



ENERGY AND ENVIRONMENT CABINET

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Governor

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Leonard K. Peters
Secretary

August 28, 2014

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

RE: Administrative Comments to the Hazardous Waste Facility Permit Application
Paducah Gaseous Diffusion Plant
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

The Kentucky Division of Waste Management (Division) received the DOE's Hazardous Waste Facility Permit Application, dated May 30, 2014. The Division has completed its review and has provided comments as an attachment. Please submit the necessary revisions to the Permit Application within forty-five (45) days from the date of this letter, which is October 13, 2014. In addition, please submit a filing fee of \$8,880 with the revised Application.

If you have any questions or require additional information, please contact Leo W. Williamson or Mike Guffey at (502) 564-6716, or e-mail at leo.williamson@ky.gov or mike.guffey@ky.gov.

Sincerely,

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

AJW:tm:lww

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DWM File: #1410; Graybar: APE20140002 (10-Year Permit Renewal)

**Division of Waste Management Comments Pertaining to the
Hazardous Waste Facility Permit for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
KY8-890-008-982**

Specific Comments

1) Appendix E, Page E-11, Second Paragraph:

The first sentence states “Measurements of the field parameters are documented using the groundwater sample data forms prior to collection of the groundwater samples.” Please include an example of the groundwater sample data form in the Permit and reference accordingly.

2) Appendix E4, Page E4-13:

The Solid Waste Management Unit / Area of Concern Summary stops at SWMU 552. There are currently 570 SWMUs. Please add the references for SWMUs 553 to 570.

3) Appendix F; Sections 3.1, 3.2 and 3.6; Pages F-3 & F-5:

Use of an inspection log sheet is mentioned in each of these three sections, but an example is not included as an attachment. Please add a blank copy of the log sheet to Appendix F1 (General Inspection Record).

4) Appendix F, Section 4, Page F-5:

This section covering the RCRA Air Emission Standards, Subpart AA, BB and CC is listed in Appendix F. In the EPA Model Permit, Subpart AA is addressed in Part M, Subpart BB is addressed in Part N and Subpart CC is addressed in Part O. Please move/modify Section 4 and distribute it to Parts M, N and O. This would help standardize the PGDP permit with the EPA Model Permit.