



## Department of Energy

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**MAY 23 2011**

Ms. Jennifer Tufts  
Remedial Project Manager  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303

PPPO-02-1166929-11B

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

Dear Ms. Tufts and Mr. Winner:

**TRANSMITTAL OF THE SITEWIDE EVALUATION WORK PLAN AT THE  
PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY  
(DOE/LX/07-0228&D2)**

References:

1. Letter from A. Webb to R. Knerr, "Paducah Federal Facility Agreement-Request for Clarification of Comments Received for the Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant (DOE/LX/07-0228&D1) from the Kentucky Division of Waste Management, Paducah Gaseous Diffusion Plant, Paducah, McCracken County, Kentucky, KY8-890-008-982," dated May 10, 2011
2. Letter from R. Knerr to E. Winner and J. Tufts, "Paducah Federal Facility Agreement-Request for Clarification of Comments Received for the Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant (DOE/LX/07-0228&D1) from the Kentucky Division of Waste Management," dated May 4, 2011
3. Letter from J. Tufts to R. Knerr, "Comments on the Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky (DOE/LX/07-0228&D1)," dated April 6, 2011
4. Letter from A. Webb to R. Knerr, "Comments to the Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant (DOE/LX/07-0228&D1) Paducah Gaseous Diffusion Plant, Paducah, McCracken County, Kentucky, KY8-890-008-982," dated March 14, 2011

In the May 4, 2011, the U.S. Department of Energy (DOE) letter to the Kentucky Department for Environmental Protection (KDEP), DOE requested clarification on several comments received from KDEP on the D1 Sitewide Walkover Work Plan. The comments either did not contain enough specificity for DOE to respond or conflicted with one another, making it unclear which comment took precedence. DOE requested that Kentucky revised the comments submitted on March 14, 2011 in order to provide adequate specificity consistent with the requirements of Section XX.G.2 of the Paducah Federal Facility Agreement. It is DOE's position that until such

time the revised comments were received, the period of time required to submit the responses to comments on the D1 Sitewide Evaluation Work Plan would not begin.

On May 10, 2011, KDEP replied to DOE's request and provided clarification for the comments in question. KDEP, however, did not agree with DOE's position that the period of time required to submit the responses to comments on the Sitewide Evaluation Work Plan would not begin until receipt of KDEP's clarification. Rather, KDEP stated that the document was due by May 23, 2011, or 45 days from the date the original comments were received from the agencies.

DOE disagrees with KDEP's position on this matter and considers it not to be consistent with the Federal Facility Agreement (FFA). DOE has chosen not to pursue this matter further under the FFA and is submitting the revised document by the time requested because it is DOE's primary interest to move forward with finalizing this project. DOE is concerned that the FFA Parties continue to diverge from the requirements of the FFA and requests that this matter be discussed at the June 2011 FFA Manager's meeting.

Enclosed for your review is the D2 *Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/LX/07-0228&D2. Enclosed also are a redline version of the document and Comment Response Summaries for comments received from KDEP and the U.S. Environmental Protection Agency.

If you have any questions or require additional information, please contact Lisa Santoro at (270) 441-6804.

Sincerely,



Reinhard Knerr  
Paducah Site Lead  
Portsmouth/Paducah Project Office

Enclosures:

1. D2 Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant
2. Redlined D1 Sitewide Evaluation Work Plan at the Paducah Gaseous Diffusion Plant
3. Comment Response Summary for KDEP Comments
4. Comment Response Summary for EPA Comments

cc w/enclosures:

DMC/Kevil

e-copy w/enclosures:

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