



ENERGY AND ENVIRONMENT CABINET

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Leonard K. Peters
Secretary

July 24, 2014

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

RE: Comments on the Addendum to the Work Plan for the Soils Operable Unit Remedial Investigation / Feasibility Study Remedial Investigation 2 - Sampling and Analysis Plan (DOE/LX/07-0120&D2/R2/A1)
Paducah Gaseous Diffusion Plant
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

The Kentucky Division of Waste Management (Division) is hereby submitting comments to the above-stated document, dated June 25, 2014. Kentucky was happy to complete an expedited review and comment submittal, enabling work to proceed as soon as possible. A draft of Division comments #2 through #8 was provided in a meeting on July 1st.

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

Sincerely,

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

AJW:tm:gb:lww

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DWM File: #1110; Graybar: AIN20140006 (Soils OU RI/FS WP Addendum RI #2 SAP)

Attachment: Kentucky Comments

**Kentucky Division of Waste Management Comments Pertaining to the
Addendum to the Work Plan for the Soils Operable Unit Remedial Investigation / Feasibility
Study Remedial Investigation 2 - Sampling and Analysis Plan**

Paducah Gaseous Diffusion Plant, Paducah, Kentucky

DOE/LX/07-0120&D2/R2/A1

July 24, 2014

Specific Comments:

1. Section 1.6, Pg. 7:

The text as written indicates that 4 feet of soil will be removed from the SMWU 1 soil mixing area, the remaining soils will be mixed, and that the 4 feet of soil that was removed will then be placed back where it came from. This is no longer accurate. The plan as currently understood is to place approximately 2 feet of the 4 feet of removed soil back into the excavation, compact it, and then to initiate soil mixing. This modified approach should be captured in Section 1.6.

2. QAPP Worksheet #10, Pg. 26:

During the scoping meetings a new rad judgmental sample was planned for SWMU 13. It was not included in the discussion on this worksheet. Please include the rad judgmental sample in the description of work to be performed in SWMU 13. It is included in Worksheet #18-1.

3. QAPP Worksheet #12-11, Pg. 51 and QAPP Worksheet #15-6, Pg. 63:

During the scoping meetings, it was decided that Barium would be removed from the list of metals analyzed by XRF because an XRF calibrated for uranium doesn't "see" barium well. However, on Worksheet #12-11, cadmium and antimony were also deleted along with barium. On worksheet #15-6, antimony was deleted in addition to barium. Please provide justification for deleting these metals. This justification should be included under Section 1.3 as part of a larger discussion of metals that were deleted from the XRF analysis list found in the original June 2010 Soils OU RI/FS Work Plan.

4. QAPP Worksheet #18-1, Pg. 67:

What is the basis for the 14 lab samples proposed for SWMU 13? Since 10% of the 158 field samples will be confirmed using a fixed-based lab, wouldn't the number be 16?

5. QAPP Worksheet #18-6, Pg. 72:

What is the basis for the 21 lab samples proposed for AOC 204? Since 10% of the 186 field samples will be confirmed using a fixed-based lab, wouldn't the number be 19?

6. QAPP Worksheet #18-7, Pg. 73:

Shouldn't there be a surface soil fixed base lab sample? While some of the grids being sampled are under pavement, some are soil.

7. Appendix A, Section A.1 Table A.1, Pg. A-9:

Scoping meeting notes taken by the Division suggest that a gamma walk-over survey (GWS) would be performed at SWMU 211A and that a new judgmental sample would be obtained. Please include this SWMU in Table A.1 or, if this is not the case, clarify in the discussion of SWMU 211A in Worksheet #10.

8. Appendix A, Figure A.1, Pg. A-10:

SWMU 225A is noted on this figure as requiring a GWS, but it is not included anywhere else. Scoping meeting notes taken by the Division do not indicate that a GWS will be performed because of proximity to the cylinder yards. Please correct the figure.

End of Division Comments

Radiation Health Branch Comment Pertaining to the
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Paducah Gaseous Diffusion Plant, Paducah, Kentucky

DOE/LX/07-0120&D2/R2/A1

July 17, 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 the topsoil before sampling unless the SAP explicitly states otherwise (Sec 6.4.7/6.5.3). This 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 if 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 the DOE in May, 2014 but Kentucky has not yet received an updated procedure.

Please list and provide a revised procedure that does not arbitrarily require the removal of topsoil from 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.

End of CHFS Comments