



Department of Energy

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JAN 23 2018

Mr. Brian Begley
Federal Facility Agreement Manager
Division of Waste Management
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601

Ms. Julie Corkran Federal Facility Agreement Manager U.S. Environmental Protection Agency, Region 4 61 Forsyth Street Atlanta, Georgia 30303

Dear Mr. Begley and Ms. Corkran:

TRANSMITTAL OF ERRATA PAGES AND COMPLETE DOCUMENT FOR THE D1/R1 SITE MANAGEMENT PLAN, PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, ANNUAL REVISION—FISCAL YEAR 2018 (DOE/LX/07-2418&D1/R1)

References:

- Letter from T. Duncan to B. Begley and J. Corkran, "Transmittal of the D1/R1 Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—FY 2018 (DOE/LX/07-2418&D1/R1)," (PPPO-02-4602574-18), dated January 16, 2018
- Letter from B. Begley and J. Corkran to T. Duncan, "EPA and Kentucky Department for Environmental Protection Request for Resubmittal: D1 Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision - Fiscal Year 2018 (DOE/LX/07-2418&D1), Primary Document, transmittal date November 15, 2017 (PPPO-02-4534345-18A)," dated December 15, 2017
- Letter from T. Duncan to B. Begley and J. Corkran, "Transmittal of the D1 Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—Fiscal Year 2018 (DOE/LX/07-07-2418&D1)," (PPPO-02-4534345-18A), dated November 15, 2017

Enclosed are the certified errata pages and complete document for the *Site Management Plan*, *Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision—FY 2018*, DOE/LX/07-2418&D1/R1, (SMP). The U.S. Department of Energy (DOE) originally submitted the D1 fiscal year (FY) 2018 SMP to the Kentucky Department for Environmental Protection (KDEP) and the U.S. Environmental Protection Agency (EPA) in accordance with Section XVIII

PPPO-02-4602574-18A

of the Paducah Federal Facility Agreement (FFA) on November 15, 2017, (Reference 3). On January 16, 2018, as directed by EPA and KDEP in a joint letter dated December 15, 2017, (Reference 2), DOE submitted a D1/R1 FY 2018 SMP for EPA and KDEP review and comment (Reference 1). Because the lifecycle baseline that contained the planning dates was not approved by DOE Headquarters at the time of the January 16, 2017, D1/R1 FY 2018 SMP submittal, the planning dates after 2032 were not included. On January 22, 2018, the DOE Site Office was given approval by DOE Headquarters to release the dates associated with the Paducah Lifecycle Baseline. As a result, this erratum to the D1/R1 FY 2018 SMP is being provided to include planning dates past 2032 in the "Planning Dates with Long-Term Targets for Decision Documents" column in Appendix 5 of the D1/R1 FY 2018 SMP for out-year projects.

As discussed during the January 18, 2018, FFA Managers Meeting, the 30-day review and comment period for the D1/R1 FY 2018 SMP is reset and begins with submittal of this erratum; therefore, comments are due on February 22, 2018. DOE looks forward to the receipt of EPA's and KDEP's comments on the D1/R1 FY 2018 SMP.

If you have any questions or require additional information, please contact me at (270) 441-6862.

Sincerely,

Fracey Duncan

Federal Facility Agreement Manager Portsmouth/Paducah Project Office

Enclosures:

- 1. Certification Page
- 2. Errata sheet for the D1/R1 Site Management Plan, Annual Revision, FY 2018
- 3. Errata pages for the D1/R1 Site Management Plan, Annual Revision, FY 2018 Redline
- 4. D1/R1 Site Management Plan, Annual Revision, FY 2018 Complete Document

e-copy w/enclosures:

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CERTIFICATION

Document Identification:

Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision —Fiscal Year 2018 DOE/LX/07-2418&D1/R1

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Four Rivers Nuclear Partnership, LLC

Myrna E. Redfield, Deputy Program Manager

Date Signed

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

U.S. Department of Energy

Jennifer Woodard, Paducah Site Lead Portsmouth/Faducah Project Office 1/23/18 Date Signed

ERRATA SHEET

Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky Annual Revision—Fiscal Year 2018 DOE/LX/07-2418&D1/R1

The following corrections should be incorporated into the document.

- 1. Cover Page: The cover was modified to indicate errata were issued for this document.
- 2. Title Page: The title page was modified to indicate errata were issued for this document on the date specified.
- 3. Appendix 5, "Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets"—Added planning dates past 2032 in the column, "Planning Dates with Long-Term Targets for Decision Documents," for out-year projects.

Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky

Annual Revision—FY 2018



CLEARED FOR PUBLIC RELEASE

Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky

Annual Revision—FY 2018

Date Issued—January 2018

Errata Issued— January 2018

U.S. DEPARTMENT OF ENERGY Office of Environmental Management

Prepared by
FOUR RIVERS NUCLEAR PARTNERSHIP, LLC,
managing the
Deactivation and Remediation Project at the
Paducah Gaseous Diffusion Plant
under Contract DE-EM0004895

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C-400 Complex Operable Unit (07)

The C-400 Complex Operable Unit (OU) is the current priority project for the remediation program at the Paducah Site. Deactivation of the C-400 Building is the precursor, non-CERCLA activity to the C-400 Building Decontamination and Decommissioning (D&D) Removal Action. Demolition will be conducted as a CERCLA non-time-critical removal action followed by a CERCLA Remedial Investigation/Feasibility Study (RI/FS) evaluating and identifying the response actions necessary to remediate soil and groundwater sources within the C-400 Complex OU area.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for		
		FY 2018-FY		Decision		
Subproject	Deliverable	2020	Out-Year	Documents ²	Comments	
C-400	D1 Removal Notification	3/1/18				
D&D	D1 Engineering Evaluation/Cost Analysis (EE/CA)	5/2/18				
	D1 Action Memorandum	8/14/18				
	D1 Removal Action Work Plan	8/17/18				
	Removal Action Field Start	11/27/18				
C-400 Final	D1 Remedial Investigation Work Plan	11/28/18				
Remedial	Remedial Investigation Field Start	11/13/19				
Action	D1 Remedial Investigation/Feasibility Study Report			3rd Quarter 2021		
	D1 Proposed Plan			1st Quarter 2022	D1 Proposed Plan is submitted 45 days after U.S. Environmental Protection Agency (EPA) and Kentucky (KY) approval of the Feasibility Study. The Proposed Plan is submitted for public comment within two weeks of approval.	
	D1 Record of Decision (ROD)			4th Quarter 2022	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan [Federal Facility Agreement (FFA) Section XIV.D].	
	D1 Remedial Design Work Plan			4th Quarter 2022		
	D1 Remedial Design Report (90% Design)			4th Quarter 2023		
	D1 Remedial Action Work Plan			4th Quarter 2023		
	Remedial Action Field Start		1st Quarter 2024			
	D1 Remedial Action Completion Report			4th Quarter 2030	D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.	

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Groundwater Operable Unit (01)

The C-400 Volatile Organic Compound Interim Remedial Source Action is complete. The last phase (Phase IIb) was not completed, and the source area will be addressed under the C-400 Complex OU. A completion report will be submitted for the phases completed (i.e., Phase I, Phase IIa) under the 2005 Interim ROD.

The Southwest Plume Sources—Solid Waste Management Unit (SWMU) 211-A is a groundwater source action being implemented under the 2012 Southwest Plume Sources ROD. The area is a source to groundwater contamination and is identified as a priority project to be completed in the near-term, along with the C-400 Complex OU actions.

•		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Decision Documents ²	Comments
C-400 Interim	D1 Remedial Action Completion Report	2/7/18			
Remedial	for IRA				
Action					
Southwest	D1 Remedial Design Report (90% Design)	11/8/19			
Plume					
Sources-	D1 Remedial Action Work Plan	12/8/19			
SWMU 211-A	D1 Remedial Action Completion Report			2nd Quarter 2021	D1 Remedial Action Completion Report is
(Enhanced In					submitted 150 days after Remedial Action is
Situ					completed.
Bioremediation)					

Waste Disposal Alternatives (06)

The Waste Disposal Alternatives Project will evaluate whether various types of waste generated by the CERCLA projects at that Paducah Site will be dispositioned at multiple existing disposal facilities available throughout the country or at an on-site waste disposal facility (OSWDF) to be built at the Paducah Site for disposal of the majority of waste generated by decommissioning, demolition, burial grounds excavation, and environmental media remediation. The project will be completed in the time frame necessary to ensure that an OSWDF (if selected) is available for the first potential burial ground excavation, SWMU 4, and for demolition of gaseous diffusion plant process and support buildings, with the exception of the C-400 Building, which is prioritized for demolition in fiscal year (FY) 2019 in order to complete soil and groundwater remediation beneath the C-400 Building. Design and construction of the first cell (phase) of a potential OSWDF will require a significant budget over a period of four years. During that period, there are no other remedial actions supported by the projected Paducah Site funding levels. All available remediation funding is dedicated to completing this project as quickly as possible, based on the funding that is provided.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Waste Disposal Alternatives	D1 Remedial Investigation/Feasibility Study			4th Quarter 2027	
Antenatives	D1 Proposed Plan			2nd Quarter 2028	D1 Proposed Plan is submitted 45 days after EPA and KY approval of the FS.
					The Proposed Plan is submitted for public comment within two weeks of approval.
	D1 ROD			4th Quarter 2028	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan (FFA Section XIV.D).
	D1 Remedial Design Work Plan			3rd Quarter 2029	
	D1 Remedial Design Report			3rd Quarter 2030	FFA schedule logic has been modified to account for the complexity of the project.
	D1 Remedial Action Work Plan			3rd Quarter 2031	FFA schedule logic has been modified to account for the complexity of the project.
	D1 Interim Remedial Action Completion Report			4 th Quarter 2035	The D1 Interim Remedial Action Completion Report is a post-construction report to be issued prior to the start of operations. A D1 Final Remedial Action Completion Report will be issued when operations cease and closure has been completed.

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Burial Grounds Operable Unit (05)

The Burial Grounds OU consists of 12 SWMUs grouped into subprojects. SWMU 4 is the highest priority project, with the others subprojects being addressed in parallel with and sequenced to have continuous field work, while also considering the best fit to stabilize annual costs.

		Enfonceable Timestable and		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
SWMU 4	D1 Proposed Plan			4 th Quarter 2033	This project is scheduled to begin with
Remedial Action	D1 ROD			2 nd Quarter 2034	Proposed Plan development and is assumed to complete two major remedial
	D1 Remedial Design Work Plan (Waste Portion)			4 th Quarter 2034	actions (one for soil and buried waste and another for groundwater treatment). This
	D1 Remedial Design Report (Waste Portion)			1 st Quarter 2035	project is planned to be the first major remediation project following the C-400
	D1 Remedial Action Work Plan (Waste Portion)			1 st Quarter 2035	Complex OU completion and construction of a potential OSWDF. Assuming FFA review logic, the CERCLA documents and both remedial actions will require a total of eight years, including approximately four years of field work. The CERCLA documents begin in a time frame such that field work begins as soon as the potential OSWDF is available to accept waste.
	D1 Interim Remedial Action Completion Report (Waste Portion)			4 th Quarter 2038	
	D1 Remedial Design Work Plan (Groundwater Treatment)			2 nd Quarter 2038	
	D1 Remedial Design Report (Groundwater Treatment)			4 th Quarter 2038	
	D1 Remedial Action Work Plan (Groundwater Treatment)			1 st Quarter 2039	
	D1 Remedial Action Completion Report (Groundwater Treatment)			3 rd Quarter 2041	

	Buria	l Grounds Operab	ole Unit (05) (0	Continued)			
		Enforceable Timetable and Deadlines ¹		Enforceable Timetable and		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments		
SWMUs 2 and	D1 Feasibility Study (if update necessary)			3 rd Quarter 2039	This project is scheduled to begin with		
3 Remedial Action	D1 Proposed Plan			1 st Quarter 2040	the FS update (if necessary) and is assumed to complete three major		
	D1 ROD			3 rd Quarter 2040	remedial actions (two for soil and buried waste and one for groundwater		
	SWMU 2 D1 Remedial Design Work Plan (Waste Portion)			1 st Quarter 2041	treatment). Assuming FFA review logic, CERCLA documents and all remedial		
	SWMU 2 D1 Remedial Design Report (Waste Portion)			2 nd Quarter 2041	actions will require a total of six years, including approximately three years of		
	SWMU 2 D1 Remedial Action Work Plan (Waste Portion)			2 nd Quarter 2041	field work. This work is sequenced such that the fieldwork for SWMU 2 would		
	SWMU 2 D1 Interim Remedial Action Completion Report (Waste Portion)			3 rd Quarter 2042	begin after SWMU 4 fieldwork and SWMU 4 groundwater treatment are		
	SWMU 2 D1 Remedial Design Work Plan (Groundwater Treatment)			2 nd Quarter 2043	complete in order to avoid interferences due to the close proximity to all three		
	SWMU 2 D1 Remedial Design Report (Groundwater Treatment)			3 rd Quarter 2043	burial grounds (SWMUs 2, 3, and 4), which are adjacent to one another and bound by roads that limit the work area. SWMU 3 fieldwork would begin after		
	SWMU 2 D1 Remedial Action Work Plan (Groundwater Treatment)			4 th Quarter 2043			
	SWMU 2 D1 Remedial Action Completion Report			2 nd Quarter 2045	SWMU 2 soil and buried waste fieldwork is complete. Once the SWMUs 2 and 3 soil and buried waste		
	SWMU 3 D1 Remedial Design Work Plan			1 st Quarter 2041	fieldwork is completed, the SWMUs 2		
	SWMU 3 D1 Remedial Design Report			2 nd Quarter 2041	and 3 groundwater treatment remedy		
	SWMU 3 D1 Remedial Action Work Plan			2 nd Quarter 2041	would be implemented.		
	SWMU 3 D1 Remedial Action Completion Report			4 th Quarter 2043			

	Buria	al Grounds Operabl	le Unit (05) (0	Continued)	
			Enforceable Timetable and Deadlines ¹		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
SWMUs 5 and	D1 Proposed Plan			2 nd Quarter 2037	This project is scheduled to begin with
6 Remedial Action	D1 ROD			4 th Quarter 2037	Proposed Plan development. Assuming FFA review logic, CERCLA documents
	D1 Remedial Design Work Plan			2 nd Quarter 2038	and fieldwork will require a total of two
	D1 Remedial Design Report			3 rd Quarter 2038	and a half years. The project is
	D1 Remedial Action Work Plan			4 th Quarter 2038	sequenced so that the fieldwork is conducted upon completion of SWMU 4
	D1 Remedial Action Completion Report			1 st Quarter 2040	soil and buried waste fieldwork and prior
	Dr Remediai riction completion report			<u>1 Quarter 2010</u>	to initiating SWMU 2 soil and buried
					waste fieldwork. The SWMUs 5 and 6
					fieldwork would occur at the same time
					as the SWMU 4 groundwater treatment
				dh	action.
SWMUs 7 and	D1 Feasibility Study (if update necessary)			4 th Quarter 2040	This project is scheduled to begin with
30 Remedial	D1 Proposed Plan			2 nd Quarter 2041	the FS update (if necessary) and is
Action	D1 ROD			4 th Quarter 2041	assumed to complete two remedial actions (one for soil and buried waste
	D1 Remedial Design Work Plan (Waste Portion)			2 nd Quarter 2042	and one for groundwater treatment).
	D1 Remedial Design Report			3 rd Quarter 2042	Assuming FFA review logic, the
	(Waste Portion)			<u>3 Quarter 2042</u>	CERCLA documents and field work will
	D1 Remedial Action Work Plan			4 th Quarter 2042	require a total of six years, including
	(Waste Portion)				approximately three years of field work.
	D1 Interim Remedial Action Completion			2 nd Quarter 2044	The project is sequenced so that the soil
	Report (Waste Portion)				and buried waste fieldwork is conducted
	D1 Remedial Design Work Plan			2 nd Quarter 2044	upon completion of SWMUs 2 and 3 fieldwork for soil and buried waste and
	(Groundwater Treatment)				prior to the SWMUs 2 and 3
	D1 Remedial Design Report			3 rd Quarter 2044	groundwater action. The groundwater
	(Groundwater Treatment)			and a south	action for SWMUs 7 and 30 would be
	D1 Remedial Action Work Plan			3 rd Quarter 2044	initiated after the SWMUs 2 and 3
	(Groundwater Treatment)			18 0	groundwater action is complete.
	D1 Remedial Action Completion Report	i		1 st Ouarter 2047	1

Burial Grounds Operable Unit (05) (Continued)								
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision				
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
SWMUs 9, 10, and 145	D1 Remedial Investigation Work Plan Addendum			4 th Quarter 2040	This project is scheduled to begin with a RI Work Plan Addendum and is			
Remedial	D1 Remedial Investigation Report			1 st Quarter 2042	assumed to complete two remedial			
Action	Addendum D1 Feasibility Study			3 rd Quarter 2042	actions (one for soil and buried material and another one for			
	D1 Proposed Plan			1 st Quarter 2043	groundwater treatment). Assuming			
	D1 ROD			3 rd Quarter 2043	FFA review logic, the CERCLA			
	D1 Remedial Design Work Plan			1 st Quarter 2044	documents and field work will require			
	D1 Remedial Design Report			3 rd Quarter 2044	a total of five years, including approximately two years of field work.			
	D1 Remedial Action Work Plan			4 th Quarter 2044				
	D1 Remedial Action Completion Report			1 st Quarter 2046	The project is sequenced so that the field work for investigation activities			
					occurs between the completion of			
					SWMU 4 groundwater treatment and			
					SWMU 2 soil and buried waste			
					fieldwork. The soil and buried material			
					fieldwork and groundwater treatment			
					will occur in parallel with SWMUs 7			
					and 30 groundwater treatment.			

Burial Grounds Operable Unit (05) (Continued)								
		Enforceable Timetable and Deadlines ¹		Enforceable Timetable and		Planning Dates with Long-Term Targets for Decision		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
Additional	SWMU 472 Remedial Investigation Work			1 st Quarter 2039	This project is scheduled to begin with			
Burial Grounds	Plan				a RI Work Plan and is assumed to			
	SWMU 472 Remedial Investigation			1 st Quarter 2040	complete one remedial action for each			
	Report				SWMU. Assuming FFA review logic,			
	SWMU 472 D1 Feasibility Study			3 rd Quarter 2040	the CERCLA documents and field			
	SWMU 472 D1 Proposed Plan			1 st Quarter 2041	work will require a total of three and a			
	SWMU 472 D1 ROD			3 rd Quarter 2041	half years, including approximately one			
	SWMU 472 D1 Remedial Design Work			1 st Quarter 2042	year of field work. The project is			
	Plan				sequenced so that the field work for			
	SWMU 472 D1 Remedial Design Report			2 nd Quarter 2042	investigation activities occurs during			
	SWMU 472 D1 Remedial Action Work			2 nd Quarter 2042	the fieldwork for SWMUs 5 and 6, and			
	Plan				the remedial action occurs during the			
	SWMU 472 D1 Remedial Action			4 th Quarter 2043	soil and buried material waste fieldwork for SWMUs 7 and 30.			
	Completion Report				Heldwork for Swivios / and 30.			
	SWMU 520 Remedial Investigation Work			1 st Quarter 2039				
	Plan			15 0 4 2040	4			
	SWMU 520 Remedial Investigation			1 st Quarter 2040				
	Report			2rd O 2040	4			
	SWMU 520 D1 Feasibility Study			3 rd Quarter 2040	4			
	SWMU 520 D1 Proposed Plan			1 st Quarter 2041	-			
	SWMU 520 D1 ROD			3 rd Quarter 2041	4			
	SWMU 520 D1 Remedial Design Work			<u>1st Quarter 2042</u>				
	Plan			2nd 0 4 2042	4			
	SWMU 520 D1 Remedial Design Report SWMU 520 D1 Remedial Action Work			2 nd Quarter 2042	-			
				2 nd Quarter 2042				
	Plan SWMU 520 D1 Remedial Action			4th Ossantan 2042	-			
				4 th Quarter 2043				
	Completion Report	I		1				

Groundwater Operable Unit (01)
The Groundwater OU includes an additional source action for SWMU 211-B, an investigation to identify any additional sources and potential remedial action, and dissolved phase treatment to complete the groundwater remedial actions.

				Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Southwest Plume Sources— SWMU 211-B	D1 Remedial Design Work Plan D1 Remedial Design Report (90% Design) D1 Remedial Action Work Plan D1 Remedial Action Completion Report			4 th Quarter 2044 2 nd Quarter 2048 2 nd Quarter 2048 2 nd Quarter 2052	This project is a groundwater source action that will be completed after the C-720 Building has been demolished and additional data is collected as part of the soils and slabs investigation to identify the full extent of groundwater source contamination adjacent and under the building. The field work will be completed in parallel with or after the slab
Potential Additional Groundwater Sources	D1 Site Investigation Work Plan D1 Site Investigation Report D1 Remedial Investigation Work Plan D1 Remedial Investigation Report D1 Feasibility Study Report D1 Proposed Plan D1 Record of Decision D1 Remedial Design Work Plan D1 Remedial Design Report (90% Design) D1 Remedial Action Work Plan D1 Remedial Action Completion Report			3 rd Quarter 2042 3 rd Quarter 2043 4 th Quarter 2043 3 rd Quarter 2044 1 st Quarter 2045 4 th Quarter 2045 1 st Quarter 2046 4 th Quarter 2046 2 nd Quarter 2047 2 nd Quarter 2047 4 th Quarter 2048	action is complete. This project is scheduled to begin with a Site Investigation Work Plan and is assumed to complete one groundwater treatment action. Assuming FFA review logic, the CERCLA documents and field work will require a total of six years, including approximately one year of investigation field work and one year of remedial action. The project is sequenced so that the field work for investigation activities occurs after SWMU 4 is complete and will run in parallel with the dissolved-phase plumes project so that the source action can be taken into account in the remedial action design for the dissolved-phase action.

	Groundwater Operable Unit (01)								
				Planning Dates with Long-Term Targets for Decision					
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments				
Dissolved-	D1 Remedial Investigation Work Plan			1 st Quarter 2042	This project is scheduled to begin with a RI				
Phase Plumes	D1 Remedial Investigation Report			1 st Quarter 2044	Work Plan and is assumed to complete				
	D1 Feasibility Study Report			3 rd Quarter 2044	multiple treatment systems to address				
	D1 Proposed Plan			2 nd Quarter 2045	dissolved-phase throughout the plumes.				
	D1 ROD			4 th Quarter 2045	Assuming FFA review logic, the CERCLA				
	D1 Treatability Work Plan			2 nd Quarter 2043	documents and field work will require a total				
	D1 Treatability Study Report			1 st Quarter 2045	of six years, including approximately three				
	D1 Remedial Design Work Plan			1 st Quarter 2046	years of field work. The project is				
	D1 Remedial Design Report			2 nd Quarter 2046	sequenced so that the field work for				
	D1 Remedial Action Work Plan			3 rd Quarter 2046	investigation activities occurs after SWMU 4				
	D1 Interim Remedial Action Completion			4 th Quarter 2048	is complete and will run in parallel with the				
	Report				groundwater source treatment actions for				
					other groundwater and burial ground sources				
					in order to integrate and consider all source				
					actions planned that would contribute to				
					dissolved-phase cleanup.				

Soils Operable Unit (04)

The Soils OU consists of a number of areas with identified soils contamination. Many of these areas are small units that are in close proximity with site buildings and other structures. The project is planned for two groupings of SWMUs; however, the SWMUs within each grouping have not yet been determined.

| Planning Dates | Pl

		Enforceable Tin Deadlin		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Remedial	D1 Feasibility Study			2 nd Quarter 2039	RI for these units has been completed. The RI
Action 1	D1 Proposed Plan			4 th Quarter 2039	Report has been approved by the FFA parties;
	D1 ROD			2 nd Quarter 2040	hence, this project is scheduled to begin with the
	D1 Remedial Design Work Plan			4 th Quarter 2040	FS and that is assumed to be a targeted
	D1 Remedial Design Report			1 st Quarter 2041	excavation. Assuming FFA review logic, the
	D1 Remedial Action Work Plan			2 nd Quarter 2041	CERCLA documents and field work will require
	D1 Remedial Action Completion			4 th Quarter 2042	a total of three years, including approximately six
	Report				months of field work. The project is sequenced
					to be conducted in parallel with the burial
					grounds remedial actions and major demolition
					activities so that the soil can be disposed of with
					demolition debris in a potential OSWDF. This coordination will avoid the costs of purchasing
					soil for fill as debris is dispositioned.
Remedial	D1 Feasibility Study			4 th Quarter 2040	This project is scheduled to begin with the FS
Action 2	D1 Proposed Plan			2 nd Quarter 2041	and is assumed to be a targeted excavation.
Action 2	D1 ROD			4 th Quarter 2041	Assuming FFA review logic, the CERCLA
	D1 Remedial Design Work Plan			2 nd Quarter 2042	documents and field work will require a total of
	D1 Remedial Design Report			<u>2 Quarter 2042</u> <u>3rd Quarter 2042</u>	three years, including approximately six months
	D1 Remedial Action Work Plan			4 th Quarter 2042	of field work. The project is sequenced to be
	D1 Remedial Action Completion			1 st Quarter 2044	conducted in parallel with the burial grounds
	Report Render Action Completion			1 Quarter 2044	remedial actions and major demolition activities
	Report				so that the soil can be disposed of with
					demolition debris in a potential OSWDF. This
					coordination will avoid the costs of purchasing
					soil for fill as the debris is dispositioned. This
					project will begin approximately one year behind
					the first grouping to avoid overlapping field
					activities and to effectively utilize the soil for fill.

DUF₆ Footprint Underlying Soils Operable Unit (08)

The DUF₆ Footprint Underlying Soils OU includes SWMUs identified as a result of soil contamination prior to construction of the DUF₆ conversion facility. These SWMUs are located underneath the currently operating DUF₆ conversion facility. It also includes the outfall ditches that discharge process and runoff from the facility and DUF₆ area.

				Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
N/A	D1 Remedial Investigation Work Plan			4 th Quarter 2051	This project cannot be completed until
	D1 Remedial Investigation Report			4 th Quarter 2052	the DUF ₆ conversion facility completes
	D1 Feasibility Study			3 rd Ouarter 2053	its mission and is decommissioned.
	D1 Proposed Plan			1 st Quarter 2054	Assuming FFA review logic, the
	D1 ROD			4 th Quarter 2055	CERCLA documents and field work will require a total of five years, including
	D1 Remedial Design Work Plan			4 th Quarter 2055	
	D1 Remedial Design Report			4 th Quarter 2056	approximately two years of field work.
	D1 Remedial Action Work Plan			4 th Quarter 2056	
	D1 Remedial Action Completion Report			2 nd Quarter 2057	

Decontamination and Decommissioning Operable Unit (10)

D&D OU consists of many facilities grouped into subprojects that will be dispositioned utilizing the CERCLA process. Some facilities already have been designated for inclusion within this operable unit, based on existing information that requires that the facilities be dispositioned under CERCLA. Other facilities are grouped into geographical areas (GAs) and will be addressed appropriately based on each facility's specific conditions. Facility characterization, deposit removal, and deactivation are non-CERCLA activities that must be completed before D&D can occur. Additionally, the potential OSWDF must be constructed and capable of accepting this CERCLA waste. Additional cells (phases) within the potential OSWDF must be constructed throughout D&D in order to have cells (phases) available for disposition. As demolition is progressing, OSWDF expansion is sequenced logically to account for the facility volumes generated. The D&D OU will take a total of 15 years to complete.

				Enforceable Timetable and Long-Term Targ	Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments	
Switchyards	D1 Removal Notification (Site Evaluation)			2 nd Quarter 2036	The first D&D that is	
D&D	Switchyards slabs and soils				scheduled to occur once the	
	D1 EE/CA Switchyards slabs and soils			3 rd Quarter 2036	OSWDF is ready to begin	
	D1 Action Memorandum Switchyards slabs and soils			4 th Quarter 2036	accepting waste.	
	D1 Removal Action Work Plan Switchyards slabs and soils			1 st Quarter 2037		
Cooling Towers	D1 Removal Notification (Site Evaluation) Cooling			3 rd Quarter 2038	The Cooling Towers D&D is	
D&D	Tower Buildings				sequenced after completion of	
	D1 EE/CA Cooling Tower Buildings			4 th Quarter 2038	the Switchyards D&D.	
	D1 Action Memorandum Cooling Tower Buildings			1 st Quarter 2039		
	D1 Removal Action Work Plan Cooling Tower			2 nd Quarter 2039		
	Buildings					
C-409 D&D	D1 Removal Notification (Site Evaluation) C-409			1 st Quarter 2038	The C-409 D&D is sequenced	
	D1 EE/CA C-409			2 nd Quarter 2038	after completion of the	
	D1 Action Memorandum C-409			3 rd Quarter 2038	Switchyards D&D and in	
	D1 Removal Action Work Plan C-409			4 th Quarter 2038	parallel with the cooling towers D&D.	
C-709/C-710	D1 Removal Notification (Site Evaluation) C-709/C-			1 st Quarter 2038	The C-709/C-710 D&D is	
D&D	710				sequenced after completion of	
	D1 EE/CA C-709/C-710			2 nd Quarter 2038	the Switchyards D&D and in	
	D1 Action Memorandum			4 th Quarter 2038	parallel with the cooling towers	
	C-709/C-710				D&D.	
	D1 Removal Action Work Plan C-709/C-710			1 st Quarter 2039		

	Decontamination :	and Decommissionir	ng Operable		
		Enforceable Tim Deadline		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-600 D&D	D1 Removal Notification (Site Evaluation) C-600			1 st Quarter 2040	The C-600 D&D is sequenced
	D1 EE/CA C-600			2 nd Quarter 2040	after completion of the C-409
	D1 Action Memorandum C-600			3 rd Quarter 2040	D&D.
	D1 Removal Action Work Plan C-600			4 th Quarter 2040	
C-720 D&D	D1 Removal Notification (Site Evaluation) C-720			4 th Quarter 2040	The C-720 D&D is sequenced
	D1 EE/CA C-720			1 st Quarter 2041	after completion of the C-709/C-
	D1 Action Memorandum C-720			2 nd Quarter 2041	710 D&D.
	D1 Removal Action Work Plan C-720			3 rd Quarter 2041	1
C-337/C-337-A	D1 Removal Notification (Site Evaluation) C-			4 th Quarter 2041	Process facility characterization
D&D	337/C-337A				and deposit removal continues
	D1 EE/CA C-337/C-337A			1 st Quarter 2042	for approximately 14 years from
	D1 Action Memorandum			2 nd Quarter 2042	FY 2018. As the deactivation
	C-337/C-337A				activities are completed, D&D
	D1 Removal Action Work Plan			3 rd Quarter 2042	will occur sequentially for the
	C-337/C-337A				process facilities. The sequence
C-335 D&D	D1 Removal Notification (Site Evaluation) C-335			3 rd Quarter 2043	is C-337/C-337-A; C-335; C-
	D1 EE/CA C-335			3 rd Quarter 2043	315; C-333/C-333-A; C-331; C-
	D1 Action Memorandum C-335			1 st Quarter 2044	310/C-310-A. D&D will occur
	D1 Removal Action Work Plan C-335			2 nd Quarter 2044	over a period of eight years for all these process facilities.
C-315 D&D	D1 Removal Notification (Site Evaluation) C-315			1 st Quarter 2045	an these process facilities.
	D1 EE/CA C-315			2 nd Quarter 2045	
	D1 Action Memorandum C-315			4 th Quarter 2045	
	D1 Removal Action Work Plan C-315			1 st Quarter 2046	
C-333/C-333-A	D1 Removal Notification (Site Evaluation) C-			1 st Quarter 2047	
D&D	333/C-333-A				
	D1 EE/CA C-333/C-333A			2 nd Quarter 2047	
	D1 Action Memorandum			3 rd Quarter 2047	
	C-333/C-333-A			al-	_
	D1 Removal Action Work Plan			4 th Quarter 2047	
I	C-333/C-333-A		I		1

	Decontamination	and Decommissioni	ng Operable	Unit (10)	
			netable and	Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-331 D&D	D1 Removal Notification (Site Evaluation) C-331			4 th Quarter 2047	
	D1 EE/CA C-331			1 st Quarter 2048	
	D1 Action Memorandum C-331			3 rd Quarter 2048	
	D1 Removal Action Work Plan C-331			4 th Quarter 2048	
C-310/C-310-A	D1 Removal Notification (Site Evaluation) C-			1 st Quarter 2048	
D&D	310/C-310-A				
	D1 EE/CA C-310/C-310-A			2 nd Quarter 2048	
	D1 Action Memorandum			4 th Quarter 2048	
	C-310/C-310-A				
	D1 Removal Action Work Plan			1 st Quarter 2049	
	C-310/C-310-A				
GA 1	D1 Removal Notification (Site Evaluation) GA 1			1 st Quarter 2047	D&D within the GAs will occur
D&D	(includes C-615 Sewage Treatment Plant and C-				in parallel beginning with the C-
	616 Former Chromate Treatment System)				409 facilities and continuing
	D1 EE/CA GA 1 (includes C-615 Sewage			2 nd Quarter 2047	through the process facilities.
•	Treatment Plant and C-616 Former Chromate				These are sequenced to stabilize
	Treatment System)				the workload, annual costs, and
	D1 Action Memorandum GA 1 (includes C-615			4 th Quarter 2047	waste volumes as the larger
	Sewage Treatment Plant and C-616 Former				facilities are undergoing D&D.
	Chromate Treatment System)				The GAs identified are those that
	D1 Removal Action Work Plan GA 1 (includes			1 st Quarter 2048	include facilities already
	C-615 Sewage Treatment Plant and C-616				identified in the D&D OU. If
	Former Chromate Treatment System)				other facilities are identified for
GA 10	D1 Removal Notification (Site Evaluation) GA			2 nd Quarter 2041	inclusion in the D&D OU, the
D&D	10 (includes C-726)				GA where they are located will
	D1 EE/CA GA 10 (includes C-726)			3 rd Quarter 2041	be updated and planning dates
	D1 Action Memorandum GA-10 (includes C-			1 st Quarter 2042	established, as appropriate.
	726)				
	D1 Removal Action Work Plan			2 nd Quarter 2042	
	GA 10 (includes C-726)				

Decontamination and Decommissioning Operable Unit (10)						
		Enforceable Tim Deadline		Planning Dates with Long-Term Targets for Decision		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments	Deleted: ,3
GA 13 D&D	D1 Removal Notification (Site Evaluation) GA 13 (includes C-415)			1 st Quarter 2041		
	D1 EE/CA GA 13 (includes C-415)			2 nd Quarter 2041		
	D1 Action Memorandum GA 13 (includes C-415)			3 rd Quarter 2041		
	D1 Removal Action Work Plan GA 13 (includes C-415)			4 th Quarter 2041		
GA 14 D&D	D1 Removal Notification (Site Evaluation) GA 14 (includes C-724-A and C-728)			2 nd Quarter 2037		
	D1 EE/CA GA 14 (includes C-724-A and C-728)			3 rd Quarter 2037		
	D1 Action Memorandum GA 14 (includes C-724-A and C-728)			1 st Quarter 2038		
	D1 Removal Action Work Plan GA 14 (includes C-724-A and C-728)			2 nd Quarter 2038		

Soils and Slabs Operable Unit (11)

This OU contains many subprojects to address the various slabs at the Paducah Site. The large process and support facilities have specific subprojects identified for each slab. Other slabs are grouped in GAs will be addressed appropriately, based on each areas specific conditions. These subprojects are designated for planning purposes only. The physical characteristics and previous actions taken within the GAs will determined the appropriate action for completion. The Soils and Slabs OU will take a total of 15 years to complete and will overlap with the D&D and Soils OUs.

				Planning Dates with Long-Term Targets for Decision	
	- · · · ·				~
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
C-409 Slab	D1 Remedial Investigation Work Plan C-409 Slab			4 th Quarter 2040	The C-409 Soils and Slabs RI
	D1 Remedial Investigation Report			2 nd Quarter 2042	will begin upon completion of
	C-409 Slab				D&D of C-409. This project is
	D1 Feasibility Study C-409 Slab			4 th Quarter 2042	estimated to take five years to
	D1 Proposed Plan C-409 Slab			2 nd Quarter 2043	complete, assuming FFA review
	D1 ROD C-409 Slab			4 th Quarter 2043	logic. These are sequenced after
	D1 Remedial Design Work Plan			2 nd Quarter 2044	the D&D is complete for each
	C-409 Slab				building.
	D1 Remedial Design Report C-409 Slab			3 rd Quarter 2044	
	D1 Remedial Action Work Plan			4 th Quarter 2044	
	C-409 Slab				
	D1 Remedial Action Completion Report C-409			1 st Quarter 2046	
	Slab				
C-340 Slab	D1 Remedial Investigation Work Plan C-340 Slab			3 rd Quarter 2042	The C-340 Soils and Slabs
	D1 Remedial Investigation Report			1 st Quarter 2044	project is scheduled after
	C-340 Slab				completion of the C-409 Soils
	D1 Feasibility Study C-340 Slab			3 rd Quarter 2044	and Slabs investigation. This
	D1 Proposed Plan C-340 Slab			1 st Quarter 2045	project is estimated to take five
	D1 ROD C-340 Slab			3 rd Quarter 2045	years to complete assuming FFA
	D1 Remedial Design Work Plan			1 st Quarter 2046	review logic.
	C-340 Slab				
	D1 Remedial Design Report			2 nd Quarter 2046	
	C-340 Slab				
	D1 Remedial Action Work Plan C-340 Slab			2 nd Quarter 2046	
	D1 Remedial Action Completion Report C-340			3 rd Quarter 2047	
	Slab				

	Soils an	d Slabs Operable	Unit (11)		
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-709/C-710	D1 Remedial Investigation Work Plan C-709/C-710			2 nd Quarter 2044	The C-709/C-710 Soils and
Slab	Slab				Slabs RI will begin upon
	D1 Remedial Investigation Report			4 th Quarter 2045	completion of D&D of C-709/C-
	C-709/C-710 Slab				710. This project is estimated to
	D1 Feasibility Study C-709/C-710 Slab			2 nd Quarter 2046	take five years to complete
	D1 Proposed Plan C-709/C-710 Slab			4 th Quarter 2046	assuming FFA review logic.
	D1 ROD C-709/C-710 Slab			2 nd Quarter 2047	These are sequenced after the
	D1 Remedial Design Work Plan			4 th Quarter 2047	D&D is complete for each
	C-709/C-710 Slab				building.
	D1 Remedial Design Report C-709/			1 st Quarter 2048	
	C-710 Slab				
	D1 Remedial Action Work Plan			1 st Quarter 2048	
	C-709/C-710 Slab				
	D1 Remedial Action Completion Report C-709/C-			3 rd Quarter 2049	
	710 Slab				
C-720 Slab	D1 Remedial Investigation Work Plan C-720 Slab			2 nd Quarter 2044	The C-720 Soils and Slabs RI
	D1 Remedial Investigation Report			3 rd Quarter 2045	will begin upon completion of
	C-720 Slab				D&D of C-720. This project is
	D1 Feasibility Study C-720 Slab			1 st Quarter 2046	estimated to take five years to
	D1 Proposed Plan C-720 Slab			3 rd Quarter 2046	complete assuming FFA review
	D1 ROD C-720 Slab			<u>1st Quarter 2047</u>	logic. These are sequenced after
	D1 Remedial Design Work Plan			3 rd Quarter 2047	the D&D is complete for each
	C-720 Slab				building.
	D1 Remedial Design Report C-720 Slab			4 th Quarter 2047	
	D1 Remedial Action Work Plan			4 th Quarter 2047	
	C-720 Slab				
	D1 Remedial Action Completion Report C-720			2 nd Quarter 2049	
	Slab				

	Soils an	d Slabs Operable	Unit (11)		
			Enforceable Timetable and Deadlines ¹		
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
C-410/C-420 Slabs	D1 Remedial Investigation Work Plan C-410/C-420 Slab			4 th Quarter 2043	The C-420/C-420 Soils and Slabs project is scheduled after
	D1 Remedial Investigation Report C-410/C-420 Slab			2 nd Quarter 2045	completion of the C-340 Soils and Slabs investigation. This
	D1 Feasibility Study C-410/C-420 Slab			4 th Quarter 2045	project is estimated to take five
	D1 Proposed Plan C-410/C-420 Slab			2 nd Quarter 2046	years to complete assuming FFA
	D1 ROD C-410/C-420 Slab			4 th Quarter 2046	review logic. These are
	D1 Remedial Design Work Plan C-410/C-420 Slab			2 nd Quarter 2047	sequenced after the D&D is complete for each building.
	D1 Remedial Design Report C-410/C-420 Slab			3 rd Quarter 2047	
	D1 Remedial Action Work Plan C-410/C-420 Slab			3 rd Quarter 2047	
	D1 Remedial Action Completion Report C-410/ C-420 Slab			1 st Quarter 2049	
C-337/C-337-A Slab	D1 Remedial Investigation Work Plan C-337/ C-337A Slab			4 th Quarter 2046	The C-337/C-337-A Soils and Slabs RI will begin upon
	D1 Remedial Investigation Report C-337/C-337A Slab			3 rd Quarter 2047	completion of D&D of C-337/C-337-A. This project is estimated
	D1 Feasibility Study C-337/C-337A Slab			1 st Quarter 2048	to take five years to complete
	D1 Proposed Plan C-337/C-337A Slab			3 rd Quarter 2048	assuming FFA review logic.
	D1 ROD C-337/C-337A Slab			<u>1st Quarter 2050</u>	These are sequenced after the
	D1 Remedial Design Work Plan			3 rd Quarter 2050	D&D is complete for each
	C-337/C-337A Slab			.th =	building.
	D1 Remedial Design Report C-337/ C-337A Slab			4 th Quarter 2050	
	D1 Remedial Action Work Plan C-337/C-337A Slab			1 st Quarter 2051	
	D1 Remedial Action Completion Report C-337/ C-337A Slab			3 rd Quarter 2052	

	Soils ar	nd Slabs Operable	Unit (11)		
				Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-335 Slab	D1 Remedial Investigation Work Plan C-335 Slab			1 st Quarter 2047	The C-335 Soils and Slabs RI
	D1 Remedial Investigation Report			4 th Quarter 2047	will begin upon completion of
	C-335 Slab				D&D of C-335. This project is
	D1 Feasibility Study C-335 Slab			3 rd Quarter 2048	estimated to take five years to
	D1 Proposed Plan C-335 Slab			1 st Quarter 2049	complete assuming FFA review
	D1 ROD C-335 Slab			3 rd Quarter 2049	logic. These are sequenced after
	D1 Remedial Design Work Plan			1 st Quarter 2050	the D&D is complete for each
	C-335 Slab				building.
	D1 Remedial Design Report C-335 Slab			2 nd Quarter 2050	
	D1 Remedial Action Work Plan			3 rd Quarter 2050	
	C-335 Slab				
	D1 Remedial Action Completion Report C-335			3 rd Quarter 2051	
	Slab				
C-310 Slab	D1 Remedial Investigation Work Plan C-310 Slab			4 th Quarter 2048	The C-310 Soils and Slabs RI
	D1 Remedial Investigation Report			4 th Quarter 2049	will begin upon completion of
	C- C-310 Slab				D&D of C-310. This project is
	D1 Feasibility Study C-310 Slab			2 nd Quarter 2050	estimated to take five years to
	D1 Proposed Plan C-310 Slab			4 th Quarter 2050	complete assuming FFA review
	D1 ROD C-310 Slab			2 nd Quarter 2051	logic. These are sequenced after
	D1 Remedial Design Work Plan			4 th Quarter 2051	the D&D is complete for each
	C-310 Slab				building.
	D1 Remedial Design Report			1 st Quarter 2052	
	C-310 Slab				
	D1 Remedial Action Work Plan			1 st Quarter 2052	
	C-310 Slab				
	D1 Remedial Action Completion Report C-310			2 nd Quarter 2053	
	Slab				

