



ENERGY AND ENVIRONMENT CABINET

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Leonard K. Peters
Secretary

January 14, 2015

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

RE: Approval of the Revised Solid Waste Management Unit Assessment Reports for 102A, 102B, 211A, 211B, 90 and 194; Request for a Revision to 526
Paducah Gaseous Diffusion Plant
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Woodard:

The Kentucky Division of Waste Management (Division) has reviewed the Solid Waste Management Unit (SWMU) Assessment Reports (SARs) for the following SWMUs:

A Revised SAR for SWMU 3, dated November 7, 2014.

Revised SARs for SWMUs 102A, 102B, 211A and 211B, dated November 14, 2014.

A Revised SAR for SWMU 194 and an (original) SAR for SWMU 90, dated December 1, 2014.

SWMU 102A:

The *Record of Decision for Solid Waste Management Units 1, 211A, 211B and Part of 102 Volatile Organic Compound Sources for the Southwest Groundwater Plume (0365&D2/R1)* functionally split SMWU 102 into two parts, 102A and 102B. The ROD also noted that no further action was required at SWMU 102A to address releases to groundwater. SMWU 102 was officially divided into 102A (Plant Storm Sewer between the south side of the C-400 Building and Outfall 008) and 102B (Plant Storm Sewer associated with C-333-A, C-337-A, C-340, C-535 and C-537) in the D2 2013 SMP with SWMU 102A was placed into the No Further Action section and 102B was placed in the Surface Water Operable Unit (SWOU) section. The D2 2013 SMP was subsequently approved, but official SARs for SWMUs 102A and 102B had

not yet been submitted. After receipt of the D1 2014 SMP, the Division, in a comment letter dated January 3, 2014, requested that Revised SARs for SWMUs 102A and 102B be submitted. These SARs were included in the DOE's above-stated November 14, 2014 submittal. It is noted that SWMU 120A is located in the No Further Action section.

SWMU 102B:

The Revised SAR for SWMU 102B is consistent with agreements made in the D2 2014 SMP (dated February 4, 2014) as well as the other Southwest Plume documents. It is noted that SWMU 102B is located in the Surface Water Operable Unit - Removal Action subsection.

SWMUs 211A and 211B:

SWMU 211 was divided into 211A (C-720 TCE Spill Site Northeast) and 211B (C-720 TCE Spill Site Southeast) to assist with the Southwest Plume Remedial Design Site Investigation and to make it possible to more easily document possible separate response actions for these two areas. Revisions to the SARs for SWMUs 211A and 211B are consistent with agreements made in the (February 4, 2014) D2 2014 Site Management Plan as well as in other Southwest Plume documents. It is noted that SWMU 211A is in both the Groundwater Operable Unit (Southwest Plume Sources) and the Soils Operable Unit. It is also noted that SWMU 211B is in both the Groundwater Operable Unit (Southwest Plume Sources) and the Soils and Slabs Operable Unit.

SWMU 3:

The Revision to the SAR for SWMU 3 removed 1,100 linear feet of a now abandoned discharge ditch from the originally stated area. The remaining area encompasses an abandoned underground transfer line and a sump that was used to transfer leachate into the line. Data supporting this decision was presented in the *Remedial Investigation Report for the Burial Grounds Operable Unit* (0030&D2, dated April 2010). This data supported removal of the abandoned ditch from the Burial Grounds Operable Unit; however, it is noted that this ditch is to be included in SWMU 526 (Internal Plant Drainage Ditches) of the Surface Water Operable Unit.

SWMU 194:

The SAR for SWMU 194 was revised due to the Division's concerns regarding SWMU 536 (Concrete Truck Washout Area) and the soil spoils piles generated by depleted uranium hexafluoride facility construction/maintenance. This Revised SAR is consistent with the status of SWMU 536. It is noted that SWMU 194 is in the Soils Operable Unit.

SWMU 90:

The Division received the "newly-submitted" SAR for SWMU 90. After extensive searching, neither the Division nor the DOE were able to find an "original" SAR for SWMU 90. To correct this oversight, the Division requested, and the DOE submitted, a "new" SAR for SWMU 90. It is noted that SWMU 90 has received No Further Action status.

Conclusions:

- The Division hereby approves the Revised SARs for SWMUs 102A, 102B, 211A, 211B, and 194 as well as the “newly-submitted” SAR for SWMU 90.
- The Division requests submittal of a Revised SAR for SWMU 526 (Internal Plant Drainage Ditches), to include a map identifying all associated internal plant ditches that comprise SWMU 526 including the ditch to be disassociated from SWMU 3. The Division will approve the requested Revision to the SAR for SWMU 3 upon receipt of the Revised SAR for SWMU 526.

If you have any questions or require additional information, please contact Leo W. Williamson at (502) 564-6716, ext. 4683 or e-mail at leo.williamson@ky.gov.

Sincerely,



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Hazardous Waste Branch

AJW:tm:lwv

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