



ENERGY AND ENVIRONMENT CABINET

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Governor

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Commissioner

December 15, 2015

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

RE: Submittal of Comments to the Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky - Annual Revision FY 2016 (DOE/LX/07-2400&D1)
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 *Site Management Plan*, dated November 16, 2015. The Division is limiting its comments to Appendix D of the FY 16 draft revision, electing to focus attention on the idled status of certain cleanup projects such as the Soils OU. However, the Division recognizes that much work and revision is needed in the SMP to provide the necessary definition for scope of work and schedules (including outyear dates) to direct the comprehensive remediation of the Paducah site inclusive of GDP D&D.

The Division looks forward to working with the FFA parties on some fresh agreements for this annual revision. Please find the Division's comments on the D1 annual revision. If you have any questions or require additional information, please contact Brian Begley at (502) 564-6716, or e-mail at brian.begley@ky.gov.

Sincerely,



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

AJW/bb/mg/lww

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DWM File #1180, TEMPO: AIN20160001 (2016 SMP)

**Kentucky Division of Waste Management Comments Pertaining to the
Annual Revision FY 2016 Site Management Plan**

Paducah Site, Paducah, Kentucky

DOE/LX/07-2400&D1

December 14, 2015

General Comments:

1. In SMP discussions occurring since approval of the FY 13 annual revision, DOE and their contractors have clutched certain elements and bases from FY 13 agreement and attempted to limit post-FY 13 discussions. As stated in the cover letter, the Division looks forward to a fresh approach to the SMP and requests the lead agency limit their verbal and written discussions of the FY 13 agreements, which the Division believes to be historical (obsolete). No written response is necessary.
2. The Division is proposing in this specific comment, somewhat arbitrarily, some new milestones to begin filling the void of environmental cleanup projects specified in the D1 submittal. Dates were chosen to accommodate three-party binning and scoping for projects such as the Soils OU. The new work proposed is chiefly composed of documents which are prerequisite to actual cleanup work and are viewed by the Division as achievable in the current budgetary environment. The Division looks forward to upcoming discussions for incorporating GDP D&D into this agreement and recognizes that many additional changes merit discussion in arriving at a balanced approach for the comprehensive cleanup at the site.

Specific Comments:

All specific comments are to Appendix 5 – Enforceable Timetables and Deadlines; Planning Dates with Long-term Targets

1. Appendix 5

Provide the following entries for a C-400 Building Supplemental Investigations:

- Work Plan – 4th Quarter FY 16
- Report – 3rd Quarter FY 17

2. Appendix 5

Provide the following entries for a GW Datagaps Investigation:

- Work Plan – 2nd Quarter FY 17
- Report – 2nd Quarter FY 18

3. Appendix 5

Provide the following entries for a Soils OU Group 1* (Removal Action):

- Removal Notification – 4th Quarter FY 16
- EE/CA – 3rd Quarter FY 17

4. Appendix 5

Provide the following entries for a Soils OU Group 2* (Remedial Action):

- Feasibility Study – 1st Quarter FY 18

5. Appendix 5

Provide the following entries for SWMU Assessment Reports-PA/SIs

- SAR for 409 Bldg. – 45 days after SMP approval
- SAR for C-613 Sedimentation Basin – 45 days after SMP approval

6. Appendix 5

Provide the following entries (Target Date) for a Soils OU Group 1 (Removal Action):

- Removal Action Work Plan – 1st Quarter FY 19

7. Appendix 5

Provide the following entries (Target Date) for a GW OU Remedial Action (C-400 Residuals)

- Remedial Action Work Plan – 1st Quarter FY 20

8. Appendix 5

Provide the following entries (Target Date) for the GDP D&D OU – Surface Water Controls for D&D

- Removal Notification – 4th Quarter FY 19
- EE/CA – 3rd Quarter FY 2020

*** No assumption for # of Soils OU grouping**

END OF DIVISION COMMENTS