Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky

Annual Revision—FY 2009



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SITE MANAGEMENT PLAN PADUCAH GASEOUS DIFFUSION PLANT PADUCAH, KENTUCKY

ANNUAL REVISION—FY 2009

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PADUCAH GASEOUS DIFFUSION PLANT
Paducah, Kentucky 42002
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CONTENTS

FIGURE	iv
ACRONYMS	v
1. INTRODUCTION	1
2. LAND USE	2
2.1 LAND USE CONTROLS.	2
3. OPERABLE UNITS	2
4. SITE PRIORITIZATION	2
APPENDIX 1 ACTIONS TAKEN TO DATE	1-1
APPENDIX 2 CERTIFICATION OF LUCIPS	2-1
APPENDIX 3 OPERABLE UNIT SCOPE DESCRIPTIONS AND KEY DOE PLANNING ASSUMPTIONS FROM LIFE CYCLE BASELINE	3-1
APPENDIX 4 SOURCE AREA BY OPERABLE UNIT	4-1
APPENDIX 5 ENFORCEABLE TIMETABLES AND DEADLINES; PLANNING DATES WITH LONG-TERM TARGETS	5-1
APPENDIX 6 DATA MANAGEMENT PLAN	6-1

FIGURES

Figure 1. Current Land Use at PGDP.	4
Figure 2. Reasonably Anticipated Future Land Use at PGDP.	5

ACRONYMS

AOC area of concern

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CSOU Comprehensive Site Operable Unit D&D decontamination and decommissioning

DOE U.S. Department of Energy EM Environmental Management

EPA U.S. Environmental Protection Agency

FFA Federal Facility Agreement

FY fiscal year

GDP gaseous diffusion plant

LOI Letter of Intent LUC land use controls

LUCAP Land Use Controls Assurance Plan LUCIP Land Use Control Implementation Plan

NCP National Contingency Plan

OU operable unit

PGDP Paducah Gaseous Diffusion Plant

RCRA Resource Conservation and Recovery Act

SMP Site Management Plan

SWMU solid waste management unit



1. INTRODUCTION

The Paducah Gaseous Diffusion Plant (PGDP) was placed on the National Priorities List 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 (EEC) (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.

DOE and Kentucky entered into a Letter of Intent (LOI) in August 2003. EPA was not a signatory to the LOI. The LOI documents the commitment by Kentucky and DOE to promote accelerated cleanup at PGDP, develop an integrated planning and funding request, meet commitments under the FFA, and settle all identified outstanding enforcement and compliance issues through an Agreed Order. The LOI does not affect DOE's legal obligation to comply with the National Contingency Plan (NCP) or FFA. An Agreed Order between DOE and Kentucky, which incorporated certain provisions of the LOI related to waste management, was signed in 2003.

The fiscal year (FY) 2004 SMP officially incorporated the provisions of the SMP Agreement

signed by DOE, EPA, and Kentucky on April 14, 2003, and input from various strategic planning meetings between DOE and the regulators. Specifically, the FY 2004 SMP established enforceable milestones for FY 2004, FY 2005, and FY 2006, and outlined enforceable completion dates for investigation and response actions associated with the strategic cleanup initiatives below.

This annual update of the SMP sets forth enforceable milestones for FY 2009, FY 2010, and FY 2011, and enforceable completion dates for media specific OUs associated with the strategic cleanup initiatives.

Strategic Cleanup Initiatives

- Groundwater OU Strategic Initiative,
- Burial Grounds OU Strategic Initiative,
- Surface Water OU Strategic Initiative,
- Soils OU Strategic Initiative, and
- Decontamination and Decommissioning (D&D) OU Strategic Initiative.

These initiatives include a series of prioritized response actions, ongoing site characterization activities to support future response action decisions, and D&D of the currently operating gaseous diffusion plant (GDP) once it ceases operation. After completion of these activities. 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 5-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 that have been documented through a Record of Decision or Action Memorandum. 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 assumption for current land use (Figure 1) and the reasonably foreseeable future land uses at and adjacent to PGDP (Figure 2) are for industrial areas located primarily inside the security fence, recreational areas located outside the security fence, and off-site residential areas.

Several factors were considered in establishing the land-use assumptions under this strategy, including current and past land use, existing lease commitments, future industrial missions planned at the site, and stakeholder input.

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.

3. OPERABLE UNITS

The OUs were established by developing a site conceptual risk model for each source area [solid waste management units (SWMUs)/areas of concern (AOC)]. This process included a qualitative evaluation of contaminant types and concentration, release mechanisms, likely exposure pathways, estimated points of exposure, and potential receptors based on current and reasonably foreseeable future land groundwater uses. The source areas initially were grouped into these media-specific OUs:

- Groundwater OU
- Surface Water OU
- Soils OU
- Burial Grounds OU
- D&D OU

and the CSOU.

Appendix 3 includes additional information regarding scope and planning assumptions for the OUs. Appendix 4 contains lists of SWMUs and AOCs sorted by OUs.

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 programs, technical considerations associated with GDP operations, mortgage reduction, and demonstrated progress toward completing the EM mission.

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 currently operating GDP units impacted by plant operations.
- Evaluate the final CSOU.

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

Consistent with those principles, the risk prioritization criteria described above are used as guidelines, in conjunction with the other previously mentioned factors, to prioritize response actions. The prioritization criteria have been applied to each of the OUs at PGDP. Enforceable milestones for FY 2009, FY 2010, and FY 2011, and outyear enforceable completion dates consistent with these prioritization criteria are included in Appendix 5.

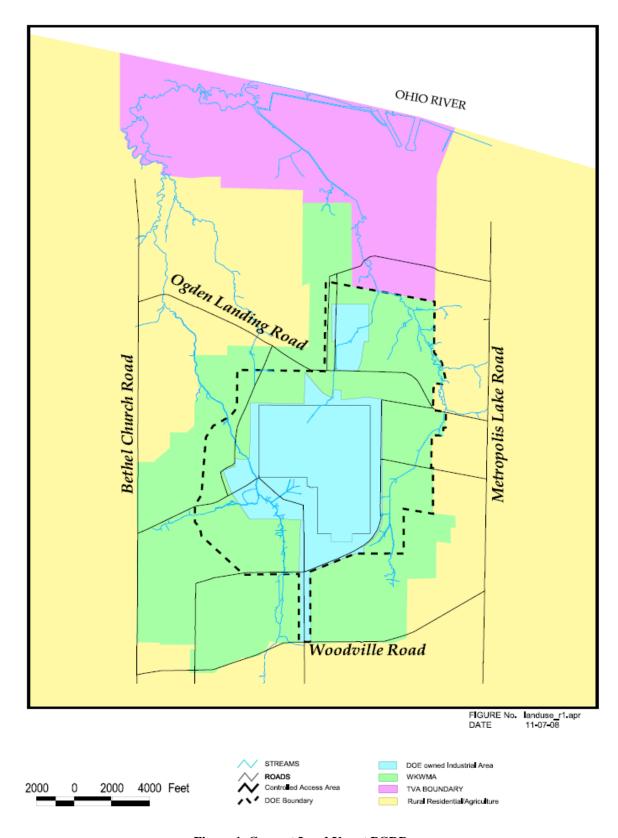


Figure 1. Current Land Use at PGDP

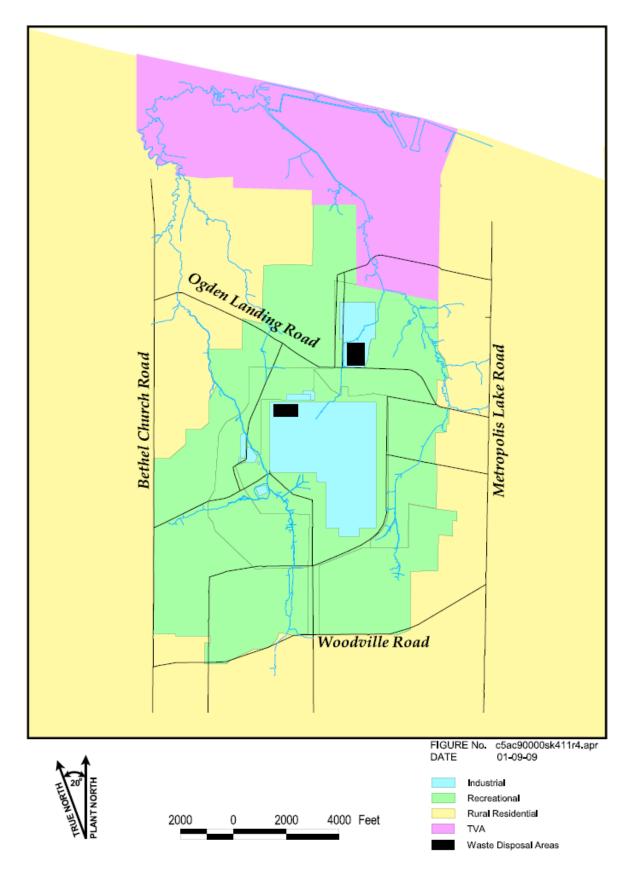
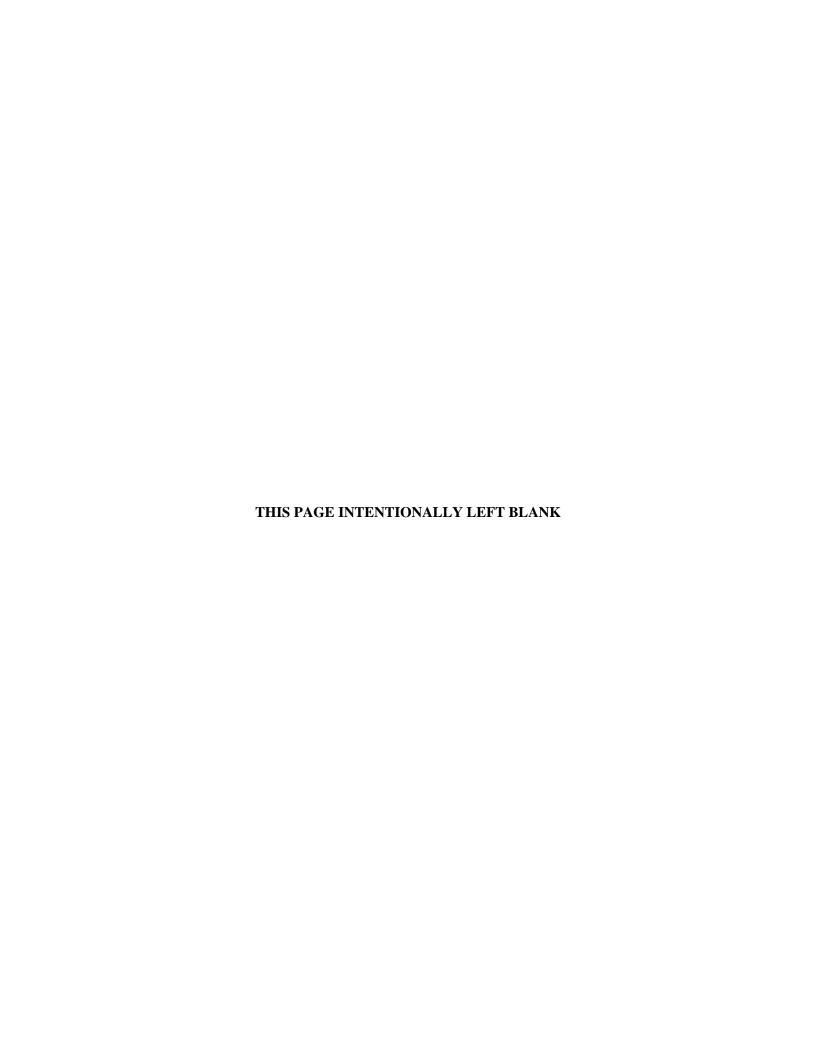


Figure 2. Reasonably Anticipated Future Land Use at PGDP



APPENDIX 1 ACTIONS TAKEN TO DATE



Operable Unit Summary

WAGs/Media	Response Type	ROD/Action Memorandum	Response Description	Status	
GROUNDWATER OPERABLE UNIT					
WAG 26/Groundwater	Emergency removal action	N/A	Provided temporary water to local residences where private wells are contaminated by TCE and ⁹⁹ Tc.	Complete	
WAG 26/Groundwater	Removal action	August 30, 1994	Extended municipal water line to residences affected by off-site groundwater contamination.	Construction Complete/Operational	
WAG 26/Groundwater (Northwest Plume)	Interim Remedial Action (IRA)	July 23, 1993	Hydraulic containment and treatment of high concentrations of off-site TCE contamination in the Northwest Plume.	Construction Complete/Operational	
WAG 26/Groundwater (Northeast Plume)	IRA	June 15, 1995	Hydraulic containment and treatment of high concentrations of off-site TCE contamination in the Northeast Plume.	Construction Complete/Operational	
SWMU 91/Soil	IRA	August 10, 1998	<i>In situ</i> treatment of TCE-contaminated soils using the LASAGNA TM technology.	Complete	
SWMU 11 and SWMU 533/Groundwater (C-400 Source Action)	IRA	August 9, 2005	In situ treatment of TCE source areas in the UCRS and RGA located in the southeast and southwest corners of the C-400 Building using electrical resistance heating technology.	ROD signed; RDSI completed; design work completed. Field start planned for FY 09.	
	S	URFACE WATER	OPERABLE UNIT		
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/Surface water and sediment	IRA	August 10, 1998	Installed riprap along creek bank to prevent direct contact, implemented institutional controls, and long-term monitoring.	Construction Complete/Operational	

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	SURFA	CE WATER OPERA	BLE UNIT (CONTINUED)	
Drum Mountain (Scrap)	Non-time-critical removal action	March 27, 2000	Removed and dispositioned Drum Mountain.	Complete
WAG 24, WAG 14, and SWMU 99/Scrap	Non-time-critical removal action	September 26, 2001	Removal and disposition 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
		BURIAL GROUND	OPERABLE UNIT	
WAG 22/Waste and soil (SWMU 2Burial Ground)	IRA	September 11, 1995	Installation of an impermeable cap to reduce leachate migration from surface infiltration, groundwater monitoring, and institutional controls.	Multilayer cap is undevaluation under the BGOU project. Institutional controls and groundwater monitoring are ongoing.
		SOILS OPERA	ABLE UNIT	
C-750-A, -B, and -C Underground Storage Tanks	N/A	N/A	Tank removal.	Complete
WAG 7/Soil (C-746-K Landfill)	IRA	N/A	Enhanced existing cap to reduce leachate migration from surface infiltration.	Complete
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	surface soils to reduce risks to plant industrial workers.	Complete
SWMU 193/Soil	Time-critical removal	February 19, 2002	Removed petroleum-contaminated soils.	Complete
	action			

D&D OPERABLE UNIT				
SWMU 478/Infrastructure (C-410)	Non-time-critical removal action	August 3, 2002	Remove process equipment and piping.	Fieldwork in progress.
SWMU 480 (C-402 Lime House); SWMU 55(C-405 Incinerator); and SWMU 464 (C-746A West End Smelter)	Non-time-critical removal action	December 5, 2005	Remove, characterize, and dispose of building structure and contents.	Completed removal action for the C-402 Lime House, C-405 Incinerator, and C- 746A West End Smelter.

