



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 9, 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 the Addendum to the Remedial Design Work Plan for Solid Waste Management Units 1, 211-A, and 211-B Volatile Organic Compound Sources for the Southwest Groundwater Plume at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Sampling and Analysis Plan (DOE/LX/07-1268&D2/R2/A1)

Dear Ms. Woodard,

The U.S. Environmental Protection Agency, Region 4 (EPA) has completed an expedited review of the *Addendum to the Remedial Design Work Plan for Solid Waste Management Units 1, 211-A, and 211-B Volatile Organic Compound Sources for the Southwest Groundwater Plume at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Sampling and Analysis Plan (DOE/LX/07-1268&D2/R2/A1)*. At EPA's request, the FFA parties met 3/9/15 to clarify how DOE will evaluate groundwater data collected from the direct push technology (DPT). As stated on page C-8, DPT groundwater samples will be evaluated holistically to determine impacts from SWMUs 211-A and 211-B on RGA groundwater quality. EPA agrees with a holistic approach of evaluating the data. However, Table C.2 provides specific DPT sample locations that will be compared and evaluated as specified in the decision rules. EPA views Table C.2 as an example of sample locations that may be compared, but expect all DPT samples will be evaluated and compared to best determine source impacts from SWMUs 211-A and 211-B on RGA groundwater as defined in the decision rules.

Also as part of the decision rules, DOE proposed to average groundwater samples at each boring location. EPA is not opposed to averaging the samples within each zone of the RGA, i.e. upper, middle, lower, but does not agree with averaging all samples at a single boring location. DOE indicated averaging concentrations within each zone of the RGA at a single location was the intent although not reflected in the document.

Based on discussions with DOE and their clarification of how data will be evaluated, EPA hereby approves the document.

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

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