



ENERGY AND ENVIRONMENT CABINET

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Governor

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Secretary

Department for Environmental Protection
Division of Waste Management
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Frankfort, Kentucky 40601-1190
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March 17, 2014

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

RE: Approval of the Federal Facility Agreement Milestone Modification for the Treatability Study Work Plan for Steam Injection, Groundwater Operable Unit (DOE/LX/07-1294&D2) and Subsequent Documents
Paducah Gaseous Diffusion Plant
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Blumenfeld:

The Kentucky Division of Waste Management (Division) acknowledges receipt of the DOE's Federal Facility Agreement (FFA) Milestone Modification for the D2 *Treatability Study Work Plan for Steam Injection, Groundwater Operable Unit*, dated March 10, 2014. This extension was verbally requested by the DOE on February 27, 2014 and was verbally approved by both the EPA and the Division on the same day. Based on this agreement and in accordance with FFA Section XXIX.B.6, the Division believes that "good cause" exists for this extension request, which is hereby approved. This revises the submittal date for the D2 version of the abovementioned document by 14 days, from March 3, 2014 to March 17, 2014.

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,

Bill Schneider

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

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Ms. Rachel H. Blumenfeld

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DWM File: #750-V, Graybar AIN20130006 (Steam Injection Treatability Study WP)

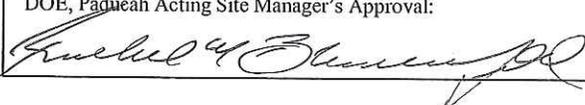
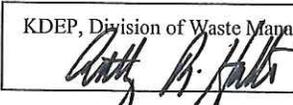
DWM File: #505-B, Graybar AIN20140002 (2014 SMP FFA Mods)

Attachment: Signed FFA Milestone Modification Form

**MODIFICATION TO THE PADUCAH FEDERAL FACILITY AGREEMENT
ACCORDING TO THE TERMS OF SECTION XXXIX**

Modification requested by: Rachel H. Blumenfeld		Date: March 10, 2014	
Requester's Organization: U.S. Department of Energy			
Section to be modified: Appendices C and G			
Reason for modification: To modify an upcoming Federal Facility Agreement (FFA) milestone to allow for the extension of the C-400 Phase IIb Treatability Study D1 Treatability Study Design by 14 days. On February 27, 2014, the U.S. Department of Energy (DOE) verbally requested to extend the submittal date for the C-400 Phase IIb Treatability Study D1 Treatability Study Design by 14 days from March 3, 2014, to March 17, 2014. This extension was approved verbally by the Kentucky Department for Environmental Protection and the U.S. Environmental Protection Agency on February 27, 2014. In accordance with Section XXIX.B.6 of the FFA, good cause exists for this extension. As agreed to by the FFA parties, this extension is needed to allow DOE time to ensure the internal cost estimate is consistent with the D1 Treatability Study Design being submitted. As further agreed to by the FFA parties, DOE will maintain the current enforceable milestone date of September 29, 2014, for the C-400 Phase IIb Treatability Study Construction Start.			
Modification requested:			
<u>Project</u>	<u>Deliverable</u>	<u>Current FFA Date¹</u>	<u>Proposed Date</u>
C-400-Phase IIb Treatability Study	D1 Treatability Study Design	3/03/2014	3/17/2014
C-400-Phase IIb Treatability Study	D1 Treatability Study Field Start	9/29/2014	9/29/2014 (No Change)
Notes: ¹ The current FFA dates are based on the milestone modification for the C-400 Phase IIb Treatability Study milestone modification dated February 10, 2014.			

Determination by any one of the three project managers that a modification is major will require that the modification be submitted for public participation to the extent required by DOE's Community Relations Plan under Section XXXIII.

	Major modification?		Date:
	YES	NO	
DOE, Paducah Acting Site Manager's Approval: 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3-10-2014
KDEP, Division of Waste Management Director's Approval: 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3/19/14
EPA, Region 4, Remedial Project Manager's Approval:	<input type="checkbox"/>	<input type="checkbox"/>	Date:

Note: Return to DOE after signature for the Administrative Record and to initiate distribution to FFA "Controlled" copies.