	Soils at	nd Slabs Operable	Unit (11)		
		Enforceable Tir Deadlir		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-315 Slab	D1 Remedial Investigation Work Plan C-315 Slab			4 th Quarter 2047	The C-315 Soils and Slabs RI will begin upon completion of
	D1 Remedial Investigation Report C-315 Slab			2 nd Quarter 2049	D&D of C-315. This project is estimated to take five years to
	D1 Feasibility Study C-315 Slab			4 th Quarter 2049	complete assuming FFA review
	D1 Proposed Plan C-315 Slab			2 nd Quarter 2050	logic. These are sequenced after
	D1 ROD C-315 Slab			4 th Quarter 2050	the D&D is complete for each
	D1 Remedial Design Work Plan C-315 Slab			2 nd Quarter 2051	building.
	D1 Remedial Design Report C-315 Slab			3 rd Quarter 2051	
	D1 Remedial Action Work Plan C-315 Slab			3 rd Quarter 2051	
	D1 Remedial Action Completion Report C-315 Slab			4 th Quarter 2052	
C-333/C-333-A Slab	D1 Remedial Investigation Work Plan C-333/ C-333-A Slab			3 rd Quarter 2050	The C-333/C-333-A Soils and Slabs RI will begin upon
	D1 Remedial Investigation Report C-333/C-333-A Slab			2 nd Quarter 2051	completion of D&D of C-333/C-333-A. This project is estimated
	D1 Feasibility Study C-333/C-333-A Slab			4 th Quarter 2051	to take five years to complete
	D1 Proposed Plan C-333/C-333-A Slab			2 nd Quarter 2052	assuming FFA review logic.
	D1 ROD C-333/C-333-A Slab			4 th Quarter 2052	These are sequenced after the
	D1 Remedial Design Work Plan C-333/C-333-A Slab			2 nd Quarter 2053	D&D is complete for each building.
	D1 Remedial Design Report C-333/ C-333-A Slab			3 rd Quarter 2053	
	D1 Remedial Action Work Plan C-333/C-333-A Slab			3 rd Quarter 2053	
	D1 Remedial Action Completion Report C-333/ C-333-A Slab			1 st Quarter 2055	

	Soils an	d Slabs Operable l	Unit (11)		
			metable and	Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
C-331 Slab	D1 Remedial Investigation Work Plan C-331 Slab			1 st Quarter 2051	The C-331 Soils and Slabs RI will begin upon completion of
	D1 Remedial Investigation Report C-331 Slab			1 st Quarter 2052	D&D of C-331. This project is
	D1 Feasibility Study C-331 Slab			3 rd Quarter 2052	estimated to take five years to
	D1 Proposed Plan C-331 Slab			1 st Quarter 2053	complete assuming FFA review
	D1 ROD C-331 Slab			3 rd Quarter 2053	logic. These are sequenced after
	D1 Remedial Design Work Plan C-331 Slab			1 st Quarter 2054	the D&D is complete for each building. This is the final Soils
	D1 Remedial Design Report C-331 Slab			2 nd Quarter 2054	and Slab project to be
	D1 Remedial Action Work Plan			2 nd Quarter 2054	completed.
	C-331 Slab				
	D1 Remedial Action Completion Report C-331			3 rd Quarter 2055	
	Slab				
GA 9, GA 12,	D1 Remedial Investigation Work Plan GA 9, GA			1 st Quarter 2044	Soils and Slabs within the GAs
GA 13, GA 15,	12, GA 13, GA 15, GA 17 Slabs				will occur in parallel, beginning
GA 17 Slabs	D1 Remedial Investigation Report			3 rd Quarter 2045	with the C-409 facilities and
	GA 9, GA 12, GA 13, GA 15, GA 17 Slabs				continuing through the process
	D1 Feasibility Study GA 9, GA 12, GA 13, GA 15,			1 st Quarter 2046	facilities. This is sequenced to
	GA 17 Slabs				stabilize the workload, annual
	D1 Proposed Plan GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			3 rd Quarter 2046	costs, and waste volumes as the larger facilities are undergoing
	D1 ROD GA 9, GA 12, GA 13, GA 15, GA 17			1 st Quarter 2047	D&D.
	Slabs				
	D1 Remedial Design Work Plan			3 rd Quarter 2047	
	GA 9, GA 12, GA 13, GA 15, GA 17 Slabs				
	D1 Remedial Design Report GA 9, GA 12, GA 13,			4 th Quarter 2047	
	GA 15, GA 17 Slabs				
	D1 Remedial Action Work Plan GA 9, GA 12, GA			4 th Quarter 2047	
	13, GA 15, GA 17 Slabs				
	D1 Remedial Action Completion Report GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			1 st Quarter 2050	

	Soils ar	nd Slabs Operable	Unit (11)		
				Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
GA 10, GA 11	D1 Remedial Investigation Work Plan GA 10, GA			4 th Quarter 2049	Soils and Slabs within the GAs
Slabs	11 Slabs				will occur in parallel, beginning
	D1 Remedial Investigation Report			2 nd Quarter 2051	with the C-409 facilities and
	GA 10, GA 11 Slabs				continuing through the process
	D1 Feasibility Study GA 10, GA 11 Slabs			4 th Quarter 2051	facilities. This is sequenced to
	D1 Proposed Plan GA 10, GA 11 Slabs			2 nd Quarter 2052	stabilize the workload, annual
	D1 ROD GA 10, GA 11 Slabs			4 th Quarter 2052	costs, and waste volumes as the
	D1 Remedial Design Work Plan			2 nd Quarter 2053	larger facilities are undergoing
	GA 10, GA 11 Slabs				D&D.
	D1 Remedial Design Report			3 rd Quarter 2053	
	GA 10, GA 11 Slabs				
	D1 Remedial Action Work Plan			3 rd Quarter 2053	
	GA 10, GA 11 Slabs			di.	
	D1 Remedial Action Completion Report GA 10, GA 11 Slabs			4 th Quarter 2054	
GA 5 Slabs	D1 Remedial Investigation Work Plan GA 5 Slabs			4 th Quarter 2041	Soils and Slabs within the GAs will occur in parallel, beginning
	D1 Remedial Investigation Report			2 nd Quarter 2043	with the C-409 facilities and
	GA 5 Slabs				continuing through the process
	D1 Feasibility Study GA 5 Slabs			4 th Quarter 2043	facilities. This is sequenced to
	D1 Proposed Plan GA 5 Slabs			2 nd Quarter 2044	stabilize the workload, annual
	D1 ROD GA 5 Slabs			4 th Quarter 2044	costs, and waste volumes as the
	D1 Remedial Design Work Plan GA 5 Slabs			1 st Quarter 2045	larger facilities are undergoing
	D1 Remedial Design Report GA 5 Slabs			2 nd Quarter 2045	D&D.
	D1 Remedial Action Work Plan GA 5 Slabs			3 rd Quarter 2045	
	D1 Remedial Action Completion Report GA 5			4 th Quarter 2046	
	Slabs				

	Soils an	d Slabs Operable	Unit (11)		
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
GA 16 Slabs	D1 Remedial Investigation Work Plan GA 16 Slabs			3 rd Quarter 2048	Soils and Slabs within the GAs
	D1 Remedial Investigation Report			1 st Quarter 2049	will occur in parallel, beginning
	GA 16 Slabs				with the C-409 facilities and
	D1 Feasibility Study GA 16 Slabs			3 rd Quarter 2050	continuing through the process
	D1 Proposed Plan GA 16 Slabs			1 st Quarter 2051	facilities. This is sequenced to
	D1 ROD GA 16 Slabs			3 rd Quarter 2051	stabilize the workload, annual
	D1 Remedial Design Work Plan			1 st Quarter 2052	costs, and waste volumes as the
	GA 16 Slabs				larger facilities are undergoing D&D.
	D1 Remedial Design Report GA 16 Slabs			2 nd Quarter 2052	D&D.
	D1 Remedial Action Work Plan			3 rd Quarter 2052	
	GA 16 Slabs			and .	
	D1 Remedial Action Completion Report GA 16			3 rd Quarter 2053	
G + 2 G + 1 4	Slabs			1910	
GA 2, GA 14	D1 Remedial Investigation Work Plan GA 2, GA			1 st Quarter 2041	Soils and Slabs within the GA
Slabs	14 Slabs			21d O 2042	will occur in parallel, beginning with the C-409 facilities and
	D1 Remedial Investigation Report			3 rd Quarter 2042	
	GA 2, GA 14 Slabs D1 Feasibility Study GA 2, GA 14 Slabs			1 st Quarter 2043	continuing through the process facilities. This is sequenced to
	D1 Proposed Plan GA 2, GA 14 Slabs			2 nd Quarter 2043	stabilize the workload, annual
	D1 ROD GA 2, GA 14 Slabs			4 th Quarter 2043	costs, and waste volumes as the
	D1 Rob GA 2, GA 14 Stabs D1 Remedial Design Work Plan			2 nd Quarter 2044	larger facilities are undergoing
	GA 2, GA 14 Slabs			<u>2 Quarter 2044</u>	D&D.
	D1 Remedial Design Report GA 2, GA 14 Slabs			3 rd Quarter 2044	
	D1 Remedial Action Work Plan GA 2, GA 14 Slabs			4 th Quarter 2044	
	D1 Remedial Action Completion Report GA 2, GA			1 st Quarter 2046	
	14 Slabs			1 Quarter 2040	
	1.0400				

Soils and Slabs Operable Unit (11)									
	2 3 1 2 3 1								
				Planning Dates with Long-Term Targets for Decision					
Subproject	Deliverable			Documents ²	Comments				
GA 1, GA 4	D1 Remedial Investigation Work Plan GA 1, GA 4			2 nd Quarter 2050	Soils and Slabs within the GAs				
Slabs	Slabs				will occur in parallel, beginning				
	D1 Remedial Investigation Report GA 1, GA 4			3 rd Quarter 2052	with the C-409 facilities and				
	Slabs				continuing through the process				
	D1 Feasibility Study GA 1, GA 4 Slabs			<u>1st Quarter 2053</u>	facilities. This is sequenced to				
	D1 Proposed Plan GA 1, GA 4 Slabs			3 rd Quarter 2053	stabilize the workload, annual				
	D1 ROD GA 1, GA 4 Slabs			1 st Quarter 2054	costs, and waste volumes as the				
	D1 Remedial Design Work Plan			3 rd Quarter 2054	larger facilities are undergoing				
	GA 1, GA 4 Slabs				D&D.				
	D1 Remedial Design Report			4 th Quarter 2054					
	GA 1, GA 4 Slabs								
	D1 Remedial Action Work Plan			4 th Quarter 2054					
	GA 1, GA 4 Slabs								
	D1 Remedial Action Completion Report GA 1, GA			4 th Quarter 2055					
	4 Slabs								

Lagoons Operable Unit (09)

The Lagoons OU consists of two subprojects to address two different types of lagoons utilized at the Paducah Site. Lagoons that were constructed to support gaseous diffusion processes are grouped together into one subproject, and lagoons constructed for the purpose of treating water drawn from the Ohio River to

provide potable and sanitary water to the Paducah Site are grouped together under another subproject.

		Enforceable Timetable and		Planning Dates with	
		Enforceable Timetable and Deadlines ¹		Long-Term Targets	
		Deadines		for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Process	D1 Remedial Investigation Work Plan			4 th Quarter 2048	The process lagoons may be required to
Lagoons	D1 Remedial Investigation Report			2 nd Quarter 2050	support deposit removal and other
	D1 Feasibility Study			4 th Quarter 2050	deactivation activities that required
	D1 Proposed Plan			1 st Quarter 2051	systems to operate to remove chemicals
	D1 ROD			3 rd Quarter 2051	within the process facilities. This project is
	D1 Remedial Design Work Plan			2 nd Quarter 2052	sequenced after the major facilities have
	D1 Remedial Design Report			3 rd Quarter 2052	been demolished. The baseline assumes
	D1 Remedial Action Work Plan			3 rd Quarter 2052	that the lagoons would be drained;
	D1 Remedial Action Completion Report			3 nd Quarter 2053	dredged; and soils placed in a potential
					OSWDF and backfilled with clean fill.
					The project is estimated to take five years
				th	to complete assuming FFA review logic.
Water	D1 Remedial Investigation Work Plan			4 th Quarter 2048	The water treatment lagoons are operating
Treatment	D1 Remedial Investigation Report			2 nd Quarter 2050	as part of the existing site water treatment
System Lagoons	D1 Feasibility Study			4 th Quarter 2050	plant. The water treatment plant may
	D1 Proposed Plan			2 nd Quarter 2051	operate until the major facilities have been
	D1 ROD			4 th Quarter 2051	demolished. The lifecycle baseline
	D1 Remedial Design Work Plan			2 nd Quarter 2052	assumes this is likely case; however, DOE
	D1 Remedial Design Report			3 rd Quarter 2052	is evaluating more cost-effective ways to
	D1 Remedial Action Work Plan			3 rd Quarter 2052	provide water to the site's facilities in
	D1 Remedial Action Completion			3 rd Quarter 2053	order to shut down the system early. The
					baseline assumes that the lagoons would
					be drained; dredged; and soils be placed in
					a potential OSWDF and backfilled with
					clean fill. The project is estimated to take
					five years to complete assuming FFA
					review logic.

5-3

Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets (Continued)

Surface Water Operable Unit (03)

The Surface Water OU includes the internal plant ditches that discharge to Little Bayou Creek and Bayou Creek. The SWMUs within the OU contributed to surface water contamination throughout the system. The outfalls and creeks also are identified as SWMUs.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Remedial	D1 Remedial Investigation Report			3 rd Quarter 2054	This project will not begin until the
Action	D1 Feasibility Study Report			1 st Quarter 2055	gaseous diffusion facilities have been
(Little Bayou	D1 Proposed Plan			3 rd Quarter 2055	dispositioned and sources of
and Bayou	D1 ROD			1 st Quarter 2056	contamination have been addressed in
Creek	D1 Remedial Design Work Plan			3 rd Quarter 2056	order to avoid recontamination through
Watersheds)	D1 Remedial Design Report			2 nd Quarter 2057	site discharges. The project is estimated
	D1 Remedial Action Work Plan			2 nd Quarter 2057	to take five years to complete assuming
	D1 Remedial Action Completion Report			4 th Quarter 2058	FFA review logic. This project is the last
					media-specific project to be addressed
					prior to the CSOU.

Comprehensive Site Operable Unit (12)

The CSOU evaluates the final actions taken at the site. It includes a sitewide baseline human health and ecological risk assessment to evaluate residual risks and ensure all actions taken to date, when considered collectively, are protective of human health and the environment from a sitewide perspective and implements any additional actions necessary to achieve final cleanup under the FFA.

			1		
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	for Decision Documents ²	Comments
N/A	D1 Remedial Investigation Work Plan			1 st Quarter 2062	The CSOU will begin upon completion of
	D1 Remedial Investigation/Feasibility			3 rd Quarter 2062	the last remedial action completion and
	Study Report				closure of the potential on-site waste
	D1 Proposed Plan			T Quarter 2000	disposal facility. It will take
	D1 ROD			3 rd Quarter 2063	approximately two years to complete.

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5-3

Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets (Continued)

Other FFA Planning Dates						
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments	
NA	D1 Five-Year Review			7/31/18	This is a statutorily required document that	
					must be approved by 6/4/19.	

¹ Enforceable Timetables and Deadlines are based on the planning scope assumptions contained in Appendix 3 and funding levels. Approval of the assumptions does not constitute decision making for the response actions described in this table.

BGOU = Burial Grounds Operable Unit

D&D = decontamination and decommissioning EPA = U.S. Environmental Protection Agency

FFA = Federal Facility Agreement

GA = geographical area

GWOU = Groundwater Operable Unit

 $FY = fiscal\ year$

NA = not applicable

OU = operable unit

RI = remedial investigation ROD = record of decision

SWOU = Surface Water Operable Unit

SWMU = solid waste management unit

TBD = to be determined

Deleted: ,3

Deleted: ³ DOE has updated the life cycle baseline to include the scope described in this SMP. The life cycle baseline is currently under final review at DOE Headquarters. The description of the priority, sequence, and time frame for the project's completion is included. Specific planning dates (quarter/year) will be included when the life cycle baseline is approved by DOE Headquarters.¶

² Not enforceable dates. These planning dates are internal DOE dates used for planning purposes only. The parties further agree that the U.S. Department of Energy can adjust the planning dates as part of the annual Site Management Plan update without having to submit an official request or justify "good cause" in accordance with Section XXIX of the FFA.

Assumes that final approval is received on the D2 document.



Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky

Annual Revision—FY 2018



CLEARED FOR PUBLIC RELEASE

Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky

Annual Revision—FY 2018

Date Issued—January 2018

Errata Issued—January 2018

U.S. DEPARTMENT OF ENERGY Office of Environmental Management

Prepared by
FOUR RIVERS NUCLEAR PARTNERSHIP, LLC,
managing the
Deactivation and Remediation Project at the
Paducah Gaseous Diffusion Plant
under Contract DE-EM0004895

CLEARED FOR PUBLIC RELEASE



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FIGURES

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ACRONYMS

AOC area of concern

BGOU Burial Grounds Operable Unit

bgs below ground surface BRA baseline risk assessment

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

COC contaminant of concern

COPC chemical or radionuclide of potential concern

CSOU Comprehensive Site Operable Unit D&D decontamination and decommissioning

DMP data management plan

DNAPL dense nonaqueous-phase liquid
DOE U.S. Department of Energy
DUF₆ Depleted Uranium Hexafluoride
ELCR excess lifetime cancer risk
EM environmental management

EPA U.S. Environmental Protection Agency

ERH electrical resistance heating

ESD explanation of significant difference

FFA Federal Facility Agreement

FS feasibility study FY fiscal year

GA geographical area
GDP gaseous diffusion plant
GSA generator staging area
GWOU Groundwater Operable Unit

HI hazard index

HSWA Hazardous and Solid Waste Amendment HVAC heating, ventilating, and air conditioning

IRA interim remedial action KOW Kentucky Ordnance Works

KPDES Kentucky Pollutant Discharge Elimination System

KY Commonwealth of Kentucky

LLW low-level waste LUC land use controls

LUCAP land use controls assurance plan LUCIP land use control implementation plan

MCL maximum contaminant level MOA memorandum of agreement

NA not applicable

NCP National Contingency Plan

NFA no further action
NPL National Priorities List
NSDD North-South Diversion Ditch
NTCRA non-time-critical removal action
O&M operation and maintenance
OSWDF on-site waste disposal unit

OU operable unit

PGDP Paducah Gaseous Diffusion Plant

PTW principal threat waste

RACR remedial action completion report

RAO remedial action objective

RCRA Resource Conservation and Recovery Act

RCW recirculating cooling water

RDSI remedial design support investigation

RGA Regional Gravel Aquifer
RI remedial investigation
ROD record of decision

SAA satellite accumulation area SAP sampling and analysis plan

SE site evaluation

SEE steam-enhanced extraction
SMP Site Management Plan
SWMU solid waste management unit
SWOU Surface Water Operable Unit

TBD to be determined TS treatability study

TSCA Toxic Substances Control Act
UCRS Upper Continental Recharge System
USEC United States Enrichment Corporation

UST underground storage tank VOC volatile organic compound

WAG waste area group

WDA waste disposal alternative

WKWMA West Kentucky Wildlife Management Area

1. INTRODUCTION

The Paducah Gaseous Diffusion Plant (PGDP) was placed on the National Priorities List (NPL) on May 31, 1994. In accordance with Section 120 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the U.S. Department of Energy (DOE) entered into a Federal Facility Agreement (FFA) with the U.S. Environmental Protection Agency (EPA) and Kentucky on February 13, 1998. The FFA established one set of consistent requirements for achieving comprehensive site remediation in accordance with the Resource Conservation and Recovery Act (RCRA) and CERCLA, including stakeholder involvement.

Section XVIII of the FFA requires that DOE submit an annual Site Management Plan (SMP), which outlines DOE's strategic approach for achieving cleanup under the FFA, to EPA and the Energy and Environment Cabinet (formerly known as the Kentucky Environmental and Public Protection Cabinet) by November 15th of each year. The FFA states that the purpose of the SMP is to coordinate and document the potential and selected operable units (OUs), including removal actions; to define cleanup priorities; to identify work activities that will serve as the basis for enforceable timetables and deadlines under the agreement; and to establish long-term cleanup goals.

During fiscal year (FY) 2012, based on projected near-term flat funding assumptions (5 years) and reasonable future funding assumptions for the Paducah Site, the FFA Senior Managers commissioned the FFA Managers to review and reprioritize FFA work, as needed, to achieve continuous progress while ensuring a bias for action. A series of meetings were held among the FFA Managers to evaluate options. The FFA Managers and FFA Senior Managers agreed to the following prioritization for work implementation:

- Optimize plume containment (Northeast Plume);
- Address groundwater sources [C-400; Southwest Plume Sources; Burial Grounds OU Solid Waste Management Unit (SWMU) 4];

- Complete decontamination and decommissioning (D&D) of C-340 and C-410/C-420;
- Continue and prioritize CERCLA Waste Disposal Alternatives activities to support future disposal needs;
- Realign the OUs schedules to coordinate disposal of waste with the availability of a potential CERCLA On-site Waste Disposal Facility (if selected); and
- Implement other work (e.g., Sitewide Evaluation) ensuring continuous progress/bias for action.

At that time, the reprioritization of projects based on projected near-term flat funding assumptions (5-years) and reasonable future funding assumptions for the Paducah Site resulted in the rescheduling of milestones, including out-year completion dates for the pre-gaseous diffusion plant (GDP) shutdown scope OUs. The FY 2013 SMP officially incorporated the changes agreed to by the FFA parties and moved completion dates for the pre-GDP shutdown scope OUs from 2019 to 2032.

In October of 2014, the United States Enrichment Corporation (USEC) terminated its agreement for operation of the GDP and returned the leased facilities to DOE. Some of these previously leased facilities contain SWMUs that had not been readily accessible during USEC operation. Because DOE now has control of the formerly leased GDP facilities, DOE has reassessed site cleanup priorities to identify areas offering the greatest opportunity to address significant sources of environmental media contamination. As a result, in 2016, DOE identified that a comprehensive characterization and final response action of the C-400 Building and its adjacent areas (see Appendix 3), hereafter referred to as the C-400 Complex, as its highest cleanup priority at the site. The C-400 Complex contains numerous SWMUs and is the largest of off-site trichloroethene groundwater contamination. The implementation of C-400 Complex as Paducah DOE's highest cleanup priority has resulted in resequencing of other cleanup work at the site to align with the new cleanup priorities and revised time frames projected for implementation. The FFA Senior

Managers signed a Memorandum of Agreement (MOA) for the C-400 Complex under the FFA for the PGDP, on August, 8, 2017, to document key aspects of the new strategy for incorporation into the FY 2018 SMP.

The new strategy from the MOA includes the following:

- Addition of the C-400 Complex OU with enforceable milestones and planning dates for all the CERCLA activities under the OU, including the out-year enforceable milestone for the C-400 Remedial Action field start;
- Integration of the pre- and post-GDP shutdown projects and schedules into the overall cleanup scope of the FFA;
- Continuation of the SWMU 211-A groundwater remedial action; and
- Resequencing of all other projects (e.g., CERCLA Waste Disposal Alternatives, Burial Grounds OU, Soils OU, Dissolved-Phase Plumes OU, Surface Water OU, Comprehensive Site OU).

This FY 2018 SMP supersedes the approved FY 2015 SMP. The FY 2016 and FY 2017 SMPs were not finalized in order to allow the FFA Senior Managers time to evaluate DOE's proposed reprioritization strategy and to reach a consensus on the path forward for the cleanup of the site.

This annual update of the SMP sets forth enforceable milestones for FY 2018, FY 2019, and FY 2020, with near-term emphasis on the C-400 Complex and the out-year enforceable completion date for the C-400 remedial action field start. consistent with the MOA. The scope associated with the overall cleanup strategy for the site includes a series of prioritized response actions, site characterization activities to support future response action decisions, and cleanup and decommissioning of the GDP. After completion of these activities, the Comprehensive Site OU (CSOU) evaluation will be conducted, with implementation of additional actions, as needed, to ensure long-term protectiveness of human health and the environment. CERCLA Five-Year Review evaluations are and will continue to be conducted to determine if any modifications to actions are required prior to the CSOU evaluation.

Appendix 1 of this SMP contains a summary of the status of all actions taken to date relative to the signed Records of Decision or Action Memoranda (including both interim and final response actions). This appendix also serves to meet the requirements of Section X.A of the FFA to submit an annual removal action report describing a summary of removal actions performed during the previous FY. More detailed information on the status of each OU is available in the FFA Semiannual Progress Report.

2. LAND USE

The planning assumptions for current land use are depicted in Figure 1, and the reasonably foreseeable future use is depicted in Figure 2. Potential future uses include recreational, industrial, and waste management. Several factors were considered in establishing the land-use assumptions under this cleanup strategy, including current and past land use, stakeholder input, and interest expressed by outside entities for the industrial use of areas on and adjacent to PGDP.

2.1 LAND USE CONTROLS

The site cleanup strategy recognizes that the long-term protectiveness of some response actions might rely upon or be supplemented by engineering barriers, institutional controls, and/or other land use controls (LUCs). To ensure that these controls remain protective, CERCLA five-year reviews, in conjunction with monitoring of requirements contained in the Land Use Control Assurance Plan (LUCAP), are implemented.

A Land Use Control Implementation Plan (LUCIP) is developed for each remedy that includes LUCs. The LUCIPs include a detailed explanation of the implementation and long-term maintenance of the LUCs. The LUCAP requires annual certification in the SMP that the LUCIPs are being implemented. This certification also will identify any noncompliance with a LUCIP and the steps taken to correct any such noncompliance, any nonmajor changes in land use, and any changes in designated officials. Appendix 2 contains the annual certification of LUCIPs implemented at PGDP.

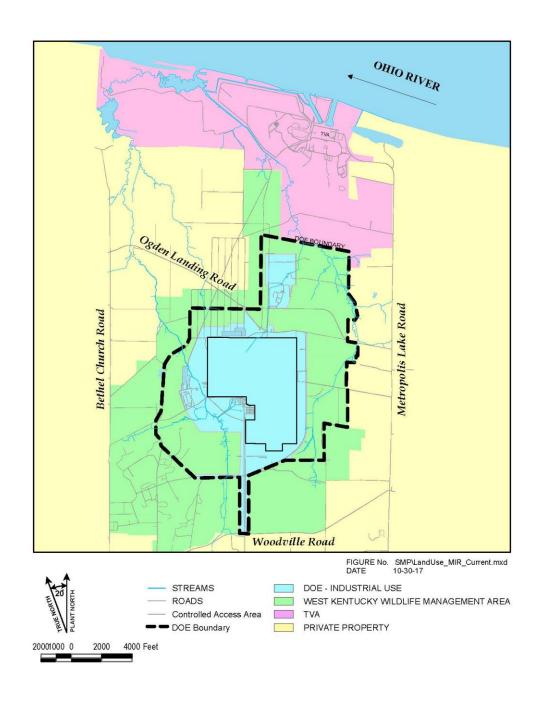


Figure 1. Current Land Use at PGDP

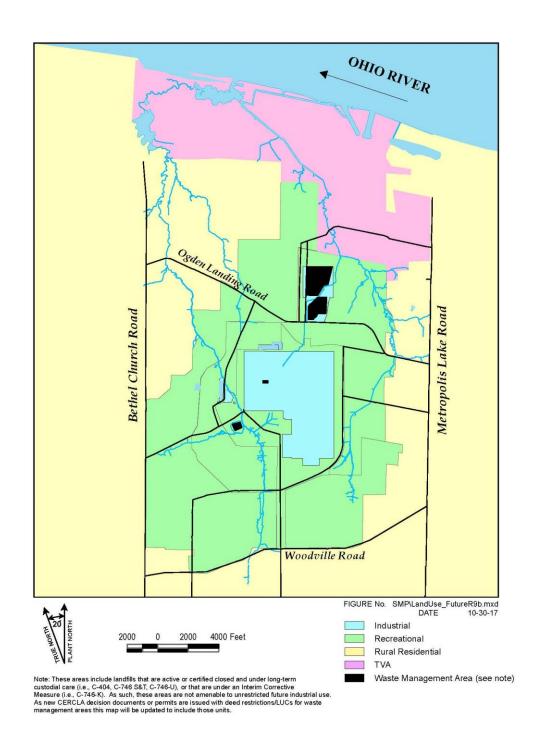


Figure 2. Reasonably Anticipated Future Land Use at PGDP

3. OPERABLE UNITS

In past SMPs, the site cleanup activities were divided as follows: (1) pre-GDP shutdown scope, (2) post-GDP shutdown scope, and (3) CSOU scope. The pre-GDP shutdown scope was associated with media-specific OUs initiated prior to shutdown of the operating GDP (i.e., Pre-GDP shutdown Activities).

In the FY 2018 SMP, the site cleanup OUs are integrated and no longer distinguish between preand post-GDP scope. Completion of these OUs is required to achieve delisting of the site from the NPL and the decommissioning of the GDP. Prior to final deletion from the NPL, partial delisting may occur if conditions are met to support potential property transfers. Appendix 3 includes additional information regarding scope and planning assumptions for each of the defined OUs. Appendix 4 contains lists of SWMUs and areas of concern (AOCs) sorted by OUs.

- C-400 Complex OU
- Groundwater OU
- Surface Water OU
- Soils OU
- Burial Grounds OU
- D&D OU
- Lagoons OU
- Depleted Uranium Hexafluoride (DUF₆) Footprint Underlying Soils OU
- CSOU

In addition, DOE currently is implementing deactivation and utility optimization activities outside of the FFA scope to prepare the site for effective implementation of all future mission activities, including cleanup activities. While the FFA parties have agreed to focus cleanup efforts on the C-400 Complex, long-term plans and strategies continue to be refined for future decommissioning of the GDP and cleanup of other OUs.

The final CSOU evaluation will support the final remedial decision for the site following completion of OUs. Any required all environmental monitoring of remedy performance and/or progress toward achieving the remedial action objectives (RAOs) will be conducted and reported in accordance with the selected remedies. Once no further response is appropriate and all RAOs have been achieved, the site (remaining property not previously deleted and/or transferred) would be eligible for deletion from the NPL.

4. SITE PRIORITIZATION

DOE uses a combination of factors to prioritize work being implemented under the Environmental Management (EM) program at PGDP. These include considerations such as regulator expectations; risk-based decision making; compliance with other program; technical considerations associated with **GDP** transition/turnover; funding projections; mortgage reduction; and demonstrated progress toward completing the EM mission. The site prioritization is evaluated each year as part of the annual update to the SMP.

The risk prioritization criteria incorporate the general program-management principles of the National Contingency Plan (NCP), which emphasize the use of accelerated actions to address imminent threats and reduce migration of off-site contamination.

Enforceable milestones for FY 2018, FY 2019, FY 2020, and out-year enforceable completion dates consistent with these prioritization criteria are included in Appendix 5. Any enforceable completion dates for remedial actions shall be considered satisfied upon issuance of a D1 Remedial Action Completion Report (RACR) (i.e., Final Remedial Action Report, as specified in FFA) for those areas where RAOs have been achieved. In cases where a period of operation and maintenance (O&M) may be required to achieve RAOs, such as groundwater, a D1 Interim RACR will be issued upon completion of remedial construction and a determination by DOE that the remedy is operating as intended.

Risk Prioritization Criteria

- Mitigate immediate threats, both on- and off-site.
- Reduce further migration of off-site contamination.
- Address sources contributing to off-site contamination.
- Address remaining sources contributing to on-site contamination.
- Perform D&D of the GDP/Address Remediation Scope OUs.
- Address soils within the DUF₆ Plant footprint once it ceases operations and D&D of the DUF₆ plant is complete.
- Evaluate the final CSOU.

Decommissioning of surplus DOE facilities is described in the 1995 DOE and EPA Memorandum: Policy on Decommissioning DOE Facilities under CERCLA. The D&D OU identifies industrial facilities (listed in Appendix 4) that pose a potential threat of release of hazardous substances to the environment that warrant a removal site evaluation (SE) to determine if a CERCLA non-time-critical removal action (NTCRA) is needed for decommissioning. Additional facilities at PGDP (listed in Appendix 6) will be evaluated to determine if there is a release threat to the environment that would warrant decommissioning under CERCLA. If it is determined during a facility review that there is a potential release threat, the facility will be included in the D&D OU in Appendix 4.

All data collected in support of any removal or remedial action shall be managed in accordance with an approved Data Management Plan (DMP). In accordance with Section XXVII.C of the FFA, Appendix 7 contains the final DMP for the Paducah Site.

APPENDIX 1 ACTIONS TAKEN TO DATE



Operable Unit Summary

*****	ъ т	ROD/Action		g 1			
WAGs/Media	Response Type	Memorandum	Response Description	Status ¹			
		GROUNDWATER (
	(OPERABLE UNIT DESIGNATION 01)						
WAG 26/Groundwater	Emergency removal action	N/A	Provided temporary water to local residences where private wells are contaminated by TCE and Tc-99.	Complete			
WAG 26/Groundwater	Removal action	August 30, 1994	Extended municipal water line to residences	Construction			
			affected by off-site groundwater contamination.	Complete/Operational			
			2013 Five-Year Review required additional actions for vapor intrusion.	The Water Policy Screening Study was completed on June 30, 2015. The Water Policy Screening Study Report was approved by KY on November 8, 2017; EPA approved on November 14, 2017.			
WAG 26/Groundwater	Interim Remedial Action	July 23, 1993	Hydraulic containment and treatment of high	Construction			
(Northwest Plume)	(IRA)		concentrations of off-site TCE contamination in the Northwest Plume.	Complete/Operational			
	Explanation of	January 27, 2011	Optimization of the Northwest Plume system	Construction			
	Significant Differences (ESD)	· ·	through placing existing southern extraction wells (EWs) on standby and installing two new EWs east of original southern extraction field.	Complete/Operational			

¹ Detailed information on the status of each project or operable unit is available in the FFA Semiannual Report.

		ROD/Action				
WAGs/Media	Response Type	Memorandum	Response Description	Status ¹		
GROUNDWATER OPERABLE UNIT						
	(OPER	ABLE UNIT DESIG	NATION 01) (Continued)			
WAG 26/Groundwater	IRA	June 15, 1995	Hydraulic containment and treatment of high	Construction		
(Northeast Plume)			concentrations of off-site TCE contamination in the Northeast Plume.	Complete/Operational		
			An ESD has been submitted for optimization of the Northeast Plume system through placing existing EWs on standby, installing two new EWs in the upgradient high concentration area of the Northeast Plume near the eastern edge of the PGDP facility, and installing new treatment units for air stripping as an alternative to the cooling towers.	Construction of an alternate treatment unit was completed on May 30, 2013. The unit became operational on September 4, 2013. The ESD and RAWP were in dispute until July 2015 at which time the Memorandum of Agreement (MOA) for resolution was signed. Optimization has been completed with		
				startup/testing completed in October 2017.		
SWMU 91/Soil	IRA	August 10, 1998	<i>In situ</i> treatment of TCE-contaminated soils using the LASAGNA TM technology.	Complete		

		ROD/Action		
WAGs/Media	Response Type	Memorandum	Response Description	Status ¹
		GROUNDWATER		
GYD GY 11			SNATION 01) (Continued)	Tr. 11
SWMU 11 and	IRA	August 9, 2005	In situ treatment of TCE source areas in the	Field operations for
SWMU 533/Groundwater			UCRS and RGA located in the southeast and	Phase I completed in
(C-400 Source Action)			southwest corners of the C-400 Building using	FY 2011. Parties agreed
			electrical resistance heating technology.	to divide Phase II into
				Phase IIa and Phase IIb.
				Phase IIa operations
				began on July 22, 2013, and ceased on
				November 5, 2014. A
				treatability study for steam-enhanced
				extraction was
				conducted and
				completed June 30,
				2015. The Treatability
				Study Report approved
				in June 2016. As a
				result of the DOE
				proposed strategy and
				reprioritization agreed
				to by the FFA Senior
				Managers in the
				August 8, 2017, MOA,
				the remaining VOC
				source in the Phase IIb
				area will be addressed
				by the C-400 Complex
				OU. The Phase I and
				Phase IIa activities will
				be documented in a
				Remedial Action
				Completion Report for
				the C-400 Interim
				Remedial Action
				(ROD, 2005).

		ROD/Action					
WAGs/Media	Response Type	Memorandum	Response Description	Status ¹			
		GROUNDWATER	OPERABLE UNIT				
(OPERABLE UNIT DESIGNATION 01) (Continued)							
SWMU 1: SWMU 211-A; and SWMU 211-B (Southwest Plume Sources)	Remedial Action	March 20, 2012	SWMU 1—In situ source treatment using deep soil mixing with interim LUCs. SWMU 211-A—In situ source treatment using enhanced in situ bioremediation with interim LUCs or long-term monitoring with interim LUCs based upon RDSI results. SWMU 211-B—In situ source treatment using enhanced in situ bioremediation with interim LUCs or long-term monitoring with interim LUCs based upon RDSI results.	ROD signed; RDSI field activities initiated on July 18, 2012. Completed RDSI field activities on April 26, 2013. Additional sampling was requested by EPA and completed by DOE. The Final Characterization Report Addendum and Letter Notification proposing remedy for 211-A and 211-B have been evaluated by the FFA parties. The FFA parties have agreed to move forward with 211-A and will determine an appropriate remedial action for 211-B based on a revised conceptual site model consistent with the data in the Final Characterization Report. Mobilization activities for SWMU 1 deep soil mixing were initiated on February 9, 2015, and soil mixing completed October 8, 2015. Soil sampling, monitoring wells installation, and Remedial Action Completion Report approved by EPA and Kentucky February 2017.			

1-7

WAGs/Media	Response Type	ROD/Action Memorandum	Response Description	Status ¹
WAGS/Media		SURFACE WATER	• •	Status
		OPERABLE UNIT I		
WAG 25/Surface water (NSDD)	IRA	March 28, 1994	Instituted action to treat certain plant effluent and control the migration of contaminated sediment associated with the NSDD.	Construction Complete/Operational
WAGs 18 & 25/Surface water and sediment (Surface Water/Ditches)	IRA	N/A	Institutional controls (fencing/posting) for off- site contamination in surface water, outfalls, and lagoons.	Construction Complete/Operational
WAG 24/Scrap (Scrapyards)	IRA	N/A	Installation of sediment controls to mitigate surface water/sediment runoff from scrap yards.	Construction Complete/Operational
WAGS 1 &7 WAG 1: SWMU 100 (Fire Training Area) and SWMU 136 (C-740 TCE Spill Site) WAG 7: SWMU 8 (C-746-K Landfill), SWMU 130 (C-611 550-gal Gasoline UST), SWMU 131 (C-611 50-gal Gasoline UST), SWMU 132 (C-611 2,000-gal. Oil UST), SWMU 133 (C-611 Grouted UST), and SWMU 134 (C-611 1,000-gal Diesel/Gasoline Tank)	IRA	August 10, 1998	Interim remedial action installed riprap along creek bank to prevent direct contact, implemented institutional controls, and long-term monitoring for SWMU 8. All other SWMUs were determined to require "no further action" under the IRA. It should be noted that at SWMU 100, institutional controls were selected as part of the remedy.	Construction Complete/Operational
Drum Mountain (Scrap)	Non-time-critical removal action	March 27, 2000	Removed and disposed of Drum Mountain.	Complete
WAG 24, WAG 14, and SWMU 99/Scrap	Non-time-critical removal action	September 26, 2001	Removed and disposed of scrap metal with enhanced sediment control measures.	Complete
SWMU 59/Sediment	IRA	September 25, 2002	Remedial action for Sections 1 and 2 of the NSDD.	Complete

WAGs/Media	Response Type	ROD/Action Memorandum	Response Description	Status ¹
vvii Os/ivicula		SURFACE WATER (Status
			NATION 03) (Continued)	
SWMU 58 (Sections 3, 4, and 5 of the NSDD); SWMU 69 (Outfall 001); SWMU 63 (Outfall 008); SWMU 66 (Outfall 010); SWMU 67 (Outfall 011); and SWMU 68 (Outfall 015) and their associated internal ditches and areas (including SWMUs 92 and 97)	Non-time-critical removal action	April 23, 2009	Removal action for contaminants associated with sediment in Sections 3, 4, and 5 of the NSDD and KPDES Outfalls 001, 008, 010, 011, and 015, and associated internal ditches and areas of PGDP.	Complete
		BURIAL GROUNDS OPERABLE UNIT D		
WAG 22/Waste and soil (SWMU 2- Burial Ground)	IRA	September 11, 1995	The interim ROD selected an impermeable cap to reduce leachate migration from surface infiltration, groundwater monitoring, and institutional controls. Through agreement of the parties, an impermeable cap was not constructed (Waste Area Grouping (WAG) 22 Post-Record of Decision (ROD) Change, October 23, 1996). This change also will be documented in the Final Remedial Decision for SWMU 2.	Additional remedial alternatives for a CERCLA final remedial action are being evaluated in the SWMUs 2, 3, 7, and 30 feasibility study. Institutional controls and groundwater monitoring are ongoing pending final remedy selection.

WAG DE I	ъ т	ROD/Action	D D 1.11	g 1			
WAGs/Media	Response Type	Memorandum	Response Description	Status ¹			
	SOILS OPERABLE UNIT (OPERABLE UNIT DESIGNATION 04)						
C-750-A, -B, and -C	N/A	N/A	Tank removal.	Complete			
USTs	IN/A	IV/A	Tank Temoval.	Complete			
WAG 7	IRA	N/A	Enhanced existing cap to reduce leachate migration from surface infiltration.	Complete			
SWMU 8							
(C-746-K Landfill)							
AOC 124 WAG 17/Soil (Concrete Rubble Piles)	Removal action	N/A	Excavated soil associated with AOC 124.	Complete			
WAG 23/Soil	Removal action	September 11, 1997	Excavated PCB and dioxin-contaminated surface soils to reduce risks to plant industrial workers.	Complete			
SWMU 193/Soil	Time-critical removal action	February 19, 2002	Removed petroleum-contaminated soils.	Complete			
SWMUs 76 and 519/Soil	Time-critical removal action	July 1, 2002	Removed empty sulfuric acid tanks, size reduced for containerization and dispositioned.	Complete			
SWMU 19 [C-410-B Hydrogen Fluoride (HF) Neutralization Lagoon], SWMU 40 (C-403) and SWMU 181 (C-218 Firing Range)	Non-time-critical removal action	May 11, 2009	Removal of lead-contaminated soil at the C-218 Firing Range (SWMU 181). Removal of contamination within the respective SWMU boundaries of C-410-B (SWMU 19). Removal of contamination within the respective SWMU boundaries of C-403 (SWMU 40).	SWMU 19 and SWMU 181 are complete. SWMU 40 removal will be implemented as part of the C-400 Complex OU.			
SWMU 27 (Acid Neutralization Tank)	Time Critical Removal Action	September 9, 2016	Removed liquid and sludge to the extent practicable within the acid neutralization tank. Filled the tank with flowable fill.	Fieldwork for SWMU 27 completed in September 2016. The final Removal Action Report was submitted in June 2017 and was approved by EPA and Kentucky in July 2017. Final cleanup decision for this SWMU will be addressed as part of the Soils and Slabs OU.			

