



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4  
ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303-8960

January 21, 2014

4WD-FFB

Rachel Blumenfeld  
United States Department of Energy  
Portsmouth/Paducah Project Site Office  
P.O. Box 1410  
Paducah, Kentucky 42002

**RE: EPA Comments on the Site Management Plan at the Paducah Gaseous Diffusion Plant, Paducah, KY (DOE/LX/07-1292&D1)**

Dear Ms. Blumenfeld,

In accordance with Section XX of the Paducah Gaseous Diffusion Plant Federal Facility Agreement, the U.S. Environmental Protection Agency has reviewed the FY 2014 Site Management Plan for the Paducah Gaseous Diffusion Plant (DOE/LX/07-1292 & D1), and provides comments below. If you have any questions or require additional information, please contact me at (404) 562-8513.

Sincerely,

Jennifer Tufts  
Remedial Project Manager  
Federal Facilities Branch

ec: Todd Mullins, KDEP-Frankfort  
Leo Williamson, KDEP-Frankfort  
Jon Richards, EPA R4  
David Buxbaum, EPA R4

**EPA Comments  
FY 2014 Site Management plan for the  
Paducah Gaseous Diffusion Plant, Paducah, KY  
DOE/LX/07-1292&D1**

**1. Appendix 1, Actions taken to date, Operable Unit Summary table, pp. 1-4 and 1-6**

On page 1-4, the Final Characterization Report for SWMUs 211-A and 211-B can be updated to reflect that the report has been finalized. Also, the status of SWMU 2 should be updated to reflect the current approach, which is that a final remedy will be selected and is currently part of the 2, 3, 30 and 7 BGOU FS.

**2. Appendix 3, Operable Unit Scope Descriptions and Key Project Assumptions, Figure 3.1 Current Groundwater Operable Strategy, Page 3-4**

Modify the Phase 1 Water Policy project green box to state “Protect against exposure to groundwater (completed)” rather than “Prevent exposure to groundwater (completed)”. Also, modify the white box to state “Water Policy (off-site risk reduced)” rather than “Water Policy (off-site risk eliminated)”.

**3. Appendix 3, Operable Unit Scope Descriptions and Key Project Assumptions, C-400 Interim Remedial Action, Page 3-5**

Modify last sentence in the “Scope” section to state “Final remedial action decisions addressing sources below building C-400 and any residual contamination will be addressed as part of the post-gaseous diffusion plant (GDP) shutdown for GDP Groundwater Sources, as discussed in Section 3.”

**4. Appendix 3, Operable Unit Scope Descriptions and Key Project Assumptions, Figure 3.2 GWOU Baseline Strategy, Page 3-8**

Add the treatment technology for SWMU 1 under the DOE Planning Assumptions.

**5. Appendix 3, Burial Grounds Operable Unit, page 3-9**

The text refers to the BGOU project goals and lists 3 bulleted goals. The first and second bullets should be modified to reflect the language in the BGOU dispute resolution and the Remedial Action Objective language currently used in the SWMUs 5&6 FS and PP as well as the SMUs 2, 3, 7, and 30 FS:

- Contribute to the protection of groundwater by eliminating, reducing, or controlling sources of groundwater contamination that will result in an exceedance of the maximum contaminant level (MCL) or risk-based concentration for residential use of groundwater in the absence of an MCL in RGA groundwater.
- Prevent exposure to waste or waste-related contaminated soils that exceed target cumulative excess lifetime cancer risks (ELCRs) and cumulative noncancer hazard indices (HIs) for the future industrial and future outdoor worker receptors. The acceptable cumulative risk levels for this RAO are defined as follows:

Surface soil: cumulative ELCR < 1E-05 and cumulative HI  $\leq$  1 for a future industrial worker

Subsurface Soil: cumulative ELCR < 1E-04 and cumulative HI  $\leq$  1 for a future outdoor worker.

- Treat or remove PTW wherever practicable, consistent with 40 *CFR* 300.430 § (a)(1)(iii)(A).