility safety in the meantime.
Northeast Plume Remedy Optimization	This project should be completed in 2012, following the accelerated process the Parties established for the Northwest Plume Optimization. If this occurs, planned funding can be used for other priorities.
Surface Water OU Remedial (sediment sampling)	Funding is needed to implement remedial investigation on two watersheds accessible to public (~6 miles of creeks). Continuous work on project critical to meet 12/17/17 out year enforceable date for the submittal of Remedial Action Completion Report for this project.
Dissolved Phase Plumes	PGDP was listed on the NPL and is a High Priority DOE site due to extensive groundwater contamination both on and off of DOE property. Residential wells have been contaminated and alternate water supplied. Focus of cleanup work to date has been on containing plumes at the Plant boundary and beginning to treat or contain sources. Two extensive plumes (several miles long) continue to migrate off-site with no effort at control. Continuous sufficient and stable funding is necessary for the parties to effectively address this risk. Completion of this project is critical to DOE complying successfully with the 2019 completion milestone, and ground water is the most difficult medium to address successfully.
Soils OU	Funding needed to meet 3/13/13 milestone for submittal of a Proposed Plan. Continuous work on project critical to meeting 3/22/16 out year enforceable milestone for the submittal of Remedial Action Completion Report for this project.