



ENERGY AND ENVIRONMENT CABINET

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Governor

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Division of Waste Management
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Leonard K. Peters
Secretary

June 19, 2014

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

RE: Conditional Concurrence to the *Treatability Study Design, Design Drawings and Technical Specifications Package for the C-400 Interim Remedial Action Phase IIB Steam Injection Treatability Study (DOE/LX/07-1295&D2)*
Paducah Gaseous Diffusion Plant
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

The Kentucky Division of Waste Management (Division) acknowledges receipt of the *Treatability Study Design, Design Drawings and Technical Specifications Package for the C-400 Interim Remedial Action Phase IIB Steam Injection Treatability Study*, dated May 24, 2014. The Division participated willfully in expedited review discussions on May 8, 2014, and generally found them to be productive. The discussions were held in part to develop and reach consensus on criteria that will be used to evaluate model performance. The Division did not specifically propose calibration or validation criteria; however, all three FFA parties discussed these topics at length and a level of understanding was reached. Consistent with these discussions, the Division expected that the D2 submittal of the document would present an alternative approach to model calibration and validation. However, when the D2 version of the document arrived, no changes were presented with regards to calibration or validation criteria.

The Division believes that reaching consensus on the model calibration approach is necessary to insure three-party acceptance of any future model simulations. Understanding and agreeing on the model's strengths and limitations is essential if the model is eventually to be used to estimate the costs of implementing a full-scale design. The Division is willing and able to promptly meet

with the C-400 Project Team in order to reach consensus (on calibration and validation criteria) prior to granting a final approval of this Treatability Study Design.

In accordance with Federal Facility Agreement (FFA) Section X.X.I, the Division hereby issues this letter of conditional concurrence and requests that DOE submit a D2/R1 version of the C-400 Phase IIb Treatability Study Design by July 18, 2014. The D2/R1 document shall reflect consensus amongst the three parties with respect to mutually acceptable calibration criteria language and development of validation criteria.

If you have any questions or require additional information, please contact Brian Begley at (502) 564-6716, or e-mail at brian.begley@ky.gov.

Sincerely,



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

AJW:tm:bb:lww

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DWM File: #750-V, Graybar ARM20140006 (C-400 Phase IIB Treatability Study Design)