WAGs/Media	Response Type	ROD/Action Memorandum	Response Description	Status ¹			
PRE-GDP SHUTDOWN D&D OPERABLE UNIT (OPERABLE UNIT DESIGNATION 02)							
SWMU 478/Infrastructure (C-410)	Non-time-critical removal action	August 3, 2002	Remove process equipment and piping.	Completed December 2013.			
SWMU 478/Infrastructure (C-410)	Non-time-critical removal action	November 23, 2009	Addendum to document a change in scope of the removal action to 1) expand the scope of the existing NTCRA to include facility structure demolition to the slabs and disposition of demolition debris and 2) allow the non-process systems to remain in place and to remove these systems at the same time the building is demolished using heavy equipment such as excavators with shears.	Fieldwork for C-410/C-420 completed in December 2015. Removal Action Report approved in June 2016.			
SWMU 477/Infrastructure (C-340 Metals Plant) and SWMU 137 (C-746-A East End Smelter)	Non-time-critical removal action	May 18, 2010	Decommissioning of the C-340 Metals Plant and C-746-A East End Smelter, which entails the demolition of C-340-A, -B, and -C structures as well as the C-746-A East End Smelter. The slabs and soils underlying these structures will be addressed in future CERCLA response actions.	Fieldwork for C-746-A East End Smelter completed in FY 2010. Removal Action Report approved in November 2011. Fieldwork for C-340 completed in September 2013. Removal Action Report approved in May 2014.			
SWMU 480 (C-402 Lime House); SWMU 55 (C-405 Incinerator); and SWMU 464 (C-746-A West End Smelter)	Non-time-critical removal action	December 5, 2005	Removed, characterized, and disposed of building structure and contents.	Complete			

AOC = area of concern; BGOU = Burial Grounds Operable Unit; ESD = explanation of significant differences; FY = fiscal year; IRA = interim remedial action; KPDES = Kentucky Pollutant Discharge Elimination System; LUCs = land use controls; N/A = not applicable; NSDD = North-South Diversion Ditch; NTCRA = non-time-critical removal action; PGDP = Paducah Gaseous Diffusion Plant; PCB = polychlorinated biphenyl; RDSI = remedial design/support investigation; RGA = Regional Gravel Aquifer; ROD = Record of Decision; SWMU = solid waste management unit; Tc-99 = technetium-99; TCE = trichloroethene; UCRS = Upper Continental Recharge System; UST = underground storage tank; WAG = waste area group

Paducah Operable Unit Designations: Groundwater OU—OU Designation 01; Pre-GDP Shutdown Decontamination and Decommissioning OU—OU Designation 02; Surface Water OU—OU Designation 03; Soils OU Designation 04; Burial Grounds OU—OU Designation 05; Waste Disposal OU—OU Designation 06; C-400 Complex OU—OU Designation 07; DUF₆ Footprint Underlying Soils OU—OU Designation 08; Lagoons—OU Designation 09; Remaining Decontamination and Decommissioning OU—OU Designation 10; Soils and Slabs OU—OU Designation 11; Comprehensive Site Operable Unit—OU Designation 12

Note: Operable Unit Designation 00 will be used for the Site Management Plan; Five-Year Review; FFA Semiannual Report; Community Relations Plan; and Data Management Plan

APPENDIX 2 CERTIFICATION OF LUCIPS



CERTIFICATION OF LUCIPS

In accordance with Section 2.9 of the Land Use Control Assurance Plan for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/OR/07-1799&D2, the U.S. Department of Energy (DOE) certifies that requirements of the Land Use Control Implementation Plan for the North-South Diversion Ditch at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/OR/07-1949&D2, and the Land Use Control Implementation Plan for Interim Remedial Action for the Groundwater Operable Unit for the Volatile Organic Compound Contamination at the C-400 Cleaning Building at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/OR/07-2151&D2/R2, are being implemented by DOE at Paducah Gaseous Diffusion Plant.

There have been no changes in the designated officials identified under the Land Use Control Implementation Plan/Land Use Control Assurance Plan. There have been no major or "nonmajor" changes of land use.



APPENDIX 3

OPERABLE UNIT SCOPE DESCRIPTIONS AND KEY PROJECT ASSUMPTIONS



OPERABLE UNIT SCOPE DESCRIPTIONS AND KEY DOE PLANNING ASSUMPTIONS FROM LIFE CYCLE BASELINE

INTRODUCTION

Pursuant to Section XVIII of the Federal Facility Agreement (FFA), the following operable unit (OU)-specific descriptions document the FFA Managers' common understanding of the expected scope of work for each of the OUs as well as U.S. Department of Energy's (DOE) key planning assumptions. The FFA Managers acknowledge that both the scope and associated assumptions may change as each project progresses; however, this appendix represents the best understanding, given existing information. The milestone dates associated with executing the scope of work are defined in Appendix 5 (Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets). The milestone dates are based on the scope and associated assumptions described in the following sections. Schedules are based on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documentation and review/comment time frames established in the FFA.

Paducah Gaseous Diffusion Plant (PGDP) ceased operations in May 2013, and leased property was returned to DOE in October 2014. Prior to delease, site cleanup activities had been divided as (1) pre-Gaseous Diffusion Plant (GDP) shutdown scope, and (2) post-GDP shutdown scope, and (3) Comprehensive Site OU (CSOU) scope. The pre-shutdown scope was associated with media-specific OUs initiated prior to shutdown of the operating GDP. In October of 2014, the United States Enrichment Corporation (USEC) terminated its lease agreement for operation of the GDP and returned the leased facilities to DOE. Some of these previously leased facilities contain solid waste management units (SWMUs) that had not been readily accessible during USEC operation. Because DOE now has control of the formerly leased GDP facilities, DOE has reassessed site cleanup priorities to identify areas offering the greatest opportunity to address significant sources of environmental media contamination. As a result, in 2016, DOE identified a comprehensive characterization and final response action of the C-400 Building and its adjacent areas, hereafter referred to as the C-400 Complex, as its highest cleanup priority at the site. The C-400 Complex contains numerous SWMUs and is the largest source of off-site trichloroethene (TCE) groundwater contamination. The implementation of C-400 Complex as Paducah DOE's highest cleanup priority has resulted in resequencing other cleanup work at the site to align with the new cleanup priorities and revising time frames projected for implementation. This fiscal year (FY) 2018 Site Management Plan (SMP) also has integrated all OUs to support a comprehensive cleanup strategy for PGDP.

Scope and Key DOE Planning Assumptions from Life Cycle Baseline have been established based on the current understanding of site conditions and to achieve compliance with CERCLA, the National Contingency Plan (NCP), and the FFA. The actual scope of any given remedy will be developed with the U.S. Environmental Protection Agency (EPA) and the Commonwealth of Kentucky (KY) in compliance with the CERCLA process and documented in the appropriate decision document, each of which is subject to public participation in accordance with the FFA, CERCLA, and the NCP. Goals have been established for each OU to guide the development of project-specific remedial action objectives (RAOs).

Assumptions included herein are for DOE's planning purposes. While EPA and KY find the assumptions to be reasonable for bounding cost and schedule forecasts based on existing information, regulatory approval of the SMP does not constitute approval of assumptions. In the event there is a conflict between an assumption in this SMP and an OU primary document, the OU primary document shall govern.

GROUNDWATER OPERABLE UNIT

The Groundwater Operable Unit (GWOU) is being implemented in a phased approach consisting of sequenced response actions designed to accomplish the following goals:

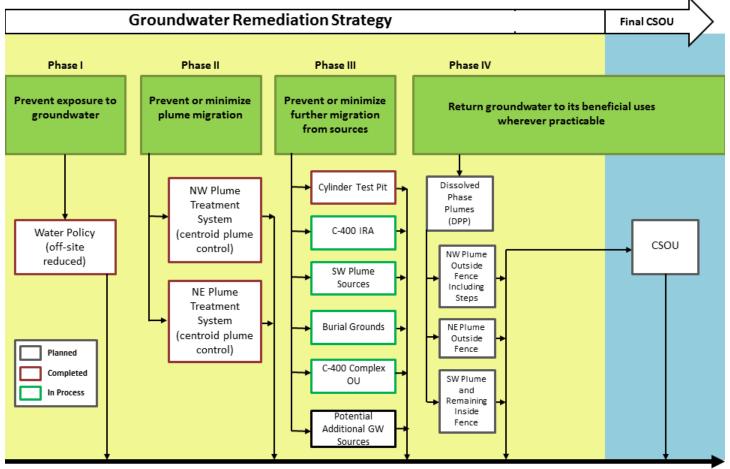
- (1) Prevent human exposure to contaminated groundwater;
- (2) Prevent or minimize further migration of contaminant plumes;
- (3) Prevent, reduce, or control contaminant sources contributing to groundwater contamination; and
- (4) Restore the groundwater to its beneficial uses wherever practicable.

A series of actions already have been completed toward meeting these goals, as depicted in Figure 3.1. These previous actions are summarized in Appendix 1 (Actions Taken to Date).

The scope of the GWOU consists of potential sources [e.g., dense nonaqueous-phase liquid (DNAPL) or buried wastes] that are contributing to groundwater contamination and the dissolved-phase groundwater plumes. The dissolved-phase groundwater consists of contaminated groundwater primarily in the Regional Gravel Aquifer (RGA), but also includes limited areas in the Upper Continental Recharge System (UCRS) that typically are associated with source areas. Remedies documented in signed records of decision (RODs) have been selected for the identified C-400 source areas and Southwest Plume source areas to address volatile organic compound (VOC) contamination. The remedy in the Southwest Plume ROD for SWMU 1 has been completed, with long-term monitoring in place. The remaining scope of that ROD related to SWMU 211-A and SWMU 211-B was subject to a recently completed remedial design site investigation.

C-400 Interim Remedial Action

The success of the Six-Phase Heating project conducted in 2003 lead to a ROD signed in 2005 that required mass removal of TCE source material within the UCRS and RGA using electrical resistance heating (ERH). The scope of the interim remedy for the C-400 source action was limited to accessible areas located around the outside perimeter of the east and southwest portions of the C-400 Building due to on-going USEC operations that occupied the C-400 Building. Implementation of the ERH remedy was designed using a two-phase approach. Phase I was completed in 2010 and focused on selected treatment areas around C-400 (east and southwest areas) where the majority of the TCE was confined to the UCRS; however, an important objective of Phase I also was to evaluate the heating performance of the ERH design in the underlying RGA down to the McNairy Formation. During implementation of Phase I, temperature goals were not attained in the lower RGA in the southwest treatment area, particularly in the lower RGA. Because of the inability of ERH to reach target temperatures in the lower RGA, the FFA parties agreed to divide Phase II into Phase IIa (using ERH to address the UCRS and upper RGA to a depth of 60 ft bgs) and Phase IIb (using a technology to be decided to address the lower RGA). Phase IIa operations were completed successfully in fall of 2014 and consisted of the implementation of ERH in the UCRS and upper RGA in the southeast treatment area. To help evaluate applicable technologies for potential use in the lower RGA during Phase IIb, a Steam-enhanced Extraction (SEE) Treatability Study (TS) was performed in 2015 to obtain data specific to understanding the behavior of steam injected into the RGA under variable injection scenarios. The TS Report for Phase IIb, dated May 2016, demonstrated the technology would be technically implementable in the hydrogeological conditions tested, although several uncertainties remained regarding the full nature and extent of the Phase II source area, particularly whether a portion of the source extends beneath the C-400 Building.



Ongoing environmental monitoring program and 5-year reviews, as appropriate

Figure 3.1. Groundwater Remediation Strategy

Prior to moving forward with implementation of the interim remedial action, DOE approached EPA and KY and proposed reprioritization of the DOE mission based on the return of the enrichment facilities (including C-400); the need to perform work in a comprehensive manner at the C-400 Complex; and the expected impacts of anticipated future funding limitations across the DOE Complex. In June 2016, DOE provided a written proposal for the entire C-400 Complex that included acceleration of the investigation and cleanup of the C-400 Complex for all sources of contamination associated with and underlying the C-400 Building. This OU also will address the remaining VOC source in the Phase IIb area. On August 8, 2017, the FFA Senior Managers signed a memorandum of agreement (MOA) for the C-400 Complex that will be implemented as a separate OU identified as the C-400 Complex OU. As a result, the prior work performed under the C-400 Interim Remedial Action for Phase I and Phase IIa will be documented in a Remedial Action Completion Report for the C-400 Interim Remedial Action (ROD 2005).

Southwest Plume Sources Remedial Action

Scope

This project addresses the following three areas in the Southwest Plume: the C-747-C Oil Landfarm (SWMU 1), the areas near the southeast and northeast (SWMU 211) areas of the C-720 Building, and part of the storm sewer between the south side of the C-400 Building and Outfall 008 (SWMU 102). TCE and its breakdown products [cis-1,2-dichloroethene (DCE), trans-1,2-DCE, and vinyl chloride] and 1,1-DCE are the primary contaminants of concern (COCs) associated with these sources. Evaluation of a final remedial action for non-VOCs COCs associated with direct contact exposure risks will be addressed as part of the Soils OU (see Appendix 4).

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) A remedy will be implemented in source areas [i.e., Oil Land Farm (SWMU 1) and Northeast and Southeast of the C-720 Building (SWMU 211 A & B)].
- (2) The SWMU 1 remedy is soil mixing with interim land use controls (LUCs). Implementation of this remedy has been completed.
- (3) The SWMU 211-A remedy is *in situ* bioremediation with interim LUCs or long-term monitoring with interim LUCs.
- (4) The SWMU 211-B remedy will be implemented after the C-720 Building has been removed and the investigation is completed for the C-720 Building Soils and Slabs action to address fully any identified sources under the slab.
- (5) No further action will be required for SWMU 102 (Plant Storm Sewer).

Dissolved-Phase Plumes Remedial Action²

Scope

This project includes conducting a remedial investigation (RI) [including a baseline risk assessment (BRA)], feasibility study (FS), and selecting a remedy and implementing any necessary response actions for the dissolved-phase groundwater contamination. The RI will evaluate dissolved-phase groundwater

² The scope and planning assumptions are consistent with the March 24, 2008, and May 20, 2010, SW Plume Dispute Resolutions.

contamination, including, but not limited to, the Northwest Plume (SWMU 201), Northeast Plume (SWMU 202), Southwest Plume (SWMU 210), and the groundwater contamination contributing to the Little Bayou Creek seeps. The RI also may determine whether any follow-up actions or modifications to response actions for the GWOU are necessary and would be evaluated further in a FS. The primary RAO for this project is based on the resolution of dispute for the Southwest Plume dated March 24, 2008, as follows:

• Return contaminated groundwaters to their beneficial use(s) and attain chemical-specific applicable or relevant and appropriate requirements [e.g., maximum contaminant levels (MCLs)] and/or risk-based concentrations for all identified COCs throughout the plume (or at the edge of the waste management area depending on whether the waste source is removed), consistent with CERCLA, the NCP (including the Preamble), and any pertinent EPA guidance.

Key DOE Planning Assumptions from Life Cycle Baseline

The following elements summarize DOE's key planning assumptions and are illustrated in Figure 3.2.

- (1) TCE and Tc-99 are expected to be the primary COCs that will drive the remediation approach.
- (2) Continue operations of the Northwest Plume and the Northeast Plume pump-and-treat systems in accordance with the completed optimizations.
- (3) Conduct a technology demonstration/treatability study at Little Bayou Creek seeps to address the TCE concentrations in surface water contamination resulting from groundwater discharge. The treatability study may include testing technologies that will have broader application to other areas of the dissolved-phase plumes.
- (4) Data collected from the Northwest Plume extraction system optimization; the Northeast Plume extraction system optimization; the TS at the Little Bayou Creek seeps; TCE degradation study; and the groundwater flow/transport model will be used to support the RI/FS process and will be documented accordingly.
- (5) The remedial action for the dissolved-phase plumes will include the following: (a) focused mass removal technology to address "high" mass residual volatile organic compounds (VOCs) and Tc-99 in the RGA near source areas in the plant vicinity; (b) operation of groundwater extraction system(s) until they meet shut-down criteria established in the final dissolved-phase plume ROD; and (c) *in situ* treatment (e.g., enhanced bioremediation or alternative technology) for distal lobes of dissolved-phase plumes.
- (6) The extent of dissolved-phase plume groundwater contamination is expected to be limited to those areas already defined, consisting of the Northeast Plume, Northwest Plume, and Southwest Plume.
- (7) A single RI/FS Work Plan will be developed, encompassing all components of the Dissolved-Phase Plume remedial action; however, the remedial investigations may be conducted separately, and the results may be reported in three separate RI Reports—(1) Northwest Plume Outside Fence Including Seeps, (2) Northeast Plume Outside Fence, and (3) Southwest Plume and Remaining Inside Fence.
- (8) In addition to the development and submittal of three separate RI Reports, three separate Feasibility Studies, Proposed Plans, Record of Decisions, Remedial Design Work Plans, Remedial Design Reports, Remedial Action Work Plans, and Remedial Action Completion Reports also may be

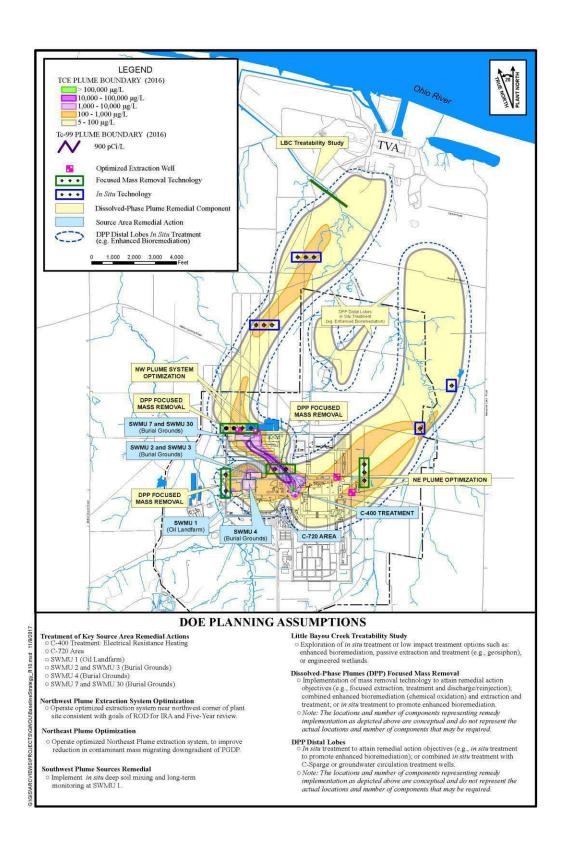


Figure 3.2. GWOU Baseline Strategy

- developed and submitted for each subproject—(1) Northwest Plume Outside Fence Including Seeps, (2) Northeast Plume Outside Fence, and (3) Southwest Plume and Remaining Inside Fence.
- (9) Investigation and remediation of the seep areas along Little Bayou Creek will be addressed as part of the Dissolved-Phase Plume remedial action.

Potential Additional Groundwater Sources

Scope

This project consists of potential sources (e.g., DNAPL) that are contributing to groundwater contamination and the dissolved-phase groundwater plumes under a building structure or newly identified sources not addressed under the other GWOU projects. The project scope includes the management, planning, assessments, CERCLA documents, remedial investigations, final remedial actions per an approved ROD, and preparation of required completion documentation.

This project is being reserved for other sources to groundwater contamination that may be identified in the future.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) A site evaluation (SE) will be conducted to determine if additional unknown sources to groundwater contamination are present based on historical and current groundwater data, process knowledge, interviews, and other documentation that suggest a release to groundwater has occurred.
- (2) Conduct an RI and FS (including fieldwork) following completion of the SE for identified sources.
- (3) Complete the necessary CERCLA documents supporting remedy selection (e.g., Proposed Plan, Record of Decision) and remedial design.
- (4) Implementation of the final remedial action for the identified sources, which are planned for VOCs, radionuclides, and polychlorinated biphenyls (PCBs).

C-400 COMPLEX OPERABLE UNIT

Scope

This project is intended to evaluate fully and take the necessary actions to address all environmental contamination in order to achieve a final remedial action for the entire C-400 Complex as shown in Figure 3.3. This scope is defined to include building demolition, a RI/FS for the entire C-400 Complex, and final remedial action that includes soils, groundwater sources, and slabs. The C-400 Complex action will address all sources of contamination, including, but not limited to, principal threat waste (PTW) (e.g., TCE DNAPL and high concentration TCE contamination). The C-400 Complex action has been prioritized in the cleanup schedule. The following is the scope.

- CERCLA Non-Time-Critical Removal Action (NTCRA) consisting of demolition of the C-400 Building structure. The building foundation (i.e., slab) will remain in place.
- CERCLA Final Remedial Action consisting of the following:



Figure 3.3. C-400 Complex—Scope of Final Action

- Conduct a combined Remedial Investigation/Feasibility Study (RI/FS) for the C-400 Complex area that includes an investigation of all remaining building structure(s) (e.g., slab and subsurface structures) and releases of any hazardous substances to soils and groundwater associated with the C-400 Building and C-400 Complex area operations (including, but not limited to, TCE DNAPL and high concentration TCE contamination areas considered PTW).
 - RI characterization to define the full nature and extent of all contamination from the surface down through the RGA and to include the upper McNairy.
- Remedy selection (proposed plan and ROD) to document a final remedial action(s) for all source areas and COCs requiring remediation for the entire C-400 Complex.
- Post-ROD documents (e.g., remedial design report, remedial action work plan) and implementation of a final remedial action(s) as specified in the ROD.

Key DOE Planning Assumptions from Life Cycle Baseline

The following elements summarize DOE's key planning assumptions for the C-400 Complex area.

- (1) Sequencing of work will occur in the following order:
 - a. Complete C-400 Building deactivation using DOE's Atomic Energy Act authority;
 - b. Demolition of the C-400 Building structure as a CERCLA NTCRA [the building foundation (i.e., slab) will remain in place];
 - c. Conduct an RI/FS (including fieldwork) following completion of building demolition;
 - d. Implement the final remedial action(s) for the entire C-400 Complex, including the Phase IIb area; and
 - e. Address Phase IIb Interim Action source area (as described in the Remedial Action Work Plan for the interim ROD) as part of this final remedial action. All completed work associated with the Phase I and Phase IIa will be documented in a Remedial Action Completion Report.
- (2) The final remedial action assumes to include the following:
 - a. Addressing all sources of contamination including, but not limited to, PTW (e.g., TCE DNAPL and high concentration TCE contamination) in the UCRS and RGA to include the upper McNairy, within the C-400 Complex OU, based on the results of the RI/FS.
 - b. Soils and slabs within the C-400 Complex will be addressed based on the results of the RI/FS. The current planning assumption is excavation of the contaminated media and slabs.
 - c. Dissolved-phase groundwater contamination will be addressed as part of the Dissolved-Phase Plumes Remedial OU.

BURIAL GROUNDS OPERABLE UNIT

In order to facilitate the development of subsequent documents, the FFA parties have agreed to group the Burial Grounds OU (BGOU) SWMUs into more manageable remedial action subprojects.

The BGOU will employ the CERCLA remedial process to accomplish the following goals (based on February 10, 2012, BGOU dispute resolution):

- Contribute to protection of groundwater by eliminating, reducing, or controlling sources of groundwater contamination;
- Prevent exposure to waste and contaminated soils that present an unacceptable risk from direct contact; and
- Treat or remove PTW wherever practicable, consistent with 40 CFR § 300.430(a)(1)(iii)(A).

The following are the SWMU-specific RAOs for SWMUs 5 and 6.

- Contribute to the protection of groundwater by eliminating, reducing, or controlling sources of groundwater contamination that will result in an exceedance of the MCL or risk-based concentration for residential use of groundwater in the absence of an MCL in RGA groundwater.
- Prevent exposure to waste or waste-related contaminated soils that exceed target cumulative excess lifetime cancer risks (ELCRs) and cumulative noncancer hazard indices (HIs) for the future industrial and future outdoor worker receptors. The acceptable cumulative risk levels for this RAO are defined as follows:
 - Surface Soil: cumulative ELCR < 1E-05 and cumulative HI \leq 1 for a future industrial worker
 - Subsurface Soil: cumulative ELCR < 1E-04 and cumulative HI \leq 1 for an future outdoor worker

The following are the SWMU-specific RAOs for SWMUs 2, 3, 7, and 30.

- Contribute to the protection of groundwater by eliminating, reducing, or controlling sources of groundwater contamination that could result in an exceedance in RGA groundwater of the MCL (or risk-based concentration for residential use of groundwater in the absence of an MCL).
- Prevent exposure to waste that exceeds target cumulative ELCRs and cumulative noncancer HIs for the future excavation worker receptor. The acceptable cumulative risk levels for this RAO are defined as follows:
 - Waste: cumulative ELCR < 1E-05 and cumulative HI ≤ 1 for a future excavation worker [considering a five-year exposure based upon the outdoor worker scenario in the 2013 Risk Methods Document]</p>
- Prevent exposure to contaminated soils that exceed target cumulative ELCRs and cumulative noncancer HIs for the future industrial and future excavation worker receptors. The acceptable cumulative risk levels for this RAO are defined as follows:
 - Surface Soil: cumulative ELCR < 1E-05 and cumulative HI \leq 1 for a future industrial worker [considering default exposures in the 2013 Risk Methods Document]
 - Surface and Subsurface Soil: cumulative ELCR < 1E-05 and cumulative HI \leq 1 for a future excavation worker [considering a five-year exposure based on the outdoor worker scenario in the 2013 Risk Methods Document]
- Treat or remove PTW wherever practicable, consistent with 40 § CFR 300.430 (a)(1)(iii)(A).

The SWMU-specific RAOs for SWMU 4 have been recommended in the RI/FS and will be developed further in the FS, which currently is under review and finalization.

BGOU Remedial (10 SWMUs)

Scope

The BGOU consists of the following 10 SWMUs:

- C-749: Uranium Burial Ground (SWMU 2)
- C-404: Low-Level Radioactive Waste Burial Ground (SWMU 3)
- C-747/748-B: Contaminated Burial Ground (SWMU 4)
- C-746-F: Burial Ground (SWMU 5)
- C-747-B: Burial Area (SWMU 6)
- C-747-A: Burial Ground and Burn Area (SWMUs 7 and 30)
- Residential/Inert Borrow Area/Old North-South Diversion Ditch (NSDD) Disposal Trench (SWMU 145)
- C-746-S: Residential Landfill (SWMU 9)³
- C-746-T: Inert Landfill (SWMU 10)³

Based on review of existing disposal records and sample data, the burial grounds contain various types of materials such as sanitary and/or hazardous waste; however, the known contents of each individual burial ground are specific to the material that was disposed of within the burial ground and are described in the specific CERCLA documents for each burial ground. Some of the burial grounds contain PTW that has released or may in the future release to soils and groundwater. Surface soil within BGOU SWMUs is being addressed by BGOU rather than Soils OU.

This burial grounds project is grouped as follows: (1) SWMUs 5 and 6; (2) SWMUs 2, 3, 7, and 30; (3) SWMU 4; and (4) SWMUs 9, 10, and 145. To facilitate phased implementation of remedial action, SWMUs 2, 3, 7, and 30 will be divided further, and separate CERCLA documents (i.e., proposed plan, ROD, remedial design work plan, remedial design report, remedial action work plan, and remedial action completion report) will be developed for SWMUs 2 and 3 and SWMUs 7 and 30.

Key DOE Planning Assumptions from Life Cycle Baseline

(1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the BGOU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential on-site waste disposal facility (OSWDF). The resequencing also assumes

³ Previously closed under solid waste regulations (C-746-T closed on 2/9/95; C-746-S closed on 8/4/95).

the OSWDF alternative would be identified and selected as the preferred alternative under the waste disposal alternatives (WDA) project.

- (2) A supplemental RI and the associated RI Report Addendum will precede the SWMUs 9, 10, and 145 FS.
- (3) SWMU 2, SWMU 3, SWMU 4, and SWMU 7 contain PTW.
- (4) Soil cover (18-inch) is expected to be included in the remedy selected for SWMU 145.
- (5) SWMUs 5 and 6 are expected to implement a Kentucky Subtitle D cap if containment is selected as the final remedy.
- (6) SWMUs 7 and 30 are expected to implement a Kentucky Subtitle D cap if containment is selected as the final remedy.
- (7) SWMUs 9 and 10 will be evaluated as part of the CERCLA process. Currently only limited actions (e.g., continue current solid waste landfill closure activities) are assumed to be required in the baseline for SWMUs 9 and 10.
- (8) Post-closure monitoring data are assumed to substantiate that capping remedies will provide long-term effectiveness, and supplemental remedial actions will not be required.
- (9) A groundwater monitoring system at each SWMU (e.g., upgradient and downgradient) will be employed to provide indication of future unanticipated releases and collect data on the effectiveness of the caps and *in situ* actions.

Additional Burial Grounds

Scope

This project includes the remaining burial grounds, as identified in Appendix 4 under Additional Burial Grounds. Currently there are two units identified: SWMU 472 and SWMU 520. The project scope includes the management, planning, assessments, CERCLA documents, RIs, final remedial actions per an approved ROD, and preparation of required completion documentation.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the BGOU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.
- (2) Conduct an RI and FS (including fieldwork) for SWMU 472 and SWMU 520.
- (3) Complete the necessary CERCLA documents supporting remedy selection (e.g., Proposed Plan, ROD) and remedial design.
- (4) It is assumed that these SWMUs are not contributing to groundwater contamination.

(5) The assumed remedial action for these SWMUs is excavation and disposal in a potential OSWDF (if selected).

SURFACE WATER OPERABLE UNIT

The Surface Water Operable Unit (SWOU) is being implemented in a phased approach consisting of a series of sequenced remedial and removal actions designed to accomplish the following goals:

- (1) Prevent human exposure to contaminated sediments presenting an unacceptable risk to on-site workers and off-site recreational users of surface water;
- (2) Prevent or minimize further off-site migration of contaminated sediments and surface water;
- (3) Reduce, control, or minimize contaminant sources contributing to sediment and surface water contamination; and
- (4) Evaluate and select long-term solutions for off-site surface water contamination to protect recreational users and ecological receptors.

A series of actions already have been completed toward meeting these goals, as depicted in Figure 3.4. The previous actions are summarized in Appendix 1 (Actions Taken to Date).

The SWOU consists of the specific SWMUs and areas of concern (AOCs) identified in Appendix 4 (Source Area by Operable Unit), and includes the soils/sediments and storm water corresponding with the points of discharge from facility piping to ditches, outfalls and Bayou and Little Bayou Creeks. Metals, radionuclides, and PCBs are the likely contaminants of interest for the SWOU.

Surface Water Remedial Action

Scope

The scope of this project includes an RI and FS remedy selection and implementation of any necessary response actions for on- and off-site areas, including Bayou Creek, Little Bayou Creek, and Outfalls 001, 002, 008, 009, 010, 011, 012, 013, and 015, and scoping for and completion of a baseline ecological risk assessment for PGDP. This OU also will address the five outfalls formerly identified in the Lagoons and Ditches OU (Outfalls 005, 006, 017, 019 and 020). The Surface Water Remedial Action includes evaluation of all areas with ditches from PGDP that drain to Bayou and Little Bayou Creeks to the Ohio River, including those areas previously addressed in the SWOU Removal Action. The timing and sequence of any remedial actions will require coordination with ongoing site activities, including Depleted Uranium Hexafluoride (DUF₆) operations to prevent recontamination and consideration of ongoing permitted discharges. The SWOU will address contaminated media (e.g., surface water and sediments) associated with ditches and creeks as part of the remedial action consistent with the NCP and EPA guidance. A final remedial action decision for the lagoons will be addressed as part of the Lagoons OU.

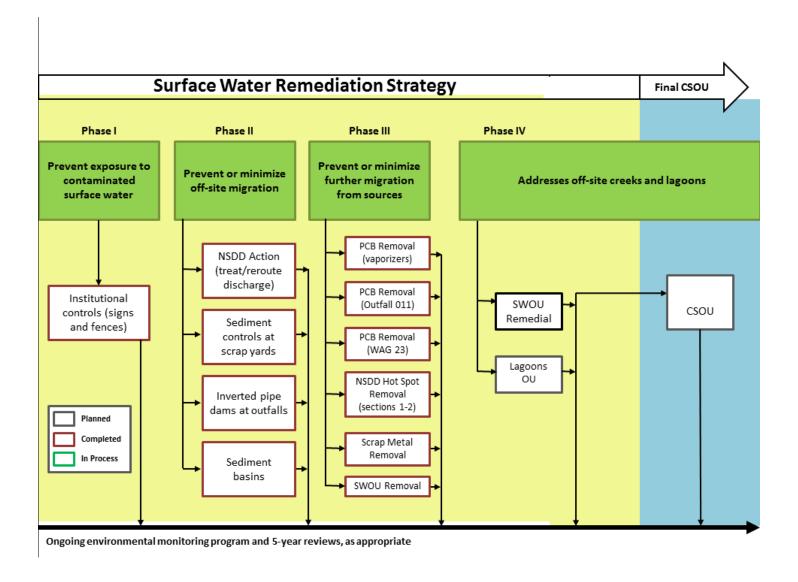


Figure 3.4. Surface Water Remediation Strategy

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the SWOU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.
- (2) RI characterization will be conducted in a phased approach, with uranium-238, cesium-137, and Total PCBs being used as indicator parameters during the first phase, and will be followed by a more comprehensive list of analyte sampling (i.e., PCBs, metals, radionuclides, and volatile organic analytes during the second phase to be used for risk assessment).
- (3) DOE's current baseline and budget assume that the use of existing data will be sufficient for final characterization; however, EPA and Kentucky have raised concerns, based upon the extended time frame for implementation of the RI and FS and the potential for changing site conditions as a result of plant activities, that the collection of additional samples is warranted. The FFA parties agree to revisit the scope of characterizing the internal ditches prior to implementation of the RI and FS Work Plan.⁴
- (4) Little Bayou Creek and Bayou Creek will be investigated to the confluence with the Ohio River.
- (5) Biota sampling will be required to support an ecological risk assessment for off-site portions of the SWOU.
- (6) The assumed remedial action is excavation of contaminated sediments in outfalls and creeks and will involve coordination with the U.S. Army Corps of Engineers. No operation and maintenance (O&M) period is assumed to be needed to achieve RAOs.
- (7) The RI/FS Work Plan is comprehensive, encompassing all components of the SWOU remedial action; however, the document is divided by watershed (Little Bayou Creek and Bayou Creek) to support independent execution of sampling and documentation of results by watershed.
- (8) A sitewide ecological risk assessment will be completed for both watersheds and included within the RI/FS Report.
- (9) Individual FSs, Proposed Plans, RODs, Remedial Design Work Plans, Remedial Design Reports, Remedial Action Work Plans, and Remedial Action Completion Reports may be developed and submitted per watershed.
- (10) Investigation and remediation of the seep areas along Little Bayou Creek will be addressed as part of the GWOU.

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⁴ Existing information for internal ditches will be used for characterization. Additional sampling will focus primarily on areas between the KPDES compliance points and drainage into Little Bayou Creek and Bayou Creek.

LAGOONS OPERABLE UNIT

Scope

This OU consists of the specific SWMUs and AOCs identified in Appendix 4 (Source Area by OU). It includes both process and water treatment system lagoons and associated soils/sediments. This OU includes the lagoons identified in Appendix 4 under Lagoons OU. Currently, six lagoons are identified (SWMU 17, SWMU 18, SWMU 21, SWMU 22, SWMU 23, and SWMU 171). This OU will address the primary inputs to the outfalls to ensure no risk pathway will continue to contribute contamination to the PGDP outfalls once the remedial actions are completed. For example, the C-613 Sedimentation Basin will be addressed to the extent that no recontamination pathway exists. The project scope includes the management, planning, assessments, CERCLA documents, RIs, final remedial actions per an approved ROD, and preparation of required completion documentation.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the Lagoons OU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.
- (2) Radionuclides, metals, and PCBs are the primary COCs. Other COCs will be considered on a case-by-case basis.
- (3) RI characterization will be conducted for each lagoon to determine the individual contaminants or radionuclides of potential concern (COPCs).
- (4) The assumed remedial action is excavation of contaminated sediments in the lagoons and disposed in a potential OSWDF (if selected). The areas may be backfilled with clean soil or graded for natural sloping and runoff, depending on the verification sampling results. No O&M period is assumed to be needed to achieve RAOs.
- (5) The RI/FS Work Plan is comprehensive, encompassing all components of the remedial action.
- (6) The RI data will support the sitewide ecological risk assessment conducted as part of the SWOU Remedial Action.
- (7) Complete the necessary CERCLA documents supporting remedy selection (e.g., Proposed Plan, ROD) and remedial design.
- (8) The OU may be divided further into OUs for the C-616-E and C-616-F Lagoons and the C-611 Water Treatment Plant Lagoons due to the timing of shutdown for the two systems being independent of each other. The outfalls formerly under this OU have been moved and will be addressed as part of the SWOU Remedial Action.

SOILS OPERABLE UNIT

The Soils OU has been implemented in a phased approach consisting of remedial and removal actions to accomplish the following goals:

- Prevent human exposure to contamination presenting an unacceptable risk;
- Prevent or minimize further off-site migration; and
- Reduce, control, or minimize contaminated soil hot spots contributing to off-site contamination.

The original scope of the Soils OU consisted of 86 SWMUs/AOCs; three inactive facilities (SWMUs 181, SWMU 40, and SWMU 19); and the soil/rubble areas that have been identified to date. The scope of the removal action for two of the three inactive facilities has been completed, except excavation of contaminated soil at the C-403 Neutralization Tank (SWMU 40). SWMU 40 will be addressed as part of the C-400 OU Complex. The scope for the soil/rubble areas also has been completed. During the development of the RI/FS Work Plan/Report, it was determined that only 63 of the 86 SWMUs/AOCs included within the original scope could be addressed under this OU, based upon accessibility. Those SWMUs/AOCs identified as inaccessible will be addressed as part of the Soils and Slabs OU scope.

The Soils OU scope focuses on accessible plant surface soils (ground surface to 10 ft bgs and 16 ft bgs in the vicinity of pipelines) not associated with PGDP operations. Sequencing of the work will be determined based on OU-specific circumstances, as mutually agreed by the FFA parties.

A series of Soils OU actions has been completed to date (See Figure 3.5). These previous actions are summarized in Appendix 1 (Actions Taken to Date).

Soils OU Remedial Action

Scope

The scope of this project includes an RI and FS remedy selection, and implementation of any necessary response actions for the 63 SWMUs/AOCs listed in Appendix 4. Sites are included in this OU based on the expectation that they primarily pose a direct contact threat to on-site industrial workers and likely are not a migration threat to groundwater or surface water. The project has incorporated results from previous actions and sitewide evaluations/surveys. Results of the Soils OU RI will be used in scoping for and completion of the baseline ecological risk assessment conducted under the SWOU.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the Soils OU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.
- (2) SWMU 27 was sampled as part of Soils RI. Based upon the sampling results, the contents of the tank were removed to the extent practicable and disposed of in accordance with the approved Time-Critical Removal Notification. A remedial decision for SWMU 27 will be selected as part of the Soils and Slabs OU.
- (3) SWMUs requiring action will be evaluated in multiple FSs that will focus on the following likely response actions: no action, institutional controls, and excavation. Individual Proposed Plans, RODs, Remedial Design Work Plans, Remedial Design Reports, Remedial Action Work Plans, and Remedial Action Completion Reports may be developed and submitted per grouping. It is currently

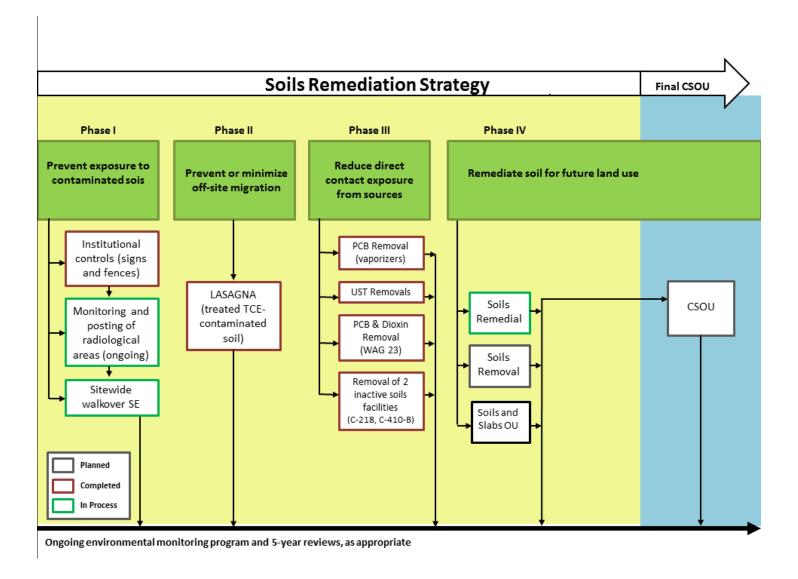


Figure 3.5. Soils Remediation Strategy

anticipated that the Soils Remedial Action may be divided into two groupings based upon investigation results. Once the RI data are evaluated, the proposed two groupings may be combined or divided further.

(4) Targeted excavation is the assumed remedy with the majority of the waste being placed in a potential OSWDF (if selected).

Soils OU Removal Action

Scope

This project is contingent upon new sampling results of the RI or newly identified release information for the Soils OU Remedial Action. Scope will include addressing any of the Soils OU SWMUs/AOCs that warrant a removal action. SWMU 27 was the only soil SWMU/AOC that had been identified that required removal action. The following assumptions will remain for project planning purposes should additional soil removal actions be required in the future.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) A single engineering evaluation/cost analysis and Action Memorandum will be developed and submitted for those SWMUs requiring removal action.
- (2) Separate Removal Action Reports may be developed.
- (3) A time-critical removal action is not warranted.

SOILS AND SLABS OPERABLE UNIT

Scope

This OU includes the units identified in Appendix 4 Soils and Slabs OU. This OU also includes soil units that were determined to be inaccessible during development of the Soils OU RI/FS Work Plan/Report. Other units have been included in this OU for slabs and underlying soils for demolished facilities. The project scope includes the management, planning, assessments, CERCLA documents, RIs, final remedial actions per an approved ROD, and preparation of required completion closure documentation. Each unit in this OU will be evaluated through the CERCLA process. This OU will be segregated into multiple subprojects. The combination and number of units within each will be defined prior to implementation to take advantage of opportunities that may arise to address a limited subset of units.

