



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 13, 2015

4WD-FFB

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

RE: EPA Approval of DOE's Request to Substitute Gas Chromatograph and Flame Ionization Detector for Photoacoustic Analyzer for Deep Soil Mixing at Solid Waste Management Unit 1

Dear Ms. Woodard,

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the February 19, 2015 letter, where DOE Requests to Substitute Gas Chromatograph (GC) and Flame Ionization Detector (FID) for Photoacoustic Analyzer (PAA) for Deep Soil Mixing at Solid Waste Management Unit 1 (SWMU 1). As stated in the letter, the *Remedial Design Report In Situ Source Treatment using Deep Soil Mixing for the Southwest Groundwater Plume Volatile Organic Compound Source at the C-747-C Oil Landfarm (Solid Waste Management Unit 1) at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky (DOE/LX/07-1276&D2/R1)* specifies use of a PAA to monitor gas discharge during the deep soil mixing project for SWMU 1. However, as described in DOE's letter and during the January 16, 2015 and February 18, 2015 meetings, DOE presented justification for utilizing GC/PID to measure gas discharge rather than the PAA because of PAA's operational issues associated with the presence of high levels of moisture. DOE provided sound justification for utilizing the GC/PID rather PAA during implementation of the SWMU 1 deep soil mixing remedy. Therefore, EPA hereby approves DOE's request.

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, KDWM – Frankfort, Todd.Mullins@ky.gov
David Dollins, DOE – Paducah, dave.dollins@lex.doe.gov
Brad Montgomery, LATA – Kevil, brad.montgomery@lataky.com