



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
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ATLANTA, GEORGIA 30303-8960

February 6, 2015

4WD-FFB

Jennifer Woodard  
United States Department of Energy  
Portsmouth/Paducah Project Site Office  
P.O. Box 1410  
Paducah, Kentucky 42002

**RE: EPA Comments on the Site Management Plan at the Paducah Gaseous Diffusion Plant, Paducah, KY (DOE/LX/07-1301&D1)**

Dear Ms. Woodard,

In accordance with Section XX of the Paducah Gaseous Diffusion Plant Federal Facility Agreement, the U.S. Environmental Protection Agency has reviewed the FY 2014 Site Management Plan for the Paducah Gaseous Diffusion Plant (DOE/LX/07-1301&D1), and provides comments below.

If you have any questions or require additional information, please contact me at (404) 562-8513.

Sincerely,

Jennifer Tufts  
Remedial Project Manager  
Federal Facilities Branch

ec: Todd Mullins, KDEP-Frankfort  
Leo Williamson, KDEP-Frankfort  
Jon Richards, EPA R4  
David Buxbaum, EPA R4

**EPA Comments**  
**FY 2015 Site Management plan for the**  
**Paducah Gaseous Diffusion Plant, Paducah, KY**  
**DOE/LX/07-1301&D1**

1. **Appendix 1 OU Summary, BGOU SWMU 2, Page 1-7** – Revise Status column information to read as follows: “Additional remedial alternatives for a CERCLA Final remedial action are being evaluated in the SWMUs 2,3,7 and 30 FS. ICs and GW monitoring are ongoing pending final remedy selection.”
2. **Appendix 1 OU Summary, D&D OU (C-410), Page 1-9** – Revise Status column to add the following: “Removal and treatment of 200,000 gallon of collected contaminated water from basement pit planned in response to EPA Stop Work Order of (11/26/14).”
3. **Appendix 3 OU Scope and DOE Planning Assumptions, 1<sup>st</sup> paragraph, Page 3-5** – Revise text on the Southwest Plume VOC source areas to reflect current status, ROD, RD, RAWP issued, construction underway, etc.
4. **Appendix 3 OU Scope and DOE Planning Assumptions, C-400 Scope, 3<sup>rd</sup> paragraph, Page 3-5** – Update description of C-400 IRA Phase IIb to include the Treatability Study and that if demonstrated successful will go full-scale as the remedy that will be documented in AROD.
5. **Appendix 3 OU Scope and DOE Planning Assumptions, BGOU 5<sup>th</sup> bullet, Page 3-11** – Revise 5<sup>th</sup> bullet to add “if containment selected as the final remedy. However, due to public comment and whether an on-site CERCLA WDF is built, these SWMUs may get excavated and disposed of in the WDF.”
6. **Appendix 3 OU Scope and DOE Planning Assumptions, BGOU 6<sup>th</sup> bullet, Page 3-11** – Revise 6<sup>th</sup> bullet to read “...implement a KY Subtitle D cap if containment selected as the final remedy.” Since not consistent with the BGOU SWMUs 2, 3, 7 and 30 D2 FS.
7. **Appendix 3 OU Scope and DOE Planning Assumptions, SWOU Scope, Page 3-13** –DOE lists the C-616 F lagoon in the table of planned projects under the SWOU but there is no discussion of how these will be addressed. Text should be added to reflect expected CERCLA actions to be taken for the lagoons (including C-616 F). For example, they will be drained and water treated, as necessary, before discharge into surface water, sediments/sludges/liner removed and disposed of in proper landfill (on-site CERCLA WDF or permitted landfill) and underlying soils characterized before backfill with clean fill.

8. **Appendix 3 OU Scope and DOE Planning Assumptions, SWOU Key Planning Assumptions, 2<sup>nd</sup> bullet, Page 3-13** – EPA would not agree to only rely on the existing information for characterization of the internal plant ditches considering that they convey contaminated stormwater runoff or other process waters and the targeted date for an RI Report of 2029. EPA as part of scoping the RI Work Plan will want more samples taken to determine full nature and extent of the contamination in the plant ditches. Update this assumption to better reflect regulators expectations which are consistent with the NCP and EPA guidance on determining nature and extent of contamination as part of an RI.
  
9. **Appendix 3 OU Scope and DOE Planning Assumptions, D&D OU Description, 2<sup>nd</sup> paragraph, Page 3-18** – Text suggests that EPA has agreed to a strategy from 2009 that would circumvent the CERCLA non-time critical removal action process as the means for addressing contaminated facilities and streamline the documentation that is identified in the FFA. A copy of that written agreement should be provided to EPA to verify its scope and contents. As expressed in e-mail and on the phone with DOE, EPA is not willing to agree with DOE on its use of non-CERCLA removal actions outside of the FFA oversight. EPA has agreed in principle to allow DOE to undertake deactivation of certain facilities on a case-by-case basis outside of CERCLA and in compliance with all applicable laws/regulations followed by decommissioning as CERCLA non-time critical removal action in accordance with the FFA requirements.
  
10. **Appendix 5 Enforceable Timetables and Planning Dates, GWOU, C-400 Phase IIb Treatability Study, Page 5-3** – The construction start date of 1/10/15 should be modified to reflect the new date.
  
11. **Appendix 5 Enforceable Timetables and Planning Dates, BGOU, SWMUs 5&6, Page 5-8** – Deadline of 1/22/15 for D1 ROD has been missed and a new deadline should be listed that has been approved by EPA and KY. Also, the D1 RDWP deadline of 2/21/15 will not be met and accordingly should be revised to reflect agreement of the FFA parties. Also, the comments column should reflect that a D2 PP will be delivered to the EPA and KY considering the Conditions that have been provided in order for finalization or that informal dispute may occur.