

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

Modification requested by: **Jennifer Woodard** Date: **January 5, 2015**

Requester's Organization:
U.S. Department of Energy

Section to be modified:
Appendices C and G

Reason for modification: To modify upcoming Burial Grounds Operable Unit (BGOU) Solid Waste Management Units (SWMUs) 5 and 6 Federal Facility Agreement (FFA) milestones to allow for extension of the D1 Record of Decision, D1 Remedial Design Work Plan, D1 Remedial Design Report, D1 Remedial Action Work Plan, Field Start, and D1 Remedial Action Completion Report by 45 days. On October 17, 2013, the U.S. Environmental Protection Agency (EPA) provided conditional concurrence on the *Proposed Plan for the Burial Grounds Operable Unit Source Areas at the Paducah Gaseous Diffusion Plant, Kentucky: Solid Waste Management Units 5 and 6, DOE/LX/07-1275&D2 (D2 Proposed Plan)*. On December 9, 2014, the Kentucky Department for Environmental Protection (KDEP), in accordance with Section XXIX.B.6 of the FFA, requested an additional 45 days to review and respond to the D2 Proposed Plan, extending KDEP's comment review period from December 11, 2014, to January 26, 2015. As a result of KDEP's extension request, which extends the period of review for the subject document, the U.S. Department of Energy's resubmission of the document or invocation of dispute in response to EPA conditions also is extended until after such time that KDEP issues a letter of concurrence, nonconcurrence, or conditional concurrence on the subject document and the period of review terminates.

Based on KDEP's extension, and in accordance with Section XXIX.B.4 of the FFA, good cause exists for this 45-day milestone extension of the subsequent documents associated with BGOU SWMUs 5 and 6.

Modification requested:

<u>Project</u>	<u>Deliverable</u>	<u>Current FFA Date¹</u>	<u>New Date</u>
BGOU 5 and 6	D1 ROD	3/8/2015	4/22/2015
BGOU 5 and 6	D1 Remedial Design Work Plan	4/7/2015	5/22/2015
BGOU 5 and 6	D1 Remedial Design Report	4/7/2016	5/22/2016
BGOU 5 and 6	D1 Remedial Action Work Plan	5/7/2016	6/21/2016
BGOU 5 and 6	Field Start	11/16/2016	12/31/2016
BGOU 5 and 6	D1 Remedial Action Completion Report	2 nd Quarter 2018 ²	2 nd Quarter 2018 ²

Notes:

¹ The currently approved FFA dates are based on the milestone modification for BGOU SWMUs 5 and 6, dated November 18, 2014.

² Indicates a planning date.

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?
YES NO

DOE, Paducah Site Lead's Approval:
Jennifer Woodard

Date:
1-5-15

KDEP, Division of Waste Management Director's Approval:

Date:

EPA, Region 4, Remedial Project Manager's Approval:
Jon Smith

Date:
1/6/15

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