AOC = area of concern

IRA = interim remedial action

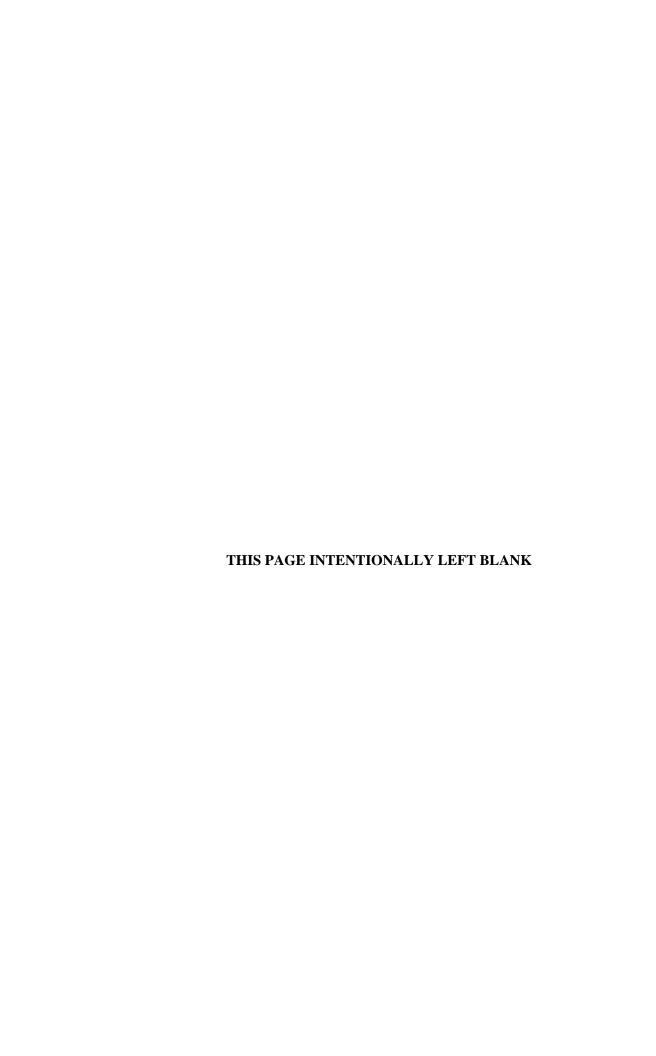
N/A = not applicable
NSDD = North-South Diversion Ditch
PCB = polychlorinated biphenyl
RAWP = Remedial Action Work Plan

RDSI = remedial design /support investigation RGA = Regional Gravel Aquifer ROD = Record of Decision

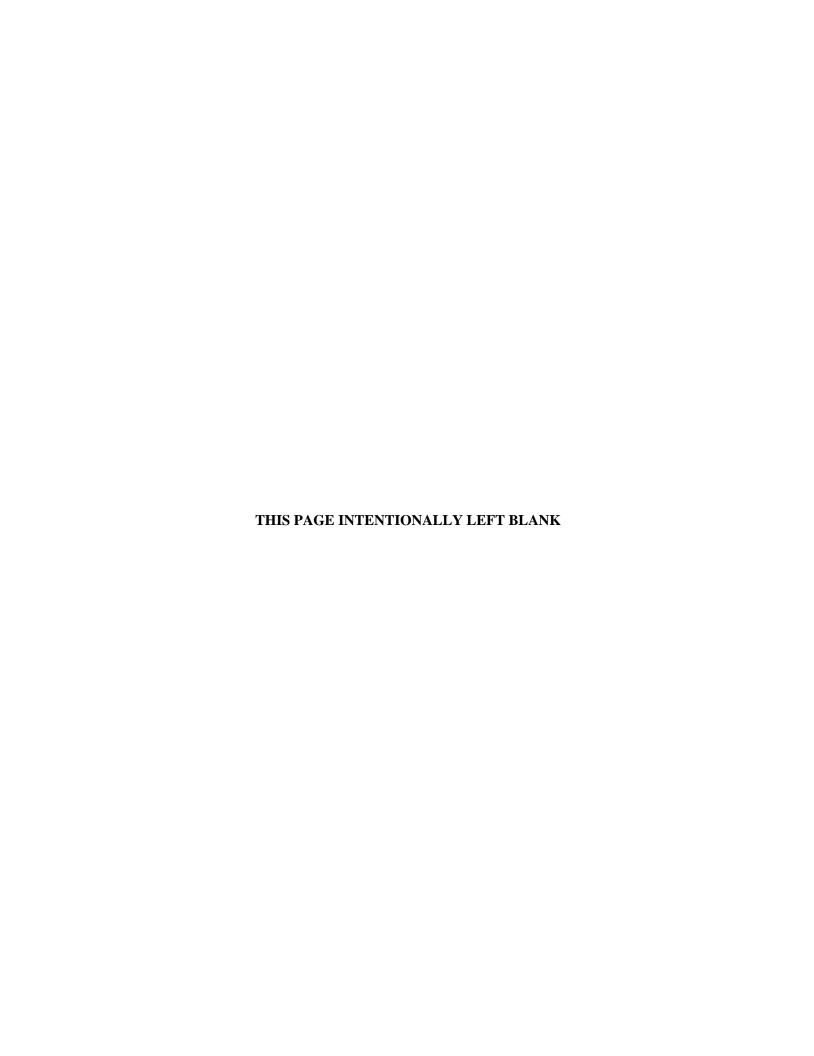
SWMU = solid waste management unit

Tc-99 = technetium-99TCE = trichloroethene

UCRS = Upper Continental Recharge System WAG = waste area group



APPENDIX 2 CERTIFICATION OF LUCIPS



CERTIFICATION OF LUCIPS

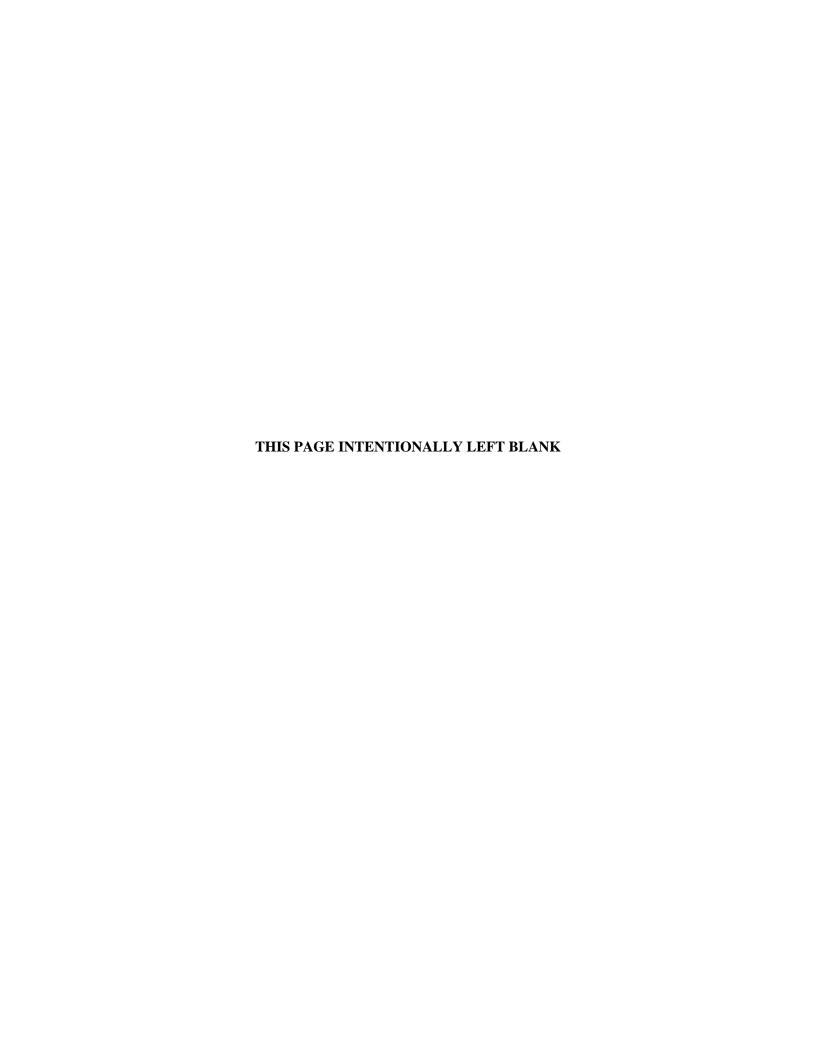
In accordance with Section 2.9 of the Land Use Control Assurance Plan for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/OR/07-1799&D2, the U.S. Department of Energy (DOE) certifies that requirements of the Land Use Control Implementation Plan for the North-South Diversion Ditch at the Paducah 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-specific descriptions document the FFA Managers' common understanding of the expected scope of work for each of the operable units 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 standard Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documentation and review/comment time frames established in the FFA. If there are deviations from the general FFA requirements, they are identified in the Key DOE Planning Assumptions from Life Cycle Baseline for each operable unit.

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 operable unit to guide the development of project-specific remedial action objectives.

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

GROUNDWATER OPERABLE UNIT

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

- (1) Prevent human exposure to contaminated groundwater;
- (2) Prevent or minimization of 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 1. These previous actions are summarized in Appendix 1 (*Actions Taken to Date*).

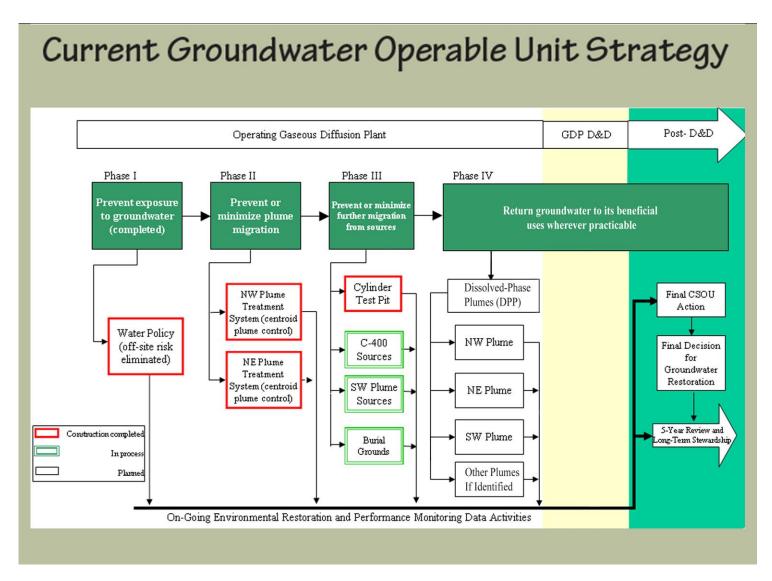


Figure 1. Current Groundwater Operable Unit Strategy

The scope of the GWOU consists of potential sources that may contribute to groundwater contamination and the dissolved-phase groundwater plumes. An interim remedy has been selected for the C-400 source areas, and a focused feasibility study (FS) is currently in development for the Southwest Plume source areas. The dissolved-phase plumes will be addressed as a future remedial action through the Remedial Investigation (RI)/FS process.

C-400 Interim Remedial Action

Scope

This project addresses releases emanating near the southeast [Solid Waste Management Unit (SWMU) 11] and southwest (SWMU 533) areas of the C-400 Cleaning Building. These areas have been identified as the major sources of groundwater contamination at PGDP. The remedial action objectives for this project are to do the following:

- Reduce exposure to contaminated groundwater by reducing the source concentrations of TCE and other VOCs in the RGA in the C-400 Cleaning Building area, thereby reducing the migration of these contaminants to off-site points of exposure (POE);
- Prevent exposure to contaminated groundwater by on-site industrial workers through institutional controls (e.g., excavation/penetration permit program); and
- Reduce contamination comprised of TCE and other VOCs found in UCRS soil in the C-400 Cleaning Building area to minimize the migration of these contaminants to RGA groundwater and to off-site POE.

A major component of the selected remedy is the reduction of the concentration of TCE and other VOCs in the soils in the C-400 Cleaning Building area through removal and treatment using electrical resistance heating (ERH) in both the UCRS and the RGA.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Installation and operation of a three-phase ERH system. The ERH system will be operated until monitoring indicates heating has stabilized in the subsurface and recovery of TCE, as measured in the recovered vapor, diminishes to a point at which further recovery is at a constant rate (recovery is asymptotic).
- (2) Installation of a groundwater and vapor treatment system to remove VOCs from extracted vapor/groundwater.
- (3) Collection of baseline and post operational soil and groundwater samples to analyze Interim Remedial Action (IRA) effectiveness. Post operational monitoring will be conducted through the Environmental Monitoring Program.
- (4) Implementation of a two-phased deployment of ERH will be conducted. Phase 1 will involve treatment areas to the southwest and the east of the C-400 Cleaning Building, and Phase II will address a large treatment area to the southeast of the building.