For planning purposes, the property under control of DOE has been divided into 17 geographical areas (GAs) to assist in the focus of long-term planning efforts for DOE property (See Figure 3.6). GAs are artificial boundaries established for the purpose of planning and evaluating areas for footprint reduction, deactivation and decommissioning, and remediation integration. No facilities or SWMUs/AOCs are located completely within two of the larger GAs (GA 3 and GA 7). GA 6 does not contain any facilities and GA 8 includes a minimal number of facilities associated with permitted landfill operations. Figure 3.6 also includes five sites that have been considered for a potential on-site waste disposal facility (Site 1, 5A, 3A, 9, 11). These have been included for reference purposes only. For planning purposes, the Soils and Slabs OU is using these geographical divisions to plan and group the actions that will address the remaining balance of plant soils and slabs.

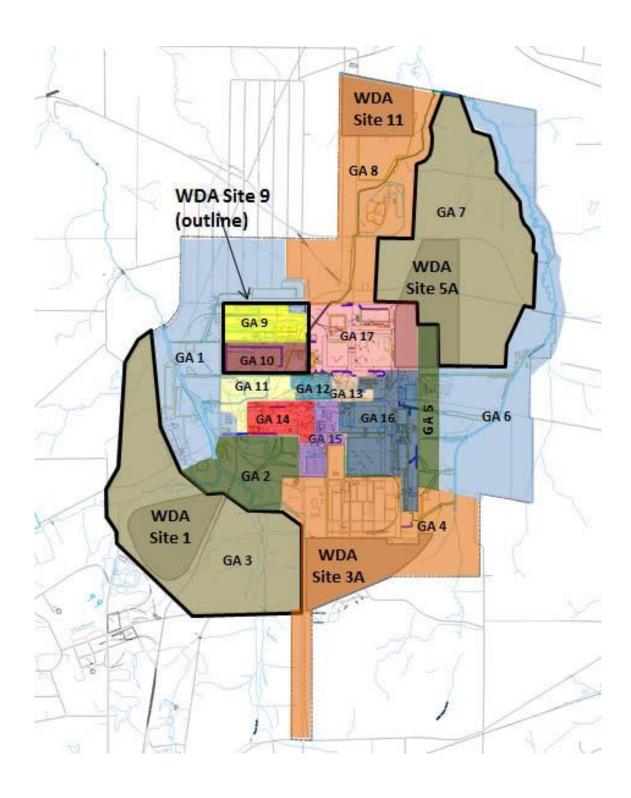


Figure 3.6. DOE Property Geographical Areas

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the Soils and Slabs OU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.
- (2) Radionuclides, metals, VOCs, and PCBs are the primary COCs. Other COCs will be considered on a case-by-case basis, based on process knowledge.
- (3) The SWMUs that require an RI will be evaluated in multiple FSs that will focus on the following likely response actions: no action, institutional controls, and excavation. Additional SWMUs may be identified as facilities are demolished, based on analytical data of the slab and/or surrounding soils or process knowledge that there was a release or high probability of release that would have impacted the soils around or under the slab. SEs will be conducted for those GAs where there has been a known or potential threat of release.
- (4) RI characterization will be conducted to identify the individual COPCs.
- (5) The assumed remedial action is excavation of contaminated soils and slab and disposed in a potential OSWDF (if selected). The areas may be backfilled with clean soil or graded for natural sloping and runoff, depending on the verification sampling results. No O&M period is assumed to be needed to achieve RAOs.
- (6) The RI/FS Work Plan is comprehensive, encompassing all components of the remedial action.
- (7) Complete the necessary CERCLA documents supporting remedy selection (e.g., Proposed Plan, ROD) and remedial design.
- (8) The baseline assumption for the CERCLA remedial action scope for GAs includes identified SWMUs/AOCs in the Soils and Slabs OU and facility slabs and associated soils where there was a potential threat of release. The results of the SE and scoping will determine the appropriate CERCLA action; however, for planning purposes, the RI and FS process through Remedial Action Completion is assumed for Gas, except for GA 3, GA 6, GA 7, and GA 8. GA 3 and GA 7 do not have facilities or currently identified SWMU/AOCs; therefore, no planning documents are included. GA 6 and GA 8 include a few discrete SWMUs/AOCs that are covered by other OUs; therefore, no planning documents are included.

FACILITY D&D OPERABLE UNIT

For the Decontamination and Decommissioning (D&D) OU under the SMP, this OU includes decommissioning activities as defined in the joint policy issued under a DOE and EPA Memorandum dated May 22, 1995, *Policy on Decommissioning DOE Facilities under CERCLA*. Disposition of the GDP consists of two phases: 1) the DOE facilities that were inactive and scheduled for D&D Pre-GDP shutdown, and 2) the facilities previously leased to USEC and/or other DOE facilities planned for D&D after shutdown of the GDP. As part of the lease turnover requirements, USEC was required to (1) shutdown the GDP properly; (2) perform limited deactivation of the USEC leased operations; (3) place the leased operations into a safe, secure condition and remove any immediate threats to human health and

safety; (4) remove all USEC waste, including any hazardous waste; and (5) remove USEC-owned property not accepted by DOE under the terms of the lease turnover.

D&D OPERABLE UNIT (PRE-GDP SHUTDOWN)

This OU consisted of 17 (15 small inactive facilities, C-340 Complex, and C-410/C-420 Complex). The completion of the C-410/C-420 Complex in FY 2016 marks the completion of the D&D OU Pre-GDP shutdown scope. Decommissioning of CERCLA facilities completed to date is summarized in Appendix 1 (Actions Taken to Date).

REMAINING D&D OPERABLE UNIT

DOE is proceeding with deactivation work of the remaining facilities not operating to support DOE site activities. The joint policy issued under a DOE and EPA Memorandum dated May 22, 1995, *Policy on Decommissioning DOE Facilities under CERCLA*, establishes a framework for conducting of decommissioning of DOE facilities and provides guidance to EPA Regions and DOE Operations Offices on the use of CERCLA response authority to decommission DOE facilities. Key elements of the Policy provide for the following:

- DOE to conduct CERCLA removal SEs to determine whether a substantial threat of a release exists that warrants a CERCLA NTCRA to protect public health, welfare, or the environment, unless the circumstances at the facilities make in inappropriate;
- DOE to consult with EPA in attempt to reach consensus on decisions regarding the use of CERCLA response actions; and
- Conducting demolition of facilities that pose a substantial release threat as CERCLA NTCRA.

The Policy states that DOE is required to conduct a removal SE in accordance with the NCP and the requirements of any interagency agreements (i.e., FFA). Section IX. (Site Evaluation) of the FFA requires that DOE conduct integrated SEs upon discovery of an area with potential or known release. The FFA further requires DOE to provide the removal SE Reports as part of the removal notification to EPA and KY for review and approval for NTCRAs.

For purposes of implementing this OU strategy, the "facilities" DOE will evaluate for inclusion in the Remaining D&D OU will consist of those permanent structures supported by a concrete slab and/or foundation that have a history of industrial operations. To support this process, 681 DOE properties/structures listed on the PGDP Site Map (Rev. 6) were reviewed and underwent an evaluation to identify those properties/structures that met the above definition of "facilities" [See Appendix 8 (FY 2018 SMP)]. The following categories were established as a result of the evaluation.

- Industrial Facilities that DOE has determined pose a potential threat of release of hazardous substances to the environment that warrant demolition or a removal SE. These facilities are listed as part of the D&D OU in Appendix 4.
- Administrative, nonindustrial, support facilities that have no potential for release and are not subject to a CERCLA response action under the FFA.

• Balance of Plant Facilities are those facilities pending future CERCLA determinations regarding a release or potential threat of release. A process will be scoped in support of the FY 2019 SMP for these facilities. These facilities are listed in Appendix 6.

For those facilities that require a CERCLA response action, NTCRAs will be utilized for demolition, where warranted.⁵

For those industrial facilities in Appendix 4 that require a removal SE, DOE will submit a report within 120 days (or other time frame agreed to by the FFA parties) after completion of deactivation. The SE Report will document any known release or threat of any release from those buildings and the magnitude of the threat of release (i.e., whether there is a substantial threat of release). The SE Report shall state whether demolition of the facility should be conducted using a CERCLA NTCRA and will serve to designate any facility or portions thereof that are related to any identified release as a SWMU and/or AOC. If a facility was designated previously in its entirety as a SWMU/AOC requiring CERCLA Action, DOE may use the existing SE, update or conduct a new SE, or include the SE as part of the removal notification for the NTCRA.

Administrative, nonindustrial support facilities have been identified as having no potential for release. Consequently, these administrative, nonindustrial support facilities will not be included as part of the D&D OU scope. DOE reviewed and evaluated the historical and current information to support the conclusion that these facilities do not pose a threat of release. DOE has documented those facilities and relevant information in a listing that has been placed into the administrative record file and into the FY 2018 SMP as Appendix 8. These facilities will not be decommissioned under CERCLA. DOE will complete demolition of these administrative/support facilities under applicable laws, regulations, and DOE requirements. As agreed to by the FFA parties, no further consultation with the agencies under the FFA will be conducted for these facilities.

Because DOE is in the early stages of deactivation, the listing and categorization in the appendices will be updated to reflect the current status and information with each SMP update. For planning purposes, the D&D OU is using the same geographical divisions described in the Soils and Slabs OU to plan and group the actions that will address the balance of plant facilities soils and slabs for those determined to be in the D&D OU.

Key DOE Planning Assumptions from Life Cycle Baseline

(1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the Remaining D&D OU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.

(2) Radionuclides, metals, and PCBs are the primary COCs. Other COCs will be considered on a case-by-case basis based on process knowledge.

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⁵ The D&D OU will employ the CERCLA removal action process to administer decommissioning activities of excess buildings (i.e., inactive with no reuse potential) that have a known or potential release of contamination to the environment. The 1995 DOE and EPA "Memorandum: Policy on Decommissioning DOE Facilities under CERCLA," establishes that decommissioning activities will be conducted as NTCRAs, unless the circumstances at the facilities make it inappropriate.

- (3) An SE will be conducted for facilities in Appendix 4 within 120 days from completion of deactivation for each facility.
- (4) CERCLA NTCRAs will be conducted for Appendix 4 facilities that already have been designated for demolition down to slab. Contaminated slabs and associated underlying soils will be incorporated into the Soils and Slabs OU. Waste will be dispositioned in either a potential OSWDF (if selected) or non-CERCLA disposal facility.
- (5) CERCLA NTCRAs will be conducted for a portion of Appendix 6 facilities demolition down to slab. Contaminated slabs and associated underlying soils will be incorporated into the Soils and Slabs OU for those facilities requiring CERCLA NTCRAs, based on information from the SE. Waste from Appendix 6 facilities that are dispositioned under CERCLA will be disposed in a potential OSWDF (if selected) or non-CERCLA disposal facility. Waste from Appendix 6 facilities that are not dispositioned under CERCLA will be disposed in a non-CERCLA disposal facility as the most cost effective option.
- (6) Administrative, nonindustrial support facilities will not undergo demolition under CERCLA; however, these facilities will be demolished and dispositioned under applicable laws, regulations, and DOE requirements. Facility waste will be disposed of in non-CERCLA disposal facility as the most cost-effective option.
- (7) The CERCLA scope for GAs will include only those facilities that have been determined to pose a potential threat of release. GA 1, GA 10, GA 13, and GA 14 currently are the only ones that include facilities where a potential threat of release during demolition has been determined. The remaining GAs plus Buildings C-750 and C-360 have not undergone deactivation, and the evaluation is not yet complete. GA 3, GA 6, and GA 7 do not have facilities. GA 8 includes only C-746-U Landfill support buildings determined not to pose a threat of release, and the buildings will be completed with the landfill closure activities.

DUF₆ FOOTPRINT UNDERLYING SOILS OPERABLE UNIT

Scope

This OU includes the units identified in Appendix 4 under DUF₆ Footprint Underlying Soils OU. This OU currently has 5 SWMUs that are located beneath or immediately adjacent to the DUF₆ facility. These units existed prior to construction of the DUF₆ facility; as such, the scope of this OU is limited only to those SWMUs. The scope does not include D&D or remediation of the currently operating DUF₆ facility.

The project scope includes the management, planning, assessments, CERCLA documents, RIs, final remedial actions per an approved ROD, and preparation of required completion closure documentation. Each unit in this OU will be evaluated through the CERCLA process.

Key DOE Planning Assumptions from Life Cycle Baseline

(1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, finalization of the decision documents and implementation of any necessary CERCLA response actions for the DUF₆ OU will be resequenced to an out-year activity. The resequencing provides for any excavation activities (if that alternative is selected) to coincide with availability of a potential OSWDF. The resequencing also assumes the OSWDF alternative would be identified and selected as the preferred alternative under the WDA project.

- (2) The RI investigation for this OU will be sequenced and scheduled for implementation after the DUF₆ facility has ceased operation and undergone D&D.
- (3) Radionuclides, metals, VOCs, and PCBs are the primary COPCs. Other COPCs will be considered on a case-by-case basis, based on process knowledge.
- (4) The RI/FS Work Plan is comprehensive, encompassing all components of the remedial action.
- (5) Complete the necessary CERCLA documents supporting remedy selection (e.g., FS, Proposed Plan, ROD) and remedial design.
- (6) The assumed remedial action is excavation of contaminated soils and slab media and disposed in a potential OSWDF (if selected). The areas may be backfilled with clean soil or graded for natural sloping and runoff, depending on the verification sampling results. No O&M period is assumed to be needed to achieve RAOs.

FINAL COMPREHENSIVE SITE OPERABLE UNIT⁶

The final CSOU evaluation will occur following completion of the D&D OU, completion of the DUF₆ Footprint Underlying Soils OU, and completion of cleanup of each of the specific OUs. As final actions for SWMUs are completed, those SWMUs will be placed in the CSOU section of Appendix 4 of the SMP to ensure that the results of the completed action are accounted for in the overall CSOU evaluation. The final CSOU will maximize use of the relevant data from previous cleanup activities and document the residual contamination and risk. Circumstances may dictate additional field activities as a result of evaluating existing information; however, it is the assumption of the FFA parties that any SWMUs entered into the CSOU will not require any additional response action. A work plan will compile and evaluate the existing information to determine if any data gaps exist related to conducting a sitewide evaluation. The RI will include a sitewide baseline human health and ecological risk assessment to evaluate residual risks and ensure all actions taken to date, when considered collectively, are protective of human health and the environment from a sitewide perspective. If the results of the final CSOU BRA conclude that overall protection of human health and the environment has been achieved, a final Proposed Plan and no further action ROD will be developed. If the BRA concludes that residual contamination still poses an unacceptable risk that exceeds the criteria established in Section XII of the FFA, a final FS will be developed, followed by a final Proposed Plan, ROD, and implementation of the final remedy. DOE intends to conduct necessary long-term monitoring to evaluate progress toward achieving RAOs. When no further response is appropriate and all the RAOs for all remedies have been achieved, PGDP will be eligible for deletion from the National Priorities List (NPL). It should be noted that partial NPL delisting may be pursued for eligible areas prior to the CSOU.

⁶ The FFA, as currently written, contemplates multiple CSOUs, consisting of those associated with integrator units (i.e., groundwater, surface water) and a final CSOU completed after issuance of all final RODs for the site. The FFA parties acknowledge that the scope description above is intended to reflect a single CSOU to address all media, and a future FFA modification will address any inconsistencies between the FFA and SMP strategy.

OTHER PROJECTS

CERCLA Waste Disposal Alternative Evaluation

Scope

The scope of this project is to evaluate disposal options for CERCLA waste that will be generated as a result of implementing removal and remedial actions for all of the OUs. The evaluation of disposal options will be conducted using the CERCLA remedial decision-making process. Accordingly, the scope of the RI/FS will be focused and tailored to the nature of this project (i.e., this is not a typical project where potential releases are investigated, evaluated, and remediated). Additionally, due to significant public interest in the project, frequent interactions with the public are expected throughout the project life cycle. The decision about whether to implement an on-site disposal facility will be documented in a ROD.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Based on DOE's recent reprioritization and proposal to focus near-term cleanup efforts on the C-400 Complex, preparation/finalization of the decision documents (i.e., Proposed Plan, ROD) and construction of any OSWDF (if selected as the preferred option under the WDA project) would be resequenced to an out-year activity to coincide with the timing of when waste generation from decommissioning of GDP facilities and remediation of the burial grounds is projected to occur.
- (2) A revised D1 RI/FS Report will be issued with updated information on waste types and volumes and other related data pertinent to remedy selection. Assumed waste types include the following categories: low-level waste (LLW), Resource Conservation and Recovery Act (RCRA), Toxic Substances Control Act (TSCA), LLW/RCRA, LLW/TSCA, LLW/RCRA/TSCA, classified wastes, asbestos containing materials, and nonhazardous solid.
- (3) A potential OSWDF (if selected) will not accept transuranic waste or waste from facilities other than PGDP.
- (4) The DUF₆ facility will not be disposed of in the OSWDF (if selected); however, any contamination in the previously defined SWMUs/AOCs that lie beneath the DUF₆ facility will be placed in the OSWDF (if selected).
- (5) Implementation of the ROD⁷ may require resequencing of other site work.
- (6) Final waste acceptance criteria will be defined during the post-ROD design phase.

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⁷ Regulatory expectations are that sufficient design and waste acceptance criteria information will be available to support the ROD.

APPENDIX 4 SOURCE AREA BY OPERABLE UNIT



Solid Waste Management Units/Areas of Concern by Operable Unit

	C-400 COMPLEX			
Operable Unit	Subpr	oject	SWMU	Description
			No.	
	C-400	D&D	Other	C-400 Building [building foundation (i.e., slab) will remain in
	C-400	Dab		place]
			11	C-400 TCE Leak Site
C-400			40	C-403 Neutralization Tank slab and underlying soils
Complex OU	C-400		47	C-400 Technetium Storage Tank Area
Complex 00	Reme		98	C-400 Basement Sump
	Acti	ion	203	C-400 Discard Waste System slab and underlying soils
			480	C-402 Lime House building slab and underlying soils
			533	TCE Spill Site from TCE Unloading Operations at C-400
	1			GROUNDWATER
	C-400 I		11	C-400 TCE Leak Site
	Reme Acti		533	TCE Spill Site from TCE Unloading Operations at C-400
	South	art	1	C-747-C Oil Land Farm
	Plume S		211 A	C-720 TCE Spill Site Northeast
	Fluine S	ources	211 B	C-720 TCE Spill Site Southeast
GWOU	Dissolved- Phase Plumes		201	Northwest Groundwater Plume
			202	Northeast Groundwater Plume
			210	Southwest Groundwater Plume
	Potential		NA	This operable unit is being reserved for remaining sources to
	Additional			groundwater contamination that may be identified in the future
	Ground			
	Sour	ces	-	
				URFACE WATER
			58	NSDD (Outside) (includes KPDES 003)
			60	C-375-E2 Effluent Ditch (KPDES 002) ¹
			61	C-375-E5 Effluent Ditch (KPDES 013) ¹
	SW		62	C-375-S6 SW Ditch (KPDES 009) ¹
	VO	R	63	C-375-W7 Oil Skimmer Ditch (KPDES 008 and KPDES 004)
	U F	em	66	C-375-E3 Effluent Ditch (KPDES 010)
CHIOLI	en	OV	67	C-375-E4 Effluent Ditch (C-340 Ditch) (KPDES 011)
SWOU	ned	al /	68	C-375-W8 Effluent Ditch (KPDES 015)
	SWOU Remedial Action	Removal Action	69	C-375-W9 Effluent Ditch (KPDES 001)
		on	92	Fill Area for Dirt from the C-420 PCB Spill Site
	tioi		97	C-601 Diesel Spill
	n		102B	Plant Storm Sewer associated with C-333-A, C-337-A, C-340,
		_	1.00	C-535, and C-537 ¹
			168	KPDES Outfall Ditch 012 ¹
			526	Internal Plant Drainage Ditches (includes KPDES 016) ²

¹ The results of the Surface Water Operable Unit (SWOU) (On-Site) Site Investigation determined that there were no unacceptable levels of risk to current and anticipated future receptors that warranted inclusion of Solid Waste Management Unit (SWMU) 60 (Outfall 002), SWMU 168 (Outfall 012), or SWMU 102 [Paducah Gaseous Diffusion Plant (PGDP) storm sewer systems associated with C-333-A, C-337-A, C-340, C-535, and C-537]. As a result, no action will be taken for these SWMUs as originally planned under the SWOU removal action. These SWMUs will be evaluated further as part of the SWOU remedial action. It also should be noted that during development of the Sampling and Analysis Plan (SAP) for SWOU (On-Site) Removal Action, Outfall 009 and Outfall 013 were evaluated. This assessment of the outfalls, which included a review of historical data, indicated that Outfall 009 and Outfall 013 did not require an early action, and further assessment of Outfall 009 and Outfall 013 would be addressed during the Comprehensive Site Operable Unit (CSOU). Based upon current site strategy, Outfall 009 and Outfall 013 also will be addressed as part of the SWOU remedial action.

² Kentucky Pollutant Discharge Elimination System (KPDES) Outfall 016, in its entirety, will be addressed as part of the SWOU Remedial Investigation.

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	SURFACE WATER (CONTINUED)			
Operable Unit	Subproject	SWMU No.	Description	
		64	Little Bayou Creek	
		65	Bayou Creek	
		93	Concrete Disposal Area East of Plant Security Area	
		105	Concrete Rubble Pile (3)	
		106	Concrete Rubble Pile (4)	
	SW	107	Concrete Rubble Pile (5)	
	SWOU Remedial Action	108	Concrete Rubble Pile (6)	
	JR	109	Concrete Rubble Pile (7)	
CMOH	em	113	Concrete Rubble Pile (11)	
SWOU	1ed	129	Concrete Rubble Pile (27)	
	ial -	175	Concrete Rubble Pile (28)	
	Acı	185	C-611-4 Horseshoe Lagoon (includes KPDES 014)	
	lior	199	Bayou Creek Monitoring Station	
		205	Eastern Portion of Yellow Water Line	
		549	Dirt/Concrete Rubble Pile near Outfall 008	
		550	Concrete Culvert Sections Located on the West Bank of the	
			Ditch Leading to Outfall 001	
		Others	Outfalls 017, 018, 019/020, and 526 and associated ditches	
			LAGOONS	
		17	C-616-E Sludge Lagoon	
	Process	18	C-616-F Full-Flow Lagoon	
T	Lagoons	171	C-617-B Lagoon	
Lagoons OU	Water	21	C-611-W Sludge Lagoon	
00	Treatment	22	C-611-Y Overflow Lagoon (includes KPDES 006)	
	System	23	C-611-V Lagoon (includes KPDES 005)	
	Lagoons			
			BURIAL GROUNDS	
		2	C-749 Uranium Burial Ground	
		3	C-404 Low-Level Radioactive Waste Burial Ground	
		4	C-747 Contaminated Burial Ground	
	BGOU	5	C-746-F Classified Burial Ground	
	Remedial	6	C-747-B Burial Area	
	(10	7	C-747-A Burial Ground	
BGOU	SWMUs)	9	C-746-S Residential Landfill	
		10	C-746-T Inert Landfill	
		30	C-747-A Burn Area	
		145	Residential/Inert Landfill Borrow Area (P-Landfill)	
	Additional	472	C-746-B Pad	
	Burial Grounds	520	Scrap Material West of C-746-A	

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	SOILS			
Operable Unit	Subproject	SWMU No.	Description	
CIII		1	C-747-C Oil Land Farm	
		13	C-746-P Clean Scrap Yard ³	
		14	C-746-E Contaminated Scrap Yard	
		15	C-746-C Scrap Yard ³	
		19	C-410-B HF Neutralization Lagoon	
		26	C-400 to C-404 Underground Transfer Line ³	
		56	C-540-A PCB Waste Staging Area ^{3, 4}	
		57	C-541-A PCB Waste Staging Area ⁴	
		76	C-632-B Sulfuric Acid Storage Tank	
		77	C-634-B Sulfuric Acid Storage Tank ^{3, 5}	
		80	C-540-A PCB Spill Site ³	
		81	C-541-A PCB Spill Site	
		99 B	C-745 Kellogg Bldg. Site—Septic Tank/Leach Field	
		138	C-100 Southside Berm	
		153	C-331 PCB Soil Contamination (West)	
		156	C-310 PCB Soil Contamination (West Side)	
	_	158	Chilled-Water System Leak Site	
		160	C-745 Cylinder Yard Spoils (PCB Soils)	
		163	C-304 Bldg./HVAC Piping System (Soil Backfill)	
	G . 11.	165	C-616-L Pipeline & Vault Soil Contamination	
Soils OU	Soils	169	C-410-E HF Vent Surge Protection Tank	
	Remedial -	170	C-729 Acetylene Bldg. Drain Pits	
		180	Outdoor Firing Range (WKWMA)	
		181	Outdoor Firing Range (PGDP)	
		194	McGraw Construction Facilities (Southside)	
		195	Curlee Road Contaminated Soil Mounds	
		196	C-746-A Septic System	
		200	Soil Contamination South of TSCA Waste Storage Facility	
		204	Dykes Road Historical Staging Area ³	
		211 A	C-720 TCE Spill Site Northeast ³	
		212	C-745-A Radiological Contamination Area	
		213	OS-02	
		214	OS-03	
		215	OS-04	
		216	OS-05	
		217	OS-06	
		219	OS-08	
		221	OS-10	
		222	OS-11	
		224	OS-13 ³	
		225A	OS-14 ³	

³ These SWMUs/areas of concern (AOCs) will be evaluated further under a Soils OU RI 2 and addressed by a subsequent Soils

OU feasibility study.

⁴ SWMUs 56 and 57 are located within, and will be addressed as part of, SWMUs 80 and 81, respectively.

⁵ This SWMU was evaluated as part of the Soils Operable Unit. The soils and underlying slabs associated with this SWMU will be addressed under the Soils and Slabs OU as part of post-GDP shutdown activities.

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	SOILS (CONTINUED)			
Operable Unit	Subproject	SWMU No.	Description	
	1 3	225 B	Contaminated Soil Area near C-533-1 DMSA OS-14 ³	
		227	OS-16	
		228	OS-17	
		229	OS-18 ³	
		486	Rubble Pile WKWMA (approximately 116 ft off roadside)	
		487	Rubble Pile WKWMA (approximately 483 ft off roadside)	
		488	PCB Contamination Area by the C-410 Trailer Complex	
		489	Septic Tank North of C-710 Laboratory	
		492	Contaminated Soil Area Near Outfall 010	
		493	Concrete Rubble Piles Near Outfall 001	
		517	Rubble and Debris Erosion Control Fill Area	
	~	518	Field South of C-746-P1 Clean Scrap Yard	
Soils OU	Soils	520	Scrap Material West of C-746-A	
(Continued)	Remedial (Continued)	531	Aluminum Slag Reacting Area (C-746-H4) near the C-746-A Facility	
		541	Contaminated Soil Area South of Outfall 011	
		561	Soil Pile I	
		562	Soil Piles C, D, E, F, G, H, J, K, and P in subunit 1 north of Soil Pile I on the west bank of Little Bayou Creek	
		563	Soil Piles 20, CC, and BW in subunit 4 north of outfall 012 west of Little Bayou Creek	
		564	Soil Pile AT in subunit 5 that consists of three soil areas on the east side of the North-South Diversion Ditch north of the P-, S-, and T-Landfills	
		565	Rubble Area KY-19 (along Bayou Creek north of C-611 Water Treatment Plant) ³	
		567	Soil Pile K013 near Outfall 013, West of Little Bayou Creek	
		1	OILS AND SLABS	
		16	C-746-D Classified Scrap Yard	
		20	C-410-E Emergency Holding Pond slab and underlying soils	
		27	C-722 Acid Neutralization Tank	
		28	C-712 Laboratory Equalization Tank slab and underlying soils	
		31	C-720 Compressor Pit Water Storage Tank slab and underlying soils	
		32	C-728 Clean Waste Oil Tanks slab and underlying soils	
Soils and Slabs		33	C-728 Motor Cleaning Facility slab and underlying soils	
OU		38	C-615 Sewage Treatment Plant slab and underlying soils	
(Continued)		41	C-410-C Neutralization Tank slab and underlying soils	
		42	C-616 Chromate Reduction Facility slab and underlying soils	
		55	C-405 Incinerator building slab and underlying soils	
		70	C-333-A Vaporizer slab and underlying soils	
		71	C-337-A Vaporizer slab and underlying soils	
		74	C-340 PCB Transformer Spill Site	
		75	C-633 PCB Spill Site	

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

		SOILS A	ND SLABS (CONTINUED)
Operable Unit	Subproject	SWMU No.	Description
•	1 0	77	C-634-B-Sulfuric Acid Storage Tank slab and underlying soils
		78	C-420 PCB Spill Site
		79	C-611 PCB Spill Site
		82	C-531 Electric Switchyard slab and underlying soils
		83	C-533 Electric Switchyard slab and underlying soils
		84	C-535 Electric Switchyard slab and underlying soils
		85	C-537 Electric Switchyard slab and underlying soils
		86	C-631 Pumphouse and Cooling Tower slab and underlying soils
		87	C-633 Pumphouse and Cooling Tower slab and underlying soils
		88	C-635 Pumphouse and Cooling Tower slab and underlying soils
		89	C-637 Pumphouse and Cooling Tower slab and underlying soils
		99 A	C-745 Kellogg Bldg. Site–Cylinder Yard
		135	C-333 PCB Soil Contamination (North Side)
		137	C-746-A Inactive PCB Transformer Sump Area ⁶
		154	C-331 PCB Soil Contamination (Southeast)
		155	C-333 PCB Soil Contamination (West)
		159	C-746-H3 Storage Pad slab and underlying soils
		161	C-743-T-01 Trailer Site (Soil Backfill)
		162	C-617-A Sanitary Water Line (Soil Backfill)
		166	C-100 Trailer Complex Soil Contamination (East Side)
Soils and Slabs		167	C-720 White Room Sump slab and underlying soils
OU		172	C-726 Sandblasting Facility slab and underlying soils
(Continued)		176	C-331 RCW Leak Northwest Side
		177	C-331 RCW Leak East Side
		178	C-724-A Paint Spray Booth slab and underlying soils
		179	Plant Sanitary Sewer System
		192	C-710 Acid Interceptor Pit slab and underlying soils
		198	C-410-D Area Soil Contamination slab and underlying soils
		209	C-720 Compressor Shop Pit Sump slab and underlying soils
		211 B	C-720 TCE Spill Site Southeast
		218	OS-07 slab and underlying soils
		220	OS-09 slab and underlying soils
		223	OS-12 slab and underlying soils
		226	OS-15
		463	C-746-A East End Smelter slab and underlying soils
		464	C-746-A West End Smelter building slab and underlying soils
		469	C-745-J Yard
		470	C-746-V Yard
		474	West of Vortec Site
		477	C-340 Metals Plant building slab and underlying soils
		478	C-410/420 Feed Plant building slab and underlying soils
		482	C-415 Feed Plant Storage Building slab and underlying soils
		483	Nitrogen Generating Facilities slab and underlying soils

⁶ SWMU 137 was evaluated as part of the American Recovery and Reinvestment Act and the Soils OU. SWMU 137 will be addressed as part of Soils and Slabs OU.

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	SOILS AND SLABS (CONTINUED)			
Operable Unit Subproject		SWMU No.	Description	
1	r g	498	C-410/420 Sump at Column D & E-1&2 slab and underlying soils	
		499	C-410/420 Sump at Column H-9&10 slab and underlying soils	
		500	C-410/420 Sump at Column U-10&11 slab and underlying soils	
		501	C-410/420 UF ₆ Scale Pit Sumps A&B slab and underlying soils	
		502	C-410/420 Sump at Column U-9 slab and underlying soils	
		503	C-410/420 Sump at Column G-1 slab and underlying soils	
		504	C-410/420 Sump at Column L-10 slab and underlying soils	
		505	C-410/420 Sump at Column A-3N slab and underlying soils	
		506	C-410/420 Sump at Column Wa-9 slab and underlying soils	
		507	C-410/420 Condensate Tank Pit slab and underlying soils	
Soils and Slabs		508	C-410/420 Settling Basin slab and underlying soils	
OU		509	C-410/420 Drain pit slab and underlying soils	
(Continued)		510	C-410/420 Sump at Column P&Q-2 slab and underlying soils	
		511	C-410/420 Sump at Column Q&R-2 slab and underlying soils	
		512	C-410/420 Sump at Column R-2 slab and underlying soils	
		513	C-411 Cell Maintenance Room Sump slab and underlying soils	
		522	C-340 Work Pit at Ground Floor Level (B-7—B-9) slab and	
			underlying soils	
		523	C-340 Metals Plant Pit at Ground Floor (F-6 to F-11) slab and	
			underlying soils	
		524	C-340 Pickling System Sump (B-10 to B-11) slab and underlying soils	
		529	C-340 Powder Plant Sump at Ground Floor Level slab and	
			underlying soils	
	DEC	CONTAMINAT	ION AND DECOMMISSIONING	
			SWMUs/AOCs or facilities may include multiple smaller or detailed listing is included in the following table entitled ities.	
		33	C-728 Motor Cleaning Facility	
		38	C-615 Sewage Treatment Plant	
		42	C-616 Chromate Reduction Facility	
		70	C-333-A Vaporizer	
		71	C-337-A Vaporizer	
		82	C-531 Electric Switchyard	
		83	C-533 Electric Switchyard	
	Domoining	84	C-535 Electric Switchyard	
Facility D&D OU	Remaining D&D	85	C-537 Electric Switchyard	
	D&D	86	C-631 Pumphouse and Cooling Tower	
		87	C-633 Pumphouse and Cooling Tower	
		88	C-635 Pumphouse and Cooling Tower	
		89	C-637 Pumphouse and Cooling Tower	
		172	C-726 Sandblasting Facility	
		178	C-724-A Paint Spray Booth	
		482	C-415 Feed Plant Storage Building	
		Other	C-310, C-310-A, C-315, C-331, C-333, C-333-A. C-335, C-337,	
		Buildings	C-337-A, C-409, C-600, C-709, C-710, C-720	
			Process Building tie-lines and bridges will be included with the	
			appropriate process building.	

DUF ₆ FOOTPRINT UNDERLYING SOILS				
DIE Essenint	164	KPDES Outfall Ditch 017 Flume - Soil Backfill		
DUF ₆ Footprint	183	McGraw UST		
Underlying Soils OU	193	McGraw Construction Facilities (Southside Cylinder Yards)		
00	194	McGraw Construction Facilities (Southside)		
	FINAL COMPREHENSIVE SITE OPERABLE UNIT			
	SWMU No.	Description		
	8	C-746-K Inactive Sanitary Landfill		
CSOU ^{7,8}	59	NSDD (Inside)		
	91	UF ₆ Cylinder Drop Test Area		
	100	Fire Training Area		

⁷ The FFA, as currently written, contemplates multiple CSOUs, consisting of those associated with integrator units (i.e., groundwater, surface water), and a final CSOU completed after issuance of all final RODs for the site. The FFA parties acknowledge that the scope description is intended to reflect a single CSOU to address all media, and a future FFA modification will be conducted to resolve any inconsistencies between the FFA and Site Management Plan strategy.

⁸ Historically, once an action has been completed for a particular SWMU whereby no additional active response actions are expected, such SWMUs have been placed in the CSOU for further evaluation; however, the FFA parties recognized the need to reach consensus on the criteria for assigning units to the CSOU. As a result, placement of SWMUs 8, 91, and 100 in the CSOU is provisional pending the FFA parties reaching consensus on such criteria.

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	PERMITTED		
	SWMU No.	Description	
	3	C-404 Low-Level Radioactive Waste Burial Ground ⁹	
	9	C-746-S Residential Landfill	
	10	C-746-T Inert Landfill	
Permitted	44	C-733 Hazardous Waste Storage Area	
	46A	C-746-Q Hazardous and Low-Level Mixed Waste Storage	
		Facility	
	207	C-752-A ER Waste Storage Bldg.	
	208	C-746-U Solid Waste Contained Landfill	

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⁹ SWMU 3 was issued only a post-closure permit, was not permitted for construction and operation, and was not an engineered hazardous waste landfill.

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	NO FURTHER ACTION ¹⁰				
SWMU No.	Description	NFA Approval By			
12	C-747-A UF ₄ Drum Yard	FFA Managers Agreement— November 17, 2011; FFA Managers Meeting, 4/12/2012			
24	C-750-D UST	KDWM (UST Branch) 11/23/1999			
25	C-750 1,000-gal Waste Oil Tank (UST)	KDWM (UST Branch) 6/20/1994			
29	C-746-B TRU Storage Area	EPA HSWA Class 1 Permit Mod 3/17/1993			
34	C-746-M PCB Waste Storage Area	EPA HSWA Class 1 Permit Mod 3/17/1993			
35	C-337 PCB Waste Storage Area	EPA HSWA Class 1 Permit Mod 3/17/1993			
36	C-337 PCB Waste Staging Area	EPA HSWA Class 1 Permit Mod 3/17/1993			
37	C-333 PCB Waste Staging Area	EPA HSWA Class 1 Permit Mod 3/17/1993			
39	C-746-B PCB Waste Storage Area	EPA HSWA Class 1 Permit Mod 3/17/1993			
43	C-746-B Waste Chemical Storage Area	EPA HSWA Class 1 Permit Mod 3/17/1993; Closed after 1993			
45	C-746-R Waste Solvent Storage Area	EPA HSWA Class 1 Permit Mod 3/17/1993; Closed after 1993			
46	C-409 Hazardous Waste Pilot Plant ¹¹	KDWM (Mod #13) 9/26/1997			
48	Gold Dissolver Storage Tank (DMSA C400-03)	KDWM 7/8/2010			
49	C-400-B Waste Solution Storage Tank	KDWM 9/26/1997			
50	C-400-C Nickel Stripper Evaporation Tank	KDWM (Mod #13) 9/26/1997			
51	C-400-D Lime Precipitation Tank	KDWM (ROC) 8/8/1994			
52	C-400 Waste Decontamination Solution Storage Tanks	EPA HSWA Class 1 Permit Mod 3/17/1993			
53	C-400 NaOH Precipitation Unit	EPA HSWA Class 1 Permit Mod 3/17/1993			
54	C-400 Degreaser Solvent Recovery Unit	KDWM 7/8/2010			
72	C-200 Underground Gasoline Tanks	KDWM (UST C-200A; UST Branch) 11/23/1999			
73	C-710 Underground Gasoline Tanks	KDWM (UST C-200A; UST C-710; UST Branch) 2/19/2002			
90	C-720 Petroleum Naphtha Pipe	KDWM 1/14/15			
96	C-333 Cooling Tower Scrap Wood Pile	EPA HSWA Class 1 Permit Mod 3/17/1993			
101	C-340 Hydraulic System	EPA and KDWM 4/2/2015			
102A	Plant Storm Sewer—between the south side of the C-400 Building and Outfall 008	EPA and KY via SW Plume ROD 3/16/2012; KDWM 1/14/2015			
103	Concrete Rubble Pile (1)	EPA and KY via WAG 17 ROD 9/29/1997			
104	Concrete Rubble Pile (2)	EPA and KY via WAG 17 ROD 9/29/1997			

¹⁰ A portion of the SWMUs/ listed may not qualify as NFAs per CERCLA and may require additional characterization for radionuclides under the appropriate OU.

¹¹ Radiological contamination associated with the sump in this unit will be addressed under the D&D program for the C-409 Stabilization Building.

