



ENERGY AND ENVIRONMENT CABINET

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December 10, 2015

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

RE: Submittal of Comments to the Addendum to the Soils Operable Unit Remedial Investigation Report for SWMU 27 (DOE/LX/07-0358&D2/R1/A1)
Paducah Site
Paducah, McCracken County, Kentucky
KY8-890-008-982

Ms. Duncan:

Attached please find Kentucky's comments on the *Addendum to the Soils OU Remedial Investigation Report for SWMU 27*, dated September 16, 2015. 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,

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

AJW:gb:lww

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DWM File: #1110; Graybar: AIN20150009 (Soils OU RI Report for SWMU 27 Add)

**Kentucky Division of Waste Management's Comments on the
Addendum to the Soils OU Remedial Investigation Report for SWMU 27**

Paducah Site, Paducah, Kentucky

DOE/LX/07-0358&D2/R1/A1

December 9, 2015

General Comments

1. Revise the document to follow Appendix D of the FFA (Document Outlines- Integrated RFI/RI Report). In particular, provide an adequate Summary and Conclusions section that discusses data limitations and recommendations for future work.
2. A No Further Action consideration is not appropriate for this SWMU since it has been discovered to contain sludge with very high concentrations of VOC and other contaminants. Beyond the need to properly address waste in the unit, the age of the data and lack of data beneath the unit eliminate any consideration of a No Further Action petition. Please revise the document by proposing a more appropriate path forward for the C-722 Acid Neutralization Tank (SWMU 27). Discussion of potential early actions such as removal and proper disposition of waste and excavation and removal of the tank would be appropriate. If the conclusion and recommendation is for future evaluation in an FS, adequately discuss how data limitations and uncertainties would be managed in the FS (and remedy selection process).
3. Revise the entire document so that any petition/reference to "no further action" is clearly denoted as a historical reference.
4. It is noted that there is a discrepancy between the document transmittal letter and the report on the amount of material in the tank. The letter states that there is approximately 2 to 4 inches of material in the tank and the report states there is approximately 3.5 feet. Kentucky staff were present in the field when the tank was opened and the level was observed to be 3.5 feet, which is consistent with the report. No change is requested.

- - End of Kentucky Comments - -