Southwest Plume Sources Interim Remedial Action

Scope

This project will address 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). An FFA dispute resolution agreement specifies that a primary RAO of this action is to address these VOC source areas, including treatment and/or removal of principal threat wastes consistent with CERCLA, the National Contingency Plan (NCP) (including the Preamble), and any pertinent EPA guidance. TCE and its breakdown products (*cis* 1,2-dichloroethene, *trans* 1,2-dichloroethene, and vinyl chloride) and 1,1-dichloroethene are the contaminants of concern (COCs). Evaluation of additional COCs associated with direct contact exposure risks will be addressed as part of the Soils Operable Unit (see Appendix 4).

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) No additional investigative fieldwork will be required to proceed with an action.
- (2) ERH will be used for VOCs in UCRS.
- (3) ERH 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)].
- (4) Membrane Interphase Probe (MIP) will be conducted prior to design and remedy implementation.
- (5) No further action will be required for SWMU 102 (Plant Storm Sewer).

<u>Dissolved-Phase Plumes Remedial Action</u>¹

Scope

This project includes conducting an RI (including a baseline risk assessment), FS, and remedy selection and implementing any necessary response actions for the dissolved-phase groundwater contamination. The RI/FS will evaluate the groundwater contamination in the RGA, including, but not limited to, the Northwest Plume (NW) (SWMU 201), Northeast Plume (NE) (SWMU 202), and Southwest Plume (SWMU 210); and the contamination found within the Little Bayou Creek seeps. The RI/FS also may determine whether any follow-up actions or modifications to response actions for the GWOU are necessary. The primary remedial action objective (RAO) for this project is based on the resolution of dispute for the Southwest Plume dated March 24, 2008, as follows:

• Return contaminated ground waters to their beneficial use(s) and attain chemical-specific ARARs (e.g., 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

(1) TCE and 99-Tc are expected to be the primary COCs that will drive the remediation approach.

¹ The scope and planning assumptions are consistent with the 3/24/08 SW Plume Dispute Resolution, but have not been incorporated into the currently approved DOE baseline (as of 11/15/08).

- (2) Implement the following actions for the pump-and-treat systems: (a) focus groundwater extraction for the NW Plume at the south well field to maximize removal of the higher TCE concentrations, thereby reducing mass flux contributing to the off-site NW dissolved-phase plume; and (b) conduct a rebound analysis for the NE Plume to assess mass flux rates and concentration trends to establish baseline conditions for the FS analysis.
- (3) Conduct a treatability study at Little Bayou Creek seeps to address the TCE concentrations in surface water contamination resulting from groundwater discharge. The treatability study will have a preference for testing technologies that will have broader application to other areas of the dissolved-phase plumes.
- (4) The FS for the dissolved-phase plumes will be sequenced to allow collection and incorporation of approximately 2 years post O&M monitoring data at C-400.
- (5) Data collected from the NE plume rebound analysis/baseline monitoring; the treatability study 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.
- (6) The remedial action for the dissolved-phase plumes will include the following: (a) focused installation of "containment technologies" to address remaining dense nonaqueous-phase liquid (DNAPL) residuals (~12,000 linear feet); (b) *in situ* treatment such as installation of approximately 20 C-Sparge Wells (ozonation) throughout the dissolved-phase plumes; and (c) continued operations of the groundwater extraction system until it meets shut-down criteria.
- (7) 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 the Southwest Plume.

BURIAL GROUNDS OPERABLE UNIT

The Burial Grounds Operable Unit (BGOU) will employ the CERCLA remedial process to accomplish the following goals:

- Contribute to the protection of current and future residential receptors from exposure to contaminated groundwater by addressing sources of groundwater contamination;
- Protect industrial workers from exposure to waste and contaminated soils; and
- Treat or remove principal threat wastes wherever practicable, consistent with 40 *CFR* 300.430(a)(iii)(A).

Scope

The BGOU consists of the following 11 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, which includes the area beneath the C-747-A UF₄ Drum Yard (SWMU 12)
- Residential/Inert Borrow Area/Old NSDD Disposal Trench (SWMU 145)
- C-746-S: Residential Landfill (SWMU 9)²
- C-746-T: Inert Landfill (SWMU 10)²
- C-746-P/P1 Scrap Yards (SWMU 13)

The burial grounds contain materials such as sanitary waste, hazardous waste, radioactive waste, and pyrophoric uranium. Some of the burial grounds contain principal threat waste that have released or may in the future release to soils and groundwater.

An RI Report currently is under regulatory review, and an FS will be conducted to support the selection of appropriate remedial actions for the burial grounds. Additional sampling will be conducted at SWMU 13 and results will be included in the FS. A field sampling plan which is an addendum to the BGOU RI work plan is being developed for this effort.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Additional field investigation will be required at the C-746 P/P1 Scrap Yards (SWMU 13).
- (2) A single FS, Proposed Plan (PP), and Record of Decision (ROD) will be developed for all burial grounds.
- (3) SWMU 2, SWMU 3, and SWMU 4 may contain principal threat waste:
 - a. SWMU 2-excavation of buried waste; dynamic underground stripping for residual volatiles, and thermal treatment for polychlorinated biphenyls (PCBs) and uranium chip roaster to remove pyrophoric characteristics from the pyrophoric uranium:
 - b. SWMU 3-excavation of buried waste; dynamic underground stripping for residual volatiles.
 - c. SWMU 4-excavation of buried waste; ERH treatment of secondary groundwater sources.
- (4) To facilitate phased implementation of remedial action, SWMU 2, 3, and 4 will have individual Remedial Design Work Plan (RDWP), Remedial Design Report (RDR), Remedial Action Work Plan (RAWP) and Remedial Action Completion Report (RACR).
- (5) Capping (18-inch soil cover) is likely for SWMU 5, 6, 7, 30, and 145.
- (6) Capping activities assumed for SWMU 5, 6, 7, 30, and 145 will be combined under a single RDWP, RDR, RAWP and RACR.
- (7) Chemical oxidation will be installed in the vicinity of SWMUs 7 and 30; an independent RDWP, RDR, RAWP and RACR will be developed for the chemical oxidation action.
- (8) No actions will be required SWMUs 9, 10, and 13.
- (9) Post-closure monitoring data are assumed to substantiate that capping remedies will provide long-term effectiveness, and supplemental remedial actions will not be required.

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

- (10) An integrated groundwater monitoring system will be employed to provide indication of future unanticipated releases and collect data on the effectiveness of the caps and chemical oxidation actions.
- (11) No technology demonstration or treatability studies will need to be conducted.

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 2. 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. Outfalls 005, 006, 17, and 19 and associated ditches are excluded from the SWOU scope, as they are scheduled to be addressed after the gaseous diffusion plant (GDP) Decontamination and Decommissioning (D&D).

Surface Water Removal Action

Scope

The scope of the removal action includes the excavation of contaminated soil/sediment in the following areas:

- o NSDD Sections 3, 4, and 5.
- o Internal ditches and areas associated with outfalls 001, 002, 008, 010, 011, 012, and 015 (excluding storm sewer piping associated with discharges from the GDP).
 - Includes spills associated with SWMUs 92 and 97.

Site investigation work has been completed for this project and the planned action is being implemented as a non-time-critical removal. Consistent with the cleanup goals developed in the Surface Water Operable Unit (On-Site) EE/CA and summarized in the Surface Water Operable Unit (On-Site) Action Memo, the risk to the current industrial workers and recreational users from exposure to contamination remaining after completion of the removal action will be within the EPA risk range of 10-6 to 10-4.

The removal action objectives are to do the following:

- (1) Ensure direct contact risk at the on-site ditches for the current industrial worker, are acceptable.
- (2) Ensure direct contact risk at the NSDD for both the current industrial worker and recreational user are acceptable.

Key DOE Planning Assumptions from Life Cycle Baseline

(1) Criteria for areas to be addressed for removal actions are based on current recreational and industrial land use. Areas to be addressed are defined laterally by the "next clean sample" and vertically to a depth of 2 ft.

Surface Water Remedial Action

Scope

The scope of this project includes an RI/FS (baseline risk assessment), 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, 010, 011, 012, and 015, as well as scoping for and completion of a baseline ecological risk assessment for the Paducah Gaseous Diffusion Plant. The timing and sequence of any remedial actions will require coordination with ongoing plant operations to prevent recontamination and consideration of ongoing permitted discharges. The SWOU will address contaminated surface water and comprehensively evaluate surface water as part of an RI/FS consistent with the NCP and EPA guidance.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) 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, followed by a more comprehensive list of analyte sampling (i.e., PCBs, metals, radionuclides, and volatile organic analyte (VOAs) during the second phase.
- (2) Existing information for internal ditches will be used for characterization. Additional sampling will focus primarily on areas between the Kentucky Pollutant Discharge Elimination System (KPDES) compliance points and drainage into Little Bayou Creek and Bayou Creek.
- (3) Little and Bayou Creeks will be investigated to the confluence with the Ohio River.
- (4) Biota sampling will be required to support an ecological risk assessment for off-site portions of the SWOU.
- (5) 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.

SOILS OPERABLE UNIT

The Soils OU is being implemented in a phased approach (i.e., Phase I – Pre GDP Shutdown and Phase II – Post GDP shutdown) 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 Soils OU consists of 79 SWMUs; three inactive facilities (SWMUs 181, SWMU 40, and SWMU 19); and the soil/rubble areas that have been identified to date.

Prior to GDP shutdown, the Soils OU will focus on accessible plant surface soils (ground surface to 10 ft below ground surface and 16 ft below ground surface in the vicinity of pipelines) not associated with PDGP operations. Following PDGP shutdown, slabs and underlying soils associated with facilities that have undergone D&D will be addressed as part of a subsequent action (e.g., additional soils OU project).

A series of Soils OU actions have been completed to date (See Figure 3). These previous actions are summarized in Appendix 1 (*Actions Taken to Date*).

Soils OU Inactive Facilities Removal Action

Scope

The scope of this project includes excavation of contaminated soil in the following areas:

- C-218 Firing Range (SWMU 181)
- C-403 Neutralization Tank (SWMU 40)
- C-410-B HF Neutralization Lagoon (SWMU 19)

The RAOs for this project are to do the following:

- (1) Control sources early; focus resources at areas that warrant attention in the near term, prioritizing actions within areas to address greatest risk first.
- (2) Minimize human exposure to contaminants, maximizing the effectiveness of institutional controls.
- (3) Control further migration of contaminated soils.
- (4) Reduce risk from contaminated soils.
- (5) Reduce the risk, making progress toward the ultimate goal of protecting recreational users and industrial workers from exposure to contaminated soils.

Site investigation work has been completed for this project and the planned action is being implemented as a non-time-critical removal.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) The C-218 Firing Range action will address only lead contaminated soil, assuming cleanup levels based on current industrial and recreational land use. Other COCs will be addressed as part of the Soils Remedial Action project.
- (2) Due to proximity to site infrastructure, the extent of excavation of C-403 Neutralization Tank and the C-410-B Sludge Lagoon will be limited to the boundary of each SWMU.

Soil/Rubble Areas

Scope

As a result of a comprehensive survey conducted in 2007, 122 soil and rubble areas were identified for possible inclusion as SWMUs/AOCs. The newly identified areas are undergoing a site evaluation under the FFA. Additionally, two previously identified soil piles (AOCs 492, and 541) are being evaluated with the new areas due to their close proximity and similar characteristics. To facilitate the site evaluation process, the soil and rubble areas were divided into four separate groups and prioritized for the purpose of undergoing sampling and analysis.

The scope of this project includes the evaluation of the previously mentioned 124 soils and rubble areas, divided as follows:

- Little Bayou Creek Soil Piles I (east side of the plant);
- Little Bayou Creek Pile including AOC 541 & 492 (east and north sides of the plant);
- Bayou Creek Pile (west side of the plant);
- Rubble areas (most on the west side of the plant).

The results of the sampling activities will be documented in four separate site evaluation reports. Based on the results of the sampling activities, a final SWMU/AOC determination will be made for these areas.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Sufficient data will be collected during the site evaluation phase of the project to establish whether a CERCLA response action, RI/FS, or no further action is required.
- (2) Soil/Rubble areas without contamination will not be identified as AOC/SWMUs.
- (3) A Soil/Rubble Areas removal action will be required only if risk warrants expedited removal; otherwise, any SWMUs/AOCs identified will be addressed with the Soils OU Remedial Action.
- (4) Removal Action will consider only no action, institutional controls, and excavation.
- (5) The scoping for and completion of any ecological assessment for the soils and rubble piles will be completed as part of scoping and completion of the SWOU baseline ecological risk assessment.

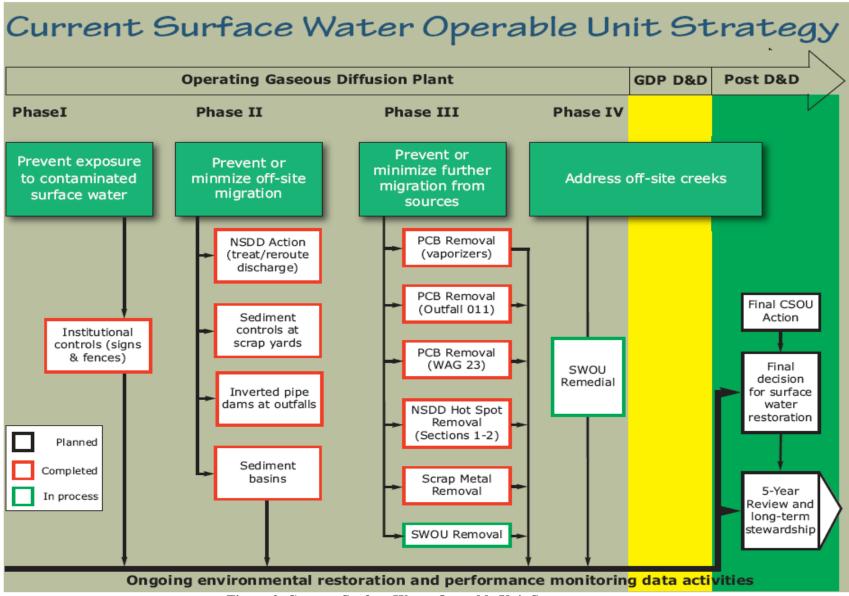


Figure 2. Current Surface Water Operable Unit Strategy

Soils OU Remedial Action (Phase I – Pre GDP Shutdown)

Scope

The scope of this project includes an RI/FS (baseline risk assessment), remedy selection, and implementation of any necessary response actions for the 79 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 will incorporate 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. Given the large number of SWMUs, data sets will be distributed in up to three pre-agreed upon packages to facilitate regulatory review of the RI Report.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Radionuclides and PCBs are the primary COCs for pre-GDP shutdown. Other COCs will be considered on a case-by-case basis prior to GDP shutdown.
- (2) As part of the remedial investigation, a PCB-contaminated soils evaluation will focus on known sources of PCB contamination that have not been targeted as part of previous investigation. Additionally, a radiological evaluation will be conducted in a phased approach using radiological walkover field instruments covering all areas within the security fence.
- (3) SWMUs requiring action will be evaluated in a single FS that will focus on the following likely response actions: no action; institutional controls; and excavation.

