



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

March 4, 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 Region 4 Conditions for Approval: **Remedial Action Work Plan for Optimization of the Northeast Plume Interim Remedial Action at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky (DOE/LX/07-1280&D2/R2)**
EPA ID KY8890008982, McCracken County, KY

Dear Ms. Duncan,

The U. S. Environmental Protection Agency (EPA) Region 4 has reviewed the revised *Remedial Action Work Plan for Optimization of the Northeast Plume Interim Remedial Action at the Paducah Gaseous Diffusion Plant (D2/R2)*. One (1) Condition for document approval was identified as a result of this review: the Condition is provided as an enclosure to this letter in support of discussion and document revision.

EPA is in receipt of the Addendum to the Remedial Action Work Plan, *Appendix D - Quality Assurance Project Plan (DOE/LX/07-1280&D2/R2/A1)*, and will provide review comments and approval of the Addendum in separate correspondence.

If you have any questions about this correspondence, please do not hesitate to contact me at (404) 562-8547 or via electronic mail at corkran.julie@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Julie L. Corkran", is positioned above the typed name.

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

Enclosure

Electronic copy with Enclosure:

April Webb – Webb.April@ky.gov
Jon Richards, US EPA – Region 4; Richards.jon@epa.gov
Robert Edwards, DOE – Paducah; Edwards.robert@lex.doe.gov
David Dollins, DOE – Paducah, dave.dollins@lex.doe.gov
Jennifer Woodard, DOE – Paducah, Jennifer.Woodard@lex.doe.gov
Kim Knerr, DOE – Paducah; kim.Knerr@lex.doe.gov
Mark J. Duff, Fluor Federal Services – Kevil; mark.duff@FFSpaducah.com
Myrna Redfield, Fluor Federal Services – Kevil; Myrna.redfield@FFSpaducah.com
John Wesley Morgan, Fluor Federal Services – Kevil; John.morgan@FFSpaducah.com
Jana White, Fluor Federal Services – Kevil; jana.white@FFSpaducah.com
Craig Jones, Fluor Federal Services – Kevil; Craig.jones@FFSpaducah.com
Karen Walker, Fluor Federal Services – Kevil; Karen.walker@FFSpaducah.com
Karla Morehead, P2S – Paducah; karla.morehead@lex.doe.gov
Christa Dailey, P2S – Paducah; christa.dailey@lex.doe.gov
Bethany Jones, P2S – Paducah; Bethany.jones@lex.doe.gov
Paige Sullivan, P2S – Paducah; paige.sullivan@lex.doe.gov
Jim Ethridge, CAB – Paducah; jim@pgdpcab.org
Matt McKinley, CHFS – Frankfort, matthewW.mckinley@ky.gov
Stephanie Brock, CHFS – Frankfort, StephanieC.Brock@ky.gov
Nathan Garner, CHFS – Frankfort; Nathan.garner@ky.gov
Brian Begley, KDWM – Frankfort; brian.begley@ky.gov
Gaye Brewer, KDWM – Paducah, gaye.brewer@ky.gov
Mike Guffey, KDWM – Frankfort; mike.guffey@ky.gov
Leo Williamson, KDWM – Frankfort, Leo.Williamson@ky.gov

United States Environmental Protection Agency (EPA) Region 4
Conditions for Approval:

**Remedial Action Work Plan for Optimization of the Northeast Plume
Interim Remedial Action at the Paducah Gaseous Diffusion Plant,
Paducah, Kentucky (DOE/LX/07-1280&D2/R2)
EPA ID KY8890008982, McCracken County, KY**

1. **EPA General Comment 4 – Section 8, Quality Assurance and Construction Quality Control Plan; Section 10, References.** In response to EPA’s General Comment 4, the Department of Energy (DOE) indicates that the reference in Section 10 to the DOE Environmental Monitoring Plan (EMP) has been deleted in the D2/R2 Remedial Action Work Plan (RAWP). However, the EMP reference has not been deleted, it has simply been reworked to *2015(b) DOE* and moved up in the list of Section 10 References to (current) page 50. A word search of the RAWP identified additional unexplained references to the DOE EMP.

Evaluate each of the following references to the DOE EMP in the RAWP and either provide for EPA consideration an explanation for each retention for discussion and resolution *or* revise the page to cite the appropriate section of the project-specific QAPP. (*Italicized bullets are for information only and do not require a response*).

- Page 18, footnote b, under Table 3 – reference to EMP – monitoring for CERCLA remedy protectiveness should be managed in the remedy specific O&M Plan, not the DOE EMP (which is a document not subject to EPA and KY approval under the FFA).
- Page 20, Table 4 entry (reference to EMP Tables C.8 and C.9)
- Page 23 – EMP referenced again with respect to remedy protectiveness monitoring
- *Page 46 – Section 8 – EMP language deleted and QAPP language inserted. No change requested.*
- Page 50 – DOE 2015b is a new citation for the old LATA EMP reference (that DOE states in the responses to EPA comments has been removed from Section 10).
- *Page 51 – LATA EMP reference deleted here (re-worked and moved to page 50. See preceding bullet). No change requested.*