	NO FURTHER ACTION ((CONTINUED)
SWMU No.	Description	NFA Approval By
110	Concrete Rubble Pile (8)	EPA and KY via WAG 17 ROD 9/29/1997
111	Concrete Rubble Pile (9)	EPA and KY via WAG 17 ROD 9/29/1997
112	Concrete Rubble Pile (10)	EPA and KY via WAG 17 ROD 9/29/1997
114	Concrete Rubble Pile (12)	EPA and KY via WAG 17 ROD 9/29/1997
115	Concrete Rubble Pile (13)	EPA and KY via WAG 17 ROD 9/29/1997
116	Concrete Rubble Pile (14)	EPA and KY via WAG 17 ROD 9/29/1997
117	Concrete Rubble Pile (15)	EPA and KY via WAG 17 ROD 9/29/1997
118	Concrete Rubble Pile (16)	EPA and KY via WAG 17 ROD 9/29/1997
119	Concrete Rubble Pile (17)	EPA and KY via WAG 17 ROD 9/29/1997
120	Concrete Rubble Pile (18)	EPA and KY via WAG 17 ROD 9/29/1997
121	Concrete Rubble Pile (19)	EPA and KY via WAG 17 ROD 9/29/1997
122	Concrete Rubble Pile (20)	WAG 17 RI Work Plan
123	Concrete Rubble Pile (21)	EPA and KY via WAG 17 ROD 9/29/1997
124	Concrete Rubble Pile (22)	EPA and KY via WAG 17 ROD 9/29/1997
125	Concrete Rubble Pile (23)	EPA and KY via WAG 17 ROD 9/29/1997
126	Concrete Rubble Pile (24)	EPA and KY via WAG 17 ROD 9/29/1997
127	Concrete Rubble Pile (25)	EPA and KY via WAG 17 ROD 9/29/1997
128	Concrete Rubble Pile (26)	EPA and KY via WAG 17 ROD 9/29/1997
130	C-611 550-gal Gasoline UST	KDWM 12/6/1996 EPA and KY via WAG 1&7 ROD
131	C-611 50-gal Gasoline UST	KDWM 12/6/1996 EPA and KY via WAG 1&7 ROD
132	C-611 2,000-gal Oil UST	KDWM 12/6/1996 EPA and KY via WAG 1&7 ROD
133	C-611 (unknown size) Grouted UST	KDWM 12/6/1996 EPA and KY via WAG 1&7 ROD
134	C-611 1,000-gal Diesel/Gasoline Tank	KDWM 12/6/1996 EPA and KY via WAG 1&7 ROD
136	C-740 TCE Spill Site	EPA and KY via WAG 1&7 ROD 8/10/1998
139	C-746-A1 UST	KDWM 12/9/2005
140	C-746-A2 UST	KDWM 12/19/1996
141	C-720 Inactive TCE Degreaser	KDWM 8/11/1992
142	C-750-A 10,000-gal Gasoline Tank (UST)	KDWM 3/25/1999
143	C-750-B 10,000-gal Diesel Tank (UST)	KDWM 3/25/1999

CIXIX/X/III NI	Dog	NIE A A 1 D.
SWMU No.	Description Description	NFA Approval By
144	C-746-A Hazardous and Mixed Waste Storage Facility	KDWM 10/10/2011
146	Concrete Rubble Pile (40)	EPA and KY via WAG 17 ROD
1.47	G P. 111 PT (41)	9/29/1997
147	Concrete Rubble Pile (41)	EPA and KY via WAG 17 ROD
148	Commente Deskille Dille (42)	9/29/1997 EPA and KY via WAG 17 ROD
148	Concrete Rubble Pile (42)	9/29/1997
149	Concrete Rubble Pile (43)	EPA and KY via WAG 17 ROD
149	Concrete Rubble File (43)	9/29/1997
150	Concrete Rubble Pile (44)	EPA and KY via WAG 17 ROD
130	Concrete Rubble File (44)	9/29/1997
151	Concrete Rubble Pile (45)	EPA and KY via WAG 17 ROD
131	Concrete Rubble 1 lie (43)	9/29/1997
152	Concrete Rubble Pile (46)	EPA and KY via WAG 17 ROD
132	Concrete Russia The (10)	9/29/1997
173	C-746-A Trash-Sorting Facility	KDWM 12/18/1992
174	C-745-K Low-Level Storage Area	KDWM 2/22/1993
184	Concrete Rubble Pile (29)	EPA and KY via WAG 17 ROD
10.		9/29/1997
186	C-751 Fuel Facility	KDWM 10/20/1993
187	C-611 Septic System	KDWM 10/20/1993
188	C-633 Septic System	KDWM 10/20/1993
189	C-637 Septic System	KDWM 10/20/1993
190	C-337A Sewage Treatment Aeration Tank	KDWM 10/20/1993
191	C-333-A Sewage Treatment Aeration Tank	KDWM 10/20/1993
197	Concrete Rubble Pile (30)	EPA and KY via WAG 17 ROD
	, ,	9/29/1997
206	C-753-A Toxic Substances Control Act Waste Storage Bldg.	KDWM 3/7/1997
208	C-746-U Solid Waste Contained Landfill	KDWM 3/7/1997
360	C-535	KDWM 1/4/2006
361	C-727–90 day	KDWM 8/28/2007
362	G-310-04	KDWM 8/28/2007
363	G-331-03	KDWM 6/29/2004
364	G-331-05	KDWM 6/29/2004
365	G-333-02	KDWM 5/12/03
366	G-333-03	KDWM 5/12/2003
367	G-333-04	KDWM 5/12/2003
368	G-333-08	KDWM 6/29/2004
369	G-333-10	KDWM 5/12/2003
370	G-333-20	KDWM 5/12/2003
371	G-335-01	KDWM 1/4/2006
372	G-337-02	KDWM 9/11/2003
373	G-337-03	KDWM 9/11/2003
374	G-337-13	KDWM 9/11/2003
375	G-337-14	KDWM 9/11/2003
376	G-337-15	KDWM 9/11/2003
377	C-337-22	KDWM 1/4/2006
378	G-340-01	EPA and KDWM 4/02/2015
379	G-340-03	KDWM 4/02/2015
380	G-340-04	KDWM 4/02/2015
381	G-340-05	KDWM 4/02/2015

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

CIXX/NATT NT	D	NO FURTHER ACTION (CONTINUED)				
SWMU No.	Description	NFA Approval By				
382	G-340-06	KDWM 8/28/2007				
383	G-400-01	KDWM 5/12/2003				
384	G-400-02	KDWM 5/12/2003				
385	G-409-25	KDWM 5/12/2003				
386	G-410-01	KDWM 8/28/2007				
387	C-416-01	KDWM 8/28/2007				
388	C-416 Decontamination Pad	KDWM 4/12/2004				
389	G-533-01	KDWM 6/29/2004				
390	G-535-02	KDWM 6/29/2004				
391	G-537-01	KDWM 1/4/2006				
392	G-540-A-01	KDWM 2/14/2006				
393	G-540-A-1-02	KDWM 2/14/2006				
394	G-541-A-01	KDWM 4/12/2004				
395	G-600-01	KDWM 3/8/2007				
396	C-611-U-01	KDWM 3/8/2007				
397	G-612-01	KDWM 3/8/2007				
398	G-612-02	KDWM 3/8/2007				
399	G-612-A-01	KDWM 3/8/2007				
400	G-635-01	KDWM 3/8/2007				
401	G-710	KDWM 1/4/2006				
402	G-710-04	KDWM 9/11/2003				
403	G-710-04 G-710-20	KDWM 1/4/2006				
404	G-710-24	KDWM 1/4/2000 KDWM 9/11/2003				
405	G-710-24 G-720-22	KDWM 9/11/2003 KDWM 2/14/2003				
405	G-743-T-17-01	KDWM 2/14/2003 KDWM 6/29/2004				
	G-743-T-17-01 G-743-T-17-02					
407		KDWM 3/8/2007				
408	G-745-B-01	KDWM 3/8/2007				
409	G-745-T-01	KDWM 2/14/2006				
410	G-746-G-01	KDWM 6/29/2004				
411	G-746-G-1-01	KDWM 3/8/2007				
412	G-746-G-2-01	KDWM 11/1/2004				
413	G-746-G-3-01	KDWM 11/1/2004				
414	G-746-F-01	KDWM 1/4/2006				
415	G-746-S-01	KDWM 8/28/2007				
416	G-746-X-01 (PCBs)	KDWM 3/8/2007				
417	G-746-X-01 (Asbestos)	KDWM 3/8/2007				
418	G-748-B-01	KDWM 6/29/2004				
419	G-752-C-01	KDWM 8/28/2007				
420	G-752-C-02	KDWM 3/8/2007				
421	G-754-01	KDWM 1/4/2006				
422	G-755-A-01	KDWM 1/28/2004				
423	G-755-C-01	KDWM 1/28/2004				
424	G-755-T-07-01	KDWM 1/28/2004				
425	G-755-T-08	KDWM 1/28/2004				
426	G-755-T-2-3-01	KDWM 1/28/2004				
427	G-755-T-3-1-01	KDWM 1/28/2004				
428	G-755-T-3-2-01	KDWM 1/28/2004 KDWM 1/28/2004				
429	S-310-04	KDWM 1/28/2004 KDWM 8/28/2007				
430	S-331-02	KDWM 8/28/2007 KDWM 1/4/2006				
430	S-333-12	KDWM 5/12/2003				
431	S-335-09	KDWM 5/12/2003 KDWM 11/23/2004				

SWMU No.	Description	NFA Approval By
433	S-337-11	KDWM 9/11/2003
434	S-340-01	EPA and KY 4/2/2015
435	S-409-100	KDWM 5/12/2003
436	S-409-20	KDWM 5/12/2003
437	S-409-20 S-409-40	KDWM 5/12/2003 KDWM 5/12/2003
438	S-409-60	KDWM 5/12/2003
439	S-409-80	KDWM 5/12/2003 KDWM 5/12/2003
440	S-410-05	KDWM 8/28/2007
441	S-540-A-2-01	KDWM 6/29/2004
441	S-612-01	KDWM 2/14/2006
	S-709-01	KDWM 6/29/2004
443		
444	S-709-02	KDWM 6/29/2004
445	S-710-05	KDWM 2/14/2006
446	S-710-06	KDWM 9/11/2003
447	S-710-09	KDWM 1/4/2006
448	S-710-16	KDWM 9/11/2003
449	S-710-18	KDWM 9/11/2003
450	S-710-32	KDWM 1/4/2006
451	S-710-41	KDWM 9/11/2003
452	S-710-44	KDWM 1/4/2006
453	S-710-46	KDWM 9/11/2003
454	S-743-T-17-01	KDWM 2/14/2006
455	S-755-T-16-01	KDWM 1/28/2004
456	S-755-T-16-02	KDWM 1/28/2004
457	S-755-T-16-03	KDWM 1/28/2004
458	S-755-T-2-3-01	KDWM 1/28/2004
459	S-755-T-3-1-01	KDWM 1/28/2004
460	S-755-T-3-2-01	KDWM 1/28/2004
461	S-755-T-3-2-02	KDWM 1/28/2004
462	S-755-T-3-2-03	KDWM 1/28/2004
465	Yard Rubble Pile and Crushate Storage Area (G-Yard)	KDWM 10/13/2009
466	South of Dyke Road, Pond Area	KDWM 8/17/2009
467	Concrete Cylinder Holders Storage Area on Western Kentucky	KDWM 8/17/2009
	Wildlife Management Area	
468	Area Northwest of Outfall 015	KDWM 2/14/2006
471	Outside C-746-B South Storage Area	KDWM 8/17/2009
473	C-746-B Pad, West	KDWM 8/28/2007
475	C-745-G5-01 (Paint Enclosure)	KDWM 2/14/2006
476	Concrete Crusher	KDWM 2/14/2006
479	C-204 Disintegrator Building	KDWM 6/3/2002
481	C-410-A Hydrogen Holder	KDWM 4/2/2002
484	C-611-M Storage Tank	KDWM 8/30/02
485	C-611-N Sanitary Water Storage	KDWM 2/18/02
490	McGraw Fuel Facility Waste Oil Storage Tank	KDWM 12/21/2001
491	Mercury Spill at the C-611 Water Treatment Plant Vault	KDWM 3/22/04
494	Ash Receiver Area in C-410/420	KDWM 6/3/16; EPA 6/9/16
495	C-410-I Ash Receiver Shed	KDWM 6/3/16; EPA 6/9/16
496	C-410 Fluorine/Hydrogen Filters (Northeast Mezzanine)	KDWM 6/3/16; EPA 6/9/16
497	C-410/420 F ₂ Cell Neutralization Room Vats	KDWM 6/3/16; EPA 6/9/16
514	C-340 Magnesium Fluoride Reject Silo	Letter approved by EPA and KY
J17	5 10 Magnesiam i moride Reject 5110	4/2/2015

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

SWMU No.	NO FURTHER ACTION (CONTINUED Description	NFA Approval By
515	C-340 "Dirty" Dust Collection System	Letter approved by EPA and KY 4/2/2015
516	C-340 Derby Preparation Area Sludge Collection System	Letter approved by EPA and KY 4/2/2015
519	C-410 Sulfuric Acid Tank (C-634-B)	KDWM 1/10/2003
521	C-340 Saw System Degreaser	Letter approved by EPA and KY 4/2/2015
525	Concrete Water Tower Supports (KOW)	KDWM 8/28/2007
527	C-410 GSA/SAA at Column J-6	KDWM 8/28/2007
528	GSA/SAA at the Northwest corner of C-745-G3 Paint Enclosure	KDWM 2/14/2006
530	Soil and Debris Storage Area by C-745-T Yard	KDWM 3/8/2007
532	Photographic Solution Treatment Area in the C-102 Building	KDWM 5/21/2003
534	UST #18, within SWMU 193	KDWM (UST Branch) 12/4/2007
535	S-755-T08-01 (Satellite Accumulation Area at C-755, Trailer 8)	KDWM 2/14/2006
536	Concrete Truck Washout Area	KDWM 6/27/2002
537	S-400-001 (SAA Located Outside at the Southeast Corner of the C-400 Building)	KDWM 2/14/2006
538	S-MST-01-01 & S-MST-01-02 (Mobile Trailer 01)	KDWM 2/14/2006
539	S-MST-02-01 & S-MST-02-02 (Mobile Trailer 02)	KDWM 2/14/2006
540	S-MST-03-01 & S-MST-03-02 (Mobile Trailer 03)	KDWM 2/14/2006
542 A	G-746-B-01; S-746-B-01; S-746-B-02 (GSA/SAAs located outside C-746-A)	KDWM 1/28/2004
542 B	G-746-A-01; S-746-A-01; S-746-A-02 (GSA/SAAs located outside C-746-A)	KDWM 1/28/2004
543	T-746-S-01 (90-Day Storage Area)	KDWM 1/28/2004
544	T-752-C-01 (90-Day Storage Area)	KDWM 1/28/2004
545	C-755-T-22-01 and G-755-T-22	KDWM 1/28/2004
546	PGDP Post 67 Diesel Fuel Spill Area	KDWM 2/14/2006
547	PGDP Post 38 Diesel Spill Area	KDWM 2/14/2006
548	Staging Area for Concrete Piers, Wood and Rubble North Side of C-745-B Cylinder Yard	KDWM 8/28/2007
551	C-755-GSA-23 Located at C-755 near the East Fence Line	KDWM 8/28/2007
552	C-760 90-Day Accumulation Area	KDWM 3/28/2007
566	H-340-01	KDWM 12/02/2010
568	C-340 ST-90 Boxes	KDWM 12/02/2010
569	C-743-T-17 Sample Return Refrigerator	KDWM 5/24/2012
570	Sample Return Sealand	KDWM 5/24/2012

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

PENDING NO FURTHER ACTION DECISION						
SWMU No. Description						
	TBD					
SW	SWMUs THAT WILL BE INVESTIGATED AND REMEDIATED BY THE U.S. ARMY CORPS OF ENGINEERS ¹²					
94	KOW Trickling Filter and Leach Field					
95	KOW Burn Area					
157	KOW Toluene Spill Area					
182	Western Portion of Yellow Water Line					

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

CSOU = Comprehensive Site Operable Unit

D&D = decontamination and decommissioning

EPA = U.S. Environmental Protection Agency

ER = environmental remediation

FFA = Federal Facility Agreement

FY = fiscal year

GDP = gaseous diffusion plant

GSA = generator staging area

HSWA = Hazardous and Solid Waste Amendments

HVAC = heating, ventilating, and air-conditioning

KDWM = Kentucky Division of Waste Management

KOW = Kentucky Ordinance Works

KPDES = Kentucky Pollutant Discharge Elimination System

KY = Kentucky

NFA = no further action

NSDD = North-South Diversion Ditch

OU = operable unit

PCB = polychlorinated biphenyl

PGDP = Paducah Gaseous Diffusion Plant

RCW = recirculating cooling water

ROD = record of decision

SAA = satellite accumulation area

SAP = Sampling and Analysis Plan

SWMU = solid waste management unit

SWOU = Surface Water Operable Unit

TBD = to be determined

TCE = trichloroethene

TSCA = Toxic Substances Control Act

UST = underground storage tank

WAG = waste area group

WKWMA = West Kentucky Wildlife Management Area

¹² The Corps of Engineers accepted responsibility for the investigation/remediation of these SWMUs in a letter dated March 13, 1996. EPA review/approval of the CERCLA documentation associated with these SWMUs has not occurred.

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

D&D OU FACILITIES									
Facility Number	Description	SWMU/AOC Number	Facility Status	Integrated Site Evaluation (SE) Complete	CERCLA NTCRA Required				
Gaseous Diffusion Process Facilities and Process Building Tie Lines and Bridges									
C-310	Purge and Product Building		Deactivating	No	Pending SE				
C-310-A	Product Withdrawal Building		Deactivating	No	Pending SE				
C-315	Surge and Waste Building		Deactivating	No	Pending SE				
C-331	Process Building		Deactivating	No	Pending SE				
C-333	Process Building		Deactivating	No	Pending SE				
C-333-A	Feed Vaporization Facility	70	Deactivating	8/24/1987	Yes				
C-335	Process Building		Deactivating	No	Pending SE				
C-337	Process Building		Deactivating	No	Pending SE				
C-337-A	Feed Vaporization Facility	71	Deactivating	8/24/1987	Yes				
C-310-331	Tie-Line		Deactivating	No	Pending SE				
C-310-331-A	Bridge (Enclosed)		Deactivating	No	Pending SE				
C-310-331-B	Tie-Line		Deactivating	No	Pending SE				
C-315-331	Tie-Line		Deactivating	No	Pending SE				
C-331-333-A	Bridge (Enclosed—300 ft)		Deactivating	No	Pending SE				
C-331-333-B	Tie-Line (West)		Deactivating	No	Pending SE				
C-331-333-C	Tie-Line (East)		Deactivating	No	Pending SE				
C-331-335	Tie-Line		Deactivating	No	Pending SE				
C-335-337-A	Bridge (Enclosed)		Deactivating	No	Pending SE				
C-335-337-B	Tie-Line (North)		Deactivating	No	Pending SE				
C-335-337-C	Tie-Line (South)		Deactivating	No	Pending SE				
	P	rocess Support I	acilities						
C-409	Stabilization Building		Deactivating	No	Pending SE				
C-415	Feed Plant Storage	482	Shutdown	7/18/2001	Yes				
C-600	Steam Plant		Shutdown	No	Pending SE				
		Switchyard	ls						
C-531-1	Switch House	82	Operating	8/24/1987	Yes				
C-531-2	Switchyard	82	Operating	8/24/1987	Yes				
C-531-3A	Fire Valve House No. 1	82	Operating	8/24/1987	Yes				
C-531-3B	Fire Valve House No. 2	82	Operating	8/24/1987	Yes				
C-532	Relay House	82	Operating	8/24/1987	Yes				
C-533-1	Switch House	83	Operating	8/24/1987	Yes				
C-533-2	Switchyard	83	Operating	8/24/1987	Yes				

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

D&D OU FACILITIES								
Facility Number	Description	SWMU/AOC Number	Facility Status	Integrated Site Evaluation (SE) Complete	CERCLA NTCRA Required			
	S	witchyards (Cor	ntinued)					
C-533-3A	Fire Valve House No. 1	83	Operating	8/24/1987	Yes			
C-533-3B	Fire Valve House No. 2	83	Operating	8/24/1987	Yes			
C-533-3C	Fire Valve House No. 3	83	Operating	8/24/1987	Yes			
C-533-3D	Fire Valve House No. 4	83	Operating	8/24/1987	Yes			
C-535-1	Switch House	84	Operating	8/24/1987	Yes			
C-535-2	Switchyard	84	Operating	8/24/1987	Yes			
C-535-3A	Fire Valve House No. 1	84	Operating	8/24/1987	Yes			
C-535-3B	Fire Valve House No. 2	84	Operating	8/24/1987	Yes			
C-535-4	Test Shop (Maintenance Office)	84	Operating	8/24/1987	Yes			
C-536	Relay House	84	Operating	8/24/1987	Yes			
C-537-1	Switch House	85	Operating	8/24/1987	Yes			
C-537-2	Switchyard	85	Operating	8/24/1987	Yes			
C-537-3A	Fire Valve House No. 1	85	Operating	8/24/1987	Yes			
C-537-3B	Fire Valve House No. 2	85	Operating	8/24/1987	Yes			
C-537-3C	Fire Valve House No. 3	85	Operating	8/24/1987	Yes			
C-537-3D	Fire Valve House No. 4	85	Operating	8/24/1987	Yes			
C-537-4	Test Shop	85	Operating	8/24/1987	Yes			
C-540-A	Oil Pump House	83	Operating	8/24/1987	Yes			
C-541-A	Oil Pump House	84	Operating	8/24/1987	Yes			
		Cooling Tow	ers					
C-631-1	Pump House	86	Operating	8/24/1987	Yes			
C-631-2	Cooling Tower	86	Operating	8/24/1987	Yes			
C-631-3	Fire Water Pump House	86	Operating	8/24/1987	Yes			
C-631-4	Blending Pump House	86	Operating	8/24/1987	Yes			
C-631-5	Blending Cooling Tower (West)	86	Operating	8/24/1987	Yes			
C-631-6	Blending Cooling Tower (East)	86	Operating	8/24/1987	Yes			
C-633-1	Pump House	87	Deactivating	8/24/1987	Yes			
C-633-2A	Cooling Tower (South)	87	Deactivating	8/24/1987	Yes			
C-633-2B	Cooling Tower (North)	87	Deactivating	8/24/1987	Yes			
C-633-3	Blending Pump House	87	Deactivating	8/24/1987	Yes			
C-633-4	Blending Cooling Tower (North)	87	Deactivating	8/24/1987	Yes			
C-633-5	Blending Cooling Tower (South)	87	Deactivating	8/24/1987	Yes			

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

D&D OU FACILITIES										
Facility Number	Description	SWMU/AOC Number	Facility Status	Integrated Site Evaluation (SE) Complete	CERCLA NTCRA Required					
	Cooling Towers (Continued)									
C-633-6	Sand Filter Building	87	Deactivating	8/24/1987	Yes					
C-635-1	Pump House	88	Deactivating	8/24/1987	Yes					
C-635-2	Cooling Tower	88	Deactivating	8/24/1987	Yes					
C-635-3	Blending Pump House	88	Deactivating	8/24/1987	Yes					
C-635-4	Blending Cooling Tower (North)	88	Deactivating	8/24/1987	Yes					
C-635-5	Blending Cooling Tower (South)	88	Deactivating	8/24/1987	Yes					
C-637-1	Pump House	89	Deactivating	8/24/1987	Yes					
C-637-2A	Cooling Tower (South)	89	Deactivating	8/24/1987	Yes					
C-637-2B	Cooling Tower (North)	89	Deactivating	8/24/1987	Yes					
C-637-3	Blending Pump House	89	Deactivating	8/24/1987	Yes					
C-637-4	Blending Cooling Tower (North)	89	Deactivating	8/24/1987	Yes					
C-637-5	Blending Cooling Tower (South)	89	Deactivating	8/24/1987	Yes					
C-637-6	Sand Filter Building	89	Deactivating	8/24/1987	Yes					
	Phosphate (Former	Chromate) Re	duction System Fac	ilities						
C-616-A	Chemical Feed Building	42	Operating	12/18/91	Yes					
C-616-B	Clarifier-East	42	Operating	12/18/91	Yes					
C-616-C	Effluent Control Vault	42	Operating	12/18/91	Yes					
C-616-D	Sludge Vault and Valve Pit	42	Operating	12/18/91	Yes					
C-616-H1	Ferrous Sulfate Storage Tank (East)	42	Operating	12/18/91	Yes					
C-616-H2	Ferrous Sulfate Storage Tank (West)	42	Operating	12/18/91	Yes					
C-616-J	Reduction Tank (East)	42	Operating	12/18/91	Yes					
C-616-K	Service Building	42	Operating	12/18/91	Yes					
C-616-L	Lift Station	42	Operating	12/18/91	Yes					
C-616-M	Clarifier (West)	42	Operating	12/18/91	Yes					
C-616-N	Reduction Tank (West)	42	Operating	12/18/91	Yes					
C-616-P	Sludge Vault and Valve Pit	42	Operating	12/18/91	Yes					
Sewage System Facilities										
C-615-A	Primary Settling Tank/Catch Basin	38	Operating	8/24/87	Yes					
C-615-B	Final Settling Tank/Catch Basin	38	Operating	8/24/87	Yes					
C-615-C	Sewage Plant Monitoring Building	38	Operating	8/24/87	Yes					
C-615-D	Digester	38	Operating	8/24/87	Yes					
C-615-E	Trickling Filter	38	Operating	8/24/87	Yes					
C-615-F	Dry Bed for Trickling Filter	38	Operating	8/24/87	Yes					
	•									

Solid Waste Management Units/Areas of Concern by Operable Unit (Continued)

	D&D OU FACILITIES								
Facility Number	Description	SWMU/AOC Number	Facility Status	Integrated Site Evaluation (SE) Complete	CERCLA NTCRA Required				
	Process Laboratory and Maintenance Facilities								
C-709	Plant Laboratory Annex		Operating	No	Pending SE				
C-710	Technical Services Building/Lab		Operating	No	Pending SE				
C-720	Maintenance and Storage Building		Operating	No	Pending SE				
C-724-A	Carpenter Shop Annex	178	Operating	01/25/93	Yes				
C-726	Sandblast Building	172	Standby	10/29/92	Yes				
C-728	Motor Cleaning Facility	33	Operating	6/2/15	Yes				

AOC = area of concern

 $CERCLA = Comprehensive\ Environmental\ Response,\ Compensation,\ and\ Liability\ Act$

NTCRA = non-time-critical removal action

SE = site evaluation

SWMU = solid waste management unit

Operating—Facility is currently in use supporting U.S. Department of Energy mission activities.

Standby—Facility is currently not in use but may be utilized to support future U.S. Department of Energy mission activities. Shutdown—Facility is not being maintained for future use but has not yet begun deactivation activities.

Deactivating—Deactivation activities have been initiated. Deactivation Complete—Awaiting decommissioning.



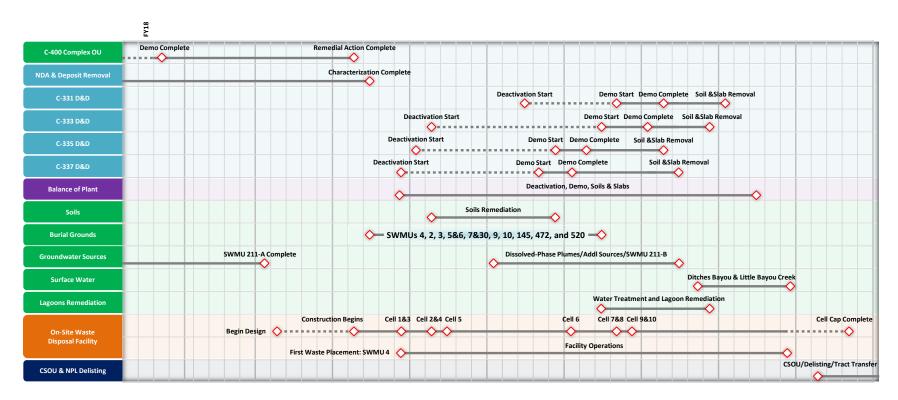
APPENDIX 5

ENFORCEABLE TIMETABLES AND DEADLINES; PLANNING DATES WITH LONG-TERM TARGETS



Operable Unit Sequencing

The Paducah Life Cycle Baseline has been updated to integrate and logically sequence site projects to remediate environmental media (including slabs); complete operating missions; deactivate facilities and systems; remove equipment and disposition small structures; decommission and demolish facilities; complete the Comprehensive Site Operable Unit (CSOU); achieve National Priorities De-listing; and turn over the site for future use. The following figure shows the major projects and activities in the Paducah Life Cycle Baseline, their sequence, and inter-relationships among projects. This figure shows both non-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site activities and CERCLA activities that are required to complete the decommissioning and remediation scope at the Paducah Site.



C-400 Complex Operable Unit (07)

The C-400 Complex Operable Unit (OU) is the current priority project for the remediation program at the Paducah Site. Deactivation of the C-400 Building is the precursor, non-CERCLA activity to the C-400 Building Decontamination and Decommissioning (D&D) Removal Action. Demolition will be conducted as a CERCLA non-time-critical removal action followed by a CERCLA Remedial Investigation/Feasibility Study (RI/FS) evaluating and identifying the response actions necessary to remediate soil and groundwater sources within the C-400 Complex OU area.

	sary to remediate son and groundwater sources within	Enforceabl	e Timetable adlines ¹	Planning Dates with Long-Term Targets for	
Submusis st	Deliverable	FY 2018–FY	0.477	Decision Documents ²	Comments
Subproject C-400	D1 Removal Notification	2020	Out-Year	Documents	Comments
D&D		3/1/18 5/2/18			
D&D	D1 Engineering Evaluation/Cost Analysis (EE/CA) D1 Action Memorandum				
		8/14/18			
	D1 Removal Action Work Plan	8/17/18			
	Removal Action Field Start	11/27/18			
	D1 Remedial Investigation Work Plan	11/28/18			
Remedial	Remedial Investigation Field Start	11/13/19			
Action	D1 Remedial Investigation/Feasibility Study Report			3rd Quarter 2021	
	D1 Proposed Plan			1st Quarter 2022	D1 Proposed Plan is submitted 45 days after U.S. Environmental Protection Agency (EPA) and Kentucky (KY) approval of the Feasibility Study. ³ The Proposed Plan is submitted for public comment within two weeks of approval.
	D1 Record of Decision (ROD)			4th Quarter 2022	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan [Federal Facility Agreement (FFA) Section XIV.D].
	D1 Remedial Design Work Plan			4th Quarter 2022	
	D1 Remedial Design Report (90% Design)			4th Quarter 2023	
	D1 Remedial Action Work Plan			4th Quarter 2023	
	Remedial Action Field Start		1st Quarter 2024		
	D1 Remedial Action Completion Report			4th Quarter 2030	D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.

Groundwater Operable Unit (01)

The C-400 Volatile Organic Compound Interim Remedial Source Action is complete. The last phase (Phase IIb) was not completed, and the source area will be addressed under the C-400 Complex OU. A completion report will be submitted for the phases completed (i.e., Phase I, Phase IIa) under the 2005 Interim ROD.

The Southwest Plume Sources—Solid Waste Management Unit (SWMU) 211-A is a groundwater source action being implemented under the 2012 Southwest Plume Sources ROD. The area is a source to groundwater contamination and is identified as a priority project to be completed in the near-term, along with the C-400 Complex OU actions.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Decision Documents ²	Comments
C-400 Interim	D1 Remedial Action Completion Report	2/7/18			
Remedial	for IRA				
Action					
Southwest	D1 Remedial Design Report (90% Design)	11/8/19			
Plume					
Sources—	D1 Remedial Action Work Plan	12/8/19			
SWMU 211-A	D1 Remedial Action Completion Report			2nd Quarter 2021	D1 Remedial Action Completion Report is
(Enhanced In					submitted 150 days after Remedial Action is
Situ					completed.
Bioremediation)					

Waste Disposal Alternatives (06)

The Waste Disposal Alternatives Project will evaluate whether various types of waste generated by the CERCLA projects at that Paducah Site will be dispositioned at multiple existing disposal facilities available throughout the country or at an on-site waste disposal facility (OSWDF) to be built at the Paducah Site for disposal of the majority of waste generated by decommissioning, demolition, burial grounds excavation, and environmental media remediation. The project will be completed in the time frame necessary to ensure that an OSWDF (if selected) is available for the first potential burial ground excavation, SWMU 4, and for demolition of gaseous diffusion plant process and support buildings, with the exception of the C-400 Building, which is prioritized for demolition in fiscal year (FY) 2019 in order to complete soil and groundwater remediation beneath the C-400 Building. Design and construction of the first cell (phase) of a potential OSWDF will require a significant budget over a period of four years. During that period, there are no other remedial actions supported by the projected Paducah Site funding levels. All available remediation funding is dedicated to completing this project as quickly as possible, based on the funding that is

		Enforceable Tin Deadlin		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Waste Disposal	D1 Remedial Investigation/Feasibility			4th Quarter 2027	
Alternatives	Study				
	D1 Proposed Plan			2nd Quarter 2028	D1 Proposed Plan is submitted 45 days after EPA and KY approval of the FS. ³ The Proposed Plan is submitted for public comment within two weeks of approval.
	D1 ROD			4th Quarter 2028	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan (FFA Section XIV.D).
	D1 Remedial Design Work Plan			3rd Quarter 2029	
	D1 Remedial Design Report			3rd Quarter 2030	FFA schedule logic has been modified to account for the complexity of the project.
	D1 Remedial Action Work Plan			3rd Quarter 2031	FFA schedule logic has been modified to account for the complexity of the project.
	D1 Interim Remedial Action Completion Report			4 th Quarter 2035	The D1 Interim Remedial Action Completion Report is a post-construction report to be issued prior to the start of operations. A D1 Final Remedial Action Completion Report will be issued when operations cease and closure has been completed.

Burial Grounds Operable Unit (05)
The Burial Grounds OU consists of 12 SWMUs grouped into subprojects. SWMU 4 is the highest priority project, with the others subprojects being addressed in parallel with and sequenced to have continuous field work, while also considering the best fit to stabilize annual costs.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
SWMU 4	D1 Proposed Plan			4 th Quarter 2033	This project is scheduled to begin with
Remedial Action	D1 ROD			2 nd Quarter 2034	Proposed Plan development and is assumed to complete two major remedial
	D1 Remedial Design Work Plan (Waste			4 th Quarter 2034	actions (one for soil and buried waste and
	Portion)				another for groundwater treatment). This
	D1 Remedial Design Report			1 st Quarter 2035	project is planned to be the first major
	(Waste Portion)				remediation project following the C-400
	D1 Remedial Action Work Plan			1 st Quarter 2035	Complex OU completion and
	(Waste Portion)				construction of a potential OSWDF.
	D1 Interim Remedial Action Completion			4 th Quarter 2038	Assuming FFA review logic, the
	Report (Waste Portion)				CERCLA documents and both remedial
	D1 Remedial Design Work Plan			2 nd Quarter 2038	actions will require a total of eight years, including approximately four years of
	(Groundwater Treatment)				field work. The CERCLA documents
	D1 Remedial Design Report			4 th Quarter 2038	begin in a time frame such that field work
	(Groundwater Treatment)				
	D1 Remedial Action Work Plan			1 st Quarter 2039	begins as soon as the potential OSWDF is available to accept waste.
	(Groundwater Treatment)				available to accept waste.
	D1 Remedial Action Completion Report (Groundwater Treatment)			3 rd Quarter 2041	

	Burial Grounds Operable Unit (05) (Continued)							
			Enforceable Timetable and Deadlines ¹					
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
SWMUs 2 and	D1 Feasibility Study (if update necessary)			3 rd Quarter 2039	This project is scheduled to begin with			
3 Remedial Action	D1 Proposed Plan			1 st Quarter 2040	the FS update (if necessary) and is assumed to complete three major			
	D1 ROD			3 rd Quarter 2040	remedial actions (two for soil and buried			
	SWMU 2 D1 Remedial Design Work Plan (Waste Portion)			1 st Quarter 2041	waste and one for groundwater treatment). Assuming FFA review logic, CERCLA documents and all remedial			
	SWMU 2 D1 Remedial Design Report (Waste Portion)			2 nd Quarter 2041	actions will require a total of six years, including approximately three years of			
	SWMU 2 D1 Remedial Action Work Plan (Waste Portion)			2 nd Quarter 2041	field work. This work is sequenced such that the fieldwork for SWMU 2 would			
	SWMU 2 D1 Interim Remedial Action Completion Report (Waste Portion)			3 rd Quarter 2042	begin after SWMU 4 fieldwork and SWMU 4 groundwater treatment are			
	SWMU 2 D1 Remedial Design Work Plan (Groundwater Treatment)			2 nd Quarter 2043	complete in order to avoid interferences due to the close proximity to all three			
	SWMU 2 D1 Remedial Design Report (Groundwater Treatment)			3 rd Quarter 2043	burial grounds (SWMUs 2, 3, and 4), which are adjacent to one another and			
	SWMU 2 D1 Remedial Action Work Plan (Groundwater Treatment)			4 th Quarter 2043	bound by roads that limit the work area. SWMU 3 fieldwork would begin after			
	SWMU 2 D1 Remedial Action Completion Report			2 nd Quarter 2045	SWMU 2 soil and buried waste fieldwork is complete. Once the			
	SWMU 3 D1 Remedial Design Work Plan			1 st Quarter 2041	SWMUs 2 and 3 soil and buried waste fieldwork is completed, the SWMUs 2			
	SWMU 3 D1 Remedial Design Report			2 nd Quarter 2041	and 3 groundwater treatment remedy			
	SWMU 3 D1 Remedial Action Work Plan			2 nd Quarter 2041	would be implemented.			
	SWMU 3 D1 Remedial Action Completion Report			4 th Quarter 2043				

Burial Grounds Operable Unit (05) (Continued)							
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision			
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments		
SWMUs 5 and	D1 Proposed Plan			2 nd Quarter 2037	This project is scheduled to begin with		
6 Remedial Action	D1 ROD			4 th Quarter 2037	Proposed Plan development. Assuming FFA review logic, CERCLA documents		
	D1 Remedial Design Work Plan			2 nd Quarter 2038	and fieldwork will require a total of two		
	D1 Remedial Design Report			3 rd Quarter 2038	and a half years. The project is		
	D1 Remedial Action Work Plan			4 th Quarter 2038	sequenced so that the fieldwork is conducted upon completion of SWMU 4		
	D1 Remedial Action Completion Report			1 st Quarter 2040	soil and buried waste fieldwork and prior		
	27 remedia recion completion report			7 Quanter 2010	to initiating SWMU 2 soil and buried waste fieldwork. The SWMUs 5 and 6 fieldwork would occur at the same time as the SWMU 4 groundwater treatment action.		
SWMUs 7 and	D1 Feasibility Study (if update necessary)			4 th Quarter 2040	This project is scheduled to begin with		
30 Remedial	D1 Proposed Plan			2 nd Quarter 2041	the FS update (if necessary) and is		
Action	D1 ROD			4 th Quarter 2041	assumed to complete two remedial		
	D1 Remedial Design Work Plan (Waste Portion)			2 nd Quarter 2042	actions (one for soil and buried waste and one for groundwater treatment).		
	D1 Remedial Design Report (Waste Portion)			3 rd Quarter 2042	Assuming FFA review logic, the CERCLA documents and field work will		
	D1 Remedial Action Work Plan (Waste Portion)			4 th Quarter 2042	require a total of six years, including approximately three years of field work.		
	D1 Interim Remedial Action Completion Report (Waste Portion)			2 nd Quarter 2044	The project is sequenced so that the soil and buried waste fieldwork is conducted		
	D1 Remedial Design Work Plan (Groundwater Treatment)			2 nd Quarter 2044	upon completion of SWMUs 2 and 3 fieldwork for soil and buried waste and		
	D1 Remedial Design Report (Groundwater Treatment)			3 rd Quarter 2044	prior to the SWMUs 2 and 3 groundwater action. The groundwater		
	D1 Remedial Action Work Plan (Groundwater Treatment)			3 rd Quarter 2044	action for SWMUs 7 and 30 would be initiated after the SWMUs 2 and 3		
	D1 Remedial Action Completion Report			1 st Quarter 2047	groundwater action is complete.		

Burial Grounds Operable Unit (05) (Continued)								
		Enforceable Tir Deadlir		Planning Dates with Long-Term Targets for Decision				
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
SWMUs 9, 10,	D1 Remedial Investigation Work Plan			4 th Quarter 2040	This project is scheduled to begin with			
and 145	Addendum				a RI Work Plan Addendum and is			
Remedial	D1 Remedial Investigation Report			1 st Quarter 2042	assumed to complete two remedial			
Action	Addendum				actions (one for soil and buried			
	D1 Feasibility Study			3 rd Quarter 2042	material and another one for			
	D1 Proposed Plan			1 st Quarter 2043	groundwater treatment). Assuming			
	D1 ROD			3 rd Quarter 2043	FFA review logic, the CERCLA			
	D1 Remedial Design Work Plan			1 st Quarter 2044	documents and field work will require			
	D1 Remedial Design Report			3 rd Quarter 2044	a total of five years, including			
	D1 Remedial Action Work Plan			4 th Quarter 2044	approximately two years of field work			
	D1 Remedial Action Completion Report			1 st Quarter 2046	The project is sequenced so that the			
					field work for investigation activities			
					occurs between the completion of			
					SWMU 4 groundwater treatment and			
					SWMU 2 soil and buried waste fieldwork. The soil and buried materia			
					fieldwork and groundwater treatment will occur in parallel with SWMUs 7			
					and 30 groundwater treatment.			

	Burial Grounds Operable Unit (05) (Continued)							
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision				
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
Additional	SWMU 472 Remedial Investigation Work			1 st Quarter 2039	This project is scheduled to begin with			
Burial Grounds	Plan				a RI Work Plan and is assumed to			
	SWMU 472 Remedial Investigation			1 st Quarter 2040	complete one remedial action for each			
	Report				SWMU. Assuming FFA review logic,			
	SWMU 472 D1 Feasibility Study			3 rd Quarter 2040	the CERCLA documents and field			
	SWMU 472 D1 Proposed Plan			1 st Quarter 2041	work will require a total of three and a			
	SWMU 472 D1 ROD			3 rd Quarter 2041	half years, including approximately one			
	SWMU 472 D1 Remedial Design Work			1 st Quarter 2042	year of field work. The project is			
	Plan				sequenced so that the field work for			
	SWMU 472 D1 Remedial Design Report			2 nd Quarter 2042	investigation activities occurs during			
	SWMU 472 D1 Remedial Action Work			2 nd Quarter 2042	the fieldwork for SWMUs 5 and 6, and			
	Plan				the remedial action occurs during the			
	SWMU 472 D1 Remedial Action			4 th Quarter 2043	soil and buried material waste			
	Completion Report				fieldwork for SWMUs 7 and 30.			
	SWMU 520 Remedial Investigation Work			1 st Quarter 2039				
	Plan							
	SWMU 520 Remedial Investigation			1 st Quarter 2040				
	Report							
	SWMU 520 D1 Feasibility Study			3 rd Quarter 2040				
	SWMU 520 D1 Proposed Plan			1 st Quarter 2041				
	SWMU 520 D1 ROD			3 rd Quarter 2041				
	SWMU 520 D1 Remedial Design Work			1 st Quarter 2042				
	Plan							
	SWMU 520 D1 Remedial Design Report			2 nd Quarter 2042	_			
	SWMU 520 D1 Remedial Action Work			2 nd Quarter 2042				
	Plan				_			
	SWMU 520 D1 Remedial Action			4 th Quarter 2043				
	Completion Report							

Groundwater Operable Unit (01)

The Groundwater OU includes an additional source action for SWMU 211-B, an investigation to identify any additional sources and potential remedial action,

and dissolved phase treatment to complete the groundwater remedial actions.

	ase treatment to complete the groundwater re	Enforceable Tim Deadline		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
Southwest Plume Sources— SWMU 211-B	D1 Remedial Design Work Plan D1 Remedial Design Report (90% Design) D1 Remedial Action Work Plan D1 Remedial Action Completion Report			4 th Quarter 2044 2 nd Quarter 2048 2 nd Quarter 2048 2 nd Quarter 2052	This project is a groundwater source action that will be completed after the C-720 Building has been demolished and additional data is collected as part of the soils and slabs investigation to identify the full extent of groundwater source contamination adjacent and under the building. The field work will be completed in parallel with or after the slab
Potential Additional Groundwater Sources	D1 Site Investigation Work Plan D1 Site Investigation Report D1 Remedial Investigation Work Plan D1 Remedial Investigation Report D1 Feasibility Study Report D1 Proposed Plan D1 Record of Decision D1 Remedial Design Work Plan D1 Remedial Design Report (90% Design) D1 Remedial Action Work Plan D1 Remedial Action Completion Report			3 rd Quarter 2042 3 rd Quarter 2043 4 th Quarter 2044 1 st Quarter 2045 4 th Quarter 2045 1 st Quarter 2046 4 th Quarter 2046 4 th Quarter 2046 2 nd Quarter 2047 2 nd Quarter 2047 4 th Quarter 2047	action is complete. This project is scheduled to begin with a Site Investigation Work Plan and is assumed to complete one groundwater treatment action. Assuming FFA review logic, the CERCLA documents and field work will require a total of six years, including approximately one year of investigation field work and one year of remedial action. The project is sequenced so that the field work for investigation activities occurs after SWMU 4 is complete and will run in parallel with the dissolved-phase plumes project so that the source action can be taken into account in the remedial action design for the dissolved-phase action.

Groundwater Operable Unit (01)									
				Planning Dates with Long-Term Targets for Decision					
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments				
Dissolved-	D1 Remedial Investigation Work Plan			1st Quarter 2042	This project is scheduled to begin with a RI				
Phase Plumes	D1 Remedial Investigation Report			1 st Quarter 2044	Work Plan and is assumed to complete				
	D1 Feasibility Study Report			3 rd Quarter 2044	multiple treatment systems to address				
	D1 Proposed Plan			2 nd Quarter 2045	dissolved-phase throughout the plumes.				
	D1 ROD			4 th Quarter 2045	Assuming FFA review logic, the CERCLA				
	D1 Treatability Work Plan			2 nd Quarter 2043	documents and field work will require a total				
	D1 Treatability Study Report			1 st Quarter 2045	of six years, including approximately three				
	D1 Remedial Design Work Plan			1 st Quarter 2046	years of field work. The project is				
	D1 Remedial Design Report			2 nd Quarter 2046	sequenced so that the field work for				
	D1 Remedial Action Work Plan			3 rd Quarter 2046	investigation activities occurs after SWMU 4				
	D1 Interim Remedial Action Completion			4 th Quarter 2048	is complete and will run in parallel with the				
	Report				groundwater source treatment actions for				
					other groundwater and burial ground sources				
					in order to integrate and consider all source actions planned that would contribute to				
					dissolved-phase cleanup.				

