



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

March 2, 2016

Ms. Tracey Duncan  
Federal Facility Agreement Manager  
United States Department of Energy  
Portsmouth/Paducah Project Site Office  
5501 Hobbs Road  
Kevil, KY 42053

RE: EPA Acknowledgement of Receipt: **Transmittal of the Water Policy Area Vapor Intrusion Screening Study Report for the Five-Year Review of Remedial Actions, Paducah, Kentucky, (DOE/LX/07-1289&D2/R1/A1/R1), Secondary Document, Issued February 22, 2016 (PPPO-02-3333431-16)**  
EPA ID KY8890008982, Paducah Gaseous Diffusion Plant, McCracken County, KY

Dear Ms. Duncan,

The U. S. Environmental Protection Agency (EPA) Region 4 has reviewed the revised Water Policy Area Vapor Intrusion Screening Study Report and DOE's responses to EPA's comments on the previous draft. The purpose of this correspondence is to acknowledge receipt of the revised report, submitted by DOE in accordance with Section XX, *Review/Comment on Draft/Final Documents*, of the Paducah Gaseous Diffusion Plan (PGDP) Federal Facility Agreement (FFA).

In DOE's cover letter transmitting the revised report (February 22, 2016), the Department requested that EPA and KY approve this report no later than March 14, 2016, *"to support inclusion of this information in the final Addendum to the 2013 Five-Year Review"*. DOE's request for approval of the Secondary document and reference to the *"final Addendum"* appear to be in conflict with the FFA.

- The FFA (Section XX (B) (2) states: *"Secondary Documents typically include those documents that are discrete portions of the Primary Documents and are typically feeder documents. Secondary Documents are issued by DOE in draft subject to review and comment by EPA and KNREPC. Although DOE must respond to comments received, the D1 Secondary Documents may be finalized in the context of the corresponding Primary Documents. A Secondary Document may only be disputed at the time the corresponding D2 Primary Document is submitted."*

As a Secondary document under the FFA, regulatory agency approval of the February 2016 revision is not expected. As a feeder document, the report of work is expected to be finalized through review and comment on the corresponding Primary Document, the Five Year Review Addendum. Therefore it is EPA's expectation that the Water Policy Area VI Screening Study report will be included in the draft (D1) version of the Five Year Review Addendum that is due to EPA and KY on March 31, 2016.

As discussed in tri-party conference calls on February 11 and February 18, 2016, DOE's proposed revisions, subsequently incorporated into the February 22, 2016, version of the report, are not responsive to EPA's General Comment #2 (submitted on December 29, 2015). Simply stated, absent a figure that illustrates the estimated 1ug/L contour for TCE in groundwater on a map of VI screening locations, an individual resident or property owner is unable to visualize why his/her property was not included in the sampling effort to evaluate the protectiveness of the Water Policy Area remedy. EPA maintains that it is not reasonable to expect users of the report to try and "connect the dots" between break-out boxes that detail the available groundwater monitoring data in order to see where homes and outbuildings are located relative to the 1 ug/L screening criterion that was used by the FFA parties to select the sampling locations. In addition, DOE has included the 1ug/L contour line on previous bi-annual updates to the Paducah groundwater plume maps.

If you have any questions about this correspondence, please do not hesitate to contact me at (404) 562-8647 or via electronic mail at [corkran.julie@epa.gov](mailto:corkran.julie@epa.gov).

Sincerely,



Julie L. Corkran, Ph.D.  
Federal Facility Agreement Manager  
Superfund Division

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