Soils OU Removal Action

This project is contingent upon the sampling results of the RI for the Soils OU Remedial Action. Scope will include addressing any of the Soils OU SWMUs/AOCs for which an unacceptable risk is present that warrants an expedited action.

Sitewide Evaluation

Scope

The scope of the project includes a survey of the DOE-owned property outside the limited/controlled area. A sitewide evaluation will be performed to identify any unknown contaminated areas requiring further CERCLA evaluation and to develop information usable when completing the Resource Conservation and Recovery Act Corrective Action (RCRA) Environmental Indicators process.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) A flyover rad survey will be conducted for a 25 square miles area.
- (2) A visual walkover survey will cover DOE owned property that is outside the controlled area and not currently a SWMU/AOC (approximately 2,676 acres). DOE property licensed to Western Kentucky Wildlife Management Area (WKWMA) and areas owned by WKWMA identified as anomalies in the flyover also will be surveyed.

- (3) Visual observation also will be used to identify piles, spills, buried materials, and other anomalies.
- (4) A radiological walkover survey using MARSSIMS approach will cover at least 10% of the property identified above (approximately 240 acres). All anomalies identified will be scanned regardless of what percentage of land they cover.
- (5) All anomalies will be documented on a map and in a database including location, description, photos, and data.
- (6) Analytical sampling will be conducted if the RAD scan indicates contamination (i.e., 2X background) or a release is visually identified.
- (7) Information will be documented in a site evaluation report. SWMU Assessment Reports will be attached to the Site Evaluation Report for any new SWMUs/AOCs identified during this evaluation.
- (8) Any newly identified SWMUs/AOCs will be addressed in the Soils OU Remedial Action (Phase I Pre GDP Shutdown). A separate removal action will not be performed.

D&D OPERABLE UNIT

The D&D Operable Unit will employ the CERCLA removal action process to administer the D&D of excess buildings (i.e., inactive with no reuse potential) that have a known or potential release of contamination to the environment. Consistent with the 1995 DOE and EPA Memorandum: *Policy on Decommissioning DOE Facilities under CERCLA*; DOE will employ the CERCLA Non-Time-Critical Removal Action framework when appropriate. In instances where facilities do not have a known or potential release, DOE may decommission the facility as a non-CERCLA demolition action using National Environmental Policy Act (NEPA) documentation. The primary objective for this OU is to accomplish the following:

• Minimize or eliminate the potential health and environmental caused by the potential uncontrolled release of hazardous substances from contaminated structures.

Scope

The remaining scope of the D&D OU prior to GDP shutdown consists of the following inactive DOE facilities:

- C-410/420 Complex
 - o Infrastructure removal at the C-410/420 Complex is currently ongoing as a CERCLA Non-Time-Critical Removal Action. An EE/CA for demolition is scheduled for 2010.
- C-340 Complex
 - o An EE/CA for infrastructure removal and demolition is scheduled for 2010.

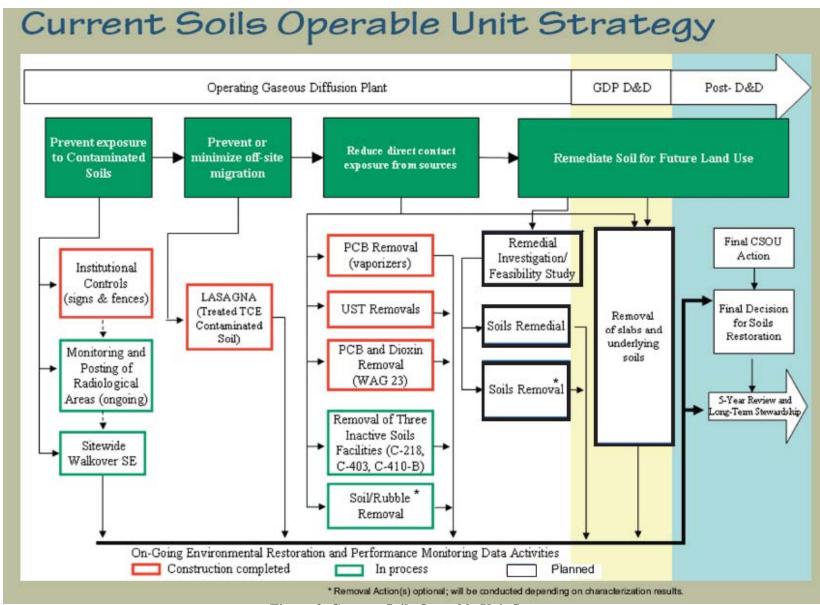


Figure 3. Current Soils Operable Unit Strategy

D&D of CERCLA facilities completed to date are summarized in Appendix 1 (*Actions Taken to Date*). There is potential for additional facilities to come under DOE control prior to GDP shutdown and, as indicated in Figure 4, additional D&D will be accomplished in a second phase post GDP shutdown.

The D&D process consists of the following activities:

- Remove facility infrastructure to levels necessary to safely demolish facility structure.
- Demolish facility to slab. Waste generated from the demolition will be disposed at the appropriate disposal facility based on the waste streams created.
- Decontaminate or apply fixative to stabilize any removable contamination remaining on the slabs to ensure slab is in a protective state. The "as left" conditions will be protective of the industrial worker.
- May fill basements and below grade structures with grout to prevent accumulation and eliminate fall hazards. The fill material will be non-permanent to facilitate decommissioning, while not inhibiting future subsurface actions.

Given the facilities currently identified for D&D and the expected D&D of more facilities pre- and post-GDP shutdown, an accelerated removal action process is currently under evaluation. The objectives of the approach are to do the following:

- D&D facilities as expediently as possible while maintaining regulatory oversight responsibility and stakeholder participation consistent with applicable requirements.
- Provide DOE with the flexibility to implement D&D in a manner that optimizes funding and workforce availability.

To facilitate this approach, DOE has proposed the development of a streamlined removal action process for the disposition of Inactive Facilities at PGDP that could accelerate the D&D of facilities and reduce the need for individual EE/CAs. Consequently, the documentation required to execute a standard D&D project would be substantially reduced, and the cost and time for such documentation could be applied to actual D&D activities.

Key DOE Planning Assumptions from Life Cycle Baseline

- (1) Slabs, subsurface structures, and underlying soils will be left and will be addressed as part of the Soils OU Phase II Post GDP Shutdown. No sampling of slab or sub-slab soils is planned within the scope of D&D.
- (2) Loose material not originating from the facility operations and asbestos abatement may be conducted under NEPA authority and not subject to CERCLA documentation.
- (3) Transite siding will be removed as part of deactivation such that it is not present during physical demolition. Transite siding may have fixed radiological contamination.
- (4) Any RCRA required closure actions associated with permitted facilities would be accomplished prior to D&D.

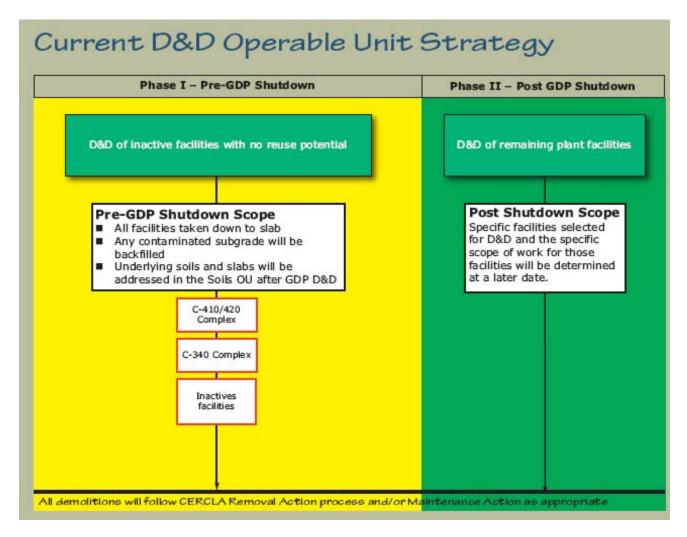


Figure 4. Current D&D Operable Unit Strategy

OTHER PROJECTS

CERCLA Waste Disposal Options

Scope

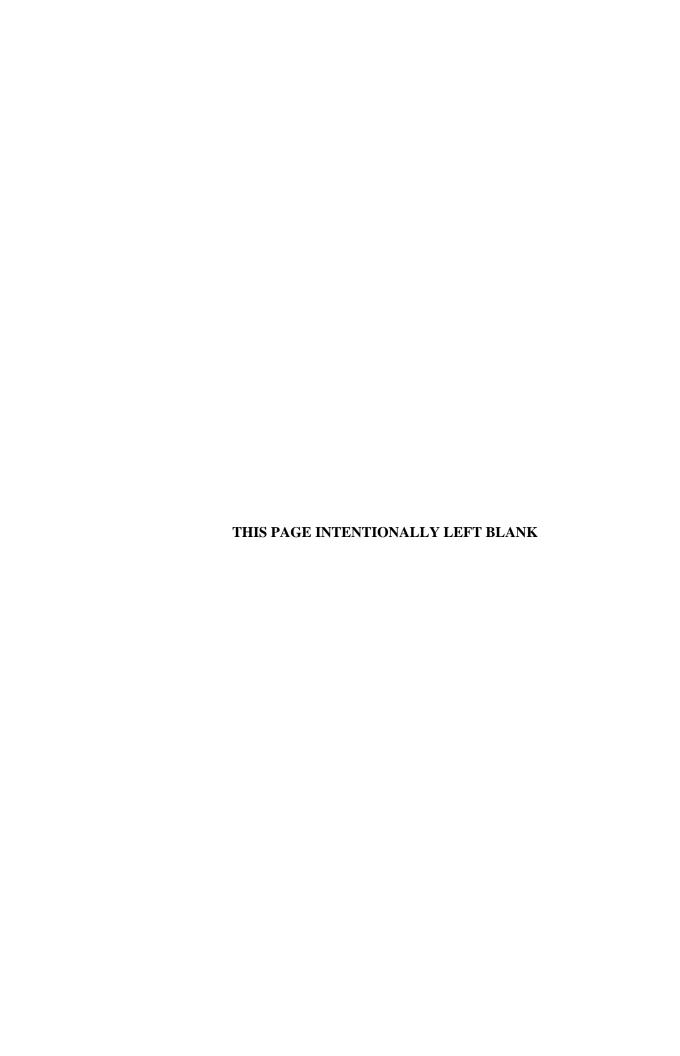
The scope of this project is to evaluate disposal options for the CERCLA waste that will be generated as a result of implementing removal and remedial actions for all of the OUs. The evaluation of disposal options will be conducted using the CERCLA remedial decision-making process. Accordingly, the scope 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, given the significant public interest in the project, frequent interactions with the public are expected throughout the project life cycle. The decision about whether or not to implement an on-site disposal facility will be documented in a ROD.

Key DOE Planning Assumptions from Life Cycle Baseline

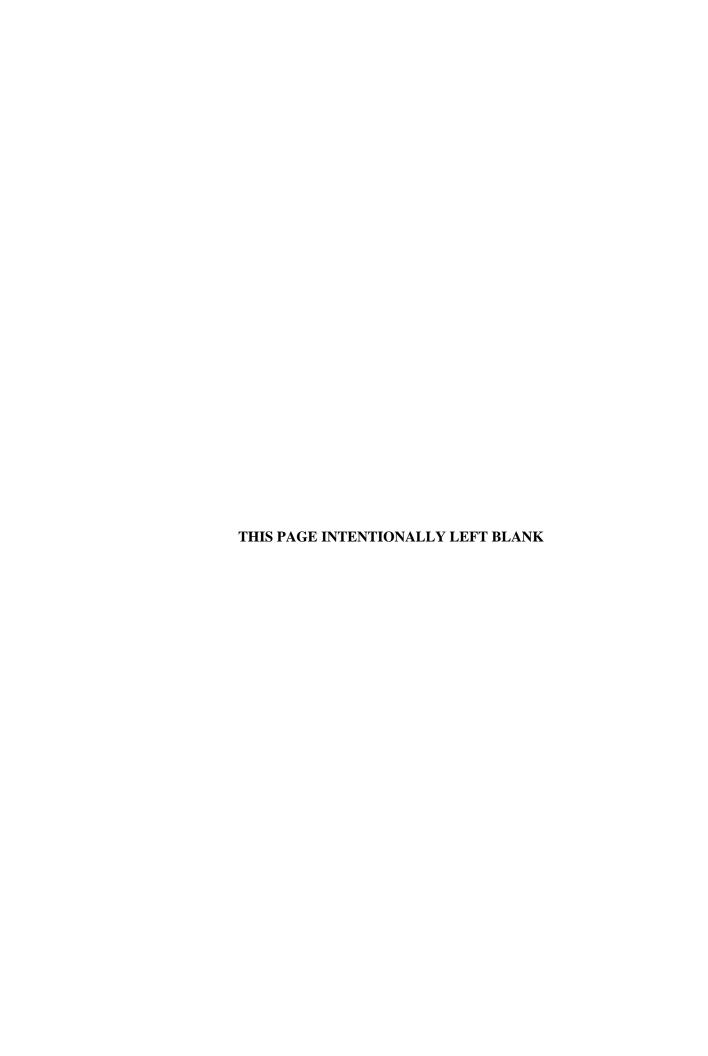
- (1) Existing information on waste types and volumes is sufficient for the RI/FS Report, and measurements of waste characteristics will not be needed for evaluation of alternatives. Assume waste types include the following categories: low level waste, RCRA, TSCA, LLW/RCRA, LLW/TSCA, LLW/RCRA/TSCA, classified wastes, asbestos containing materials, and non-hazardous solid (U-Landfill waste).
- (2) A potential on-site CERCLA disposal facility will not accept transuranic waste.
- (3) A combined RI/FS report will be developed.
- (4) Sufficient information about the design, cost, and Waste Acceptance Criteria for the existing disposal facilities (e.g., Nevada Test Site, Energy *Solutions*, U-Landfill) is available; no additional data collection is needed for the RI/FS.
- (5) Up to five potential locations on the Paducah Site will be evaluated in a site screening process and up to three candidate sites will be selected for evaluation in the RI/FS Report.
- (6) Post-ROD documents, design, construction, operation, and closure currently are not in the DOE cost and schedule certified baseline. Implementation of ROD may require resequence of other site work.
- (7) Final Waste Acceptance Criteria will be defined during the post-ROD design phase.