Soils Operable Unit (04)
The Soils OU consists of a number of areas with identified soils contamination. Many of these areas are small units that are in close proximity with site buildings and other structures. The project is planned for two groupings of SWMUs; however, the SWMUs within each grouping have not yet been determined.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for	
				Decision	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
Remedial	D1 Feasibility Study			2 nd Quarter 2039	RI for these units has been completed. The RI
Action 1	D1 Proposed Plan			4 th Quarter 2039	Report has been approved by the FFA parties;
	D1 ROD			2 nd Quarter 2040	hence, this project is scheduled to begin with the
	D1 Remedial Design Work Plan			4 th Quarter 2040	FS and that is assumed to be a targeted
	D1 Remedial Design Report			1 st Quarter 2041	excavation. Assuming FFA review logic, the
	D1 Remedial Action Work Plan			2 nd Quarter 2041	CERCLA documents and field work will require
	D1 Remedial Action Completion Report			4 th Quarter 2042	a total of three years, including approximately six months of field work. The project is sequenced
	Teport				to be conducted in parallel with the burial
					grounds remedial actions and major demolition
					activities so that the soil can be disposed of with
					demolition debris in a potential OSWDF. This
					coordination will avoid the costs of purchasing
					soil for fill as debris is dispositioned.
Remedial	D1 Feasibility Study			4 th Quarter 2040	This project is scheduled to begin with the FS
Action 2	D1 Proposed Plan			2 nd Quarter 2041	and is assumed to be a targeted excavation.
	D1 ROD			4 th Quarter 2041	Assuming FFA review logic, the CERCLA
	D1 Remedial Design Work Plan			2 nd Quarter 2042	documents and field work will require a total of
	D1 Remedial Design Report			3 rd Quarter 2042	three years, including approximately six months
	D1 Remedial Action Work Plan			4 th Quarter 2042	of field work. The project is sequenced to be
	D1 Remedial Action Completion			1 st Quarter 2044	conducted in parallel with the burial grounds
	Report				remedial actions and major demolition activities
					so that the soil can be disposed of with
					demolition debris in a potential OSWDF. This
					coordination will avoid the costs of purchasing
					soil for fill as the debris is dispositioned. This
					project will begin approximately one year behind the first grouping to avoid overlapping field
					activities and to effectively utilize the soil for fill.
					activities and to effectively utilize the soft for fill.

DUF₆ Footprint Underlying Soils Operable Unit (08)

The DUF₆ Footprint Underlying Soils OU includes SWMUs identified as a result of soil contamination prior to construction of the DUF₆ conversion facility. These SWMUs are located underneath the currently operating DUF₆ conversion facility. It also includes the outfall ditches that discharge process and runoff from the facility and DUF₆ area.

		Enforceable Ti Deadli	4	Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
N/A	D1 Remedial Investigation Work Plan			4 th Quarter 2051	This project cannot be completed until
	D1 Remedial Investigation Report			4 th Quarter 2052	the DUF ₆ conversion facility completes
	D1 Feasibility Study			3 rd Quarter 2053	its mission and is decommissioned.
	D1 Proposed Plan			1 st Quarter 2054	Assuming FFA review logic, the
	D1 ROD			4 th Quarter 2055	CERCLA documents and field work will
	D1 Remedial Design Work Plan			4 th Quarter 2055	require a total of five years, including approximately two years of field work.
	D1 Remedial Design Report			4 th Quarter 2056	approximately two years of field work.
	D1 Remedial Action Work Plan			4 th Quarter 2056	
	D1 Remedial Action Completion Report			2 nd Quarter 2057	

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Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets (Continued)

Decontamination and Decommissioning Operable Unit (10)

D&D OU consists of many facilities grouped into subprojects that will be dispositioned utilizing the CERCLA process. Some facilities already have been designated for inclusion within this operable unit, based on existing information that requires that the facilities be dispositioned under CERCLA. Other facilities are grouped into geographical areas (GAs) and will be addressed appropriately based on each facility's specific conditions. Facility characterization, deposit removal, and deactivation are non-CERCLA activities that must be completed before D&D can occur. Additionally, the potential OSWDF must be constructed and capable of accepting this CERCLA waste. Additional cells (phases) within the potential OSWDF must be constructed throughout D&D in order to have cells (phases) available for disposition. As demolition is progressing, OSWDF expansion is sequenced logically to account for the facility volumes generated. The

D&D OU will take a total of 15 years to complete.

		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Switchyards	D1 Removal Notification (Site Evaluation)			2 nd Quarter 2036	The first D&D that is
D&D	Switchyards slabs and soils				scheduled to occur once the
	D1 EE/CA Switchyards slabs and soils			3 rd Quarter 2036	OSWDF is ready to begin
	D1 Action Memorandum Switchyards slabs and soils			4 th Quarter 2036	accepting waste.
	D1 Removal Action Work Plan Switchyards slabs			1 st Quarter 2037	
	and soils				
Cooling Towers	D1 Removal Notification (Site Evaluation) Cooling			3 rd Quarter 2038	The Cooling Towers D&D is
D&D	Tower Buildings				sequenced after completion of
	D1 EE/CA Cooling Tower Buildings			4 th Quarter 2038	the Switchyards D&D.
	D1 Action Memorandum Cooling Tower Buildings			1 st Quarter 2039	
	D1 Removal Action Work Plan Cooling Tower			2 nd Quarter 2039	
	Buildings				
C-409 D&D	D1 Removal Notification (Site Evaluation) C-409			1 st Quarter 2038	The C-409 D&D is sequenced
	D1 EE/CA C-409			2 nd Quarter 2038	after completion of the
	D1 Action Memorandum C-409			3 rd Quarter 2038	Switchyards D&D and in
	D1 Removal Action Work Plan C-409			4 th Quarter 2038	parallel with the cooling towers D&D.
C-709/C-710	D1 Removal Notification (Site Evaluation) C-709/C-			1 st Quarter 2038	The C-709/C-710 D&D is
D&D	710				sequenced after completion of
	D1 EE/CA C-709/C-710			2 nd Quarter 2038	the Switchyards D&D and in
	D1 Action Memorandum			4 th Quarter 2038	parallel with the cooling towers
	C-709/C-710				D&D.
	D1 Removal Action Work Plan			1 st Quarter 2039	
	C-709/C-710				

	Decontamination and Decommissioning Operable Unit (10)								
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision					
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments				
C-600 D&D	D1 Removal Notification (Site Evaluation) C-600			1 st Quarter 2040	The C-600 D&D is sequenced				
	D1 EE/CA C-600			2 nd Quarter 2040	after completion of the C-409				
	D1 Action Memorandum C-600			3 rd Quarter 2040	D&D.				
	D1 Removal Action Work Plan C-600			4 th Quarter 2040					
C-720 D&D	D1 Removal Notification (Site Evaluation) C-720			4 th Quarter 2040	The C-720 D&D is sequenced				
	D1 EE/CA C-720			1 st Quarter 2041	after completion of the C-709/C-				
	D1 Action Memorandum C-720			2 nd Quarter 2041	710 D&D.				
	D1 Removal Action Work Plan C-720			3 rd Quarter 2041					
C-337/C-337-A	D1 Removal Notification (Site Evaluation) C-			4 th Quarter 2041	Process facility characterization				
D&D	337/C-337A				and deposit removal continues				
	D1 EE/CA C-337/C-337A			1 st Quarter 2042	for approximately 14 years from				
	D1 Action Memorandum			2 nd Quarter 2042	FY 2018. As the deactivation				
	C-337/C-337A				activities are completed, D&D				
	D1 Removal Action Work Plan			3 rd Quarter 2042	will occur sequentially for the				
	C-337/C-337A				process facilities. The sequence				
C-335 D&D	D1 Removal Notification (Site Evaluation) C-335			3 rd Quarter 2043	is C-337/C-337-A; C-335; C-				
	D1 EE/CA C-335			3 rd Quarter 2043	315; C-333/C-333-A; C-331; C-310/C-310-A. D&D will occur				
	D1 Action Memorandum C-335			1 st Quarter 2044	over a period of eight years for				
	D1 Removal Action Work Plan C-335			2 nd Quarter 2044	all these process facilities.				
C-315 D&D	D1 Removal Notification (Site Evaluation) C-315			1 st Quarter 2045	an these process racinities.				
	D1 EE/CA C-315			2 nd Quarter 2045					
	D1 Action Memorandum C-315			4 th Quarter 2045					
	D1 Removal Action Work Plan C-315			1 st Quarter 2046					
C-333/C-333-A	D1 Removal Notification (Site Evaluation) C-			1 st Quarter 2047					
D&D	333/C-333-A			-1					
	D1 EE/CA C-333/C-333A			2 nd Quarter 2047					
	D1 Action Memorandum C-333/C-333-A			3 rd Quarter 2047					
	D1 Removal Action Work Plan C-333/C-333-A			4 th Quarter 2047					

	Decontamination	and Decommissioni	ng Operable	Unit (10)	
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
C-331 D&D	D1 Removal Notification (Site Evaluation) C-331			4 th Quarter 2047	
	D1 EE/CA C-331			1 st Quarter 2048	
	D1 Action Memorandum C-331			3 rd Quarter 2048	
	D1 Removal Action Work Plan C-331			4 th Quarter 2048	
C-310/C-310-A	D1 Removal Notification (Site Evaluation) C-			1 st Quarter 2048	
D&D	310/C-310-A				
	D1 EE/CA C-310/C-310-A			2 nd Quarter 2048	
	D1 Action Memorandum			4 th Quarter 2048	
	C-310/C-310-A				
	D1 Removal Action Work Plan			1 st Quarter 2049	
	C-310/C-310-A				
GA 1	D1 Removal Notification (Site Evaluation) GA 1			1 st Quarter 2047	D&D within the GAs will occur
D&D	(includes C-615 Sewage Treatment Plant and C-				in parallel beginning with the C-
	616 Former Chromate Treatment System)				409 facilities and continuing
	D1 EE/CA GA 1 (includes C-615 Sewage			2 nd Quarter 2047	through the process facilities.
	Treatment Plant and C-616 Former Chromate				These are sequenced to stabilize
	Treatment System)				the workload, annual costs, and
	D1 Action Memorandum GA 1 (includes C-615			4 th Quarter 2047	waste volumes as the larger
	Sewage Treatment Plant and C-616 Former				facilities are undergoing D&D.
	Chromate Treatment System)				The GAs identified are those that
	D1 Removal Action Work Plan GA 1 (includes			1 st Quarter 2048	include facilities already
	C-615 Sewage Treatment Plant and C-616				identified in the D&D OU. If
	Former Chromate Treatment System)			and a second	other facilities are identified for
GA 10	D1 Removal Notification (Site Evaluation) GA			2 nd Quarter 2041	inclusion in the D&D OU, the
D&D	10 (includes C-726)			and a	GA where they are located will
	D1 EE/CA GA 10 (includes C-726)			3 rd Quarter 2041	be updated and planning dates
	D1 Action Memorandum GA-10 (includes C-			1 st Quarter 2042	established, as appropriate.
	726)			and a	
	D1 Removal Action Work Plan			2 nd Quarter 2042	
	GA 10 (includes C-726)				

	Decontamination :	L'afanacable 'l'imetable and		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
GA 13	D1 Removal Notification (Site Evaluation) GA			1 st Quarter 2041	
D&D	13 (includes C-415)				
	D1 EE/CA GA 13 (includes C-415)			2 nd Quarter 2041	
	D1 Action Memorandum GA 13 (includes C-415)			3 rd Quarter 2041	
	D1 Removal Action Work Plan			4 th Quarter 2041	
	GA 13 (includes C-415)				
GA 14	D1 Removal Notification (Site Evaluation) GA			2 nd Quarter 2037	
D&D	14 (includes C-724-A and C-728)				
	D1 EE/CA GA 14 (includes C-724-A and C-728)			3 rd Quarter 2037	
	D1 Action Memorandum GA 14 (includes C-724-			1 st Quarter 2038	
	A and C-728)				
	D1 Removal Action Work Plan			2 nd Quarter 2038	
	GA 14 (includes C-724-A and C-728)				

Soils and Slabs Operable Unit (11)

This OU contains many subprojects to address the various slabs at the Paducah Site. The large process and support facilities have specific subprojects identified for each slab. Other slabs are grouped in GAs will be addressed appropriately, based on each areas specific conditions. These subprojects are designated for planning purposes only. The physical characteristics and previous actions taken within the GAs will determined the appropriate action for completion. The Soils and Slabs OU will take a total of 15 years to complete and will overlap with the D&D and Soils OUs.

			Enforceable Timetable and Deadlines ¹		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	for Decision Documents ²	Comments
C-409 Slab	D1 Remedial Investigation Work Plan C-409 Slab			4 th Quarter 2040	The C-409 Soils and Slabs RI
	D1 Remedial Investigation Report C-409 Slab			2 nd Quarter 2042	will begin upon completion of D&D of C-409. This project is
	D1 Feasibility Study C-409 Slab			4 th Quarter 2042	estimated to take five years to
	D1 Proposed Plan C-409 Slab			2 nd Quarter 2043	complete, assuming FFA review
	D1 ROD C-409 Slab			4 th Quarter 2043	logic. These are sequenced after
	D1 Remedial Design Work Plan C-409 Slab			2 nd Quarter 2044	the D&D is complete for each building.
	D1 Remedial Design Report C-409 Slab			3 rd Quarter 2044	
	D1 Remedial Action Work Plan C-409 Slab			4 th Quarter 2044	
	D1 Remedial Action Completion Report C-409 Slab			1 st Quarter 2046	
C-340 Slab	D1 Remedial Investigation Work Plan C-340 Slab			3 rd Quarter 2042	The C-340 Soils and Slabs
	D1 Remedial Investigation Report C-340 Slab			1 st Quarter 2044	project is scheduled after completion of the C-409 Soils
	D1 Feasibility Study C-340 Slab			3 rd Quarter 2044	and Slabs investigation. This
	D1 Proposed Plan C-340 Slab			1 st Quarter 2045	project is estimated to take five
	D1 ROD C-340 Slab			3 rd Quarter 2045	years to complete assuming FFA
	D1 Remedial Design Work Plan C-340 Slab			1 st Quarter 2046	review logic.
	D1 Remedial Design Report C-340 Slab			2 nd Quarter 2046	
	D1 Remedial Action Work Plan C-340 Slab			2 nd Quarter 2046	
	D1 Remedial Action Completion Report C-340 Slab			3 rd Quarter 2047	

	Soils an	d Slabs Operable l	Unit (11)		
			Enforceable Timetable and Deadlines ¹		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-709/C-710	D1 Remedial Investigation Work Plan C-709/C-710			2 nd Quarter 2044	The C-709/C-710 Soils and
Slab	Slab				Slabs RI will begin upon
	D1 Remedial Investigation Report C-709/C-710 Slab			4 th Quarter 2045	completion of D&D of C-709/C-710. This project is estimated to
	D1 Feasibility Study C-709/C-710 Slab			2 nd Quarter 2046	take five years to complete
	D1 Proposed Plan C-709/C-710 Slab			4 th Quarter 2046	assuming FFA review logic.
	D1 ROD C-709/C-710 Slab			2 nd Quarter 2047	These are sequenced after the
	D1 Remedial Design Work Plan			4 th Quarter 2047	D&D is complete for each
	C-709/C-710 Slab			4 Quarter 2047	building.
	D1 Remedial Design Report C-709/			1 st Quarter 2048	
	C-710 Slab				
	D1 Remedial Action Work Plan			1 st Quarter 2048	
	C-709/C-710 Slab			-1	
	D1 Remedial Action Completion Report C-709/C-710 Slab			3 rd Quarter 2049	
C-720 Slab	D1 Remedial Investigation Work Plan C-720 Slab			2 nd Quarter 2044	The C-720 Soils and Slabs RI
	D1 Remedial Investigation Report			3 rd Quarter 2045	will begin upon completion of
	C-720 Slab				D&D of C-720. This project is
	D1 Feasibility Study C-720 Slab			1 st Quarter 2046	estimated to take five years to
	D1 Proposed Plan C-720 Slab			3 rd Quarter 2046	complete assuming FFA review
	D1 ROD C-720 Slab			1 st Quarter 2047	logic. These are sequenced after
	D1 Remedial Design Work Plan			3 rd Quarter 2047	the D&D is complete for each
	C-720 Slab				building.
	D1 Remedial Design Report C-720 Slab			4 th Quarter 2047	
	D1 Remedial Action Work Plan			4 th Quarter 2047	
	C-720 Slab				
	D1 Remedial Action Completion Report C-720			2 nd Quarter 2049	
	Slab				

	Soils an	d Slabs Operable U	Jnit (11)		
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-410/C-420 Slabs	D1 Remedial Investigation Work Plan C-410/C-420 Slab			4 th Quarter 2043	The C-420/C-420 Soils and Slabs project is scheduled after
	D1 Remedial Investigation Report C-410/C-420 Slab			2 nd Quarter 2045	completion of the C-340 Soils and Slabs investigation. This
	D1 Feasibility Study C-410/C-420 Slab			4 th Quarter 2045	project is estimated to take five
	D1 Proposed Plan C-410/C-420 Slab			2 nd Quarter 2046	years to complete assuming FFA
	D1 ROD C-410/C-420 Slab			4 th Quarter 2046	review logic. These are
	D1 Remedial Design Work Plan C-410/C-420 Slab			2 nd Quarter 2047	sequenced after the D&D is complete for each building.
	D1 Remedial Design Report C-410/C-420 Slab			3 rd Quarter 2047	
	D1 Remedial Action Work Plan C-410/C-420 Slab			3 rd Quarter 2047	
	D1 Remedial Action Completion Report C-410/ C-420 Slab			1 st Quarter 2049	
C-337/C-337-A Slab	D1 Remedial Investigation Work Plan C-337/ C-337A Slab			4 th Quarter 2046	The C-337/C-337-A Soils and Slabs RI will begin upon
Siau	D1 Remedial Investigation Report C-337/C-337A			3 rd Quarter 2047	completion of D&D of C-337/C-
	Slab			3 Quarter 2047	337-A. This project is estimated
	D1 Feasibility Study C-337/C-337A Slab			1 st Quarter 2048	to take five years to complete
	D1 Proposed Plan C-337/C-337A Slab			3 rd Quarter 2048	assuming FFA review logic.
	D1 ROD C-337/C-337A Slab			1 st Quarter 2050	These are sequenced after the
	D1 Remedial Design Work Plan			3 rd Quarter 2050	D&D is complete for each
	C-337/C-337A Slab			.1	building.
	D1 Remedial Design Report C-337/ C-337A Slab			4 th Quarter 2050	
	D1 Remedial Action Work Plan C-337/C-337A Slab			1 st Quarter 2051	
	D1 Remedial Action Completion Report C-337/ C-337A Slab			3 rd Quarter 2052	

	Soils ar	nd Slabs Operable l	Unit (11)		
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-335 Slab	D1 Remedial Investigation Work Plan C-335 Slab			1 st Quarter 2047	The C-335 Soils and Slabs RI
	D1 Remedial Investigation Report			4 th Quarter 2047	will begin upon completion of
	C-335 Slab				D&D of C-335. This project is
	D1 Feasibility Study C-335 Slab			3 rd Quarter 2048	estimated to take five years to
	D1 Proposed Plan C-335 Slab			1 st Quarter 2049	complete assuming FFA review
	D1 ROD C-335 Slab			3 rd Quarter 2049	logic. These are sequenced after
	D1 Remedial Design Work Plan			1 st Quarter 2050	the D&D is complete for each
	C-335 Slab				building.
	D1 Remedial Design Report C-335 Slab			2 nd Quarter 2050	
	D1 Remedial Action Work Plan			3 rd Quarter 2050	
	C-335 Slab				
	D1 Remedial Action Completion Report C-335			3 rd Quarter 2051	
	Slab				
C-310 Slab	D1 Remedial Investigation Work Plan C-310 Slab			4 th Quarter 2048	The C-310 Soils and Slabs RI
	D1 Remedial Investigation Report			4 th Quarter 2049	will begin upon completion of
	C- C-310 Slab				D&D of C-310. This project is
	D1 Feasibility Study C-310 Slab			2 nd Quarter 2050	estimated to take five years to
	D1 Proposed Plan C-310 Slab			4 th Quarter 2050	complete assuming FFA review
	D1 ROD C-310 Slab			2 nd Quarter 2051	logic. These are sequenced after
	D1 Remedial Design Work Plan			4 th Quarter 2051	the D&D is complete for each
	C-310 Slab				building.
	D1 Remedial Design Report			1 st Quarter 2052	
	C-310 Slab				
	D1 Remedial Action Work Plan			1 st Quarter 2052	
	C-310 Slab				
	D1 Remedial Action Completion Report C-310			2 nd Quarter 2053	
	Slab				

	Soils ar	nd Slabs Operable I	Unit (11)		
		Enforceable Tir Deadlir		Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
C-315 Slab	D1 Remedial Investigation Work Plan C-315 Slab			4 th Quarter 2047	The C-315 Soils and Slabs RI will begin upon completion of
	D1 Remedial Investigation Report C-315 Slab			2 nd Quarter 2049	D&D of C-315. This project is estimated to take five years to
	D1 Feasibility Study C-315 Slab			4 th Quarter 2049	complete assuming FFA review
	D1 Proposed Plan C-315 Slab			2 nd Quarter 2050	logic. These are sequenced after
	D1 ROD C-315 Slab			4 th Quarter 2050	the D&D is complete for each building.
	D1 Remedial Design Work Plan C-315 Slab			2 nd Quarter 2051	building.
	D1 Remedial Design Report C-315 Slab			3 rd Quarter 2051	
	D1 Remedial Action Work Plan C-315 Slab			3 rd Quarter 2051	
	D1 Remedial Action Completion Report C-315 Slab			4 th Quarter 2052	
C-333/C-333-A Slab	D1 Remedial Investigation Work Plan C-333/ C-333-A Slab			3 rd Quarter 2050	The C-333/C-333-A Soils and Slabs RI will begin upon
	D1 Remedial Investigation Report C-333/C-333-A Slab			2 nd Quarter 2051	completion of D&D of C-333/C-333-A. This project is estimated
	D1 Feasibility Study C-333/C-333-A Slab			4 th Quarter 2051	to take five years to complete
	D1 Proposed Plan C-333/C-333-A Slab			2 nd Quarter 2052	assuming FFA review logic.
	D1 ROD C-333/C-333-A Slab			4 th Quarter 2052	These are sequenced after the
	D1 Remedial Design Work Plan C-333/C-333-A Slab			2 nd Quarter 2053	D&D is complete for each building.
	D1 Remedial Design Report C-333/ C-333-A Slab			3 rd Quarter 2053	
	D1 Remedial Action Work Plan C-333/C-333-A Slab			3 rd Quarter 2053	
	D1 Remedial Action Completion Report C-333/ C-333-A Slab			1 st Quarter 2055	

	Soils and Slabs Operable Unit (11)							
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision				
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
C-331 Slab	D1 Remedial Investigation Work Plan C-331 Slab			1 st Quarter 2051	The C-331 Soils and Slabs RI will begin upon completion of			
	D1 Remedial Investigation Report C-331 Slab			1 st Quarter 2052	D&D of C-331. This project is			
	D1 Feasibility Study C-331 Slab			3 rd Quarter 2052	estimated to take five years to			
	D1 Proposed Plan C-331 Slab			1 st Quarter 2053	complete assuming FFA review			
	D1 ROD C-331 Slab			3 rd Quarter 2053	logic. These are sequenced after			
	D1 Remedial Design Work Plan C-331 Slab			1 st Quarter 2054	the D&D is complete for each building. This is the final Soils			
	D1 Remedial Design Report C-331 Slab			2 nd Quarter 2054	and Slab project to be			
	D1 Remedial Action Work Plan C-331 Slab			2 nd Quarter 2054	completed.			
	D1 Remedial Action Completion Report C-331 Slab			3 rd Quarter 2055				
GA 9, GA 12, GA 13, GA 15,	D1 Remedial Investigation Work Plan GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			1 st Quarter 2044	Soils and Slabs within the GAs will occur in parallel, beginning			
GA 17 Slabs	D1 Remedial Investigation Report GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			3 rd Quarter 2045	with the C-409 facilities and continuing through the process			
	D1 Feasibility Study GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			1 st Quarter 2046	facilities. This is sequenced to stabilize the workload, annual			
	D1 Proposed Plan GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			3 rd Quarter 2046	costs, and waste volumes as the larger facilities are undergoing			
	D1 ROD GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			1 st Quarter 2047	D&D.			
	D1 Remedial Design Work Plan GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			3 rd Quarter 2047				
	D1 Remedial Design Report GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			4 th Quarter 2047				
	D1 Remedial Action Work Plan GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			4 th Quarter 2047				
	D1 Remedial Action Completion Report GA 9, GA 12, GA 13, GA 15, GA 17 Slabs			1 st Quarter 2050				

Soils and Slabs Operable Unit (11)						
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision		
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments	
GA 10, GA 11	D1 Remedial Investigation Work Plan GA 10, GA			4 th Quarter 2049	Soils and Slabs within the GAs	
Slabs	11 Slabs				will occur in parallel, beginning	
	D1 Remedial Investigation Report			2 nd Quarter 2051	with the C-409 facilities and	
	GA 10, GA 11 Slabs				continuing through the process	
	D1 Feasibility Study GA 10, GA 11 Slabs			4 th Quarter 2051	facilities. This is sequenced to	
	D1 Proposed Plan GA 10, GA 11 Slabs			2 nd Quarter 2052	stabilize the workload, annual	
	D1 ROD GA 10, GA 11 Slabs			4 th Quarter 2052	costs, and waste volumes as the	
	D1 Remedial Design Work Plan			2 nd Quarter 2053	larger facilities are undergoing	
	GA 10, GA 11 Slabs				D&D.	
	D1 Remedial Design Report			3 rd Quarter 2053		
	GA 10, GA 11 Slabs					
	D1 Remedial Action Work Plan			3 rd Quarter 2053		
	GA 10, GA 11 Slabs			41-		
	D1 Remedial Action Completion Report GA 10, GA 11 Slabs			4 th Quarter 2054		
GA 5 Slabs	D1 Remedial Investigation Work Plan			4 th Quarter 2041	Soils and Slabs within the GAs	
	GA 5 Slabs				will occur in parallel, beginning	
	D1 Remedial Investigation Report			2 nd Quarter 2043	with the C-409 facilities and	
	GA 5 Slabs				continuing through the process	
	D1 Feasibility Study GA 5 Slabs			4 th Quarter 2043	facilities. This is sequenced to	
	D1 Proposed Plan GA 5 Slabs			2 nd Quarter 2044	stabilize the workload, annual	
	D1 ROD GA 5 Slabs			4 th Quarter 2044	costs, and waste volumes as the	
	D1 Remedial Design Work Plan GA 5 Slabs			1 st Quarter 2045	larger facilities are undergoing	
	D1 Remedial Design Report GA 5 Slabs			2 nd Quarter 2045	D&D.	
	D1 Remedial Action Work Plan GA 5 Slabs			3 rd Quarter 2045		
	D1 Remedial Action Completion Report GA 5			4 th Quarter 2046		
	Slabs					

Soils and Slabs Operable Unit (11)						
	Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision			
Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments		
D1 Remedial Investigation Work Plan GA 16 Slabs				Soils and Slabs within the GAs		
D1 Remedial Investigation Report			1 st Quarter 2049	will occur in parallel, beginning		
GA 16 Slabs				with the C-409 facilities and		
				continuing through the process		
				facilities. This is sequenced to		
				stabilize the workload, annual		
			1 st Quarter 2052	costs, and waste volumes as the		
			3	larger facilities are undergoing		
				D&D.		
			3 rd Quarter 2052			
			ard a			
			3 rd Quarter 2053			
			1st 0 2011			
			1 st Quarter 2041	Soils and Slabs within the GA		
			2rd O	will occur in parallel, beginning with the C-409 facilities and		
			3 Quarter 2042			
			1st Oscarton 2042	continuing through the process facilities. This is sequenced to		
				stabilize the workload, annual		
				costs, and waste volumes as the		
*				larger facilities are undergoing		
			2 Quarter 2044	D&D.		
			3 rd Quarter 2044			
,						
			1 Quarter 2040			
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	Soils and Slabs Operable Unit (11)							
		Enforceable Timetable and Deadlines ¹		Planning Dates with Long-Term Targets for Decision				
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
GA 1, GA 4 Slabs	D1 Remedial Investigation Work Plan GA 1, GA 4 Slabs			2 nd Quarter 2050	Soils and Slabs within the GAs will occur in parallel, beginning			
	D1 Remedial Investigation Report GA 1, GA 4 Slabs			3 rd Quarter 2052	with the C-409 facilities and continuing through the process			
	D1 Feasibility Study GA 1, GA 4 Slabs			1 st Quarter 2053	facilities. This is sequenced to			
	D1 Proposed Plan GA 1, GA 4 Slabs			3 rd Quarter 2053	stabilize the workload, annual			
	D1 ROD GA 1, GA 4 Slabs			1 st Quarter 2054	costs, and waste volumes as the			
	D1 Remedial Design Work Plan GA 1, GA 4 Slabs			3 rd Quarter 2054	larger facilities are undergoing D&D.			
	D1 Remedial Design Report GA 1, GA 4 Slabs			4 th Quarter 2054				
	D1 Remedial Action Work Plan GA 1, GA 4 Slabs			4 th Quarter 2054				
	D1 Remedial Action Completion Report GA 1, GA 4 Slabs			4 th Quarter 2055				

Lagoons Operable Unit (09)

The Lagoons OU consists of two subprojects to address two different types of lagoons utilized at the Paducah Site. Lagoons that were constructed to support gaseous diffusion processes are grouped together into one subproject, and lagoons constructed for the purpose of treating water drawn from the Ohio River to provide potable and sanitary water to the Paducah Site are grouped together under another subproject.

	and summary water to the radical stream of the are given			Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Process	D1 Remedial Investigation Work Plan			4 th Quarter 2048	The process lagoons may be required to
Lagoons	D1 Remedial Investigation Report			2 nd Quarter 2050	support deposit removal and other
	D1 Feasibility Study			4 th Quarter 2050	deactivation activities that required
	D1 Proposed Plan			1 st Quarter 2051	systems to operate to remove chemicals
	D1 ROD			3 rd Quarter 2051	within the process facilities. This project is
	D1 Remedial Design Work Plan			2 nd Quarter 2052	sequenced after the major facilities have
	D1 Remedial Design Report			3 rd Quarter 2052	been demolished. The baseline assumes
	D1 Remedial Action Work Plan			3 rd Quarter 2052	that the lagoons would be drained;
	D1 Remedial Action Completion Report			3 nd Quarter 2053	dredged; and soils placed in a potential OSWDF and backfilled with clean fill.
					The project is estimated to take five years to complete assuming FFA review logic.
Water	D1 Remedial Investigation Work Plan			4 th Quarter 2048	The water treatment lagoons are operating
Treatment	D1 Remedial Investigation Report			2 nd Quarter 2050	as part of the existing site water treatment
System Lagoons	D1 Feasibility Study			4 th Quarter 2050	plant. The water treatment plant may
	D1 Proposed Plan			2 nd Quarter 2051	operate until the major facilities have been
	D1 ROD			4 th Quarter 2051	demolished. The lifecycle baseline
	D1 Remedial Design Work Plan			2 nd Quarter 2052	assumes this is likely case; however, DOE
	D1 Remedial Design Report			3 rd Quarter 2052	is evaluating more cost-effective ways to
	D1 Remedial Action Work Plan			3 rd Quarter 2052	provide water to the site's facilities in
	D1 Remedial Action Completion			3 rd Quarter 2053	order to shut down the system early. The
					baseline assumes that the lagoons would
					be drained; dredged; and soils be placed in
					a potential OSWDF and backfilled with
					clean fill. The project is estimated to take
					five years to complete assuming FFA
					review logic.

Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets (Continued)

Surface Water Operable Unit (03)

The Surface Water OU includes the internal plant ditches that discharge to Little Bayou Creek and Bayou Creek. The SWMUs within the OU contributed to surface water contamination throughout the system. The outfalls and creeks also are identified as SWMUs.

				Planning Dates with Long-Term Targets for Decision	
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments
Remedial	D1 Remedial Investigation Report			3 rd Quarter 2054	This project will not begin until the
Action	D1 Feasibility Study Report			1 st Quarter 2055	gaseous diffusion facilities have been
(Little Bayou	D1 Proposed Plan			3 rd Quarter 2055	dispositioned and sources of
and Bayou	D1 ROD			1 st Quarter 2056	contamination have been addressed in
Creek	D1 Remedial Design Work Plan			3 rd Quarter 2056	order to avoid recontamination through
Watersheds)	D1 Remedial Design Report			2 nd Quarter 2057	site discharges. The project is estimated
	D1 Remedial Action Work Plan			2 nd Quarter 2057	to take five years to complete assuming
	D1 Remedial Action Completion Report			4 th Quarter 2058	FFA review logic. This project is the last
					media-specific project to be addressed
			0 11 77		prior to the CSOU.

Comprehensive Site Operable Unit (12)

The CSOU evaluates the final actions taken at the site. It includes a sitewide baseline human health and ecological risk assessment to evaluate residual risks and ensure all actions taken to date, when considered collectively, are protective of human health and the environment from a sitewide perspective and implements any additional actions necessary to achieve final cleanup under the FFA.

		Enforceable Ti Deadli		Planning Dates with Long-Term Targets	
				for Decision	
Subproject	Deliverable	FY 2018–FY 2020	Out-Year	Documents ²	Comments
N/A	D1 Remedial Investigation Work Plan			1 st Quarter 2062	The CSOU will begin upon completion of
	D1 Remedial Investigation/Feasibility			3 rd Quarter 2062	the last remedial action completion and
	Study Report				closure of the potential on-site waste
	D1 Proposed Plan			_ (disposal facility. It will take
	D1 ROD			3 rd Quarter 2063	approximately two years to complete.

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Enforceable Timetables and Deadlines; Planning Dates with Long-Term Targets (Continued)

	Other FFA Planning Dates							
	Enforceable Timetable and Deadlines ¹			Planning Dates with Long-Term Targets for Decision				
Subproject	Deliverable	FY 2018-FY 2020	Out-Year	Documents ²	Comments			
NA	D1 Five-Year Review			7/31/18	This is a statutorily required document that			
					must be approved by 6/4/19.			

¹ Enforceable Timetables and Deadlines are based on the planning scope assumptions contained in Appendix 3 and funding levels. Approval of the assumptions does not constitute decision making for the response actions described in this table.

BGOU = Burial Grounds Operable Unit

D&D = decontamination and decommissioning EPA = U.S. Environmental Protection Agency

FFA = Federal Facility Agreement

GA = geographical area

GWOU = Groundwater Operable Unit

FY = fiscal year

NA = not applicable

OU = operable unit

RI = remedial investigation

ROD = record of decision

SWOU = Surface Water Operable Unit

SWMU = solid waste management unit

TBD = to be determined

² Not enforceable dates. These planning dates are internal DOE dates used for planning purposes only. The parties further agree that the U.S. Department of Energy can adjust the planning dates as part of the annual Site Management Plan update without having to submit an official request or justify "good cause" in accordance with Section XXIX of the FFA.

³ Assumes that final approval is received on the D2 document.



APPENDIX 6

PADUCAH GASEOUS DIFFUSION PLANT FACILITIES PENDING FUTURE CERCLA DETERMINATION



]	FACILITIES PENDING FUTURE C	ERCLA DETE	RMIN	ATION
Facility Number	Description	SWMU/AOC Number	GA	Facility Status
	Sewage System and Water Treats	nent Ancillary Fac	cilities	
C-611-A	Building and Shop Storage	-	1	Operating
C-611-A1	Activated Carbon Storage Facility		1	Operating
C-611-B	Head House		1	Operating
C-611-B1	Polymer Feed System Enclosure		1	Operating
C-611-C	Flocculator Basin		1	Operating
C-611-D	Settling Basin (Northeast)		1	Operating
C-611-E	Settling Basin (Northwest)		1	Operating
C-611-F	Settling Basin (southeast)		1	Operating
C-611-F1	Secondary Coagulation Basin		1	Operating
C-611-F2	Chemical Feed Building for C-611-F1		1	Operating
C-611-F3	Feed Facility		1	Operating
C-611-G	Settling Basin (southwest)		1	Operating
C-611-H	Filter Building and Pump Station		1	Operating
C-611-I	Clear Well		1	Operating
C-611-J	Pump House (Settled Water)		1	Operating
C-611-O	Sanitary Water Storage Tank		16	Operating
C-611-P	Building – Pump House		12	Standby
C-611-Q	36" Raw Water Line Booster Station		8	Shutdown
C-611-S	Storage and Chlorine Facility		1	Operating
C-611-T	Booster Pump Station Plant Water		1	Shutdown
C-611-U	Softening Facility (West)		1	Operating
C-611-X	Softening Facility (East)		1	Operating
C-611-Z	Flocculator Basin		1	Operating
C-615-G	Sewage Lift Station		14	Operating
C-615-H	Sewage Lift Station		17	Operating
C-615-H1	Sewage Lift Station		16	Operating
C-615-H2	Sewage Lift Station		17	Operating
С-615-Н3	Sewage Lift Station		5	Operating
C-615-H4	Sewage Lift Station		4	Operating
C-615-H4A	Sewage Lift Station		4	Operating
C-615-H5	Sewage Lift Station		5	Operating
С-615-Н6	Sewage Lift Station		9	Operating
C-615-H7	Sewage Lift Station		17	Operating
C-615-H8	Sewage Lift Station		16	Operating

	FACILITIES PENDING FUTURE CEI	RCLA DETE	RMI	NATION
Facility Number	Description	SWMU/AOC Number	GA	Facility Status
C-615-K	East/West Ditch (Former Chromate) Lift Station		17	Operating
C-615-O	Oil Control Building		11	Operating
	Gaseous Diffusion Plant Sup	port Facilities		
C-100	Administrative Building		15	Operating
C-101	Former Cafeteria		15	Operating
C-102	Hospital		15	Operating
C-200	Guard and Fire Headquarters		14	Operating
C-203	Emergency Vehicle Shelter		14	Operating
C-204	Disintegrator	479	14	Standby
C-205	Respirator Issue Facility		14	Operating
C-207	Fire Training Facility		11	Operating
C-301	Former Fire Training Building		16	Standby
C-303	Supervisory Control and Data Acquisition System		15	Operating
C-320	Communication Building		15	Operating
C-350	Drying Agent Storage Building		17	Operating
C-360	Toll Transfer and Sampling Building		16	Operating
C-360-A	Toll Transfer and Sampling Building Anne		16	Operating
C-400-A	Emergency Power for Critical Alarms		12	Deactivating
C-410-D	Fluorine Storage Building		13	Operating
C-410-K	Fluorine Facility		13	Operating
C-410-L	Quonset Hut		13	Operating
C-601	Nitrogen Generator Building Addition		12	Deactivating
C-601-C	Steam Plant Fuel Oil Pump House		12	Operating
C-604	Utilities Maintenance Building		12	Operating
C-605	Substation Building		12	Operating
C-606	Coal Crusher Building		12	Standby
C-607	Emergency Air Compressor Generator Build		12	Operating
C-620	Air Compressor Room		16	Operating
C-635-6	Recirculating Heat Utilization Pump House		17	Operating
C-710-A	Gas Cylinder Storage Building		15	Operating
C-711	Storage/Former Gas Manifold		15	Operating
C-720-A	Compressor Shop Addition		14	Operating
C-720-B	Machine Shop Addition		14	Operating
C-720-C	Converter Shop Addition		14	Operating
C-720-C1	Paint Shop		14	Operating

	FACILITIES PENDING FUTURE CE	RCLA DETE	RMI	NATION
Facility Number	Description	SWMU/AOC Number	GA	Facility Status
C-720-D	Transformer Building		14	Operating
C-720-E	Change House Addition		14	Operating
C-720-G	Warehouse		14	Operating
С-720-Н	Warehouse		14	Operating
C-720-J	Air Lock		14	Operating
C-720-K	Instrument Shop Addition		14	Operating
C-721	Gas Manifold Storage		14	Operating
C-724-B	Carpenter Shop		14	Operating
C-724-C	Paint Shop		14	Operating
C-724-D	Lumber Storage Building		14	Operating
C-725	Paint Shop		14	Operating
C-727	90-Day Mixed Waste Accumulation Facility		16	Deactivation Complete
C-729	Acetylene Building		14	Standby
C-730	Maintenance Service Building		2	Operating
C-731	Railroad Repair Equipment Storage Building		14	Operating
C-740-B	Oil Drum Storage Shelter		14	Operating
C-742	Cylinder Storage Building		14	Operating
C-742-B	Drying Agent Cylinder Storage	-	10	Operating
C-744	Material Handling Building	-	14	Operating
C-745-B1	Cylinder Storage Yard Office	-	4	Shutdown
C-745-R1	Cylinder Changeout Building		4	Operating
C-746-A	North Warehouse	-	9	Deactivation Complete
C-746-G	Building – Electrical Equipment Storage	-	16	Operating
C-746-Q1	High Assay Waste Storage Building		4	Operating
C-750	Garage		14	Operating
C-752-C	Off-Site Decontamination Facility		2	Operating
C-753-A	TSCA Waste Storage Facility	206	10	Operating
C-754-B	Low Level Waste Storage		16	Operating
C-755-A	Decontamination Building		5	Operating
C-755-B	Changehouse Building		5	Operating
C-755-C	Sample Shipment/Storage Facility		5	Operating
C-757	Solid and Low-Level Waste Processing Facility		17	Operating

FACILITIES PENDING FUTURE CERCLA DETERMINATION							
Facility Number Description SWMU/AOC Number				GA	Facility Status		
	Remedial Action Facilities						
C-612	C-612 Northwest Plume Groundwater Treatment Facility				1	Operating	

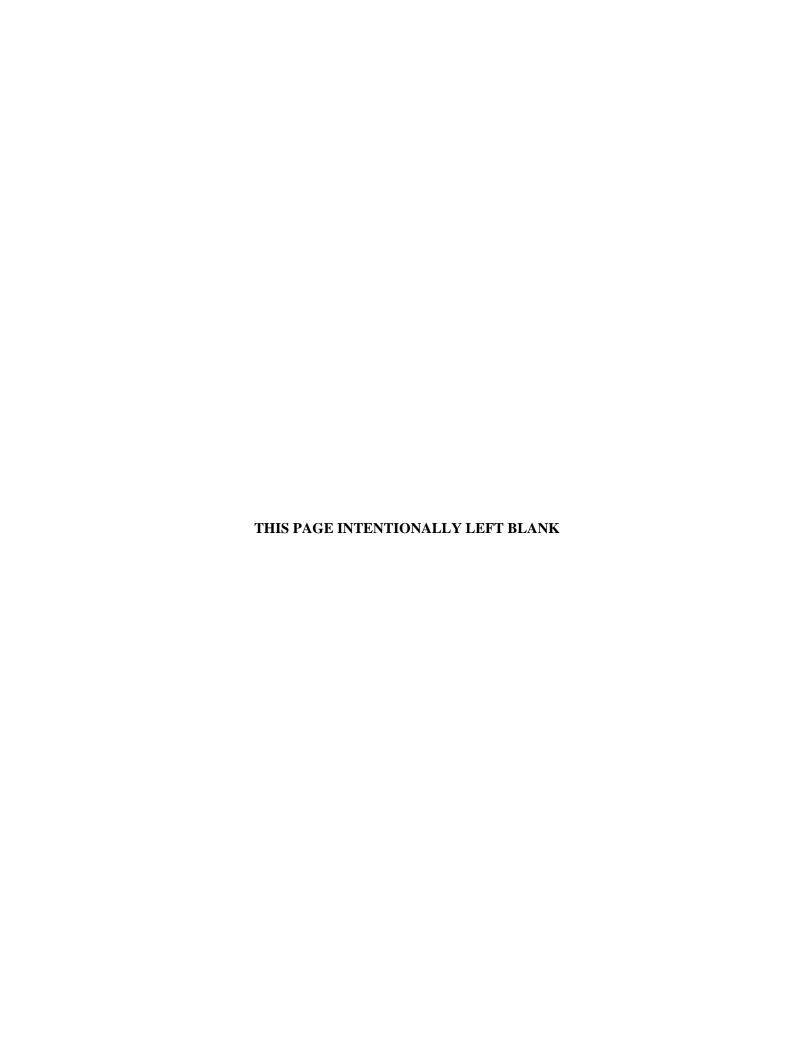
GA = Geographical Area

Operating = Facility currently is in use supporting U.S. Department of Energy mission activities.

