



ENERGY AND ENVIRONMENT CABINET

Matthew G. Bevin
Governor

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
200 FAIR OAKS LANE
FRANKFORT, KENTUCKY 40601
PHONE (502) 564-6716
FAX (502) 564-4049
www.waste.ky.gov

Charles G. Snaveley
Secretary

R. Bruce Scott
Commissioner

March 8, 2016

Ms. Tracey Duncan
US Department of Energy
Portsmouth/Paducah Project Site Office
5501 Hobbs Road
Paducah, Kentucky 42053

RE: Approval of the Water Policy Area Vapor Intrusion Screening Study Report for Five-Year Review of Remedial Actions (1289&D2/R1/A1/R1)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Duncan:

The Division of Waste Management (Division) has reviewed the D2/R1/A1 Water Policy Area Screening Study Report. The document is hereby approved.

However, the Division does not agree with DOE's response to Specific Comment #1 which in part stated: "the only utility of a 1.0 µg/L TCE plume boundary is an evaluation of vapor intrusion ...". Comment #1 requested that DOE consider adding the 1.0 µg/L contour to Figure 1 and DOE provided an explanation that focused on the premise that "there is no benefit to drawing a contour of questionable certainty (the 1.0 µg/L TCE plume boundary) on the current plume map." The Division notes that all contours and shadings are interpretive and as such are of questionable certainty in areas other than data points. The Division also notes that a 1.0 µg/l contour would hold potential interest to some stakeholders and also have utility in trending efforts. The Division does find the additional labeling (sample date and result) at each monitoring well location to be an improvement from the previous version of the map. In regards to Specific Comment #3, the modification, as written, appears to assert that all UCRS soils in the vicinity of PGDP do not show evidence of vapor migration. In UCRS soils where TCE DNAPL

is present, the likelihood for vapor migration to occur is high, and may be extremely high where preferential pathways are present.

If you have any questions or require additional information, please contact Mike Guffey at (502) 564-6716, ext. 4698 or e-mail at mike.guffey@ky.gov.

Sincerely,



For April J. Webb, P.E., Manager
Hazardous Waste Branch

AJW/bb/mg/lww

Ec: Julie Corkran, US EPA – Region 4; corkran.julie@epa.gov
Jon Richards, US EPA – Region 4; Richards.jon@epa.gov
Robert E. Edwards III, DOE – Paducah; Robert.edwards@lex.doe.gov
David Dollins, DOE – Paducah; dave.dollins@lex.doe.gov
Jennifer Woodard, DOE – Paducah; Jennifer.Woodard@lex.doe.gov
Tracey Duncan, DOE – Paducah; tracey.duncan@lex.doe.gov
Kim Knerr, DOE – Paducah; kim.Knerr@lex.doe.gov
Rich Bonczek, DOE – Lexington; Richard.Bonczek@lex.doe.gov
Rose Wigton, DOE – Lexington; rose.wigton@lex.doe.gov
Paula Rhea, DOE – Lexington; paula.rhea@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
Jennifer Blewett, Fluor Federal Services – Kevil; Jennifer.blewett@ffspaducah.com
Craig Jones, Fluor Federal Services – Kevil; craig.jones@ffspaducah.com
Karen Walker, Fluor Federal Services – Kevil; Karen.walker@ffspaducah.com
Darla Bowen, Fluor Federal Services – Kevil; Darla.bowen@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
Michael Smith, TechLaw, Inc. – Alpharetta; msmith@TechLawInc.com
Matt McKinley, CHFS – Frankfort; matthewW.mckinley@ky.gov
Stephanie Brock, CHFS – Frankfort; StephanieC.Brock@ky.gov
Nathan Garner, CHFS – Frankfort; Nathan.garner@ky.gov

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Brian Begley, KDWM – Frankfort; brian.begley@ky.gov
Mike Guffey, KDWM – Frankfort; mike.guffey@ky.gov
Gaye Brewer, KDWM – Paducah; gaye.brewer@ky.gov
Leo Williamson, KDWM– Frankfort; Leo.Williamson@ky.gov

DWM File: #1100-E; Graybar: ARM20150006 (Water Policy Screening Study Rpt for
Five-Year Rev of Remedial Actions)