COMPREHENSIVE SITE OPERABLE UNIT

The final CSOU evaluation will occur following completion of D&D of the GDP after plant shutdown. The scope of the final CSOU will include an RI (including a baseline human health and ecological risk assessment to evaluate residual risks remaining), an FS, a PP, and a ROD. The objective for this operable unit is to evaluate and identify any additional response actions necessary to ensure long-term protectiveness of human health and the environment in compliance with CERCLA. The CSOU will integrate information from all OUs and evaluate all prior RODs to determine if further remedial action is necessary. Final remedial action, if necessary, for the Soils OU, GWOU, BGOU, D&D OU, and SWOU will be decided under the CSOU. The CSOU will serve as the basis for delisting PGDP from the NPL.



APPENDIX 4 SOURCE AREA BY OPERABLE UNIT



C1	wa i aat		UNDWATER OPERABLE UNIT	
Subproject		SWMU No.	Description Description	
C-400 Action		11	C-400 TCE Leak Site	
Southwest Plume Sources		533	TCE Spill Site from TCE Unloading Operations at C-400	
		1 102	C-747-C Oil Land Farm	
		102	Plant Storm Sewer	
		211 A&B	C-720 TCE Spill Site Northeast and Southeast	
D: 1 1 D	ı DI	201	Northwest Groundwater Plume	
Dissolved-Phase Plumes		202	Northeast Groundwater Plume	
		210	Southwest Groundwater Plume	
		SURF	ACE WATER OPERABLE UNIT	
NSDD		59	NSDD (Inside)	
		58	NSDD (Outside)	
		60	C-375-E2 Effluent Ditch (KPDES 002)	
		61	C-375-E5 Effluent Ditch (KPDES 013)	
		62	C-375-S6 SW Ditch (KPDES 009)	
		63	C-375-W7 Oil Skimmer Ditch (KPDES 008)	
		66	C-375-E3 Effluent Ditch (KPDES 010)	
	SWOU	67	C-375-E4 Effluent Ditch (C-340 Ditch)	
	Removal	68	C-375-W8 Effluent Ditch (KPDES 015)	
	Action	69	C-375-W9 Effluent Ditch (KPDES 001)	
		92	Fill area for dirt from the C-420 PCB Spill Site	
		97	C-601 Diesel Spill	
		102	Plant Storm Sewer	
		168	KPDES Outfall Ditch 012	
		526	Internal Plant Drainage Ditches	
		64	Little Bayou Creek	
SWOU		65	Bayou Creek	
Remedial		93	Concrete Disposal Area East of Plant Security Area	
Action		105	Concrete Rubble Pile (3)	
		106	Concrete Rubble Pile (4)	
		107	Concrete Rubble Pile (5)	
		108	Concrete Rubble Pile (6)	
	ŀ	108	Concrete Rubble Pile (7)	
	ŀ	113	Concrete Rubble Pile (1)	
	ŀ	129	Concrete Rubble Pile (11) Concrete Rubble Pile (27)	
	ŀ	175	Concrete Rubble Pile (27) Concrete Rubble Pile (28)	
	-	185	C-611-4 Horseshoe Lagoon	
	•	199		
		205	Bayou Creek Monitoring Station	
		549	Eastern Portion of Yellow Water Line Concrete Rubble Pile by Outfall 8	
		550	Concrete Rubble File by Outfall 8 Concrete Culvert Sections, west of Outfall 001 ditch	
			AL GROUND OPERABLE UNIT	
	i	2	C-749 Uranium Burial Ground	
	ŀ	3	C-404 Low-Level Radioactive Waste Burial Ground	
	-	4	C-404 Low-Level Radioactive waste Burial Ground C-747 Contaminated Burial Ground	
DC	OU	5	C-746-F Burial Ground	
υd	00			
		6	C-747-B Burial Area	
		<u>7</u> 9	C-747-A Burial Ground	

Subproject	SWMU No.	Description			
-	10	C-746-T Inert Landfill			
	13	C-746-P Clean Scrap Yard			
BGOU (Continuation)	30	C-747-A Burn Area			
	145	Residential/Inert Landfill Borrow Area (P-Landfill)			
		SOILS OPERABLE UNIT			
	1	C-747-C Oil Land Farm			
	11	C-400 Trichloroethylene Leak Site			
	12	C-747-A UF4 Drum Yard			
	13	C-746-P Clean Scrap Yard			
	14	C-746-E Contaminated Scrap Yard			
	15	C-746-C Scrap Yard			
	16	C-746-D Classified Scrap Yard			
	19	C-410-B HF Neutralization Lagoon			
	20	C-410-E Emergency Holding Pond			
	26	C-400 to C-404 Underground Transfer Line			
	27	C-722 Acid Neutralization Tank			
	31	C-720 Compressor Pit Water Storage Tank			
	32	C-728 Clean Waste Oil Tanks			
	40	C-403 Neutralization Tank			
	47	C-400 Technetium Storage Tank Area			
	56	C-540-A PCB Staging Area			
	57	C-541-A PCB Waste Staging Area			
	74	C-340 PCB Transformer Spill Site			
	75	C-633 PCB Spill Site			
	76	C-632-B Sulfuric Acid Storage Tank			
Soils Operable Unit	77	C-634-B Sulfuric Acid Storage Tank			
Phase I – Pre GDP	78	C-420 PCB Spill Site			
Shutdown	79	C-611 PCB Spill Site			
	80	C-540 PCB Spill Site			
	81	C-541 PCB Spill Site			
	99	C-745 Kellogg Bldg. Site			
	135	C-333 PCB Soil Contamination			
	137	C-746-A Inactive PCB Area			
	138	C-100 Southside Berm			
	153	C-331 PCB Soil Contamination (West)			
	154	C-331 PCB Soil Contamination (Southeast)			
	155	C-333 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)			
	165	C-616-L Pipeline & Vault Soil Contamination			
	169	C-410-E HF Vent Surge Protection Tank			
	170	C-729 Acetylene Bldg. Drain Pits			
	172	C-726 Sandblasting Facility			
	176	C-331 RCW Leak Northwest Side			
	177	C-331 Leak East Side			
	180	Outdoor Firing Range (WKWMA)			
	181	Outdoor Firing Range (PGDP)			

Subproject	SWMU No.	Description			
	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			
	211	C-720 TCE Spill Site Northwest			
	212	C-745-A Radiological Contamination Area			
	213	OS-02			
	214	OS-03			
	215	OS-04			
	216	OS-05			
	217	OS-06			
	218	OS-07			
	219	OS-08			
	220	OS-09			
	221	OS-10			
Soils Operable Unit	222	OS-11			
Phase I – Pre GDP	223	OS-12			
Shutdown (Continuation)	224	OS-13			
(Continuation)	225	OS-14			
	226	OS-15			
	227	OS-16			
	228	OS-17			
	229	OS-18			
	483	Nitrogen Generating Facilities			
	488	PCB Contamination Area by the C-410 Trailer Complex			
	489	Septic Tank, North of C-710			
	492	Contaminated Soil Area, North of Outfall 10			
	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			
	520	Scrap Material West of C-746-A			
	531	Aluminum Slag Reacting Area			
	541	Contamination area by Outfall 011			
	561	Soil Pile I			
Soils Operable Unit	55	C-405 Incinerator building slab and underlying soils			
Phase II – Post GDP	464	C-746-A West End Smelter building slab and underlying soils			
Shutdown	480	C-402 Lime House building slab and underlying soils			
	ļ				

DECONTAMINATION AND DECOMMISSION OPERABLE UNIT						
Subproject	SWMU No.	SWMU No. Description				
	41	C-410-C Neutralization Tank				
	478	C-410/420 Feed Plant				
	494	Ash Receiver Area in C-410/420				
	495	C-410/420 Ash Receiver Shed				
	496	C-410/420 F2 filters in Northeast Mezzanine				
	497	C-410/420 F2 Cell Neutralization Room Vats				
	498	C-410/420 Sump at Column C&D-1&2				
	499	C-410/420 Sump at Column H-9&10				
	500	C-410/420 Sump at Column U-10&11				
	501	C-410/420 UF6 Scale Pit Sumps A&B				
Inactive Facilities	502	C-410/420 Sump at Column U-9				
(C-410 D&D)	503	C-410/420 Sump at Column G-1				
,	504	C-410/420 Sump at Column L-10				
	505	C-410/420 Sump at Column A-3N				
	506	C-410/420 Sump at Column Wa-9				
	507	C-410/420 Condensate Tank Pit				
	508	C-410/420 Settling Basin				
	509	C-410/420 Drain pit				
	510	C-410/420 Sump at Column P&Q-2				
	511	C-410/420 Sump at Column Q&R-2				
	512	C-410/420 Sump at Column R-2				
	513	C-411 Cell Maintenance Room Sump				
	101	C-340 Hydraulic System				
	378	G-340-01				
	379	G-340-01 G-340-03				
	380	G-340-03 G-340-04				
	381	G-340-04 G-340-05				
	434	S-340-01				
	477	C-340 Metals Plant				
Inactive Facilities	514	C-340 Magnesium Fluoride Reject Silo				
(C-340 D&D)	515	C-340 "Dirty" Dust Collection System				
	516	C-340 Derby Preparation Area Sludge Collection System				
	521	C-340 Saw System Degreaser				
	522	Pit - Ground Floor at B-7 - B-9				
	523	Pit - Ground Floor at F-6 - F-11				
	524	Pickling Spray Booth Sump at B-10 & 11				
	529	C-340 Powder Plant Sump at Ground Floor Level				
	17	C-616-E Sludge Lagoon				
	18	C-616-F Full-Flow Lagoon				
	21	C-611-W Sludge Lagoon				
	22	C-611-Y Overflow Lagoon				
CDDDOD	23	C-611-V Lagoon				
GDP D&D	28	C-712 Laboratory Equalization Tank				
	33	C-728 Motor Cleaning Facility				
	38	C-615 Sewage Treatment Plant				
	42	C-616 Chromate Reduction Facility				
	70	C-333-A Vaporizer				

SWMU No.	Description					
71	C-337-A Vaporizer					
82	C-531 Electric Switchyard					
83	C-533 Electric Switchyard					
84	C-535 Electric Switchyard					
85	C-537 Electric Switchyard					
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					
98	C-400 Basement Sump					
159	C-746-H3 Storage Pad					
161	C-743-T-01 Trailer Site (Soil Backfill)					
162	C-617-A Sanitary Water Line (Soil Backfill)					
164	KPDES Outfall Ditch 017 (Soil Backfill)					
166	C-100 Trailer Complex Soil Contamination					
167	C-720 White Room Sump					
171	C-617-A Lagoons					
172	C-726 Sandblasting Facility					
178	C-724-A Paint Spray Booth					
179	Plant Sanitary Sewer System					
192 C-710 Acid Interceptor Pit						
198	C-410-D Area Soil Contamination					
203	C-400 Sump					
209	C-720 Compressor Shop Pit Sump					
463	C-746-A East End Smelter					
482	C-415 Feed Plant Storage Building					
183	McGraw UST					
193	McGraw Construction Facilities (Southside Cylinder Yards)					
194	McGraw Construction Facilities (Southside)					
FINAL COMI	PREHENSIVE SITE OPERABLE UNIT					
	Description					
C-746-K Inactiv	ve Sanitary Landfill					
UF ₆ Cylinder D	rop Test Area					
Fire Training A	rea					
	PERMITTED					
C-404 Low-Level Radioactive Waste Burial Ground						
C-746-S Residential Landfill						
C-746-T Inert L						
C-733 Hazardous Waste Storage Area						
	dous and Low-Level Mixed Waste Storage Facility					
C-746-A Hazardous and Mixed Waste Storage Facility						
C / 10 / I I I uzur	aous una minea music biorage i aemit,					
	aste Storage Bldg.					
	71 82 83 84 85 86 87 88 89 98 159 161 162 164 166 167 171 172 178 179 192 198 203 209 463 482 183 193 194 FINAL COMI C-746-K Inactiv UF ₆ Cylinder D Fire Training A					

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

NO FURTHER ACTION ³						
SWMU No.	SWMU No. Description					
24	C-750-D UST					
25	C-750 1000-gallon Waste Oil Tank (UST)					
29	C-746-B TRU Storage Area					
34	C-746-M PCB Waste Storage Area					
35	C-337 PCB Waste Storage Area					
36	C-337 PCB Waste Storage Area					
37	C-333 PCB Waste Staging Area					
39	C-746-B PCB Waste Storage Area					
43	C-746-B Waste Chemical Storage Area					
45	C-746-R Waste Solvent Storage Area					
46	C-409 Hazardous Waste Pilot Plant					
48	C-400-A Gold Dissolver Storage Tank					
49	C-400-B Waste Solution Storage Tank					
50	C-400-C Nickel Stripper Evaporation Tank					
51	C-400-D Lime Precipitation Tank					
52	C-400 Waste Decontamination Solution Storage Tanks					
53	C-400 NaOH Precipitation Unit					
54	C-400 Degreaser Solvent Recovery Unit					
72	C-200 Underground Gasoline Tanks					
73	C-710 Underground Gasoline Tanks					
90	C-720 Underground Petroleum Naphtha Pipe					
96	Cooling Tower Scrap Wood Pile					
103	Concrete Rubble Pile (1)					
104	Concrete Rubble Pile (2)					
110	Concrete Rubble Pile (8)					
111	Concrete Rubble Pile (9)					
112	Concrete Rubble Pile (10)					
114	Concrete Rubble Pile (12)					
115	Concrete Rubble Pile (13)					
116	Concrete Rubble Pile (14)					
117	Concrete Rubble Pile (15)					
118	Concrete Rubble Pile (16)					
119	Concrete Rubble Pile (17)					
120	Concrete Rubble Pile (18)					
121	Concrete Rubble Pile (19)					
122	Concrete Rubble Pile (20)					
123	Concrete Rubble Pile (21)					
124	Concrete Rubble Pile (22)					
125	Concrete Rubble Pile (23)					
126	Concrete Rubble Pile (24)					
127	Concrete Rubble Pile (25)					
128	Concrete Rubble Pile (26)					
130	C-611 550-gal Gasoline UST					
131	C-611 50-gal Gasoline UST					
132	C-611 2000-gal Oil UST					
133	C-611 (unknown size) Grouted UST					
134	C-611 1000-gal Diesel/Gasoline Tank					
136	C-740 TCE Spill Site					

³ A portion of the SWMUs/areas of concerns listed may not qualify as NFAs per CERCLA and may require additional characterization for radionuclides under the final CSOU.