Standby = Facility currently is not in use, but may be utilized to support future U.S. Department of Energy mission activities. Shutdown = Facility is not being maintained for future use, but has not yet begun deactivation activities. Deactivating = Deactivation activities have been initiated and are ongoing.

Deactivation Complete = Awaiting Decommissioning

APPENDIX 7 DATA MANAGEMENT PLAN



DATA AND DOCUMENTS MANAGEMENT AND QUALITY ASSURANCE PLAN FOR PADUCAH ENVIRONMENTAL MANAGEMENT AND ENRICHMENT FACILITIES

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U.S. DEPARTMENT OF ENERGY
Under Contract No. DE-AC05-980R22700

DATA AND DOCUMENTS MANAGEMENT AND QUALITY ASSURANCE PLAN APPROVALS

Approved by:	D. L. Chumbler	Date:	10/5/98
	D. L. Chumbler		r
	Bechtel Jacobs Company LLC		
	Quality Manager		
Approved by:	A Faster	Date:	10/5/98
	R. L. Eoster		/ /
	Bechtel Jacobs Company LLC		
	Information Technology and Sample Managem	ent	
Approved by:	R. E. Scott Bechtel Jacobs Company LLC Engineering and Technical Services	Date:	10/5/98
Approved by:	J. C. Massey Bechtel Jacobs Company LLC Paducah Manager of Projects	Date:	H5/58
Approved by:	J. C. Hodges DOE FFA Project Manager	Date:	10-5-98

PREFACE

This plan is generated to define the roles, responsibilities, and activities affecting data management, document management, and quality for data collection between the Department of Energy (DOE) and the regulatory agencies that govern the Paducah Gaseous Diffusion Plant (PGDP) Federal Facility Agreement (FFA). Pursuant to the FFA section titled "Quality Assurance/Sampling Availability/Data Management," all quality-assured data or summaries of all quality-assured data from all samples collected, analyzed, and reported shall be available no later than 30 days after the analyses have been received and validated. Further, DOE shall maintain one consolidated database for the Site which includes all data/studies generated pursuant to this agreement. To fulfill this requirement, Paducah DOE has an integrated "data system" made up of many databases managed by one organization. Electronic formats and/or hard copies of all data/studies and related documents are made available upon request.

In addition to the requirements in the Federal Facility Agreement (FFA), other agreements require a consolidated data management process:

 Environmental Protection Agency (EPA) Hazardous and Solid Waste Amendment Permit states:

Condition I.D.9.d.—Monitoring and Records

"All environmental monitoring data collected pursuant to Part II of this Permit shall be submitted to the Regional Administrator in a consistent format, with consistent parameters and concentration units. This will facilitate collection and recording of such data in a computer data file. Within one (1) year from the effective date of the Permit, this monitoring data shall also be routinely submitted electronically and on computer disc..."

Condition II.E.3.b.—Interim Measures (IM) Reports

- "...The IM Report shall contain the following information at a minimum, (e) copies of all relevant laboratory/monitoring data, etc., in accordance with Condition I.D.9."
- 2) Kentucky Division of Waste Management Hazardous and Solid Waste Permit states:

Condition III.E.9.a—Monitoring and Records

- "...All environmental and monitoring data collected pursuant to Part II.J and Part IV of the Permit shall be submitted to the Division, both in written and electronic format. Sampling data shall be submitted in accordance with the schedules described in this Permit."
- 3) Agreement in Principle states:
 - "...DOE will promptly furnish to Kentucky environmental monitoring data in electronic format, if available, or paper copies. DOE data reports will be released to Kentucky within 90 days after receipt from the laboratory and completion of the appropriate level of review and quality assurance/quality control (QA/QC) validation..."

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ACRONYMS

AIP Agreement in Principle
AR Administrative Record

ASER Annual Site Environmental Report

ASTM American Society for Testing and Materials

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

COC chain-of-custody
DOE Department of Energy

DMC Document Management Center

DMP Data Management Plan
DMS Data Management System
DQO Data Quality Objectives
EDD Electronic Data Deliverable

EMEF Environmental Management & Enrichment Facilities

EMP Environmental Monitoring Program

EMP PEMS Environmental Monitoring Program Project Environmental Measurements

System

EMP RTL Environmental Monitoring Program Ready-to-Load

EPA Environmental Protection Agency

ER PEMS Environmental Restoration Project Environmental Measurements System

ER RTL Environmental Restoration Ready-to-Load

FFA Federal Facility Agreement
GIS Geographic Information System

GW PEMS Groundwater Project Environmental Measurements System

GW RTL Groundwater Ready-to-Load

IM interim measures

NENW PEMS North East/North West Project Environmental Measurements System

NENW RTL North East/North West Ready-to-Load

OREIS Oak Ridge Environmental Information System

PC personal computer

PEMS Project Environmental Measurements System

PGDP Paducah Gaseous Diffusion Plant

QA quality assurance

QAMS Quality Assurance Management Staff

QC quality control

RCRA Resource, Conservation, and Recovery Act

SAP Sampling and Analysis Plan SMO Sample Management Office

SOW Statement of Work

SWMU Solid Waste Management Unit VOA volatile organic analysis VOC volatile organic compound WAG Waste Area Grouping

WM PEMS Waste Management Project Environmental Measurements System

WM RTL Waste Management Ready-to-Load

DEFINITIONS

Administrative Record (AR)—Official body of documents that forms the basis of the selection of a particular response action.

Chain-of-Custody (COC)—A process used to document the transfer of custody of samples from one individual to another from collection until final disposition. A sample is under custody if:

- 1. it is in the field personnel's possession;
- 2. it is in the field personnel's view after being in their physical possession;
- 3. it was in the field personnel's physical possession and then it was secured to prevent tampering; or
- 4. it is placed in a designated secure area.

Data Backup—The process by which computerized data is copied from one electronic medium to another to guard against the loss of data.

Data Entry—The manual keying of information using data entry screens for transfer into a database.

Data Qualifiers—A set of predefined alphabetic or numeric codes applied to analytical data to signify its usability. Qualifiers pertaining to data include laboratory qualifiers, verification qualifiers, validation qualifiers, and assessment qualifiers.

Data Quality Checks—A list of quality control (QC) elements associated with a data collection activity which are evaluated during data verification and/or data validation.

Data Quality Objectives (DQO)—A set of criteria established for the collection of data. The DQO process is based on the DQO process developed by the Environmental Protection Agency (EPA), Region IV and is a planning tool based on the scientific method that clearly identifies an environmental problem; the remedial decisions to be made to address the problem; and the type, quantity, and quality of data needed to support decision making. The DQO process may be applied in modified form to any data collection activity. The DQO process balances risks with cost, in selecting the most appropriate data collection plan.

Paducah Department of Energy (DOE) Program Integrated Data System—An integrated computer system for data storage and retrieval that organizes data into tables consisting of one or more rows of information, each containing the same set of data items. Data files are cross-referenced to one another to provide flexible access so that data collection is complete, consistent, sufficiently documented, and reusable to the maximum extent possible. The Paducah DOE Program Integrated Data System is compatible with the central Oak Ridge Environmental Information System (OREIS) to comply with the Oak Ridge Federal Facilities Agreement (FFA).

Data Transfer—The exchange of data from one electronic medium to another.

Document—Writings, drawings, graphs, charts, photographs, electronic tapes, diskettes, and data compilation from which information can be obtained.

DEFINITIONS (Continued)

Document Management Center (DMC)—A location established for a targeted audience where individual documents are tracked and maintained for audit purposes. It also may be a center where collection of controlled documents is maintained. Paducah's established location is the document center at 761 Veterans Avenue, Kevil, Kentucky.

Document Management System (DMS)—A computerized system used by the DOE Program at the Paducah Gaseous Diffusion Plant (PGDP) to facilitate the electronic handling of bibliographic, file classification, and index information.

Electronic Data Deliverable (EDD)—Data that is received in electronic format either through transfer on physical media or direct communication between computerized data management systems. EDD contents must meet defined completeness, consistency, and format requirements. These criteria are defined in the Statement of Work (SOW) for each program or project.

Electronic Media—Data storage device such as diskette, disk drive, tape, or optical disk.

Field Logbooks—The primary record for field activities. They should include a description of any modifications to the protocols outlined in the work plan, field sampling plan, or health and safety plan with justifications for such modifications. They are intended to provide sufficient data and observations to enable participants to reconstruct events that occurred. All entries should be dated and signed by the data recorder and quality assured by another individual.

Historical Data—Data which was collected and managed prior to implementation of procedure PMSA-1001, "Quality Assured Data."

Metadata—Information about measurement data that helps to define data usability and associated context.

Quality Assurance (QA) and Data Management Plan (DMP)—A document written for each task that presents in specific terms the policies, organization, objectives, functional responsibilities, and specific QA/Quality Control (QC) activities designed to achieve the data quality goals.

Quality Assurance (QA) Record—A complete document that furnishes evidence of the quality of items, activities, or credentials and has been designated as a QA record. Such records are considered to be lifetime or nonpermanent records.

Protocol—A record or document utilized to provide guidance or work direction. Some examples of protocols would be procedures, SOWs, work guides, work instructions, sampling plans, etc.

Records—Books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under federal law or in connection with the transaction of public business. Virtually all recorded, informational materials in the custody of the government (including information held by contractors that is considered by contract to be government information), regardless of the medium (hard copy, machine-readable, microfilm, etc.), are considered government "records."

DEFINITIONS (Continued)

Sample Delivery Group—A unit used to identify a group of samples for delivery. Each Sample Delivery Group is assigned a unique ID number.

Sampling and Analysis Plan (SAP)—A plan of action developed before implementation of field activities that describes the methods and protocols for obtaining representative portions of the environment being investigated. It also describes the methods for analysis and the required parameters.

Statement of Work (SOW)—The contractual agreement between the requesting organization and the service provider. The SOW defines the scope of work, including associated QA/QC, schedules, and deliverables.

Task Files—Files maintained at the PGDP Site Office pertaining to the site mission. A Task File is required for each task and usually pertains to a single task.

1. INTRODUCTION

1.1 **PURPOSE**

This plan will be used for the Paducah Department of Energy (DOE) tasks that are involved in the collection of data. Each section of the plan was written to meet the data quality requirements set forth by the Paducah DOE Program and defined in 10 CFR 830.120 and provides a description of the programmatic elements which should occur for each task. Appendix A provides additional information concerning the quality assurance (QA) and data management aspects which are specific to the task and cannot be defined at this level. Appendix A should be completed once the task has been planned or has documented the Data Quality Objectives (DQOs). This plan, along with a completed Appendix A, will serve as the "Quality Assurance and Data Management Plan" for the task, will be provided to appropriate personnel, and will be maintained as a project record.

For the purpose of this document, Appendix A is not completed but shows the information to be completed for each task involved in the collection of data. Each task will issue the task-specific "Quality Assurance and Data Management Plan" through the designated channels.

1.2 APPLICABILITY

The requirements of this plan apply to the collection and generation of data by Paducah DOE. This plan applies to screening and definitive analytical data as defined in Section 3.2, historical data, and locationally descriptive data which includes the Geographic Information System (GIS), lithology, geophysical data, etc. Implementation for tasks is based on data collection needs and final use of the data. The requirements of this plan do not apply to data collected by the Health and Safety Program or personnel and financial data.

2. PROGRAM ORGANIZATION, RESPONSIBILITY, AND TRAINING

This information describes the basic organization, responsibility, and training requirements for tasks. Specific task plans should be developed using Appendix A as a guide to define individuals and matrix responsibilities. The task will further define training needs based on activities performed in the field.

2.1 **ORGANIZATION**

The DOE Project Manager and the DOE Performance Management contractor establish task scope and prioritize work to ensure the Paducah DOE Program strategic plans are accomplished. Furthermore, they serve as the primary interface to ensure that task, regulatory agency, stakeholder, and other involved organizations objectives are met. They will ensure that requirements in this plan are incorporated into various protocols and other Statements of Work (SOWs). In addition, they will ensure adequate technical support is in place for the task and that QA and safety are first priorities throughout the task life cycle.

2.2 ROLES AND RESPONSIBILITIES

The functional responsibilities of task staff members shown below relate to their involvement with the data collection and the output process. This section identifies task activities with staff members performing the work. While the descriptions are identified by title, they indicate functional responsibilities that task staff perform rather than individual staff positions.

2.2.1 Stakeholders

DOE Project Manager

The DOE Project Manager has direct communication with the DOE Performance Management contractor Project Manager and is responsible for task oversight, overall compliance for the task, and submitting various reports to, and interfacing with, the Environmental Protection Agency (EPA) and the Commonwealth of Kentucky.

Commonwealth of Kentucky

The Commonwealth of Kentucky is the state regulatory stakeholder for the site. Activities including remedial action, enrichment facilities, and waste management of the Paducah DOE Program are reviewed, commented upon, and approved by the Commonwealth of Kentucky.

EPA, Region IV

EPA is the federal regulatory stakeholder for the Site. Activities, including remedial action, enrichment facilities, and waste management of the Paducah DOE Program are reviewed, commented upon, and approved by EPA.

Kentucky Agreement in Principle (AIP)

The Kentucky AIP reflects the understanding and commitments between DOE and the Commonwealth of Kentucky regarding DOE's provision to provide to the Commonwealth technical and financial support for the Commonwealth's activities in environmental oversight, surveillance, remediation, and emergency-response activities. The AIP is intended to support nonregulatory activities. Its goal is to maintain an independent, impartial, and qualified assessment of the potential environmental impacts of present and future DOE activities at the Paducah Gaseous Diffusion Plant (PGDP).

Federal Facility Agreement (FFA)

The FFA reflects the understanding and commitments between DOE, EPA, and the Kentucky Division of Waste Management regarding the comprehensive remediation of PGDP. The purpose of the FFA is to provide a set of comprehensive requirements for remediation that coordinates the cleanup provisions of both Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource, Conservation, and Recovery Act (RCRA).

2.2.2 DOE Managing and Integrating Contractor

Bechtel Jacobs Company LLC as the managing and integrating contractor is responsible for ensuring the following functions are performed either by their staff or a subcontractor.

Data Manager

The Data Manager is responsible for long-term electronic storage of data, loading Electronic Data Deliverables (EDDs), electronic verification of data, and ensuring compliance to policies and protocols relating to data management. The Data Manager has overall responsibility for the design, operations, and maintenance of the databases; ensures compatibility with central Oak Ridge Environmental Information System (OREIS); serves on the OREIS Steering Committee; reviews the system performance; determines the need for changes; authorizes changes; and oversees the electronic transfer of electronic data to external agencies. The Data Manager interfaces with the Sample Manager and the Project Data Coordinator to set up the Project Environmental Measurements System (PEMS) for each task. The Data Manager oversees the completion of task-specific Data Management Plans.

Data Requestor

The requestor may be a task lead or his designated representative, such as a technical lead, risk assessor, waste management coordinator, compliance coordinator, or other individual who determines the need for data to support decision making. The requestor is responsible for coordinating sample collection, sample analysis, data assessment, and decision making. If the requestor is a designated representative, the task lead has ultimate responsibility.

Network Administrator

The Network Administrator is responsible for implementing the system design for the Paducah DOE Program Integrated Data System platform; coordinating necessary network and personal computer (PC) maintenance; establishing user accounts to the network; and performing daily backups to system data.

Project Data Coordinator/Data Management Team

The Project Data Coordinator/Data Management Team is responsible for ensuring that the requirements relating to data management are met for the task. This includes accumulation of historical data, control of data generated by field activities or as a result of lab analyses, and storage of data as part of the task. The Project Data Coordinator ensures that all data are entered into PEMS. The Project Data Coordinator works with the Data Manager and the Sample Manager to ensure consistency throughout the task data, with other task's data, and the data systems in place. The Project Data Coordinator is responsible for data entry verification; assisting with the data evaluation and review process; data updates and deletions, as authorized by the Data Manager; and performing electronic transfer of data files from electronic data laboratory deliverables to the Paducah DOE Program Integrated Data System.

Project Manager

The Project Manager has direct responsibility for the overall task oversight, including budget, schedule, and milestones. This responsibility includes the management of strategic planning, safety, quality, task activities, and for the successful completion of task assignments within budget and on schedule. The Project Manager ensures that implementation of the QA and Data Management Programs is consistent with guidelines and ensures requirements are adhered to, as stated in this plan. The Project Manager reports to the Bechtel Jacobs Company Manager of Projects and interfaces with DOE and the task team.

Task Team

The Task Team is made up of personnel (i.e., Project Manager, Task Manager, Task Lead, Quality Engineer, Sample Manager, Data Manager, Technical Manager, Field Team Leader, and other field personnel) responsible for a specific task. The team is responsible for the data collection planning; fieldwork; sampling and analysis; data review; and decision making for a set task.

Quality Engineer

The Quality Engineer is responsible for the overall QA concerns of the data and system functions relating to a task. The Quality Engineer is involved in the planning and review of data to ensure that data quality requirements are met. The Quality Engineer is also responsible for helping prepare QA plans, work agreements, protocols, and documents to establish and implement requirements, performing assessments, providing guidance/assistance in resolving quality problems, and ensuring that corrective action is taken and appropriately documented.

Records Clerk

The Records Clerk is responsible for entering records; indexing data into Data Management System (DMS) records; indexing tables; assisting with the records storage and retrieval process; and performing data updates and deletions as authorized by the Records Manager.

Records Manager

The Records Manager is responsible for maintaining all pertinent and required records associated with operating the DMS and preserving the data; determining which records must be stored and the storage requirements; establishing a records classification, inventory, and indexing system; maintaining the DMS records indexing tables; implementing a records storage and retrieval system; and coordinating with the Data Manager and Sample Manager to establish pointers to data processing records and associated metadata (e.g., laboratory data packages, regulatory documents, QA requirements, and program plans).

Project Records Coordinator

The Project Records Coordinator is responsible for the task records. Duties include all activities relating to identification, acquisition, classification, indexing, and storage of task records related to field activities. The task records include data documentation materials; plans and protocols; and all task file requirements. Upon completion of the task, the Project Records Coordinator transmits all task files to the Paducah Document Management Center (DMC).

Release Requestor

The Release Requestor is identified as the person who requests the release of data to an external agency. This responsibility could be filled by several different roles including, but not limited to, the Task Lead or the Technical Manager.

Sample Manager

The Sample Manager is responsible for working with the Task Lead to develop specific analytical requirements for the task, interfacing with the Oak Ridge Sample Management Office (SMO) for procurement of laboratory services, contracting validation services, and coordinating contractual screening. The Sample Manager works with the task team to resolve issues identified during contractual screening or electronic data review of the data with the laboratory. The Sample Manager interfaces with the Data Manager, the Project Data Coordinator, and the task team.

Task Lead

The Task Lead is responsible for direct task coordination, issuing technical reports, and maintaining the task is on schedule and within the budget. The Task Lead coordinates all team personnel working on the task and communicates regularly with the Task Team personnel on the status of task budgets and schedules; assuring all protocols are followed; deliverables are met; and that any issues or concerns associated with the task are properly addressed. The Task Lead ensures that implementation of the QA and Data Management Programs is consistent with guidelines and ensures requirements are adhered to as stated in this plan. The Task Lead reports to the Task Manager and interfaces with the task team.

Task Manager

The Task Manager is responsible for ensuring that the proper resources are available and that personnel are appropriately trained for the assigned task. The Task Manager ensures that all requirements and protocols for the task are followed and that they are consistent with the overall mission of the Environmental Management and Enrichment Facilities (EMEF) Program. The Task Manager also ensures that implementation of the QA and Data Management Programs is consistent with guidelines and ensures requirements are adhered to as stated in this plan. The Task Manager reports to the Project Manager and interfaces with the Task Lead.

Technical Manager/Subcontractor Technical Representative

The Technical Manager/Subcontractor Technical Representative is responsible for providing technical support and guidance to the task. This includes field observations and oversight of subcontractors, generating reports/documents, and making decisions regarding technical issues (i.e., sample locations, analytical methods, etc.).

2.3 TRAINING

Personnel assigned to the task, including field personnel and subcontractors, will be trained to perform the tasks to which they are assigned. Training requirements are defined in the task-specific SOWs and plans.

3. QA OBJECTIVES FOR MEASUREMENT DATA

QA objectives, for the purposes of this plan, apply to measurement data only. Other data (such as locationally descriptive information) is discussed in Section 8.

3.1 DQOs

DQOs are statements developed by data users to specify the quality of data from field and laboratory data collection activities to support specific decisions or regulatory actions. DQOs are qualitative and quantitative specifications that are used to design a study that will limit uncertainty to an acceptable level. The DQOs describe what data is needed, why the data is needed, and how the data will be used to address the problems being investigated. DQOs also establish numeric limits to ensure that data collected is of sufficient quality and quantity for user applications.

The DQO process is a planning tool based on the scientific method that clearly identifies a problem; the decisions to be made to address the problem; and the type, quantity, and quality of data needed to support the decision making. The DQO process may be applied in modified form to any data collection activity. The DQO process balances risks with costs in selecting the most appropriate data collection plan. When applicable, various regulatory agencies (i.e., EPA, Kentucky Department for Environmental Protection, etc.) may participate in the DQO sessions.

Specific DQOs and Sampling and Analysis Plans (SAPs) for tasks are developed per PMSA-1001 and will be documented in Appendix A.

3.2 ANALYTICAL DATA CATEGORIES

Two descriptive data categories have been specified by EPA in the *Data Quality Objectives Process for Superfund*, *Interim Final Guidance*, EPA/540/G-93/071 (EPA, 1993). These two data categories supersede the five quality control (QC) levels (Levels I, II, III, IV, and V). The two new data categories are associated with specific QA/QC elements and may be generated using a wide range of analytical methods. The type of data generated will be based on the qualitative and quantitative DQOs. The two data categories are:

Screening data—Measurements generated through the use of field- or fixed-laboratory methods in which the level of certainty in the data cannot be determined given physical evidence documenting the acquisition and analysis of the sample. Analytical methods producing field measurements or screening data include those that indicate the presence or absence of an analyte, or class of analytes, or provide a semiquantitative (estimated) result. Field measurement and other screening data include, but are not limited to, Draeger tubes; organic vapor analyses; soil gas surveys; and radiation and contamination monitoring. Screening data results must be confirmed by collecting a specified percentage of definitive data. Screening data should be used conservatively and not rule out the presence of a contaminant without some percentage of the data being confirmed by definitive data.

Definitive data—Analytical measurements for which the presence and corresponding concentration of the target analyte(s) can be determined with a known degree of certainty. The measurements are supported with appropriate physical evidence documenting the acquisition and analysis. Definitive data, in electronic form, must be supported with retrievable, but not necessarily retrieved, physical evidence in the laboratory. This evidence can include analytical results, QA/QC results, chains-of-custody (COCs), logbooks, standards information, etc.

Definitive data, or a combination of screening data, definitive confirmation, and definitive data, will be collected when the task is implemented. A minimum of ten percent of the screening samples will also be analyzed by a fixed-base laboratory using EPA SW-846 Methods (1986) to provide the required definitive data. When not available, other nationally recognized methods such as those of the American Society for Testing and Materials (ASTM), DOE, and EPA, will be used.

Applicable task documents summarize the data uses, data users, data categories, and data deliverable QC levels for each of the media and sample types that will be collected during the investigation.

4. APPLICABLE PROTOCOLS AND DOCUMENTS

Company protocols, sampling methods, administrative procedures, etc., utilize hierarchy documents that relate to data quality. Hierarchy documents such as EPA Quality Assurance Management Staff (QAMS) 005/80, Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, EPA Region 4 Environmental Investigations Standard Operating Procedures and Quality Assurance Manual, and Environmental Data Management Implementation Handbook for the Environmental Restoration Program (ES/ER/TM-88/R1) are used as flow-down documents in writing company protocols. Deviations are documented as described in Section 16. Protocols and documents applicable to the processes described will be defined in completion of Appendix A.

5. SAMPLE CUSTODY

COC is a process used to document the transfer of custody of samples from one individual to another from sample collection until final disposition. COC records are handled in accordance with applicable protocols. COC requires signature transfer of samples from sampling personnel to the sample custodians, who then transfer samples to the appropriate analytical laboratory personnel. The transfer of samples between individuals in the same work group located in the same general location (sampling or analytical) does not require a signature transfer since the integrity of the sample is maintained at all times. If the individuals are not in the same general location, a COC is required. This is accomplished by the samples being locked in a refrigerator when laboratory personnel are not available. Sample residuals are disposed of only after notification by the Task Lead that they no longer need archiving or once holding times have been exceeded. Sample custody protocols are identified in Appendix A.

6. CALIBRATION PROTOCOLS AND FREQUENCY

6.1 FIELD EQUIPMENT CALIBRATION PROTOCOLS AND FREQUENCIES

The calibration of field instruments will be checked in the field in accordance with manufacturer's specifications. Field calibration records will be documented in logbooks and/or on field data sheets. Calibration frequencies for field instruments will be defined in Appendix A.

6.2 LABORATORY CALIBRATION PROTOCOLS AND FREQUENCIES

The laboratory(ies) will use written, standard protocols for equipment calibration and frequency. These protocols are based on EPA guidance or manufacturer's recommendations and are given in the EPA-approved analytical methods. Supplemental calibration details, such as documentation and reporting requirements, are given in the laboratory QA Plan. The laboratory QA Plan will be reviewed and approved as part of the contract review process. When available, standards used for calibration will

be traceable by the National Institute of Standards and Technology. Corrective action protocols for malfunctioning equipment will be addressed in the laboratory QA Plan. Calibration records, in accordance with the laboratory QA Plan, will be maintained for each piece of measuring and test equipment and each piece of reference equipment. The records will indicate that established calibration protocols have been followed. Records of equipment use will be kept in the laboratory files.

7. ANALYTICAL PROTOCOLS

When available and appropriate for the sample matrix, SW-846 Methods will be used. When SW-846 Methods are not available or lower detection limits that are required cannot be achieved by SW-846 Methods, other nationally-recognized methods such as those of ASTM, DOE, and EPA will be used. Analytical methods, detection limits, sample preservation, holding times, and container requirements for field measurements and analytical parameters are defined during the DQO process and are incorporated in the analytical SOW for the task and applicable protocols and will be defined in Appendix A.

8. DETAILS OF DATA AND DOCUMENT FLOW

The components of data management include planning, collection, review, archival, and transmittal. Task activities follow identical paths to meet data management requirements. A flow chart (Figure 1) and narrative (Sections 8 and 9) are provided for each component of data and document flow. The Paducah DOE Program Integrated Data System is discussed first. The data system is core to each of the data management components.

8.1 INTEGRATED DATA SYSTEM

The Paducah DOE Program Integrated Data System provides a centralized system for management and storage of environmental information while allowing easy, yet controlled, access. The basis for the Paducah DOE Program Integrated Data System is to establish and maintain a program to provide the most efficient system of data collection, analysis, storage, and retrieval. DOE, as specified in the FFA, is to maintain one consolidated database for the Paducah Site. All data collected under this agreement (the FFA) is to be routinely submitted electronically in a consistent format to the stakeholders (see Section 9.2 and Appendix B). In addition, under the Kentucky AIP, AIP personnel require access to the electronic data that is maintained by the Paducah facility and its contractors. Consequently, the Paducah DOE Program Integrated Data System meets the regulatory requirements and provides Paducah EMEF with a platform to manage its data.

The Paducah DOE Program Integrated Data System is composed of integrated hardware and software to support the collection, management, analysis, and presentation of data associated with environmental restoration/remedial action, compliance, and monitoring activities at PGDP. All environmental measurements, analyses, and locationally descriptive information (e.g., GIS, lithology, and monitoring structure information), as applicable per this plan, is included. In addition, an extensive collection of descriptive and reference information about environmental tasks and permits is stored. A flow diagram for the Paducah DOE Program Integrated Data System is shown in Figure 2.

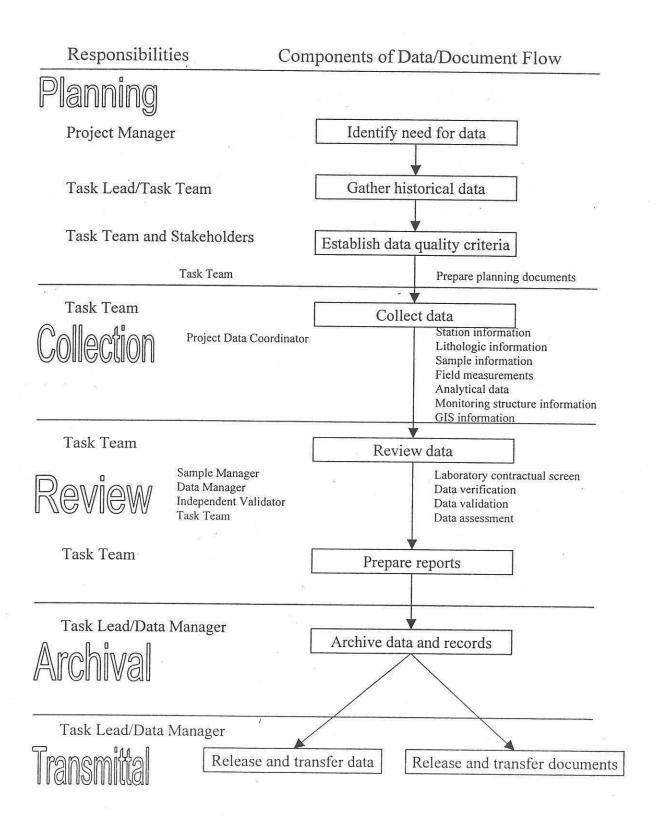
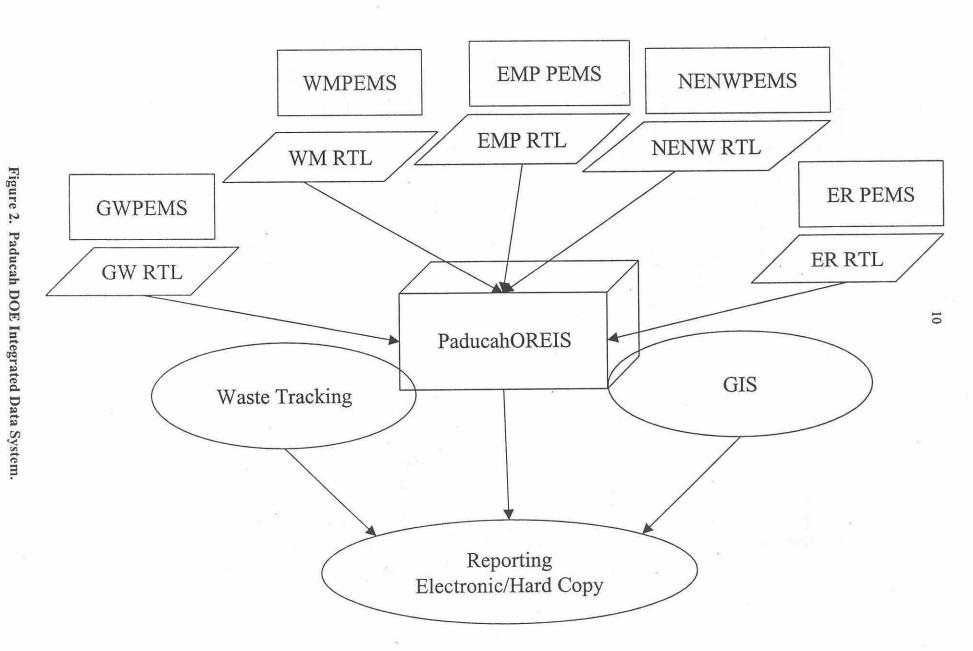


Figure 1. Detail of Data and Data Flow.



As part of the Paducah DOE Program Integrated Data System, each project utilizes a PEMS for sample scheduling, collection, and tracking each sample and associated data from point of collection through final data reporting. Each PEMS is established on a project-specific basis. PEMS tracking includes field forms, COCs, hard copy data packages, and EDDs. Project data is entered as the project progresses. All field measurement data, analytical data, lithologic descriptions, monitoring structure information, sample stations, and corresponding coordinates (as appropriate) are entered into PEMS.

Upon completion of the project, or on a routine basis, data from each PEMS is reviewed as described in Section 8.4 and transferred to Paducah OREIS for permanent retention. All final data reporting is reported from Paducah OREIS. Additionally, PEMS data is archived on a specified frequency to ensure data traceability.

The Paducah DOE Program Integrated Data System is accessed by a computer network. The system is designed to allow the electronic transfer of information between all branches of EMEF. A central file server is used to maintain the software and database applications. This server may be accessed from several PC workstations within the computer network.

8.2 DATA PLANNING

8.2.1 Initiation of Data Collection

The need for data collection is determined by the Task Lead and Project Manager to satisfy applicable regulatory requirements and/or DOE Orders. The Task Lead identifies the need for collection of data to support the task and is responsible for the development of applicable documents that outline the specific objectives of the data collection activity.

8.2.2 Historical Data Gathering

A substantial effort should be made by the data requestor (i.e., project manager/task lead) to acquire and analyze all historical data and documents relevant to the task (i.e., in numeric, spatial, attribute, and textual form) prior to the DQO process and/or data generation. For example, these documents and data might include prior work done for preliminary assessments, site characterization tasks, remedial investigations, annual monitoring reports, or data summaries provided by previous analysts. In addition, information specialists who would know of relevant documents, GIS information, and data sets should be consulted to acquire a comprehensive task background. In many cases, descriptive and qualitative information about the data (e.g., metadata) may be required. This is often the case with electronic files that may be received without the basic information provided through proper documentation. Some research may be required to prepare these metadata statements which are essential to the determination of data quality and usability.

If the data is in electronic form, the usable data and metadata should be entered into the Paducah DOE Program Integrated Data System for inclusion into Paducah OREIS. If the data is in document form, the usable data and metadata should be extracted and key-entered into the Paducah DOE Program Integrated Data System. If GIS information is required, themes/coverages should be updated as necessary.

8.2.3 Data Quality Criteria

With the usable historical data now in the Paducah DOE Program Integrated Data System, the data, along with the documents and metadata, can be retrieved, analyzed (both statistically and spatially), modeled, and used in support of DQOs for the task. This data, along with elements from the DQO process such as, contaminants of concern, QA/QC requirements, "Identification of Project Data Quality Checks" checklist, data review options, and the sampling design is used to generate applicable plans.

Field SOWs, sampling plans, and analytical SOWs are developed in support of field preparation. A field SOW describes the field activities to be undertaken and subsequent work to be performed. A sampling plan may be used to further expand on details of field activities. An analytical SOW is prepared which includes analytical parameters, methods, and detection limits. A validation SOW is also prepared when validation services are required to ensure the analytical laboratory's performance is acceptable.

Information from each of the SOWs and sampling plans is used to initiate sampling logbooks, labels, and other required field documentation. Documentation generated by the data collection activity shall be forwarded electronically and/or in hard copy to the Task Lead and the DMC to be indexed and filed as specified per the SOW.

8.3 DATA COLLECTION

Data collection information is recorded and maintained for all data collection activities. This information includes station information, lithologic information, sample information, field measurements, analytical data, monitoring structure information, and GIS information and is explained below.

8.3.1 Station Information

Station information is data describing the location from which a sample is taken. Station information includes plant coordinates (surveyed or estimated, as appropriate), station description, and station type. This information is input directly into PEMS. Methods for determining coordinates and relevant information necessary to determine and document accuracy should be recorded.

8.3.2 Lithologic Information

Lithologic information is data describing the lithology of a borehole. This information is input directly into PEMS.

8.3.3 Sample Information

Sample information is environmental data describing the sampling event and consists of the following: station, date collected, time collected, and other sampling conditions collected for every sampling event. This information is recorded in logbooks and may be included on the COC or sample labels. This information is input directly into PEMS.

8.3.4 Field Measurements

Field measurements are measurements of a parameter without physical collection of a sample which are collected real-time in the field. Field measurements may include water level measurements, pH, conductivity, flow rates, temperature, and dissolved oxygen. Field measurements are taken and recorded on appropriate field forms or in logbooks, and input into PEMS.

8.3.5 Analytical Data

The Sample Manager tracks progress of analytical samples as fieldwork continues. COCs are reviewed and lab receipt of samples is verified. Once samples have entered the laboratory, the laboratory is responsible for sample analysis, data reduction, and data reporting. The analytical data will be checked for completeness and reasonableness. A system is set up within the Paducah DOE Program Integrated Data System to log shipment of samples and receipt of data packages.

All data packages received from the fixed-base and screening/field laboratories are tracked, reviewed, and maintained in a secure environment. The primary individual responsible for these tasks is the Sample Manager. The following information is tracked: sample delivery group number, date received, number of samples, sample analyses, receipt of EDD (if applicable), and comments. The Sample Manager compares the contents of the data package with the COC form and identifies discrepancies. Discrepancies are immediately reported to the laboratory and the data validators. All data packages are forwarded to the Bechtel Jacobs Company EMEF DMC for permanent storage.

8.3.6 Monitoring Structure Information

Monitoring structure information is data describing the monitoring wells and boreholes installed during the combined tasks. Information includes well screen depth; borehole and well diameter; screened aquifer; and datum information. This information is input directly into PEMS.

8.3.7 GIS Information

GIS information is metadata that is visually descriptive of the area around the location of a project. Information may include maps of roads, streams, underground utilities, etc. Projects creating new GIS information or causing required updates to existing GIS information supply the information to the Paducah DOE Program Integrated Data System.

8.4 DATA REVIEW

8.4.1 Laboratory Contractual Screening

Laboratory contractual screening is the process of evaluating a set of data against the requirements specified in the analytical SOW to ensure that all requested information is received. The contractual screening includes, but is not limited to, the COC, number of samples, analytes requested, total number of analyses, methods used, QC samples analyzed, EDDs, units, holding times, and reporting limits achieved.

The Sample Manager conducts the screening upon receipt of data from the analytical laboratory. To the extent possible, the contractual screening should be done electronically. The Sample Manager identifies and documents any exceptions to the SOW on a Laboratory Deliverable Contractual Screening Checklist.

8.4.2 Data Verification

Data verification is the process for comparing a data set against a set standard or contractual requirement. Verification may be performed electronically, manually, or by a combination of both. Data verification includes contractual screening and can include other data quality checks established by the task team. Applicable task plans define the specific verification to be performed. Data is flagged as necessary.

Specific documentation associated with data verification is developed per PMSA-1001, Appendix G, entitled, "Identification of Project Data Quality Checks," and will be provided in Appendix A.

8.4.3 Data Validation

Data validation is the process for evaluating the laboratory adherence to analytical-method requirements. This is performed by a qualified individual for a data set, independent from sampling, laboratory, project management, or other decision-making personnel for the task. Data validation is performed according to PMSA-1001 and is coordinated by the Sample Manager. Validation qualifiers are stored in the Paducah DOE Program Integrated Data System. Documentation associated with data validation (the validation SOW, data validation reports, and exception reports, if applicable) is filed in the DMC. Specific documentation associated with data validation is identified in Appendix A.

8.4.4 Data Assessment

Data assessment is the process for assuring that DQOs are met, and that the type, quality, and quantity of data are appropriate for their intended use. It allows for the determination that a decision (or estimate) can be made with the desired level of confidence given the quality of the data set. Data assessment follows data verification and data validation and must be performed on 100 percent to ensure data is usable.

The data assessment is conducted by a designated task team member in conjunction with other task team members according to PMSA-1001. Assessment qualifiers are stored in the Paducah DOE Program Integrated Data System. Data is made available for reporting upon completion of the data assessment and associated documentation (Data Assessment Review Checklist) is filed with the task files.

8.4.5 Report Preparation

Personnel will utilize the official Paducah OREIS data tables for all official data reporting. Prior to the release of any data, the "Data Release" form shall be completed according to PMSA-1001, Appendix I. Release of all data shall be approved by DOE and the Managing and Integrating Contractor.

8.5 DATA AND RECORDS ARCHIVAL

8.5.1 Data Archival

Data archival refers to the long-term storage of electronic data generated by a task in the Paducah DOE Program Integrated Data System. Long-term storage in a central repository assures maximum accessibility by the environmental engineering community. To ensure its future usability, sufficient documentation, including the associated metadata, must accompany archived data to describe the source, contents, and structure of the data. Paducah OREIS is the database that stores archived data for future use. In addition, the Paducah PEMS used for the task is archived both intact and as exported ASCII text with sufficient documentation to recreate task data. The archive of Paducah PEMS, as well as the backups for Paducah OREIS, are stored in the DMC.

8.5.2 Records Archival

The DMC is a repository for all EMEF documents and data. Each EMEF task transmits a copy of all task documentation to be filed in the DMC as the task file. This information is arranged by a file classification scheme and is filed on shelves in color-coded folders. The documents are shelved in mobile file cabinets which are located inside a two-hour-rated firewall vault. The vault is protected by a wet-pipe sprinkler system and intrusion alarm. The DMC staff utilizes the DMS, a database management system designed for management and retrieval of documents, to perform searches. DMS records contain bibliographic information (title; author; issue date; document type and number; etc.), file classification information (document location), and index information (subject keywords, document status, facility name/waste area grouping [WAG]/solid waste management unit [SWMU] number, cleared for public use flag, and administrative record [AR] codes).

By utilizing the DMC, all documents relevant to EMEF work will be located in a central repository and will be available to the EMEF organization as well as other identified users. The DMC will also provide controlled access to these documents.

Information that may be found in a task file include hard copies of all original field and analytical results; data reduction and summarization programs; data packages; logbooks; associated QA/QC forms; correspondence; contracts; meeting minutes; training records; plans; and reports. All contents of a task file are classified, indexed, and stored into appropriate file groups and record series within the task file.

