



## Department of Energy

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OCT 07 2009

Ms. Jennifer Tufts  
U.S. Environmental Protection Agency, Region 4  
Federal Facilities Branch  
61 Forsyth Street  
Atlanta, Georgia 30303

PPPO-02-717-09

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 D2/R1 REMOVAL ACTION WORK PLAN FOR SOILS  
OPERABLE UNIT INACTIVE FACILITIES SWMU 19 AND SWMU 181 AT THE  
PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY  
(DOE/LX/07-0220&D2/R1)**

References:

1. Letter from J. Tufts to R. Knerr, "Conditional Approval of the D2 Removal Action Work Plan for Soils Operable Unit Inactive Facilities SWMU 19 and SWMU 181 at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky (DOE/LX/07-0220&D2)," dated September 8, 2009
2. Letter from A. Webb to R. Knerr, "Approval of the Removal Action Work Plan for Soils Operable Unit Inactive facilities SWMU 19 and SWMU 181 (DOE/LX/07-0220&D2)," dated September 2, 2009
3. Letter from R. Knerr to J. Tufts and E. Winner, "Transmittal of the Removal Action Work Plan for Soils Operable Unit Inactive Facilities SWMU 19 and SWMU 181 at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky (DOE/LX/07-0220&D2)," (PPPO-02-592-09), dated August 7, 2009

Please find enclosed the certified D2/R1 *Removal Action Work Plan for Soils Operable Unit Inactive Facilities SWMU 19 and SWMU 181 (RAWP) at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky (DOE/LX/07-0220&D2/R1)* for your review. Also enclosed is a red-lined version of the document and a summary table in response to comments received from U.S. Environmental Protection Agency (reference 1).

In a letter dated September 8, 2009, EPA conditionally approved the subject D2/R1 RAWP (reference 1). The subject D2/R1 RAWP was approved by Kentucky Department for Environmental Protection (KDEP) with no conditions in a letter dated September 2, 2009

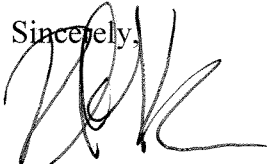
(reference 2). As subsequently discussed between U.S. Department of Energy, EPA, and KDEP during a teleconference on October 6, 2009 the parties agreed to a modification for 1 of the 2 EPA conditions. The modified condition originally described in Comment 1 of EPA's comments is as follows:

- 1) A draft protocol for fill and cover material verification is attached.

The following condition, as stated in Comment 2 in EPA's letter (reference 1) was fully implemented.

- 2) A short description is provided in the Executive Summary and Section 1.2 regarding SWMU 40.

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

Sincerely,  


Reinhard Knerr  
Paducah Site Lead  
Portsmouth/Paducah Project Office

Enclosures:

1. Certification Page
2. D2/R1 RAWP for 2 Soils Inactive Facilities
3. Comment Response Summary
4. Red-lined Document

cc w/enclosures:

AR File/Kevil  
DMC/Kevil  
EIC/PAD

e-copy w/enclosures:

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## CERTIFICATION

**Document Identification:**

**Removal Action Work Plan for Soils Operable Unit Inactive  
Facilities SWMU 19 and SWMU 181 at the Paducah Gaseous  
Diffusion Plant, Paducah, Kentucky,  
DOE/LX/07-0220&D2/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 assure 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.

Paducah Remediation Services, LLC  
Operator



Myrna E. Redfield, Environmental Monitoring/  
Restoration Group Deputy

10/7/09  
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 assure 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 (DOE)  
Owner



Reinhard Knerr, Paducah Site Lead  
Portsmouth/Paducah Project Office

10/7/09  
Date Signed