	NO FURTHER ACTION (CONTINUED)					
SWMU No.	Description					
139	C-746-A1 UST					
140	C-746-A2 UST					
141	C-720 Inactive TCE Degreaser					
142	C-750-A 10,000-gal Gasoline Tank (UST)					
143	C-750-B 10,000-gal Diesel Tank (UST)					
146	Concrete Rubble Pile (40)					
147	Concrete Rubble Pile (41)					
148	Concrete Rubble Pile (42)					
149	Concrete Rubble Pile (43)					
150	Concrete Rubble Pile (44)					
151	Concrete Rubble Pile (45)					
152	Concrete Rubble Pile (46)					
173	C-746-A Trash-Sorting Facility					
174	C-745-K Low-Level Storage Area					
184	Concrete Rubble Pile (29)					
186	C-751 Fuel Facility					
187	C-611 Septic System					
188	C-633 Septic System					
189	C-637 Septic System					
190	C-337A Sewage Treatment Aeration Tank					
191	C-333-A Sewage Treatment Aeration Tank					
197	Concrete Rubble Pile (30)					
206	C-753-A Toxic Substances Control Act Waste Storage Bldg.					
208	C-746-U Solid Waste Contained Landfill					
360	C-535					
361	C-727 – 90 day					
362	G-310-04					
363	G-331-03					
364	G-331-05					
365	G-333-02					
366	G-333-03					
367	G-333-04					
368	G-333-08					
369	G-333-10					
370	G-333-20					
371	G-335-01					
372	G-337-02					
373	G-337-03					
374	G-337-13					
375	G-337-14					
376	G-337-15					
377	C-337-22					
382	G-340-06					
383	G-400-01					
384	G-400-02					
385	G-409-25					
386	G-410-01					
387	C-416-01					
388	C-416					
389	G-533-01					
307	G-535-01 G-535-02					

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

	NO FURTHER ACTION (CONTINUED)
SWMU No.	Description
391	G-537-01
392	G-540-A-01
394	G-541-A-01
395	G-600-01
396	C-611-U-01
397	G-612-01
398	G-612-02
399	G-612-A-01
400	G-635-01
401	G-710
402	G-710-04
403	G-710-20
404	G-710-24
405	G-720-22
406	G-743-T-17-01
407	G-743-T-17-02
408	G-745-B-01
409	G-745-T-01
410	G-746-G-01
411	G-746-G-1-01
412	G-746-G-2-01
413	G-746-G-3-01
414	G-746-F-01
415	G-746-S-01
416	G-746-X-01
417	G-746-X-01
418	G-748-B-01
419	G-752-C-01
420	G-752-C-02
421	G-754-01
422	G-755-A-01
423	G-755-C-01
424	G-755-T-07-01
425	G-755-T-08
426	G-755-T-2-3-01
427	G-755-T-3-1-01
428	G-755-T-3-2-01
429	S-310-04
430	S-331-02
431	S-333-12
432	S-335-09
433	S-337-11
435	S-409-100
436	S-409-20
437	S-409-40
438	S-409-60
439	S-409-80
440	S-410-05
441	S-540-A-2-01
442	S-612-01
443	S-709-01
-	•

	NO FURTHER ACTION (CONTINUED)					
SWMU No.	Description					
444	S-709-02					
445	S-710-05					
446	S-710-06					
447	S-710-09					
448	S-710-16					
449	S-710-18					
450	S-710-32					
451	S-710-41					
452	S-710-44					
453	S-710-46					
454	S-743-T-17-01					
455	S-755-T-16-01					
456	S-755-T-16-02					
457	S-755-T-16-03					
458	S-755-T-2-3-01					
459	S-755-T-3-1-01					
460	S-755-T-3-2-01					
461	S-755-T-3-2-02					
462	S-755-T-3-2-03					
468	Area West of plant, North of Outfall 015					
473	West of C-746-B					
475	C-745-G5 Paint Enclosure GSA					
476	Concrete Crusher					
479	C-204 Disintegrator Building					
481	C-410-A Hydrogen Cylinder					
484	C-611-M North Sanitary Water Storage Tank					
485	C-611-N North Sanitary Water Storage Tank					
490	McGraw Fuel Facility Waste Oil Storage Tank					
491	Mercury Spill at the C-611 Water Treatment Plant Vault					
519	C-410 Sulfuric Acid Tank (C-634-B)					
525	KOW Water Tower Concrete Supports					
527	C-410 GSA/SAA at Column J-6					
528	GSA/SAA at the Northwest corner of C-745-G3 Paint Enclosure					
530	Soil and Debris Storage Area by C-745-T Yard					
532	Photographic Solution Treatment Area					
534	UST #18, within SWMU 193					
535	Satellite Accumulation Area at C-755 Trailer 8					
536	Concrete Truck Washout Area					
537	SAA Located Outside at the Southeast Corner of the C-400 building (S-400-01)					
538	S-MST-01-01 & S-MST-01-02 (Mobile Trailer 01)					
539	S-MST-01-01 & S-MST-01-02 (Mobile Trailer 02)					
540	S-MST-01-01 & S-MST-01-02 (Mobile Trailer 03)					
542 a & b	GSA/SAAs located outside C-746-A					
543	T-746-S-01, 90 Day Storage Area					
544	T-752-C-01, 90 Day Storage Area					
545	SWMUs 545, Generator Staging Area at C-755-T-2					
546	Diesel Fuel Spill/Leak @ Post 67					
547	Diesel Spill/Leak @ Post 38					
548	Concrete Piers, Wood, and Rubble North of C-745-B Cylinder Yard					
551	GSA at C-755 east fence line					
552	C-760 90-Day Storage Area					

PENDING NO FURTHER ACTION DECISION						
465	G Yard Rubble Pile					
466	South of Dykes Road, Pond Area					
467	WKWMA on KOW					
469	C-745-J					
470	West of C-752-A					
471	South Area Outside C-746-B					
472	West of C-746-B					
474	West of Vortec Site					
486	Rubble Pile WKWMA					
487	Rubble Pile WKWMA					
S	WMUS THAT WILL BE INVESTIGATED AND REMEDIATED					
	BY THE U.S. ARMY CORPS OF ENGINEERS					
94	KOW Trickling Filter and Leach Field					
95	KOW Burn Area					
157	KOW Toluene Spill Area					
182	Western Portion of Yellow Water Line					

 $ER = environmental\ remediation$

GSA = generator staging area

HVAC = heating, ventilating, and air-conditioning

KOW = Kentucky Ordinance Works KPDES = Kentucky Pollutant Discharge Elimination System

NSDD = North-South Diversion Ditch

PCB = polychlorinated biphenyl

PGDP = Paducah Gaseous Diffusion Plant

RCW = recirculating cooling water

SAA = satellite accumulation area

TCE = trichloroethene

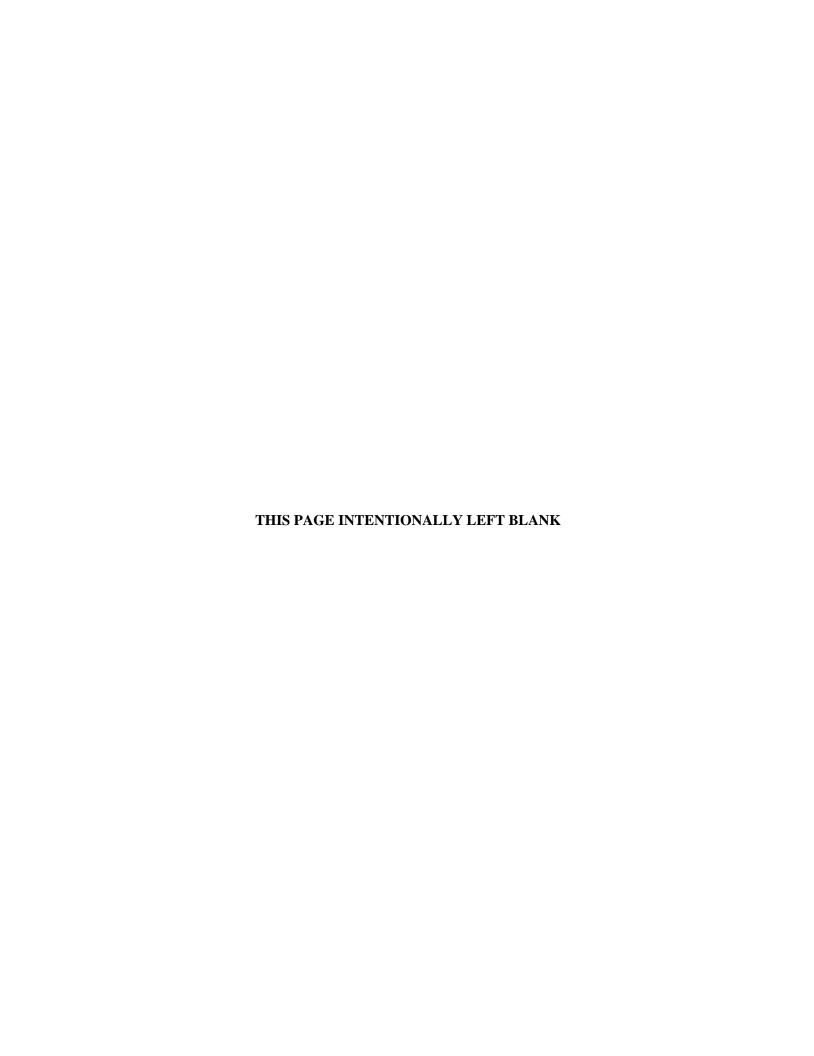
TSCA = Toxic Substances Control Act

UST = underground storage tank

WKWMA = West Kentucky Wildlife Management Area

APPENDIX 5

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



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

				timetable lines ¹	Planning dates with long-term	
Operable Unit	Subproject	Deliverable	FY 2009–FY 2011	Out-year	targets for decision documents ²	Comments
GŴOU	Southwest Plume Sources ^c	D1 Focused Feasibility Study	7/28/09	_ car year		Focused FS to address VOC sources per 3/24/08 Southwest Plume Dispute Resolution Agreement
		D1 Proposed Plan	3/25/10			D1 Proposed Plan is submitted 60 days after EPA and KY approval of the Feasibility Study.
		D1 ROD	9/17/10			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	11/18/10			
		D1 Remedial Action Completion Report		6/28/15		D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.
	C-400	D1 Remedial Action Completion Report	4/26/11			D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.
	Dissolved-Phase Plumes	D1 RI/FS Work Plan			10/10/11	Project scoping will consider the TCE degradation study results (projected for September 30, 2009) and completion of C-400 O&M activities.

			Enforceable timetable and deadlines ¹		Planning dates with long-term	
Operable Unit	Subproject	Deliverable	FY 2009–FY 2011	Out-year	targets for decision documents ²	Comments
GWOU (continuation)	Dissolved-Phase Plumes (continuation)	D1 ROD	2011	Out-year	4 th quarter 2015	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan (FFA Section XIV.D).
D&D OU	Disposition of Inactive Facilities at PGDP	D1 Removal Notification	11/24/09		3/15/09	The proposed enforceable date of 11/24/09 is currently consistent with DOE's baseline for C-340 facility, which is the next scheduled inactive facilities removal action. It is DOE's goal to accelerate project implementation to meet the FY 09 planning date of 3/15/09.
		D1 EE/CA	2/10/10		4/30/09	The proposed enforceable date of 2/10/10 is currently consistent with DOE's baseline for C-340 facility, which is the next scheduled EE/CA for inactive facilities. It is DOE's goal to accelerate project implementation to meet the FY 09 planning date of 4/30/09 and expand the scope of the EE/CA to include D&D of other future inactive facilities.
		D1 Action Memorandum	9/30/10		10/12/09	D1 Action Memorandum for the Disposition of Inactive Facilities at PGDP is submitted 30 days after close of Public Comment period on the EE/CA (FFA Section X.E).
		D1 Removal Action Work Plan	1/28/11		1/10/10	D1 Removal Action Work Plan for the Disposition of Inactive Facilities at PGDP is submitted 30 days after EPA and KY approval of the Action Memorandum (FFA Section X.E).

