



## Department of Energy

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**JUL 29 2011**

Ms. Judy Clayton, Chair  
Paducah Citizens Advisory Board  
111 Memorial Drive  
Paducah KY 42001

PPPO-02-1200607-11

Dear Ms. Clayton:

### **RESPONSE TO CITIZENS ADVISORY BOARD RECOMMENDATION 11-06: CAB COMMENTS ON FOCUSED FEASIBILITY FOR SOLID WASTE MANAGEMENT UNIT 211A AND 211B**

The U.S. Department of Energy (DOE) is in receipt of the Citizens Advisory Board (CAB) Recommendation 11-06, CAB Comments on Focused Feasibility for Solid Waste Management Units 211A and 211B.

**The CAB recommends that DOE negotiate with EPA and DWM to determine what additional sampling might be beneficial to determine if DNAPL is present. Although additional sampling would result in an implementation delay, the extra time is trivial compared with the overall estimated time of completion for either alternative. The additional costs are relatively low when considering the additional cost of the more aggressive remedial action.**

In consideration and agreement of the CAB recommendation, DOE, the U.S. Environmental Protection Agency (EPA) and Kentucky Division of Waste Management (KDWM) tentatively agreed to data collection to confirm site conditions in terms of source mass and the time required to achieve cleanup. This approach includes additional data collection to determine if an active remedy is necessary or if contaminant impacts are diminishing as a result of natural processes. The details of how best to structure the data collection effort, address any schedule impacts, and achieve consensus on the path forward are reflected in the Proposed Plan that is currently under review by EPA and KDWM. The key elements of this approach are as follows:

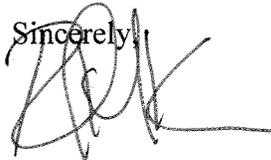
- A final characterization effort will be implemented to assess soil Volatile Organic Compounds concentrations and determine if constituent concentrations have declined due to natural processes and are substantially reduced from the values that compose the dataset used to evaluate the sites for remedy selection.
- Upon review of the results the FFA parties will either a) implement Alternative 2, Long Term Monitoring with Interim Land Use Controls at the C-720 Northeast and Southeast sites based on observed concentration reductions and anticipated reductions in the time required to reach remediation goals, or b) decide to implement Alternative 8, *In Situ* Source Treatment using Enhanced *In Situ* Bioremediation and Interim Land Use Controls

at the C-720 Northeast and Southeast sites to accelerate attainment of remediation goals, compared to the timeframe required to achieve goals as a result of contaminant reductions from natural processes.

- The method of introduction of bio-amendments for Alternative 8 at the C-720 Northeast and Southeast sites could be via gravity fed infiltration or via pressure injection. Detailed design concepts and approaches for how best to introduce amendements will be explored more fully during the remedial design process.

DOE extends its appreciation to the CAB for their work on behalf of the community, your interest in finding the best alternative to meet the needs of all stakeholders, and your continued support of ongoing communication efforts between DOE, KDWM, and the EPA.

If you have any questions, or require additional information, please contact Buz Smith at (270) 441-6821.

Sincerely,  


Reinhard Knerr  
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