



ENERGY AND ENVIRONMENT CABINET

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May 27, 2016

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

RE: Approval of the Treatability Study Report for the C-400 Interim Remedial Action Phase IIb Steam Injection Treatability Study (DOE/LX/07-2202&D2)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Duncan:

The Kentucky Division of Waste Management (Division) has completed its review of the D2 subject document dated May 10, 2016. Overall, the Treatability Study Report met the objectives associated with the Work Plan and is hereby approved.

The Department of Energy and their contractors did engage the Division and EPA during Comment Resolution Meetings, to a limited degree, regarding the Division's General Comment 1; sequencing [delaying] full-scale Steam Enhanced Extraction (SEE) to investigate the area beneath C-400 building or proceeding forward with design and full-scale [phase IIb area] implementation. Noteworthy, DOE states in their response to Comment 14 that steam injection and dual-phase extraction locations presented in the conceptual design were intentionally placed outside of the target treatment area "that creates a strong outside-in migration pattern [which] is maintained for hydraulic control" and "the proposed layout is a prudent design to address uncertainties. The industry standard is to design the layout larger than the target treatment area."

The Division supports moving forward with design and full-scale implementation of SEE at the phase IIb area; with or without a complete understanding of the sub-surface contamination beneath C-400. The Division believes the best approach for resolving C-400 sub-slab

uncertainties to be a limited and focused C-400 sub-slab investigation in the southeast corner (near the current phase IIB area). The limited and focused C-400 sub-slab investigation can occur, simultaneously with the design process, allowing for design modifications if additional source areas are encountered. The Division favors maintaining the current SMP dates for full scale SEE for the C-400 IIB area.

If you have any questions or require additional information, please contact Brian Begley (502) 564-6716, ext. 4641 or e-mail at Brian.Begley@ky.gov.

Sincerely,



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

AJW/bb/lww

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Phase IIB Steam Injection)