Satellite document centers are sometimes established with routine transfer frequencies to the PGDP DMC. Task records are maintained by the Task Records Coordinator as record copy as specified in task data and document management plans and as required by protocol. Logbooks and field documentation are copied weekly unless maintained as record copies, which are kept in one-hour-rated, fire-resistant, locked file cabinets overnight. If the activities during logbook use could potentially damage the logbook or result in loss, then weekly copies are required. If copies are made, they are maintained separate from the original logbook and are forwarded to the task files and maintained as record copy until the originals are complete. At that time, the originals replace the copies as record copy. The record copy is transferred to the Paducah EMEF DMC. Upon completion of the task, all original logbooks (field and analytical), field documentation, and project deliverables will be forwarded to the DMC by the task manager or designee.

Documents will be selected for the AR from the task file. The AR files are duplicated and made available to the public at the Environmental Information Center. Documentation associated with data and records archival includes archive checklists; indexed and filed copies of all relevant hard copies; and lists of all items recommended for the AR file.

9. DOCUMENT AND DATA RELEASE AND TRANSFER

9.1 DOCUMENT RELEASE AND TRANSFER

A standard distribution list is maintained for regulatory documents submitted according to the FFA. Changes to this distribution list should be submitted through the DOE Site Office. Other documents generated for the EMEF Program may be specially requested through the DOE Site Office or their designee. Requested documents may be historical or newly generated and will be transmitted within a reasonable time frame.

9.2 ELECTRONIC DATA RELEASE AND TRANSFER

Once data has undergone verification, validation, and data assessment, it may be released to external agencies. Routine data or data specially requested by external agencies is downloaded into a standard format (see Appendix B) and transmitted either electronically or by physical transfer on electronic media (diskettes, etc.). If data is transmitted electronically, data files will be placed on an externally-accessible file server that is password protected. The external agency has the responsibility to protect the data that has been provided. Passwords shall not be shared with anyone outside the external agency. External agencies will be notified of data availability via electronic mail.

The Task Lead/Release Requestor will complete the "Paducah EMEF Data Release to External Agencies" form and obtain all appropriate signatures. Field QC data is not routinely transmitted with the data; however, this information is available upon request. Electronic data formats will contain a "Read Me" file that will identify the electronic data package and the number of files associated with the package. The "Read Me" file will also indicate the appropriate data qualifiers along with their associated definitions and the appropriate data quality level. Hard copy data formats will contain a cover letter that will identify the contents of the data package. The cover letter will also indicate the appropriate data qualifiers along with their associated definitions and the appropriate data quality level.

9.2.1 DOE Remedial Action Investigations

DOE will provide electronically-transmitted data concurrent with the D1 Report/Characterization Report or when the Project Completion Report is issued (if formal D1 is not required) for remedial action investigations.

9.2.2 DOE-Permitted Facilities/Routine Environmental Monitoring Reports

Permitted and routine sampling is outlined in Table 8.1. Additionally, Table 8.1 includes reporting and transfer frequencies. DOE will provide electronic-transmitted data per the agreed schedule in this document.

9.2.3 Special Requests

Data will be transmitted routinely as specified in Sections 9.2.1 and 9.2.2. Any additional data generated from sampling activities that are available electronically may be transmitted upon receipt of a special request correspondence. Special requests shall be submitted through the DOE Site Office, or their designee, specifying the sampling event information required.

Table 8.1. Regulatory and routine sampling.

		FREQUENCIES/SCHEDU	ILE
PROGRAM	SAMPLING	REPORTING	TRANSFER
Permit-Associated Sampling			
Kentucky Pollutant Discharge Elimination System Permit DOE Outfalls	Monthly and Quarterly	Monthly 28 th of each month	Monthly 28 th of each month
Toxicity Monitoring	Quarterly	Quarterly Publication of the ASER	Quarterly Concurrent with ASER
Bioaccumulation Study	Annually	Annually Publication of the ASER	Annually Concurrent with ASER
Fish Community	Semiannually	Annually Publication of the ASER	Annually Concurrent with ASER
C-746-K Surface Water	Quarterly	Semiannually June 30, December 30	Semiannually June 30, December 30
C-746-S&T Surface Water	Quarterly	Quarterly January 15, April 15, July 15, October 15	Quarterly January 15, April 15, July 15, October 15
C-746-U Surface Water	Quarterly	Quarterly January 15, April 15, July 15, October 15	Quarterly January 15, April 15, July 15, October 15
C-746-K Groundwater	Quarterly	Semiannually June 30, December 30	Semiannually June 30, December 30
C-404 Landfill Groundwater	Quarterly	Semiannually May 30, November 30	Semiannually May 30, November 30
C-746-S&T Landfill Groundwater	Quarterly	Quarterly February 30, May 30, August 30, November 30	Quarterly February 30, May 30, August 30, November 30
C-746-U Groundwater Monitoring	Quarterly	Quarterly February 30, May 30, August 30, November 30	Quarterly February 30, May 30, August 30, November 30
Environmental Monitoring Programs	s (EMP)		
EMP Surface Water Sampling	Bimonthly	Annually Publication of Annual Site Environmental Report (ASER)	Annually Concurrent with ASER
EMP Annual Sediment Sampling	Annually	Annually Publication of ASER	Annually Concurrent with ASER
EMP Annual Deer Sampling	Annually	Annually Publication of ASER	Annually November
Plume Groundwater Sampling	Monthly and Quarterly	Quarterly January 30, April 30, July 30, October 30	Quarterly January 30, April 30, July 30, October 30
Residential Groundwater Sampling	Monthly, Quarterly, and Annually	Annually Publication of ASER	Semiannually April and October
Surveillance Groundwater Sampling	Monthly, Quarterly, and Annually	Annually Publication of ASER	Semiannually January and July

	FREQUENCIES/SCHEDULE					
PROGRAM	SAMPLING REPORTING		TRANSFER			
Surveillance & Maintenance or Ope	ration & Maintenance Ac	tivities				
C-404 Leachate	Per Permit As needed	Per Permit January 30, April 30, July 30, October 15	Annually * October 15			
C-746-S&T Leachate	Per Permit As needed	Quarterly per permit	Quarterly per permit			
C-746- U Leachate	Per Permit As needed	Quarterly per permit	Quarterly per permit			
Northwest Plume/Northeast Plume	Daily	Quarterly and Annually January 30, April 30, July 30, October 30	Quarterly January 30, April 30, July 30, October 30			

^{*} If leachate samples were collected.

10. INTERNAL QC CHECKS

10.1 FIELD QC SAMPLES

Standard operating protocols are used for all routine sampling operations. Field QC sampling will be conducted to check sampling and analytical accuracy and precision for both laboratory and field analyses of the original samples. All QC samples will be handled, shipped, and analyzed as stated in Sections 5 and 7. Field QC samples will have sample numbers which are unique and which identify them as QC samples.

A filter blank is a sample of ASTM Type II water passed through, or over, a filter before any samples are filtered. Filter blanks are used as a measure of filter contamination. Samples are analyzed for the same parameters as the filtered sample. Filter blanks can be collected at a rate of one per lot number.

Field blanks serve as a check on environmental contamination at the sample site. ASTM Type II water is transported to the site, opened in the field, transferred into each type of sample bottle, and returned to the laboratory for analysis of all parameters associated with that sampling event. It is also acceptable for field blanks to be filled in the lab, transported to the field, and then opened. Field blanks may be used as a reagent blank as needed. It is recommended that field blanks be collected at a rate of 1:20.

Equipment blanks (may also be referred to as equipment rinseates) are samples of ASTM Type II water passed through decontaminated sampling equipment. Equipment blanks are used as a measure of decontamination-process-effectiveness and are analyzed for the same parameters as the sample collected with the equipment. Equipment blanks may also be used as a reagent blank as needed. Equipment blanks are required only when nondisposable equipment is being used. It is recommended that equipment blanks be collected at a rate of 1:20.

A trip blank is a sample used to detect contamination by volatile organic compounds (VOCs) during sample shipping and handling. Trip blanks are 40 mL volatile organic analysis (VOA) vials of ASTM Type II water that are filled in the laboratory, transported to the sampling site, and returned to the laboratory with VOA samples. Trip blanks are not opened in the field. One trip blank is to accompany each cooler containing VOA samples. Each trip blank is to be stored at the laboratory with associated samples, and analyzed with those samples. Trip blanks are only analyzed for VOCs.

Duplicates are two separate samples taken from the same source during the same sampling event and are analyzed for the same parameters. Data generated by duplicate samples includes sampling and analytical variability (precision). It is recommended that duplicates be collected at a rate of 1:20.

10.2 ANALYTICAL LABORATORY QC SAMPLES

Fixed-based analytical laboratories that provide services will have an approved QA plan that describes the laboratory QC sample program and the laboratory control sample program. The analytical laboratory has an established internal QC program that is managed by the laboratory supervisors. Analytical laboratory QC samples will be analyzed as required by the analytical method for the parameters of interest and the results will be included in the analytical report. Blind samples are samples in which the laboratory has no information on the sample location and, subsequently, would have no indication of the possible analytical results. These samples will be analyzed for the parameters of interest and the results will be included in the analytical report. Acceptable completion of the blind samples provides an indication of the laboratory's performance. DOE laboratories participating in the blind sample program will follow blind submittal frequencies determined by the SMO.

11. AUDITS AND SURVEILLANCES

11.1 AUDITS

Audits are qualitative reviews of task activity to check that the overall QA program is functioning. Audits should be conducted early in the task so that problems can be corrected quickly. The audit involves the review of all available and relevant task and contract documents and includes an evaluation of QC measures for office and field. Audits will be performed as requested by management.

11.2 SURVEILLANCES

Surveillances follow the same general format as an audit but are less detailed and require a less formal report. A surveillance is designed to give task staff rapid feedback concerning QA compliance and to facilitate corrective action. Surveillances will be performed as requested by management.

12. PREVENTIVE MAINTENANCE

Equipment is an inclusive term for tools, gauges, instruments, and other items. The equipment discussed in this section requires that specific preventive maintenance is serviced as specified by the manufacturer's recommended schedule. All services are documented and performed by qualified and trained individuals. Out-of-service equipment is controlled to prevent inadvertent use and its maintenance is recorded. A list is maintained of the critical, spare parts that should be stocked to minimize equipment downtime. Specific field equipment preventive-maintenance practices, frequencies, and spare parts are described in the factory manual for each instrument.

Preventive-maintenance protocols for laboratory equipment and instruments are provided in laboratory QA plans. All maintenance activities will be recorded in maintenance logs. Laboratories will be required to maintain an adequate inventory of spare parts and consumables to prevent downtime as a result of minor problems.

13. SPECIFIC ROUTINE PROTOCOLS

The precision, accuracy, and completeness parameters are quantitative tools by which data sets can be evaluated. These parameters can help ensure that DQOs are met and are defined as follows:

- Precision—A quantitative measurement of the variability of a group of measurements as compared to their average. Usually expressed as a percentage or a standard deviation, it evaluates the reproducibility of the system. Sample duplicates measure the reproducibility of the sampling event, while lab replicates measure the precision of the analytical process. The acceptable precision may be defined by the laboratory method used.
- Accuracy—A quantitative measurement of the bias of the data. It represents how close the measurement data is to the true value. Analytical accuracy is measured by percent recoveries associated with the laboratory analytical control spikes (blank spikes), surrogate spikes, or matrix spikes. The acceptable accuracy may be defined by the laboratory method used. Sampling accuracy can be assessed by evaluating field and trip blanks.
- Representativeness—A qualitative measurement of the ability of a sample or group of data to adequately describe or define the conditions being measured. Precision, accuracy, and completeness all affect representativeness. Sampling strategy (location, method, and frequency) are critical to ensure that the samples statistically represent the population. Laboratory precision and accuracy reflect how representative the data is of the sample.
- <u>Completeness—A</u> quantitative measurement of the percentage of acceptable data as compared to the number planned. Both sampling and analytical completeness can be measured.
- Comparability—A qualitative measurement of the confidence with which one data set can be compared with another. Comparability is achieved by using standard techniques for collection and analysis.

Protocols for assessing the precision, accuracy, and completeness are provided in the following text. It should be noted that there are no standard guidelines available for representativeness and comparability.

13.1 PRECISION

To determine the precision of the laboratory analysis, a routine program of replicate analyses, in accordance with the analytical method requirements, is performed by the laboratory. The results of replicate analyses are used to calculate the relative percent difference which is used to assess laboratory precision.

For replicate results C_1 and C_2 :

Relative percent difference =
$$\frac{|C_1 - C_2|}{\left(\frac{C_1 + C_2}{2}\right)} \times 100$$

Precision of the total sampling and analytical measurement process will be assessed from field duplicates. Although a quantitative goal cannot be set due to sample variability, the Task Lead will review relative percent difference values of field duplicates to estimate precision. Analytical precision can be measured separately from sampling precision through the use of laboratory duplicate and matrix spikes.

13.2 ACCURACY

To determine the accuracy of an analytical method and/or the laboratory analysis, a periodic program of sample spiking is conducted (minimum one spike and one spike duplicate per 20 samples). The results of sample spiking are used to calculate the QC parameter for accuracy evaluation, the percent recovery (% R).

For surrogate spikes and QC samples:

$$\%R = \frac{C_s}{C_t} \times 100$$

where--

C_s = measured spiked sample concentration (or amount)

 C_t = true spiked concentration (or amount)

For matrix spikes:

$$\%R = \frac{|C_s - C_o|}{C_t} \times 100$$

where--

 C_s = measured, spiked sample concentration C_o = sample concentration (not spiked) C_t = true concentration of the spike

Accuracy of the total sampling and analytical measurement process will not be determined. This would require the addition of chemical-spiking compounds to the samples in the field.

13.3 COMPLETENESS

To determine the completeness of data, the percentage of valid, viable data obtained from a measurement system is compared with the number of total measurements. The goal of completeness is to generate a sufficient amount of valid data to satisfy task needs.

Completeness, C, is calculated as follows:

 $% C = \frac{\text{Number of valid measurements}}{\text{Number of total measurements}} \times 100$

14. NONCONFORMANCES AND CORRECTIVE ACTIONS

Nonconforming equipment, items, activities, conditions, and unusual incidents that could affect compliance with task requirements will be identified, controlled, and reported in a timely manner. Nonconforming equipment will immediately be labeled or tagged, and segregated, if possible. Specific protocols for controlling nonconforming items will be described in applicable documents. Nonconformance Reports issued as a result of an audit or surveillance will identify the root cause of the problem. Laboratories must notify the appropriate personnel of any nonconformance or problems with analytical samples. Laboratory corrective actions reports are completed by the analytical laboratory when a nonconformance is recognized by laboratory personnel. Handling of any nonconformance is described in appropriate plans and protocols.

Corrective actions to audit/surveillance findings and nonconformances are managed. The Task Manager is notified of a nonconformance and/or surveillance finding. These are documented and a copy is furnished to the Task Lead as soon as possible. Copies of audits, surveillances, and/or nonconformances and their dispositions will be forwarded to the appropriate management personnel and will be placed in the DMC.

15. QA REPORTS TO MANAGEMENT

Upon request, QA personnel will provide to management a report which summarizes QA activities for the task, system, and performance audits conducted (internal and external); quality problems found; corrective actions initiated; and other applicable items. Some reports that present measurement data generated during the work assignment may require a QA section addressing the quality and limitations of the data. This QA section will address results of audits or surveillance of the measurement work; quality problems found and corrective actions taken; and deviations from applicable documents.

16. FIELD CHANGES

Field changes will be governed by control measures commensurate with those applied to the documentation of the original protocol. The task team identifies, documents, and approves field changes. These changes are communicated to the team through the use of Change Notices and Change Orders.

REFERENCES

- 10 CFR 830.120, "Quality Assurance," April 1994.
- Bechtel Jacobs Company LLC. Quality Assurance Program Plan, DRAFT, October 1998.
- Energy Systems. Environmental Measurements Data Management Plan Implementation Handbook for the Environmental Restoration Program, ES/ER/TM-88/R1, 1996.
- EPA. Data Quality Objectives Process for Superfund, Interim Final Guidance, EPA/540/G-93/071, 1993.
- EPA. Hazardous and Solid Waste Amendment Permit, Permit #KY8890008982, August, 19, 1991.
- EPA. Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, QAMS 005/80, December 20, 1980.
- EPA. Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 1986.
- EPA. EPA Region 4 Environmental Investigations Standard Operating Procedures and Quality Assurance Manual, May 1996.
- Kentucky Division of Waste Management Hazardous Waste Management Permit, Permit No. KY8890008982, August 19, 1991.
- Kentucky Agreement in Principle, January 1, 1997.
- Quality Assured Data, PMSA-1001, Bechtel Jacobs Company LLC Procedures Manual, April 1997.

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APPENDIX A

TASK-SPECIFIC INFORMATION FOR QUALITY AND DATA ELEMENTS

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TASK-SPECIFIC INFORMATION FOR QUALITY AND DATA ELEMENTS

Purpose and Introduction

This plan can be used and implemented for the Paducah DOE tasks requiring the collection of analytical data. Each section of the FFA QA/DMP was written to meet data-quality requirements and provides a description of the programmatic elements which should occur for each task. This appendix provides additional information concerning the QA and Data Management aspects which are specific to the task and cannot be defined at the programmatic level. This appendix should be completed once the task has been planned or once the DQOs have been documented. This completed appendix, along with the "Data and Documents Management and Quality Assurance Plan for the Paducah Environmental Management and Enrichment Facilities Program," will serve as the "Quality Assurance and Data Management Plan" for the task, will be provided to appropriate personnel, and will be maintained as a task record.

For the purpose of this document, this appendix is not completed but shows the information to be completed for each task involved in the collection of analytical data. This appendix should be completed, printed with attachments compiled, combined with the "Data and Documents Management and Quality Assurance Plan for the Paducah Environmental Management and Enrichment Facilities Program," and distributed to the appropriate personnel for review, approval, and use.

INSTRUCTIONS FOR COMPLETING THE QUALITY ASSURANCE/DATA MANAGEMENT PLAN (QA/DMP)

Use the following instructions to complete each section for the task-specific QA/DMP. Attachments may be used to serve as and/or supplement the information provided in the tables.

TITLE PAGE: Type over the task-specific information in the underlined/bolded/italicized portion of the text. Information needed is the issue date, document number, document title, and author(s). Document numbers must be obtained from the Records Manager.

APPROVAL PAGE: Type over the task-specific information in the underlined/bolded/italicized portion of the text. Information needed is the preparers' names and titles and the approvers' names and titles. Minimum approvals are the Task Lead, Project Manager, and QA Manager.

TABLE OF CONTENTS AND ATTACHMENTS: Include the appropriate page numbers to the table of contents and identify and document the attachments provided to supplement this QA/DMP.

SECTION 1.0—TASK ORGANIZATION, RESPONSIBILITY, AND TRAINING: Identify the task organizational chart listing additional roles and responsibilities, including those identified in Section 2.2 of the "Data and Documents Management and Quality Assurance Plan for the Paducah Environmental Management and Enrichment Facilities Program." Also, document in Table 1.1 the training requirements for key personnel. An organizational chart and/or training matrix may be attached to this QA/DMP.

SECTION 2.0—DATA QUALITY OBJECTIVES (DQOs) AND SAMPLE PLANNING: Refer to PMSA-1001, Quality Assured Data, Appendix C, for directions to complete DQOs for the project. Attach DQO documentation to this QA/DMP. Using the DQO documentation, with assistance from the task team, identify details of the SAP. The SAP is generated out of the data needs identified in the DQOs and will specify applicable samples (i.e., regular samples, QC samples, and waste characterization samples) to be collected. Complete Table 2.1 (if SAP is not available) and/or attach the task SAP for environmental data. Complete Table 2.2 for waste characterization.

SECTION 3.0—APPLICABLE PROTOCOLS, DOCUMENTS, AND WORK INSTRUCTIONS: Identify the applicable protocols and documents (to data quality activities) which will be followed for the data collection activity and document in Table 3.1. Work instructions may be required for task-specific tasks.

When available and appropriate for the sample matrix, SW-846 Methods will be used. When not available, other nationally-recognized methods such as those of ASTM, DOE, and EPA will be used. Analytical methods are listed in Table 2.0 and in analytical SOWs; therefore, an additional listing of analytical methods is not required in Table 3.1.

SECTION 4.0—CALIBRATION PROTOCOLS AND FREQUENCIES: This section addresses documentation of field equipment and field support laboratory equipment which is to be calibrated for the task. Fixed-base laboratory calibration protocols and frequencies are not required to be included in this plan but are covered in the laboratory QA plans and protocols. The SMO oversight/audit has ensured the laboratory has met the requirements of SW-846. Calibration protocols and frequency information may be attached to this QA/DMP.

Identify the field equipment and field support laboratory equipment to be used during the data collection activity and document in Table 4.1 or attach supplemental information concerning equipment calibrations, the protocols, and frequencies.

SECTION 5.0—DATA REVIEW PROCESS: For details on the data review process, refer to PMSA-1001, *Quality Assured Data*, Appendices E, F, G, and H. Complete verification and assessment.

For the purposes of this section, contractual screening, data verification, and data assessment frequencies are identified in Table 5.1, Table 5.2, and Table 5.4, respectively; however, responsible personnel for these tasks must be identified and documented in the appropriate tables. Complete and attach Appendix G, "Data Quality Checks," from PMSA-1001, Quality Assured Data, to better define verification and assessment criteria. Complete Table 5.3 to document the validation strategy defined by the task team.

SECTION 6.0—DOCUMENT AND RECORDS CONTROL AND TRANSFER: Identify the documents and records to be controlled during the task, the document or record name and type (i.e., a document such as a QA project plan or a record such as a logbook) and the frequency of transfer of the document or record to the EMEF DMC. Record this information in Table 6.1 for documents and Table 6.2 for records.

SECTION 7.0—QUALITY ASSESSMENT SCHEDULE: Identify and document in Table 7.1 the quality assessments to be performed for the task as requested by the Task Lead or other applicable managers.

DISTRIBUTION LIST: Identify and document the appropriate personnel to receive a copy of the QA/DMP.

REVIEWING, APPROVING, AND ISSUING THE QA/DMP: Upon completion of the above instructions, the QA/DMP should be printed, noticeably stamped "DRAFT," and provided to the appropriate personnel for review. Comments should be received and resolved in a timely manner. The revised QA/DMP should be printed, approved, and provided to the appropriate personnel as defined in the distribution list.

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DATE OF ISSUE: **DATE**

DOCUMENT NO., REV. NO.

<u>PROJECT TITLE</u> QUALITY ASSURANCE AND DATA MANAGEMENT PLAN

AUTHOR(S)

Prepared by
Environmental Management and Enrichment Facilities
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Managed by
BECHTEL JACOBS COMPANY
for the
U. S. DEPARTMENT OF ENERGY
Under Contract No. DE-AC05-98OR22700

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*PROJECT TITLE*QUALITY ASSURANCE AND DATA MANAGEMENT PLAN

APPROVALS

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2.0	DATA QUALITY OBJECTIVES AND SAMPLE PLANNING
3.0	APPLICABLE PROTOCOLS AND DOCUMENTS
1.0	CALIBRATION PROTOCOLS AND FREQUENCIES
5.0	DATA REVIEW PROCESS
5.0	DOCUMENT AND RECORDS CONTROL AND TRANSFER
7.0	ASSESSMENT SCHEDULE

ATTACHMENTS

- Organizational Chart
 Training Matrix
 DQO Documentation
 Sampling and Analysis Plan
 Figures/Drawings of Area
 Calibration Protocols and Frequencies
 Data Quality Checks Checklist

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1.0 TASK ORGANIZATION, RESPONSIBILITY, AND TRAINING

Table 1.1. Task Organization, Responsibility, and Training.

Job Title or Position	Name	Role, Responsibility, and Interface	Training*
DOE Project Manager			
Data Clerk			
Data Manager	M&I Data Manager/ Subcontractor Personnel		2
Network Administrator	M&I Network Administrator		+
Project Manager			4.
Project Engineer			
QA Specialist			
Records Clerk	*		
Records Manager	M&I Records Manager/ Subcontractor Personnel		
Sample Manager	M&I Sample Manager/ Subcontractor Personnel		, i
Task Lead	Subcontractor reisonner		
Task Manager			
Field Team Leader	Subcontractor Personnel		N.
Samplers	Subcontractor Personnel		
Drillers	Subcontractor Personnel	1	
Other	Subcontractor Personnel		_
Other	Subcontractor Personnel		

*The required training (GET, GERT, RAD II, etc.) should be identified for Subcontractor Personnel for this project
Identify Location of Training Records for Subcontractor Personnel:

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2.0 DATA QUALITY OBJECTIVES AND SAMPLE PLANNING

Table 2.1. DQOs and sample planning for environmental data collection.

				. DQOS and san						
Sampling Location	Matrix	Sampling Method(s)	Sampling Frequency	Data Type(s) (Screen or Def)	Analyte(s)	Analytical Method	Detection Limit(s)	Holding Time	Container	Preservative
				I	Regular Sample	'S		TI .		
		X								
	100									2
				*						
			AND DESCRIPTION OF THE PARTY AND							
4100 K = 0.010 H = 0.010		Market and Control of the Control of			QC Samples					
West of the second		4								
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Table 2.2. DQOs and sample planning for waste characterization data collection.

Material/ Volume/ Container	Preliminary Classification	Characterizat ion Method	Future Disposition	Analyte(s)	Analytical Method	Detection Limit(s)	Holding Time	Container	Preservative
		I		Re	gular Sample	es .			
							:4:		
				Q	C Samples				
							÷		
							\(\frac{1}{2}\)		

3.0 APPLICABLE DOCUMENTS, PROTOCOLS, AND WORK INSTRUCTIONS

Table 3.1. Applicable documents, protocols, and work instructions.

Protocol Number	Protocol Name	Applicability		
		Yes	No	
	General			
ti	List appropriate protocols for to be used for chain-of-custodies, logbooks, ensuring quality data, etc.			
	Sampling			
	List appropriate sampling protocols to be used.			
	Data Management		te = 7,7/5%	
	List appropriate data management protocols to be used.		ALIAN	
	Data Validation			
	List appropriate data validation protocols to be used.			

4.0 CALIBRATION PROTOCOLS AND FREQUENCIES

Table 4.1. Field equipment and field support laboratory calibration protocols and frequencies.

Equipment & Serial No.	Field Usage	Calibration Check Frequency	Calibration Check Material	Calibration Check Protocol
		Field Equipment		
		-		
	Field	Support Laboratory Equi	pment	
			3	

5.0 DATA REVIEW PROCESS

- A	Table	5.1. Contractual screen	ing.	. 1
17. 17.				
Responsibl	e Person:	19411 		
Oth	ar•			
Oth	er:			
	Tal	ole 5.2. Data verification	l	
Responsibl	e Person:			
Oth	er:			
	Table, 5.3. De	tails for performing data	a validation.	*
	The state of the s		Protocol Used	Completed By
Frequency	Data Package Type	Analytes & Media	Protocol Usea	Completed By
		æ		, n
Describle Days	. a			
Responsible Person	n:			
	Ta	ble 5.4. Data assessment	i.	
Responsibl	e Person:			West of the second seco
	December 1 Married States			1

6.0 DOCUMENT AND RECORDS CONTROL AND TRANSFER

Document Name and Type	Controlled Document (Yes* or No)	Storage Location	Frequency of Transfer	Comments
		N.		

^{*} If a document is identified as a "controlled document", then a distribution list must be created, maintained, and updated, as needed. The access control method for the "controlled document" must be defined and implemented.

Table 6.2. Identification of records.					
Record Name and Type	Quality Record (Yes or No)	Storage Location	Frequency of Transfer	Comments	
0					
#				4	

7.0 ASSESSMENT SCHEDULE

Self Assessment No.		Completed By
1		

DISTRIBUTION

(List appropriate names and associated organization, if needed, for distribution of document.)

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APPENDIX B

DATA DICTIONARY AND FORMATS FOR PADUCAH OREIS TRANSMITTALS

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TRANSMITTAL FORMAT

Transmittal format for all data transmittals will be in exported database format (.dbf) and as a Microsoft Access table (version 97 or more recent). The file will be added to the password-protected external server under the base directory \home\oreis\data\ in a zipped file named according to the structure outlined below that corresponds to Table 1 in addition to other applicable transmittals.

KPDES Permit DOE Outfalls, Toxicity Monitoring, Bioaccumulation Study, Fish Community ...\data\permit\KPDES\KPDESTYYYY-MM

where T corresponds to the sa

corresponds to the sample type (i.e., R=regular permitted sampling, T=toxicity sampling, B=bioaccumulation sampling, F=fish community sampling)

YYYY corresponds to the calendar year, and

MM corresponds to the month

C-746-K Surface Water, C-746-K Groundwater

...\data\permit\C746K\KMYYYY-SA

where M corresponds to the media (i.e., S=Surface water, G=Groundwater)

YYYY corresponds to the calendar year, and

SA corresponds to the 1st or 2nd half of the year

C-746-S&T Surface Water, C-746-S&T Groundwater, C-746-S&T Leachate

...\data\permit\C746S&T\S TMYYYY-QQ

where M corresponds to the media (i.e., S=Surface water, G=Groundwater, L=Leachate)

YYYY corresponds to the calendar year, and

QQ corresponds to the quarter

C-746-U Surface Water, C-746-U Groundwater, C-746-U Leachate

...\data\permit\C746U\UMYYYY-QQ

where M corresponds to the media (i.e., S=Surface water, G=Groundwater, L=Leachate)

YYYY corresponds to the calendar year, and

QQ corresponds to the quarter

C-404 Groundwater, C-404 Leachate

...\data\permit\C404\404MYYYY-SA

where M corresponds to the media (i.e., S=Surface water, G=Groundwater, L=Leachate)

YYYY corresponds to the calendar year, and

SA corresponds to the 1st or 2nd half of the year

Environmental Monitoring Surface Water Sampling

...\data\envmon\SW-YYYY

where YYYY corresponds to the calendar year

Environmental Monitoring Sediment Sampling

...\data\envmon\SD-YYYY

where YYYY corresponds to the calendar year

Environmental Monitoring Deer Sampling

...\data\envmon\D-YYYY

where YYYY corresponds to the calendar year

Environmental Monitoring Plume Groundwater Sampling

...\data\envmon\Pl-GW\PlGWYYYY-QQ

where YYYY corresponds to the calendar year, and

QQ corresponds to the quarter

Environmental Monitoring Residential Groundwater Sampling

...\data\envmon\Res-GW\ResGWYYYY-SA

where YYYY corresponds to the calendar year, and

SA corresponds to the 1st or 2nd half of the year

Environmental Monitoring Surveillance Groundwater Sampling

...\data\envmon\Sur-GW\SurGWYYYY-SA

where YYYY corresponds to the calendar year, and

SA corresponds to the 1st or 2nd half of the year

S&M/O&M Northwest Plume Operations Sampling

...\data\sm_om\NWYYYY-QQ

where YYYY corresponds to the calendar year, and

QQ corresponds to the quarter

S&M/O&M Northeast Plume Operations Sampling

...\data\sm om\NEYYYY-QQ

where YYYY corresponds to the calendar year, and

QQ corresponds to the quarter

DOE Remedial Action Investigations

...\data\ra\PROJCODE

where PROJCODE corresponds to the PROJ_CODE in Paducah OREIS (e.g., ERI-WAG6, ERI98-698W22, etc.)

Special Requests

...\data\requests\YYYYMMDD-A

where YYYY corresponds to the calendar year,

MM corresponds to the month,

DD corresponds to the day of the request, and

A corresponds to the sequential number for the request.

Lithology

...\data\lith\PROJCODE

where PROJCODE corresponds to the PROJ_CODE in Paducah OREIS from which the lithology description was collected (e.g., ERI-WAG6, ERI-WAG 27, LASAGNA, etc.)

GIS Themes/Coverages

...\data\gis\

Each file will be named to appropriately describe the theme/coverage. Updates to themes/coverages will be named identical to the previous version with a revision number immediately following (e.g., roads, roads1, roads2,etc).

GIS Themes/coverages will be in a format compatible to be viewed in ArcView 2.0 or higher (i.e., ArcInfo Coverages, AutoCAD drawings, etc.)

DATA DICTIONARY INFORMATION

CODE

The CODE table contains the codes used in Paducah OREIS tables and their descriptions.

CODE

Code referenced in other Paducah OREIS tables.

CODE_DESCRIPTION

Description of the coded value. This is the 'decoded' value.

CODE TYPE

Column name for the codes and descriptions. This value identifies the type

of coded value.

PROJECT FLD SMP MEAS

The export of PROJECT FLD SMP MEAS table contains the measurement data taken in the field, which is associated with specific SAMPLEs collected during a STATION_EVENT. Examples are flow rate, depth, and temperature. Only those field measurements directly associated with a SAMPLE will be stored in the FLD_SMP_MEAS table. Field measurement data collected, not directly associated with a SAMPLE (e.g., water level suites) will also be in this format.

PROJ CODE

Acronym assigned by the project (e.g., "ERI-WAG6" for the WAG 6

Environmental Restoration Field Investigation).

STA NAME

Unique station name assigned by the individual projects (e.g., 400-212

or MW156).

PROJ_SAMPLE_ID

Unique sample identifier assigned by the project. Comments about the sample.

SAMPLE_COMMENTS SMP STRT LEVEL

For a measurement taken over a range of elevations or depths, the upper

vertical distance in feet of the measurement from ground surface.

SMP END LEVEL

For a measurement taken over a range of elevations or depths, the lower

vertical distance in feet of the measurement from ground surface.

MED_TYPE

Coded value that represents the part of the environment from which a sample is collected, or on which a field measurement or observation is made. See CODE table where CODE TYPE = MED TYPE for a list of

valid values and their descriptions.

SMP TYPE

Coded value that represents the type of sample collected. See CODE table where CODE TYPE = SMP TYPE for a list of valid values and

their descriptions.

D COLLECTED

Date sample was collected.

CHEMICAL NAME

Description of the chemical or measurement parameter. For CAS

numbers, this is the preferred name defined by the Common Lab

Practices Committee.

CAS_NUM

Chemical Abstract Services number with dashes, blank if no CAS

number is available.

LAB CODE

Coded value assigned by the project that represents the analytical

laboratory that performed the analysis of the sample. See the CODE table where CODE_TYPE = LAB_CODE for a list of valid values and

their descriptions.

RESULTS

Measurement for a given parameter.

RSLT PREFIX QUALIFIER

A qualifier indicating whether the result is below, within, or above

range limits. See CODE table where CODE TYPE =

RSLT PREFIX QUALIFIER for a list of valid values and their

descriptions.

Coded value that documents any conditions associated with the results RSLTQUAL

of the analysis. See CODE table where CODE TYPE = RSLTQUAL

for a list of valid values and their descriptions.

Coded value that represents the units of measure used to report the UNITS

parameter value. See CODE table where CODE TYPE = UNITS for a

list of valid values and their descriptions.

For Paducah OREIS, this field designates electronic verification NON COMPLI CODE

qualifiers assigned during the Data Assessment process according to

PMSA-1001. See CODE table where CODE TYPE =

NON COMPLI CODE for a list of valid values and their descriptions. A null field may indicate no criteria were established or may indicate verification was clear. Non-standard criteria are established on a

project-by-project basis.

Coded value that represents the outcome of the data validation process. VALIDATION

See CODE table where CODE TYPE = VALIDATION for a list of

valid values and their descriptions.

Coded value describing assessment qualifiers added to data as a result of ASSESSMENT

Comments about the measurement.

PMSA-1001. Applies only to data generated after effective date of procedure. See CODE table where CODE TYPE = ASSESSMENT for

a list of valid values and their descriptions.

FLD COMMENTS

ANA METHOD

Method number used to identify a standard analysis method.

ANA TYPE

Coded value of the chemical group to which the analyte belongs. See CODE table where CODE TYPE = ANA TYPE for a list of valid

values and descriptions.

PROJECT LAB MEAS

The export of PROJECT LAB MEAS table contains the measurement data analyzed by an analytical laboratory, which is associated with specific SAMPLEs collected during a STATION EVENT.

Acronym assigned by the project (e.g., "ERI-WAG6A" for the WAG 6 PROJ CODE

Environmental Restoration Field Investigation).

Unique station name assigned by the individual projects (e.g., 400-212 STA NAME

or MW156).

Unique sample identifier assigned by the project. PROJ_SAMPLE_ID

Comments about the sample. SAMPLE COMMENTS

SMP STRT LEVEL For a measurement taken over a range of elevations or depths, the upper

vertical distance in feet of the measurement from ground surface.

For a measurement taken over a range of elevations or depths, the lower SMP END LEVEL

vertical distance in feet of the measurement from ground surface.

Coded value that represents the part of the environment from which a MED TYPE

sample is collected, or on which a field measurement or observation is made. See CODE table where CODE TYPE = MED TYPE for a list of

valid values and their descriptions.

Coded value that represents the type of sample collected. See CODE SMP_TYPE

table where CODE TYPE = SMP TYPE for a list of valid values and

their descriptions.

Date sample was collected. D COLLECTED

Description of the chemical or measurement parameter. For CAS CHEMICAL NAME

numbers, this is the preferred name defined by the Common Lab

Practices Committee.

Chemical Abstract Services number with dashes, blank if no CAS CAS NUM

number is available.

Coded value assigned by the project that represents the analytical LAB_CODE

laboratory that performed the analysis of the sample. See the CODE table where CODE TYPE = LAB CODE for a list of valid values and

their descriptions.

RESULTS Measurement for a given parameter.

A qualifier indicating whether the result is below, within, or above RSLT_PREFIX_QUALIFIER

range limits. See CODE table where CODE TYPE =

RSLT_PREFIX_QUALIFIER for a list of valid values and their

descriptions.

Coded value that documents any conditions associated with the results RSLTQUAL

of the analysis. See CODE table where CODE TYPE = RSLTQUAL

for a list of valid values and their descriptions.

Coded value that represents the units of measure used to report the UNITS

parameter value. See CODE table where CODE TYPE = UNITS for a

list of valid values and their descriptions.

RAD ERR The counting error for a specific radionuclide expressed as 2 standard

deviations.

For Paducah OREIS, this field designates electronic verification NON_COMPLI_CODE

qualifiers assigned during the Data Assessment process according to

PMSA-1001. See CODE table where CODE TYPE =

NON COMPLI CODE for a list of valid values and their descriptions. A null field may indicate no criteria were established or may indicate verification was clear. Non-standard criteria are established on a

project-by-project basis.

Coded value that represents the outcome of the data validation process. VALIDATION

See the CODE table where CODE TYPE = VALIDATION for a list

valid values and their descriptions.

ASSESSMENT Coded value describing assessment qualifiers added to data as a result of

> PMSA-1001. Applies only to data generated after effective date of procedure. See CODE table where CODE TYPE = ASSESSMENT for

a list of valid values and their descriptions.

LAB COMMENTS

Comments about the individual sample.

Method number used to identify a standard analysis method. ANA METHOD ANA TYPE

Coded value of the chemical group to which the analyte belongs. See

CODE table where CODE TYPE = ANA TYPE for a list of valid

values and descriptions.

STATION-LOCATION

The export of STATION-LOCATION table contains the data about sampling points associated with one or more projects. Each point has a distinct station name/station type within a project. Locational information contains coordinate and other information describing a point on the ground. Most location are points described by x,y coordinates, but a location could be a line or a polygon where measuring events occur. In those cases, a single point, such as the estimated center point, is used.

STA_NAME Unique station name assigned by the individual projects (e.g., GW101).

STA_TYPE Coded value that represents the type of station (e.g., seep, spring, well).

See CODE table where CODE TYPE = STA TYPE for a list of valid

values and their descriptions.

STATION COMMENTS Comments about the station.

STA_DESC Description of the specific sampling or measuring location.

GRND ELV Elevation of ground surface (for groundwater, soil, or sediment)

sampling) at a sampling or measuring location in feet above mean sea

level (msl).

ADMIN_EAST X-value of the distance in feet of a sampling or measuring location from

the reference location based on the administrative coordinate grid

system.

ADMIN NORTH Y-value of the distance in feet of a sampling or measuring location from

the reference location based on the administrative coordinate grid

system.

SWMU Acronym for Solid Waste Management Unit, if applicable.

LOCATION COMMENTS Comments about the location.

DATUM Coded value that represents the method by which reference points were

established (e.g., NAD27, NAD83). Datum should be associated with the state plane coordinate system. It is not valid for administrative grid. See CODE table where CODE TYPE = DATUM for a list of valid

values and their descriptions.

SPLANE EAST X-value of the distance in meters of a sampling or measuring location

from the reference location based on the state plane coordinate grid

system.

SPLANE_NORTH Y-value of the distance in meters of a sampling or measuring location

from the reference location based on the state plane coordinate grid

system.

LOC ERROR Station location error in feet.

LOC METHOD Coded value that represents the method used for locating the station.

See CODE table where CODE TYPE = LOC METHOD for a list of

valid values and their descriptions.

LITHOLOGY

The LITHOLOGY export provides a description of a material (e.g., sand, gravel) encountered underground at a given location at a specific interval within a well, borehole, etc. and the discrete fixed top and bottom points of the interval where the sample was taken.

CONSTR_DEPTH_VAL The total measureme

The total measurement from the ground surface of a hole downward to the bottom of the screening material in a well, expressed in feet. HOLE DIAM

Diameter in inches of the well. If more than one diameter is available, this column will contain the smallest diameter and the others will be listed in the COMMENTS column.

LOG FLAG

A flag which indicates that reference source information (e.g., geophysical logs) exists.

LOG TYPE

Coded value that represents a specific geophysical log. An example would be CL for Caliper Log, GRL for Gamma Ray Log. A name or abbreviation representing a type of LOG used in geologic work (e.g., driller, caliper, gamma). See CODE table where CODE_TYPE = LOG TYPE for a list of valid values and their descriptions.

TOT DRILLED DEPTH

The total measurement from the ground surface to the bottom of a newly-constructed well after any plug back material has been added, expressed in feet.

INT_BOT_DEPTH_VAL

The distance in feet, from the ground surface to the bottom of a monitored interval.

INT_TOP_DEPTH_VAL

The distance in feet, from the ground surface to the top of a monitored interval.

MONIT_INT_NAME

The name (or number) assigned to a given monitored interval at a given

MONIT ZONE CODE

Coded value that represents the generic interval of a saturated zone that a hole monitors. A monitored interval can cut across multiple zones. See CODE table where CODE_TYPE = MONIT_ZONE_CODE for a list of valid values and their descriptions.

INT MATL CODE

Coded value that represents a specific characteristic or set of characteristics of the solid content found at a specific location. See CODE table where CODE_TYPE = INT_MAT_TYPE for a list of valid values and their descriptions.

STRAT_SEQ

Number assigned by the site geologist to each distinct lithologic layer at

VISUAL DESC

Textual and mineralogical description of the material comprising the layer to augment or qualify the lithtype code (e.g., grain sizes, color, secondary characteristics).

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8

APPENDIX 8

PGDP SITE MAP (REV 6) FACILITIES EVALUATION WORKSHEET (CD)



PGDP SITE MAP (REV 6) FACILITIES EVALUATION WORKSHEET

(**CD**)