	Subproject	Deliverable	Enforceable timetable and deadlines ¹		Planning dates with long-term	
Operable Unit			FY 2009–FY 2011	Out-year	targets for decision documents ²	Comments
D&D OU (cont.)	Disposition of Inactive Facilities at PGDP (cont.)	D1 Removal Action Completion Notification		9/30/17		D1 Removal Action Completion Notification is submitted 150 days after Removal Action is completed.
SWOU	Removal Action	D1 Action Memorandum	12/6/08			Completed. Action Memorandum was submitted to EPA and KY on 11/10/08.
		D1 Removal Action Work Plan	04/05/09			D1 Removal Action Work Plan is submitted 30 days after EPA and KY approval of Action Memorandum (FFA Section X.E).
	Remedial Action	D1 ROD			3rd quarter – 2015	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan (FFA Section XIV.D).
		D1 Remedial Action Completion Report		12/13/17		D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.
Soils OU	Inactive Facilities Removal Action	D1 Action Memorandum	12/10/08			Completed. Action Memorandum was submitted to EPA and KY on 10/15/08.
		D1 Removal Action Work Plan	4/09/09			D1 Removal Action Work Plan is submitted 30 days after EPA and KY approval of Action Memorandum (FFA Section X.E).
	Remedial Action (Phase I – Pre GDP Shutdown)	D1 RI/FS Work Plan	3/12/09			

			Enforceable timetable and deadlines ¹		Planning dates with long-term	
Operable Unit	Subproject	Deliverable	FY 2009–FY 2011	Out-year	targets for decision documents ²	Comments
Soils OU (Cont.)	Remedial Action (Phase I	D1 Remedial Investigation Report	9/30/10			
	– Pre GDP Shutdown) (cont).	D1 Feasibility Study	5/28/11			D1 Feasibility Study is submitted 60 days after EPA and KY approve the RI Report.
		D1 ROD			3rd quarter – 2012	D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan (FFA Section XIV.D).
		D1 Remedial Action Completion Report		9/30/15		D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.
	Soil and Rubble Areas	D1 Addendum 2 Site Evaluation Report	4/6/09			D1 Site Evaluation Report is due 45 days of receipt of final validated data for entry to OREIS (per 2/16/07 Notification letter).
		D1 Addendum 1B Site Evaluation Report	6/14/09			D1 Site Evaluation Report is due 45 days of receipt of final validated data for entry to OREIS (per 2/16/07 Notification letter).
	Sitewide Walkover	Sitewide Evaluation Work Plan			9/30/09	Sitewide Evaluation Work Plan is submitted 30 days after EPA and KY approve the Soils and Rubble Areas Sampling and Analysis Plans, as outlined in the 2/16/07 DOE letter, and the FFA Managers reach consensus on the walk-over scope.
BGOU	Burial Grounds	D1 Feasibility Study	8/01/09			D1 Feasibility Study is submitted 60 days after EPA and KY approve the RI Report.

			Enforceable timetable and deadlines ¹		Planning dates with long-term	
			FY 2009-FY 2011	Out-year	targets for decision	
Operable Unit	Subproject	Deliverable	2022		documents ²	Comments
BGOU (cont.)	Burial Grounds (cont.)	D1 Proposed Plan D1 ROD	3/26/10		1 st Qtr 2012	D1 Proposed Plan is submitted 60 days after EPA and KY approval of the Feasibility Study. D1 ROD is submitted 30 days after close of public comment period on the Proposed Plan (FFA Section
		D1 Remedial Action Completion Report		9/30/19		D1 Remedial Action Completion Report is submitted 150 days after Remedial Action is completed.

¹ Enforceable Timetables and Deadlines are based on the planning scope assumptions contained in Appendix 3, the Southwest Plume Dispute Resolution Agreement, and funding levels in the currently approved baseline (as of November 15, 2008). While the FFA parties find these assumptions to be reasonable for bounding cost and schedule forecasts based on existing information, approval of the assumptions does not constitute decision-making for the response actions described in this table. Planning dates for the Dissolved-Phase Plume Project RI/FS Work Plan and ROD and Enforceable out-year milestones for the D&D OU Removal Action Completion Report and BGOU Remedial Action Completion Report (RACR) are inconsistent with the 11/5/08 DOE HQ target funding direction. The DOE Paducah Site Office currently projects that these planning dates and out-year milestones will need to be extended as follows to reflect the impacts of the 11/5/08 DOE HQ target funding direction: Dissolved Phase Plume RI/FS Work Plan – 3/20/23 (planning date); Dissolved Phase Plume ROD – 2nd Qtr 2027 (planning date); D&D OU RACR – 9/30/23 (out-year milestone); and BGOU RACR – 9/30/29 (out-year milestone). The FFA Managers will negotiate in good faith revisions to the schedules set forth herein and take into consideration the 11/5/08 DOE HQ target funding guidance. The FFA managers will seek to complete such negotiations to allow for revised schedules to be incorporated into the SMP FY10.

BRA = baseline risk assessment

DOE = U.S. Department of Energy

EE/CA = engineering evaluation/cost analysis

EI = Environmental Indicators

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

EPA = U.S. Environmental Protection Agency

SWMU = solid waste management unit

FY = fiscal year

HQ = Headquarters

O&M =operations and maintenance

PP = proposed plan

RI = remedial investigation

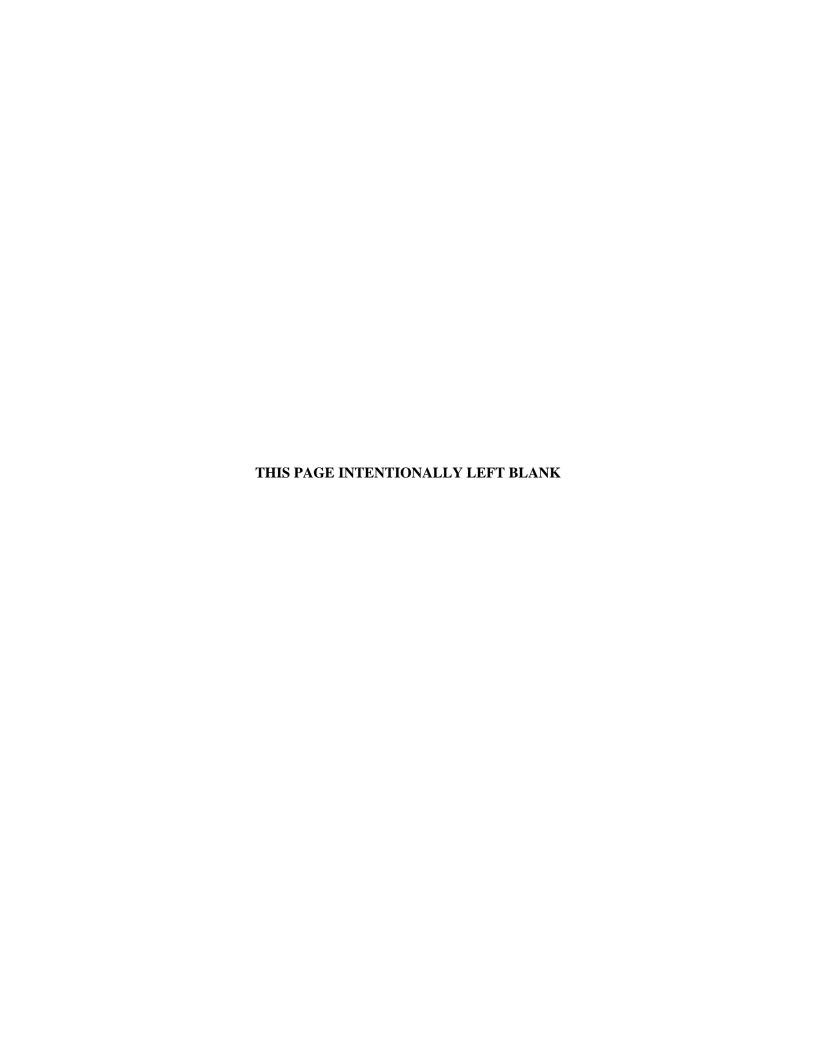
ROD = record of decision

OU = operable unit

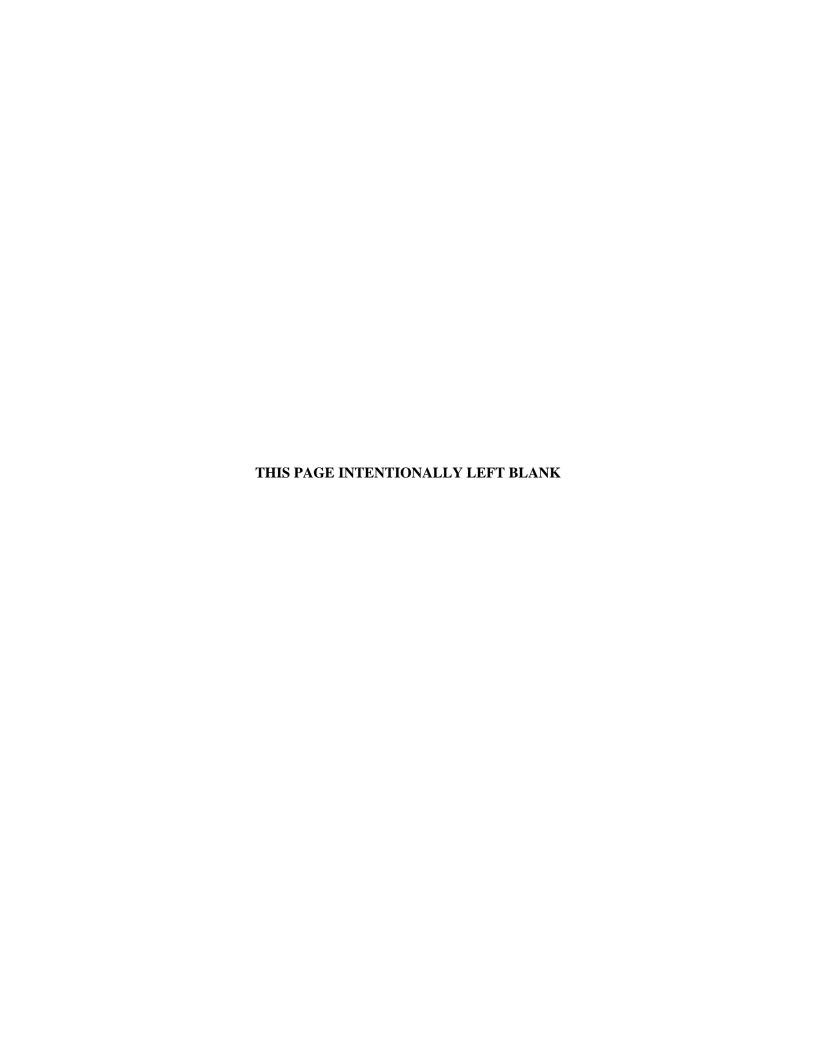
FFA = Federal Facility Agreement

FS = feasibility study

² Not enforceable dates. Used for planning purposes only.



APPENDIX 6 DATA MANAGEMENT PLAN



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

J. R. Blewett T. L. Brindley L. K. Garner J. L. White

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

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DATA AND DOCUMENTS MANAGEMENT AND QUALITY ASSURANCE PLAN APPROVALS

Approved by: 1. L. Chumbler	Date:	10/5/98
D. L. Chumbler		1
Bechtel Jacobs Company LLC		
Quality Manager		
Approved by:	Date:	10/5/98
R. L. Foster		/ /
Bechtel Jacobs Company LLC		
Information Technology and Sample Manager	ment	
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:	p/5/58
Approved by: J. C. Hodges DOE FFA Project Manager	Date: _	10-5-98

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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:

1) 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."
- 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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CONTENTS

				Page
	PRI	EFACE	•••••••••••••••••••••••••••••••••••••••	v
	AC]	RONYN	AS	xi
			ONS	xiii
1.			CTION	1
	1.1			_
	1.2	APPI	POSELICABILITY	1 1
2.	PRO	OGRAM	ORGANIZATION, RESPONSIBILITY, AND TRAINING	1
	2.1	ORG	ANIZATION	1
	2.2	ROL	ES AND RESPONSIBILITIES	1 2
		2.2.1	Stakeholders	2
		2.2.2	DOE Performance Management Contractor	2
	2.3	TRAI	INING	5
3.	QA (TIVES FOR MEASUREMENT DATA	5
	3.1	DQO	S	6
	3.2	ANAI	LYTICAL DATA CATEGORIES	6
4.	APP	LICABI	LE PROTOCOLS AND DOCUMENTS	7
5.	SAM	PLE C	USTODY	7
6.			ION PROTOCOLS AND FREQUENCY	7
	6.1		D EQUIPMENT CALIBRATION PROTOCOLS AND	
		FREQ	QUENCIES	7
	6.2	LADU	RATURY CALIBRATION PROTOCOLS AND	•
		FREQ	UENCIES	7
7.	ANA	LYTICA	AL PROTOCOLS	8
8.	DETA	AILS O	F DATA AND DOCUMENT FLOW	8
	8.1	INTE	GRATED DATA SYSTEM	8
	8.2	DATA	PLANNING	11
		8.2.1	Initiation of Data Collection	11
		8.2.2	Historical Data Gathering	11
		8.2.3	Data Quality Criteria	12

CONTENTS (Continued)

	8.3	DATA (COLLECTION	12
		8.3.1	Station Information	12
			Lithologic Information	12
			Sample Information	12
			Field Measurements	12
			Analytical Data	13
		0.3.3	Monitoring Structure Information	13
			GIS Information	13
		8.3.7	G15 Intormation	13
	8.4	DATA I	REVIEW	13
		8.4.1	Laboratory Contractual Screening	13
			Data Verification	13
			Data Validation	14
		8.4.4	Data Assessment	14
		8.4.5	Report Preparation	14
	8.5	3.5 DATA AND RECORDS ARCHIVAL		
			Data Archival	14
		8.5.2	Records Archival	15
9.	DOC	UMENT	AND DATA RELEASE AND TRANSFER	16
	9.1	DOCU	MENT RELEASE AND TRANSFER	16
	9.2	ELECT	TRONIC DATA RELEASE AND TRANSFER	16
		9.2.1	DOE Remedial Action Investigations	16
			DOE-Permitted Facilities/Routine Environmental Monitoring	
			Reports	16
		9.2.3	Special Requests	16
10.	INTE	RNAL C	OC CHECKS	18
10.				
	10.1	FIELD	OC SAMPLES	18
	10.2	ANALY	YTICAL LABORATORY QC SAMPLES	19
11.	AUD	ITS AND	SURVEILLANCES	19
	11.1	AUDIT	'S	19
	11.2	SURVE	EILLANCES	19
12.	PRE	VENTIV	E MAINTENANCE	20

CONTENTS (Continued)

13.	SPECIFIC ROUT	FINE PROTOCOLS	20
	13.1 PRECISIO 13.2 ACCURAC 13.3 COMPLET	DN CY FENESS	21 21 22
14.	CORRECTIVE A	ACTIONS AND NONCONFORMANCES	22
15.	QA REPORTS T	O MANAGEMENT	22
16.	FIELD CHANGE	S	22
	REFERENCES		23
	APPENDIX A	PROJECT-SPECIFIC INFORMATION FOR QUALITY AND DATA ELEMENTS	A-1
	APPENDIX B	DATA DICTIONARY AND FORMATS FOR PADUCAH OREIS TRANSMITTALS	B-1

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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

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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.

