



Department of Energy

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DEC 15 2010

Mr. W. Turpin Ballard
Remedial Project Manager
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

PPPO-02-1085494-11

Mr. Edward Winner, FFA Manager
Kentucky Department for Environmental Protection
Division of Waste Management
200 Fair Oaks Lane, 2nd Floor
Frankfort, Kentucky 40601

Dear Mr. Ballard and Mr. Winner:

TRANSMITTAL OF THE D1 FISCAL YEAR 2011 SITE MANAGEMENT PLAN, PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, AND PROPOSED FEDERAL FACILITY AGREEMENT MODIFICATION

In accordance with Section XVIII of the Paducah Federal Facility Agreement (FFA), U.S. Department of Energy (DOE) is submitting the *D1 Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, Annual Revision FY 2011, DOE/LX/07-0348&D1, (SMP) for your review and comment. The document reflects an updated list of enforceable milestones, the status of operable units (OUs) with a signed Record of Decision (ROD) or Action Memorandum, and agreed to changes to the site cleanup strategy.

This version of the SMP is consistent with the scoping discussions held by the FFA Managers between June and November 2010 and reflects the verbal agreements reached by the FFA parties. The following are some of the major changes to note when comparing this document to the fiscal year (FY) 2010 D2 approved SMP.

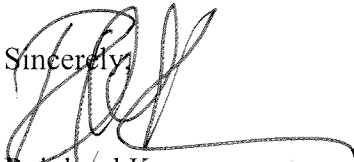
- The main body of the SMP indicates the three year enforceable periods of FY 2011, FY 2012, and FY 2013.
- Appendix 1 includes an updated status of the removal and remedial actions.
- Appendix 2 includes the required certification indicating that land use controls for the North-South Diversion Ditch and the C-400 actions are being implemented, as described in their respective Land Use Control Implementation Plans.

- Appendix 3 includes the OU scope descriptions and key project assumptions. The language in Appendix 3 is consistent with language discussed among the U.S. Environmental Protection Agency (EPA), the Kentucky Department for Environmental Protection (KDEP), and DOE in scoping meetings held between June and November 2010. As discussed during the FFA Managers Meetings, the scope discussion for the Groundwater OU has been expanded to include optimization of the Northeast Plume extraction system and the Burial Grounds OU has been expanded to include a sampling plan to determine nature and extent of trichloroethene contamination within the four disposal cells at Solid Waste Management Unit (SWMU) 4. Scope completed in support of the Soils OU and Surface Water OU has been removed. The Decontamination and Decommissioning (D&D) OU has been updated to reflect completion of the C-746-A East End Smelter. The Waste Disposal Alternative Evaluation has been updated to reflect 12 potential locations and the evaluation of up to five candidate sites.
- Appendix 4 has been modified to reflect the changes discussed among EPA, KDEP, and DOE during the FY 2011 SMP scoping meetings. Specific changes to Appendix 4 are as follows:
 - SWMUs have been added to the Additional Burial Ground Sources OU.
 - Nomenclature has been modified as appropriate to ensure consistency with the Hazardous Waste Permit.
 - SWMUs 27 and 211B have been added to ensure consistency with the Hazardous Waste Permit.
 - Based upon correspondence received from KDEP, SWMUs 566 and 568 have been added to the No Further Action category.
 - SWMU 137 has been removed from the Soils and Slabs OU and placed in the GPD D&D OU.
 - A "Pending No Further Action Decision" category has been added.
- Appendix 5 includes enforceable commitments for FY 2011, FY 2012, and FY 2013. New introductory text has been added to Appendix 5 that describes incorporation of DOE budget target funding guidance and impacts to the Paducah site. Out-year enforceable milestone dates remain the same; however, a footnote has been added to indicate that the out-year enforceable milestone dates are in jeopardy of being missed based upon the funding targets for the Paducah site. The FFA managers have agreed to leave the current out-year enforceable milestones as placeholders with the understanding that revisions to the enforceable milestones may be necessary under the current funding targets. Appendix 5 reflects the following strategy:
 - Continuation of work for FY 2011 as planned, ensuring that the current FY 2011 enforceable milestones are met.
 - Acceleration of Burial Grounds OU through implementation of a removal action for SWMU 4 and division of the remaining burial ground SWMUs into more manageable scopes of work.
 - Construction of the waste disposal cell in parallel with SWMU 4, assuming a waste disposal cell is selected via the regulatory process currently underway.
 - Continuation of Groundwater OU actions at Southwest Plume and C-400.

- Implementation of the optimization of the Northeast Plume extraction system with resequencing of the Groundwater OU Dissolved-Phased Plume remedial action.

Additional enforceable milestones have been developed and included in Appendix 5. These include milestones for the Soils Site Evaluation and Northeast Plume. DOE plans to establish enforceable milestones for the Waste Disposal Alternative Evaluation once dispute resolution is achieved. In the meantime, "to-be-determined" has been added as a placeholder until enforceable dates can be established. DOE also is accelerating the enforceable milestones for the Soils OU Site Evaluation Report and the SWMU 13 D1 Site Evaluation Report. It should be noted that the date for C-400 has been updated and that the footnote has been modified to indicate that the date reflects the one year of "good cause" agreed to by the FFA parties and current project estimates for completion of Phase II.

If you have any questions or require additional information, please contact Dave Dollins at (270) 441-6819.

Sincerely,

Reinhard Knerr
Paducah Site Lead
Portsmouth/Paducah Project Office

Enclosures:

1. Certification Page
2. D1 SMP FY 2011
3. D1 SMP FY 2011 Redline from Approved SMP FY 2010

cc w/enclosures:
DMC/Kevil

e-copy w/enclosure:

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CERTIFICATION

Document Identification: *Site Management Plan, Paducah Gaseous Diffusion Plant, Paducah, Kentucky, Annual Revision FY 2011, DOE/LX/07-0348&D1, December, 2010*

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.

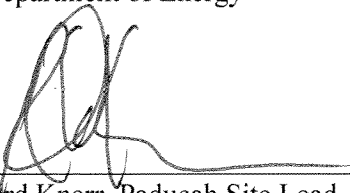
LATA Environmental Services of Kentucky, LLC

Barbara A. Mazurowski
Barbara A. Mazurowski, Paducah Project Manager

12-14-10
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


Reinhard Knerr, Paducah Site Lead
Portsmouth/Paducah Project Office

12/15/10
Date Signed