



## ENERGY AND ENVIRONMENT CABINET

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December 15, 2014

Ms. Jennifer Woodard  
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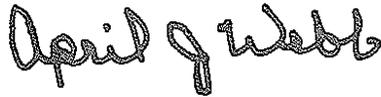
**RE: Submittal of Comments to the 2015 Site Management Plan (DOE/LX/07-1301&D1)**  
Paducah Gaseous Diffusion Plant  
Paducah, McCracken County, Kentucky  
KY8-890-008-982

Ms. Woodard:

The Kentucky Division of Waste Management (Division) has completed its review of the *2015 Site Management Plan (SMP)*, dated November 14, 2014. The Division is forgoing specific comments on inclusion of the C-409 Building and the C-613 Sedimentation Basin in SMP Appendix 4 pending a forthcoming discussion on the topic between yourself and Tony Hatton. It is hoped that the outcome of this discussion will help to resolve this matter to the satisfaction of the FFA parties prior to finalization of the 2015 SMP. The Division would also like to propose that the parties have a short discussion regarding the current No Further Action status of SWMU 102A prior to document finalization. The Southwest Plume's Record of Decision states that SWMU 102A was determined not to be a source of groundwater contamination to the Southwest Plume and therefore required no further action as a part of the Southwest Plume's Sources remedial action. Given that some low concentrations of contamination were detected along the length of this storm sewer line and that direct contact risk does not appear to have been formally quantified, it may be premature to grant no further action for SWMU 102A. Please note that the respective Appendix 4 Tables in the main submittal and redline/strikeout version are not in agreement. Ensuring the correct file versions are transmitted in the D2 document should resolve some of the Division's specific comments on Appendix 4.

Please find the Division's attached comments on the subject document. Please address the comments in a D2 version of the document. If you have any questions or require additional information, please contact Todd Mullins at (502) 564-6716, or e-mail at [todd.mullins@ky.gov](mailto:todd.mullins@ky.gov).

Sincerely,



April J. Webb, P.E., Manager  
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DWM File #1180, TEMPO: AIN20150001 (2015 SMP)

**Kentucky Division of Waste Management Comments Pertaining to the  
2015 Site Management Plan  
Paducah Gaseous Diffusion Plant, Paducah, Kentucky  
DOE/LX/07-1301&D1  
December 15, 2014**

**General Comment**

1. DOE's February 4, 2014 response to KDWM's Specific Comment #10 to the 2014 Site Management Plan (SMP) states:

“During the November 4, 2013, FY 2014 SMP scoping meeting, Kentucky noted that SWMU 536, Concrete Truck Washout Area, had received an NFA; however, based upon recent field inspections, Kentucky had determined that SWMU 536 still was being utilized as a concrete truck washout area and requested that it be added back to Appendix 4 for reevaluation. Per Kentucky's request, SWMU 536 was added to the D&D OU, DUF<sub>6</sub> D&D section of Appendix 4. As discussed with the FFA Managers during the January 29, 2014, comment resolution meeting, DOE will submit the revised SAR under a separate cover letter independent of the FY 2014 Site Management Plan.”

To date, a Revised SAR for SWMU 536 has not been submitted. Please submit a Revised SAR for SWMU 536.

**Specific Comments**

1. **Section 4, Page 3, “Risk Prioritization Criteria” insert:**

This figure appears to prioritize post-GDP OU work below D&D of the DUF<sub>6</sub> facility. The Division believes that, to the extent possible, post-GDP work should be performed concurrently with D&D of the GDP. For instance, following D&D of the C-400 Building there should be little delay in addressing any contamination that may exist beneath the building's slab. It is suggested that “post-GDP work” be listed immediately below “Perform D&D of the GDP.”

2. **Appendix 3, Page 3-10:**

The second bullet listed at the top of the page lists acceptable cumulative risk and hazard for surface soil and subsurface soils. A cumulative ELCR < 1E-4 and cumulative HI ≤ 1 are also applicable to buried waste. Modify the text as necessary.

3. **Appendix 3, Page 3-11:**

Planning assumption #6 refers to a “modified soil cover” as the expected remedy for SWMUs 7 and 30. This reference is inconsistent with the D2 Feasibility Study for SWMUs 2, 3, 7 and 30 in that all SWMU 7 and 30 alternatives that leave waste in place require a Kentucky Subtitle D cap. Modify as necessary.

**4. Appendix 3, Pages 3-18 and 3-19:**

The C-340 and C-746-A East End Smelter work has been completed. It is suggested that the D&D Operable Unit scope discussion listed here be deleted and instead be included in Appendix 1.

**5. Appendix 4, Page 4-5:**

SWMU 226 (OS-15) is not in the Soils OU (Remedial) section. It may be a typographical error (SWMU 225B was typed over it?). The Division's records show that SWMU 226 is both in the Soils OU and the Soils and Slabs OU. Please correct.

**6. Appendix 4, Page 4-6:**

SWMU 11 is referred to as "C-400 Trichloroethylene Leak Site". Upon review of the original SAR, this SWMU is referred to as the "C-400 TCE Leak Site". Please correct.

**7. Appendix 4, Page 4-6:**

In the Soils and Slabs OU list, SWMU 74 should be listed before SWMU 75.

**8. Appendix 4, Page 4-6:**

Appendix 4 of the 2015 SMP shows that SWMU 16 (C-746-D Classified Scrap Yard), SWMU 47 (C-400 Technetium Storage Tank) and SWMU 74 (C-340 PCB Transformer Spill Site) were all transferred from the Soils OU (Soils Remedial) to the Soils and Slabs OU. In keeping with past practice, the Division requests that DOE submit a letter documenting the transfer of these three SWMUs to the Soils and Slabs OU along with the basis for this transfer (i.e., agreement on the part of the FFA parties).

**9. Appendix 4, Page 4-6:**

A Revised SAR, dated October 24, 2014, stated that eight Soils OU SWMUs (75, 79, 99A, 137, 154, 155, 176 and 177) were reassigned to the Soils and Slabs OU. During review, it was noted that SWMU 137 (C-746-A Inactive PCB Transformer Sump Area) is missing from Appendix 4. Please add SWMU 137 to the Soils and Slabs OU.

**10. Appendix 4, Page 4-6:**

A Revised SAR, dated October 24, 2014, stated that eight Soils OU SWMUs (75, 79, 99A, 137, 154, 155, 176 and 177) were reassigned to the Soils and Slabs OU. During review, it was noted that SWMU 154 (C-331 PCB Soil Contamination (Southeast)) is missing from Appendix 4. Please add SWMU 154 to the Soils and Slabs OU.

**End of Division Comments**