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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.

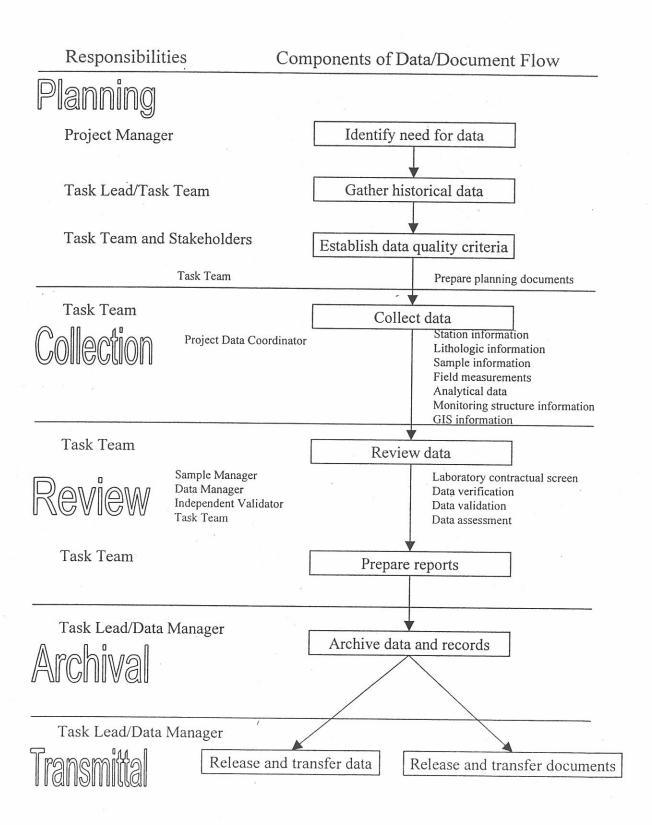


Figure 1. Detail of Data and Data Flow.

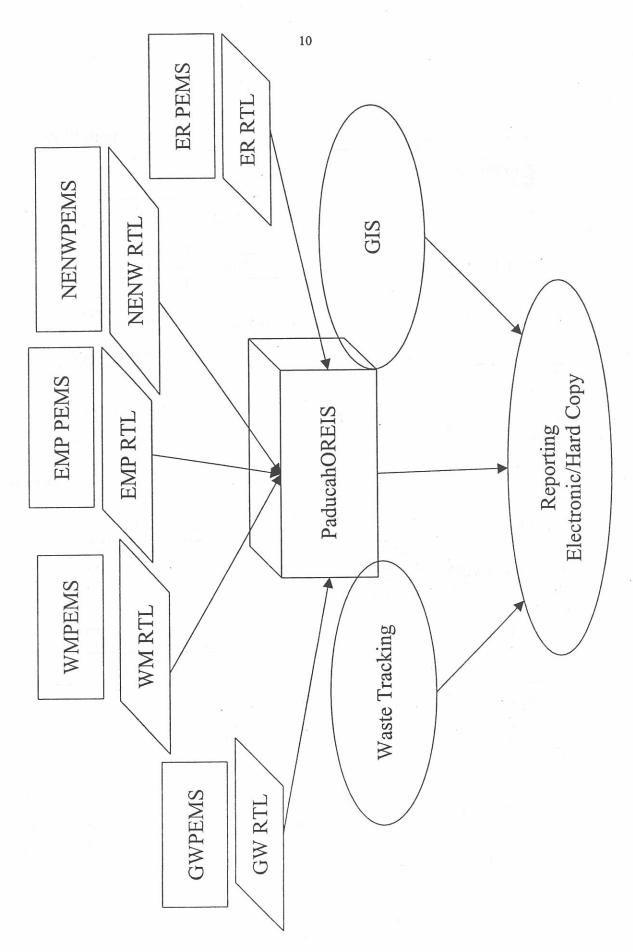


Figure 2. Paducah DOE Integrated Data System.

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.

PROGRAM	FREQUENCIES/SCHEDULE			
	SAMPLING	REPORTING	TRANSFER	
Permit-Associated Sampling			THE MISTER	
Kentucky Pollutant Discharge	Monthly and Quarterly			
Outfalls	monning and Quartern	Monthly 28 th of each month	Monthly 28th of each month	
Toxicity Monitoring	Quarterly	Quarterly	Oundaria	
Bioaccumulation Study	Annually	Publication of the ASER Annually	Quarterly Concurrent with ASER Annually	
Fish Community	Semiannually	Publication of the ASER	Concurrent with ASER	
C-746-K Surface Water		Annually Publication of the ASER	Annually	
	Quarterly	Semiannually	Concurrent with ASER Semiannually	
C-746-S&T Surface Water	Quarterly	June 30, December 30 Quarterly	June 30, December 30	
		January 15, April 15.	Quarterly January 15, April 15,	
C-746-U Surface Water	Quarterly	July 15, October 15	July 15, October 15	
	Quarterly	Quarterly January 15, April 15,	Quarterly	
C-746-K Groundwater	Overt	July 15, October 15	January 15, April 15, July 15, October 15	
	Quarterly	Semiannually	Semiannually	
C-404 Landfill Groundwater	Quarterly	June 30, December 30 Semiannually	June 30, December 30	
-746-S&T Landfill Groundwater		May 30, November 30	Semiannually May 30, November 30	
Salarii Groundwaler	Quarterly	Quarterly	Quarterly	
746 110		February 30, May 30, August 30, November 30	February 30, May 30,	
-746-U Groundwater Monitoring	Quarterly	Quarterly	August 30, November 30 Quarterly	
		February 30, May 30	February 30, May 30,	
		August 30, November 30	August 30, November 30	
nvironmental Monitoring Program	is (EMP)			
MP Surface Water Sampling	Bimonthly			
-		Annually Publication of Annual Site	Annually	
		Environmental Report	Concurrent with ASER	
AP Annual Sediment Sampling		∫(ASER)		
	Annually	Annually	Annually	
1P Annual Deer Sampling	Annually	Publication of ASER Annually	Concurrent with ASER	
Ime Ground at G	1	Publication of ASER	Annually	
ime Groundwater Sampling	Monthly and Quarterly	Quarterly	November Quarterly	
		January 30, April 30,	January 30, April 30.	
idential Groundwater Sampling	Monthly, Quarterly,	July 30, October 30	July 30, October 30	
	and Annually	Annually Publication of ASER	Semiannually	
veillance Groundwater Sampling	Monthly, Quarterly,	Annually	April and October	
	and 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.
- <u>Comparability</u>—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 =
$$\frac{\left|C_1 - C_2\right|}{\left(\frac{C_1 + C_2}{2}\right)} \times 100$$

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.

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
Kevil, Kentucky 42053
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BECHTEL JACOBS COMPANY
for the
U. S. DEPARTMENT OF ENERGY
Under Contract No. DE-AC05-98OR22700

$\frac{\textit{PROJECT TITLE}}{\text{QUALITY ASSURANCE AND DATA MANAGEMENT PLAN}}$

APPROVALS

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CONTENTS

1.0	TASK ORGANIZATION, RESPONSIBILITY, AND TRAINING
2.0	DATA QUALITY OBJECTIVES AND SAMPLE PLANNING
3.0	APPLICABLE PROTOCOLS AND DOCUMENTS
4.0	CALIBRATION PROTOCOLS AND FREQUENCIES
5.0	DATA REVIEW PROCESS
6.0	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

1.0 TASK ORGANIZATION, RESPONSIBILITY, AND TRAINING

Table 1.1. Task Organization, Responsibility, and Training.

Job Title or	Name	Role, Responsibility, and	Training*		
Position		Interface	11 aming		
DOE Project					
Manager	· · · · · · · · · · · · · · · · · · ·				
Data Clerk					
Data Manager	M&I Data Manager/				
Data Manager	Subcontractor Personnel		*		
Network	M&I Network Administrator	,			
Administrator		1			
Project					
Manager		* "			
Project					
Engineer	"				
QA Specialist					
Records Clerk					
Records Clerk					
Records	M&I Records Manager/				
Manager	Subcontractor Personnel				
Sample	M&I Sample Manager/				
Manager	Subcontractor Personnel	*			
Task Lead					
Task Manager					
Field Team	Subcontractor Personnel				
Leader					
Samplers	Subcontractor Personnel				
Drillers	Subcontractor Personnel				
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:

2.0 DATA QUALITY OBJECTIVES AND SAMPLE PLANNING

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

Container Preservative				A STATE OF THE STA		70			
Container		i	972					21073	
Holding Time	-								
Detection Limit(s)	-								
Analytical Method	S								
Analyte(s)	Regular Samples						QC Samples		
Data Type(s) (Screen or Def)	I								
Sampling Frequency							,		
Sampling Method(s)			8					1	
Matrix				ä					
Sampling Location									

	Preservative									
	Container	1								
DQOs and sample planning for waste characterization data collection.	Holding Time		*					8		
haracteriza	Detection Limit(s)	10								
g for waste o	Analyte(s) Analytical Detection Method Limit(s)	Regular Samples				QC Samples				
mple plannin	Analyte(s)	Reg				00			-	
OQOs and sai	Future Disposition									
Table 2.2. I	Characterizat ion Method									
	Preliminary Classification									
	Material/ Volume/ Container									

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	- N		
	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			
	List appropriate data management protocols to be used.	- 1	*	
	Data Validation	50	5	
	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	Eigld Hann		- Protocolo uni	
	Field Usage	Calibration Check	Calibration Check	Calibration Check
No.		Frequency	Material	Protocol
	9	Field Equipment		
			1 12 1	F
			=	
	Field S	Support Laboratory Equi	pment	
		, , , , ,		
1				

5.0 DATA REVIEW PROCESS

	Table	5.1. Contractual screen	ing.	
Responsible	e Person:			
Othe	er:			
	Tal	ble 5.2. Data verification		
	-0			
Responsible	e Person:			
Othe	er:			
13				
	Table. 5.3. De	etails for performing data	validation.	
Frequency	Data Package Type	Analytes & Media	Protocol Used	Completed By
		·		2 4
Responsible Person	:			*
•	7			
	Та	ble 5.4. Data assessment	•	
Responsible	e Person:			

6.0 DOCUMENT AND RECORDS CONTROL AND TRANSFER

	Table 6.1. Idea	ntification of docume	ents.	
Document Name and Type	Controlled Document (Yes* or No)	Storage Location	Frequency of Transfer	Comments
		·		
200.00.00.00.00.00.00				

^{*} 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. Id	entification of record	ds.	
Record Name and Type	Quality Record (Yes or No)	Storage Location	Frequency of Transfer	Comments
×				
		-		

7.0 ASSESSMENT SCHEDULE

Audit/Surveillance/ Self Assessment No.	Subject/Topic	Date	Completed By
Sen Assessment No.			
	(SF 1)		
			×

DISTRIBUTION

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

APPENDIX B

DATA DICTIONARY AND FORMATS FOR PADUCAH OREIS TRANSMITTALS

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 corre

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 CODE TYPE

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

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

STA NAME

Environmental Restoration Field Investigation). Unique station name assigned by the individual projects (e.g., 400-212

or MW156).

PROJ SAMPLE ID

Unique sample identifier assigned by the project.

SAMPLE_COMMENTS SMP STRT_LEVEL

Comments about the sample.

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

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. Comments about the measurement.

FLD COMMENTS

ANA METHOD ANA TYPE

Method number used to identify a standard analysis method.

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.

PROJ CODE

Acronym assigned by the project (e.g., "ERI-WAG6A" 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 SAMPLE COMMENTS Unique sample identifier assigned by the project.

Comments about the sample.

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.

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

RSLT_PREFIX_QUALIFIER

Measurement for a given parameter.

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.

RSLTQUAL

Coded value that documents any conditions associated with the results of the analysis. See CODE table where CODE_TYPE = RSLTQUAL

for a list of valid values and their descriptions.

UNITS

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

NON_COMPLI_CODE

For Paducah OREIS, this field designates electronic verification 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.

VALIDATION

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

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

ANA_METHOD ANA TYPE Comments about the individual sample.

Method number used to identify a standard analysis method.

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 STA TYPE

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

STATION COMMENTS

STA DESC GRND_ELV Description of the specific sampling or measuring location.

Elevation of ground surface (for groundwater, soil, or sediment sampling) at a sampling or measuring location in feet above mean sea

level (msl).

X-value of the distance in feet of a sampling or measuring location from ADMIN EAST the reference location based on the administrative coordinate grid

system.

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

the reference location based on the administrative coordinate grid

SWMU

LOCATION COMMENTS

DATUM

Acronym for Solid Waste Management Unit, if applicable.

Comments about the location.

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.

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

from the reference location based on the state plane coordinate grid

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

from the reference location based on the state plane coordinate grid

LOC ERROR LOC METHOD Station location error in feet.

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

HOLE_DIAM

LOG FLAG

LOG_TYPE

TOT_DRILLED_DEPTH

INT_BOT_DEPTH_VAL

INT_TOP_DEPTH_VAL

MONIT_INT_NAME

MONIT_ZONE_CODE

INT_MATL_CODE

STRAT SEQ

VISUAL DESC

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.

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

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.

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.

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

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

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

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.

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.

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

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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