



ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear
Governor

Department for Environmental Protection
Division of Waste Management
200 Fair Oaks, 2nd Floor
Frankfort, Kentucky 40601-1190
www.kentucky.gov

Leonard K. Peters
Secretary

July 28, 2014

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

RE: Comments on the Sitewide Evaluation Work Plan for Anomalies Located Outside the Limited Area (DOE/LX/07-1288&D1)
Paducah Gaseous Diffusion Plant
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

Attached are Kentucky's comments on the D1 *Sitewide Evaluation Work Plan for Anomalies Located Outside the Limited Area*, dated June 27, 2014. Kentucky was happy to provide an expedited review and comments to this document to enable the work to proceed as soon as possible.

If you have any questions or require additional information, please contact Todd Mullins at (502) 564-6716, or e-mail todd.mullins@ky.gov.

Sincerely,

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

AJW:lww:tm

ec: Jennifer Tufts, US EPA - Region 4, Tufts.Jennifer@epa.gov
Jon Richards, US EPA – Region 4; Richards.jon@epa.gov
William E. Murphie, DOE – Paducah; William.murphie@lex.doe.gov
Rob Seifert, DOE – Paducah; Rob.Seifert@lex.doe.gov
Lisa Santoro, DOE – Paducah; Lisa.santoro@lex.doe.gov
Jennifer Woodard, DOE – Paducah, Jennifer.Woodard@lex.doe.gov
Kim Knerr, DOE – Paducah; kim.Knerr@lex.doe.gov
Mark J. Duff, LATAKY – Kevil; mark.duff@lataky.com
Myrna Redfield, LATAKY – Kevil; Myrna.Redfield@lataky.com
John Wesley Morgan, LATAKY – Kevil; John.Morgan@lataky.com
Jana White, LATAKY – Kevil; jana.white@lataky.com
Craig Jones, LATAKY – Kevil, craig.jones@lataky.com
Darla Bowen, LATAKY – Kevil; darla.bowen@lataky.com
Sunny Osborne, LATAKY – Kevil; sunny.osborne@lataky.com
Tracey Duncan, P2S – Paducah; tracey.duncan@lex.doe.gov
Rebecca Wren, P2S – Paducah; Rebecca.Wren@lex.doe.gov
Christa Dailey, P2S – Paducah; christa.dailey@lex.doe.gov
Bethany Jones, P2S – Paducah; Bethany.jones@lex.doe.gov
Jim Ethridge, CAB – Paducah; jim@pgdpcab.org
Matt McKinley, CHFS – Frankfort, matthewW.mckinley@ky.gov
Stephanie Brock, CHFS – Frankfort, StephanieC.Brock@ky.gov
Nathan Garner, CHFS – Frankfort; Nathan.garner@ky.gov
Todd Mullins, KDWM – Frankfort; Todd.Mullins@ky.gov
Gaye Brewer, KDWM – Paducah, gabe.brewer@ky.gov
Leo Williamson, KDWM– Frankfort, Leo.Williamson@ky.gov
DWM File: #5000; Graybar: AIN20140007 (Sitewide Eval Anomalies WP)

**Division of Waste Management Comments Pertaining to the
Sitewide Evaluation Work Plan for Anomalies Located Outside the Limited Area
Paducah Gaseous Diffusion Plant Paducah, Kentucky
(DOE/LX/07-1288&D1)**

July 23, 2014

Specific Comments:

1. Section 1.2, Pg. 3, 2nd Section Paragraph:

The third sentence in this paragraph requires modification. Uranium does not “serve as proxies” for the remaining 509 anomalies as stated in the sentence. Rather, the 25 selected anomalies serve as proxies. Uranium serves as a proxy for other plant related contamination. Please reword as necessary.

2. Section 1.4, Pg. 6, 2nd Section Paragraph:

The second sentence in the paragraph is somewhat unclear. The words “and not currently a SWMU/AOC” appear misplaced. Perhaps the sentence is attempting to convey that areas for which visual surveys were performed were only those areas that had not previously been identified as SWMUs or AOCs. If this is the case then the sentence should be modified so as to communicate this more clearly. Modify as necessary.

3. Section 6, QAPP Worksheet #3, Pg. 24:

The distribution list incorrectly identifies Jana White as “FFA Manager.” Jana’s correct title should be included on the worksheet.

4. Section 6, QAPP Worksheet #10, Pg. 33:

The sentence adjacent to *rationale for inclusion of chemical and non-chemical analysis* requires revision. Please see Specific Comment #1.

5. Section 6, QAPP Worksheet #30, Pg. 54:

The Analytical Services Table lists “Metals” under two analytical groups. Presumably, one of these involves analysis using XRF while the other refers to fixed-based lab testing; however, the two groups are not labeled as such. Please indicate on the form the testing methods that apply to each analytical group.

6. Section 8.3.3, Pg. 74:

The text indicates that field screening will not be collected for this project. Isn’t radiological survey data considered screening data? Modify the text if necessary.

End of Division Comments

**Radiation Health Branch Comments Pertaining to the
Sitewide Evaluation Work Plan for Anomalies Located Outside the Limited Area
Paducah Gaseous Diffusion Plant Paducah, Kentucky
(DOE/LX/07-1288&D1)**

July 23, 2014

General Comment:

1. The procedure listed for composite sampling (PAD-ENM-0023, *Composite Sampling*) does not currently meet the requirements of this project. In this procedure, it appears as though the standard is to remove 1/2" to 3/4" of topsoil before sampling unless the SAP explicitly states otherwise (Sec 6.4.7/6.5.3). This action will likely remove the very surface deposited contamination that this project is attempting to identify. The only thing that should ever be removed from a surface soil sample (whether composited or not) is vegetation and debris when necessary, as is described in the non-composite sampling procedure (PAD-ENM-2300, *Collection of Soil Samples*, Sec 3.4 (9)).

This concern was discussed with DOE in May, but we have not yet received an updated procedure.

Please list and provide a revised procedure that does not arbitrarily require the removal of topsoil from the composited soil samples, or add text to the document that requires retention of all topsoil and states that "only vegetation and debris will be removed, when necessary" despite procedural instructions to the contrary.

Specific Comments:

1. **Page 16, Section 5.2, 1st bullet, last sentence:**

The sentence currently reads "Any visible debris will be removed from the sample when the sample is homogenized." In order to ensure that the observed count rate did not originate in the removed debris and that appropriate action is taken if it did, please modify the document to require the survey of any removed debris and to discuss with the FFA parties if the debris appears to be the source of elevated count rates.

2. **Page 16, Section 5.2, 2nd bullet:**

Please add additional text to this section describing how a sample will be split if it is one of the 10% requiring laboratory analysis. Also, please add that these same samples will be split with RHB for laboratory analysis.

3. **Page 43, QAPP Worksheet #19:**

While 20 grams may indeed be the minimum sample size that is required, the column title does not seem appropriate given the mass units listed under it. Please revise for consistency.

4. Page A-11, Table A.1:

Please explain the difference between "soil mound" and "dirt mound" as listed in the description column. If there is no difference, please revise using a single term to remove confusion.

5. Page A-20, Section A.4.3, 9th bullet, 1st sentence:

The current text can be interpreted as committing to always moving debris, and to do so manually when possible. This does not appear to be intended. Please revise.

End of CHFS Comments