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ENERGY AND ENVIRONMENT CABINET

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Leonard K. Peters
Secretary

March 11, 2014

Mrs. Rachel H. Blumenfeld
US Department of Energy
Portsmouth/Paducah Project Site Office
PO Box 1410
Paducah, Kentucky 42002-1410

RE: Submittal of Comments to the Removal Action Report for the C-340 Metals Reduction Plant (DOE/LX/07-1286&D1)
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Ms. Blumenfeld:

On December 10, 2013, the Kentucky Division of Waste Management (Division) received the D1 *Removal Action Report for the C-340 Metals Reduction Plant*. The Division hereby submits comments on this document for your consideration.

If you have any questions or require additional information, please contact Jeff Gibson at 502.564-6716 or via email at jeffrey.gibson@ky.gov.

Sincerely,

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

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DWM File: #1090-E; Graybar ARM20140002 (C-340 Building RACR)

Attachment: Kentucky Comments

**Kentucky Division of Waste Management Comments Pertaining to the
Removal Action Report for the C-340 Metals Reduction Plant
Paducah Gaseous Diffusion Plant, Paducah, Kentucky**

DOE/LX/07-1286&D1

March 10, 2014

General Comments

1. The C-340 Removal Action detailed in the RAR, given its intended implementation of the Removal Action Work Plan (RAWP) for the C-340 Complex, does not provide the reader or the Division with sufficient information regarding how the specific provisions of the RAWP were implemented and accomplished with the completion of the C-340 Removal Action. Please make revisions to the RAR so that it is clear what steps and process were used to fulfill the RAWP on which the C-340 Removal Action was based.

2. There remaining structures at the PGDP that will be the subject of future Demolition and Decommissioning (D&D) activities should benefit from the challenges and successes encountered from this removal action. Providing information that would essentially be a case study for D&D activities may prove useful not only to future DOE managers for D&D projects, but would also help to educate the public and the Division on the approaches and processes that can be anticipated to occur in future D&D activities. Whether such information is provided within the RAR or is provided in a separate document for distribution and discussion among the stakeholders, providing such information could provide keen insights on how to learn from prior experiences and lead to enhanced efficiency and cost-effectiveness for future D&D activities. Please consider providing such information in the D2.

3. As a result of this action, a significant amount of mobile uranium was put into the C-746-U landfill, likely via contaminated paneling. Subsequently, there were unexpected releases of uranium to surface water in the months following the disposal of this C-340 sourced waste. Additionally, the Division received information indicating that some of the C-340 waste set off count rate alarms at the C-746-U landfill and may have exceeded the limitations in the Waste Acceptance Criteria (WAC), based on surveys. Please detail in this document what materials contributed to the releases from the C-746-U landfill, why this event was unexpected, how the WAC was met during the disposal of the materials in question (including any portions of the waste that set off alarms), and lessons learned from the disposal of waste from this action.

Specific Comments

1. Demolition, Pg. 3, 1st full paragraph, second sentence

This sentence states that straw bales are best management practice for sediment control. They are not recommended by Kentucky Division of Water for that use. In fact, they are discouraged. Please revise the sentence by deleting the reference to best management practices.

2. Slab Verification Survey and Surface Preparation, Pg.5, 1st paragraph

Were the sumps and pits inspected after they were cleaned, before they were filled? Were the inspections documented? If so, please provide additional information on the sumps and pits.

3. Summary of Problems Encountered, Pg. 10, 2nd paragraph

The Summary of Problems Encountered section makes an attempt to provide the general type of information concerning lessons learned from C-340 removal activities as addressed in the general comments. A more thorough and complete step-by-step analysis of the RAWP objectives and their completion during removal activities would be helpful and would help demonstrate the degree to which the removal actions were thorough and complete.

4. Appendix A – Photographs

No photograph(s) of segregated materials were provided. These efforts are key to ensuring that waste management activities associated with the D&D activities are handled in an efficient and cost-effective manner. Please provide one or more photos of waste segregation activities conducted as part of this removal action.

5. Appendix A – Transite Panels

No photograph(s) of stacked transite panels removed from the C-340 complex prior to their disposal at the U-Landfill was provided. Given the large component of C-340 removal actions that were focused on these panels, documenting the volume of these materials generated awaiting disposal would be an important set of facts to documents from this and future removal actions. Please include photographs, if available, of transite panels removed from C-340 awaiting onsite disposal.