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ENERGY AND ENVIRONMENT CABINET
Department for Environmental Protection

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July 22, 2016

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

RE: Submittal of Comments on the Removal Notification for SWMU 27 (DOE/LX/07-2406&D1)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Duncan:

The Division of Waste Management (Division) has completed its review of the *Removal Notification for SWMU 27*, dated June 21, 2016. Please address the attached comment on the document.

If you have any questions or require additional information, please contact Gaye Brewer at (270) 898-8468, or e-mail at gaye.brewer@ky.gov.

Sincerely,

E-Signed by Webb, April
VERIFY authenticity with e-Sign 


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

AJW:bb:gb:lww

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DWM File: #1110-F; Graybar: ARM20160012 (Soils OU RI #2 Rpt – SWMU 27 RN)

**Kentucky Division of Waste Management Comment to the
Removal Notification for SWMU 27
Paducah Site, Paducah, Kentucky
DOE/LX/07-2406&D1
July 18, 2016**

Specific Comment:

1. Section 4.1.3, pg. 10

This section states that the sludge will be removed from the tank “to the extent practicable”. The Division is concerned that no metric or common understanding has been established to determine when the tank is deemed sufficiently empty. Residual tank sludge could be/become a source of continuing contamination. Given that the tank was emptied in 1992 and the integrity of the tank and the origin of its ~1,200 gallon contents are unknown, Kentucky would like criteria established and agreed upon by the three FFA parties prior to approving this Removal Notification. Considerations should include (but not limited to) utilizing real-time video verification, best professional judgement, and agitation of the residual sludge with additional water to facilitate its removal. Please revise this section to provide completion criteria that will satisfy this concern.