



## ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear  
Governor

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Division of Waste Management  
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Leonard K. Peters  
Secretary

August 6, 2014

Mrs. Jennifer Woodard, Site Lead  
Portsmouth/Paducah Project Site Office  
US Department of Energy  
PO Box 1410  
Paducah, Kentucky 42002

**RE: Approval of the Federal Facility Agreement Milestone Modification for the Addendum to the Work Plan for the Burial Grounds Operable Unit Remedial Investigation / Feasibility Study - Solid Waste Management Unit 4 Sampling and Analysis Plan (DOE/LX/07-2179&D2/A2/R3) and Subsequent Documents.**

Paducah Gaseous Diffusion Plant  
Paducah, McCracken County, Kentucky  
KY8-890-008-982

Mrs. Woodard:

The Kentucky Division of Waste Management (Division) acknowledges receipt of the DOE's August 1, 2014 Federal Facility Agreement (FFA) Milestone Modification for the D2/A2/R3 *Addendum to the Work Plan for the Burial Grounds Operable Unit Remedial Investigation / Feasibility Study - Solid Waste Management Unit 4 Sampling and Analysis Plan* and subsequent documents. This extension is based on both EPA's February 4, 2014 and the Division's February 7, 2014 letters requesting modification of the R2 document. In accordance with Sections XXIX.B.4 and XXIX.B.6 of the FFA, the Division agrees that good cause exists for this Modification, which is hereby granted.

If you have any questions or require additional information, please contact Gaye Brewer at (270) 898-8468, or e-mail [gaye.brewer@ky.gov](mailto:gaye.brewer@ky.gov).

Sincerely,



April J. Webb, P.E., Manager  
Hazardous Waste Branch

AJW:tm:gb:lww

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Mrs. Jennifer Woodard

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DWM File: #1100-C; Graybar ARM20110009 (BGOU RI/FS Work Plan Addendum - SWMU 4 SAP)

DWM File: #505-B; Graybar: AIN20140002 (2014 SMP FFA Mods)

Attachment: Signed FFA Milestone Modification Form

**MODIFICATION TO THE PADUCAH FEDERAL FACILITY AGREEMENT  
ACCORDING TO THE TERMS OF SECTION XXXIX**

<b>Modification requested by:</b> Jennifer Woodard	<b>Date:</b> July 23, 2014																																				
<b>Requester's Organization:</b> U.S. Department of Energy																																					
<b>Section to be modified:</b> Appendices C and G																																					
<p><b>Reason for modification:</b> To modify upcoming Burial Grounds Operable Unit (BGOU) Solid Waste Management Unit (SWMU) 4 Federal Facility Agreement (FFA) milestones to allow for extension of the D1 Remedial Investigation Addendum, D1 Feasibility Study, D1 Proposed Plan, D1 Record of Decision, D1 Remedial Design Work Plan, D1 Remedial Design Report, D1 Remedial Action Work Plan, Field Start, and D1 Remedial Action Completion Report by 550 days. On February 4, 2014, and February 7, 2014, the U.S. Department of Energy (DOE) received a request to modify the <i>Addendum to the Work Plan for Burial Grounds Operable Unit Remedial Investigation/Feasibility Study at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Solid Waste Management Unit 4 Sampling and Analysis Plan</i>, DOE/OR/07-2179&amp;D2/A2/R2 (Work Plan Addendum) from the U.S. Environmental Protection Agency (EPA and the Kentucky Department for Environmental Protection (KDEP), respectively. On March 24, 2014, DOE accepted EPA's and KDEP's requests with the understanding that the enforceable and planning milestones would be adjusted to reflect the additional work and revised schedule once scoping was completed. Both EPA and KDEP agreed that the enforceable milestones would be impacted by their requests and that adjustment of the enforceable milestones dates would be warranted. Scoping meetings to establish the details of the additional work were held in April, May, and June 2014. Based on agreement of the Federal Facility Agreement (FFA) parties and in accordance with Sections XXIX.B.4 and XXIX.B.6 of the FFA, good cause exists for this 550-day extension of the enforceable milestones associated with Burial Grounds Operable Unit SWMU 4. This extension includes the time frame for scoping of the additional work associated with Phase III, revision of the Work Plan Addendum (Quality Assurance Project Plan), and installation and sampling of the additional Phase III borings.</p>																																					
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<b>Notes:</b>																																					
<sup>1</sup> The currently approved FFA dates are based on the D2 FY 2014 Site Management Plan (DOE/LX/07-1292&D2).																																					
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Determination by any one of the three project managers that a modification is major will require that the modification be submitted for public participation to the extent required by DOE's Community Relations Plan under Section XXXIII.

**Major modification?**  
YES      NO

DOE, Paducah Site Lead's Approval: 	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Date: 
KDEP, Division of Waste Management Director's Approval: 	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Date: 
EPA, Region 4, Remedial Project Manager's Approval:	<input type="checkbox"/> YES <input type="checkbox"/> NO	Date:

Note: Return to DOE after signature for the Administrative Record and to initiate distribution to FFA "Controlled" copies.