



Kentucky Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division of Waste Management

received
6-9-03 CB 52

RECORD COPY

SOLID WASTE DISPOSAL FACILITY PERMIT

Permittee: U. S. DEPARTMENT OF ENERGY
Oak Ridge Operations
Paducah Gaseous Diffusion Plant
P.O. Box 1410
Paducah, Kentucky 42002-1410

Facility: U. S. DEPARTMENT OF ENERGY
PADUCAH GASEOUS DIFFUSION PLANT
5600 Hobbs Road
Paducah, Kentucky 42001

The Division of Waste Management hereby grants the above-named facility a permit to engage in the activity specified below. This permit has been issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto and are subject to all conditions and operating limitations contained herein. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet and/or other state and local agencies.

--See Page 1-2--

No deviation from the plans and specifications submitted with your application or the conditions specified herein is allowed, unless authorized in writing from the Division of Waste Management. Violation of the terms and conditions specified herein shall render this permit null and void. All rights of inspection by representatives of the Division of Waste Management are reserved. Conformance with all applicable Waste Management Regulations is the responsibility of the permittee. Receipt of the permit fee and bond amount specified below is hereby acknowledged.

PERMIT TYPE:	Operation (Closure Only)	PERMIT NUMBER:	073-00015
TYPE OF ACTIVITY:	Inert Landfill (closure)	FINDS NUMBER:	KY 8890008982
BOND:		COUNTY:	McCracken
INSTRUMENT TYPE:	NA		
INSTRUMENT NUMBER:	NA		
AMOUNT:	NA		
ACRES:			
WASTE DISPOSAL AREA:	10.5 Acres		
PERMIT AREA:	20.1		Issued this 23rd day of July 2001
PERMIT FEE:	NA		
EFFECTIVE DATE:	July 3, 1989		
EXPIRATION DATE:	June 11, 2003		

Robert H. Daniell
Robert H. Daniell, Director

Robert W. Logan
Robert W. Logan, Commissioner



PERMIT NUMBER: 073-00015

ISSUE DATE: 07-23-01

SOLID WASTE DISPOSAL FACILITY PERMIT - Continued

General Conditions

- 1) The Permittee shall complete closure activities in accordance with the environmental performance standards of 401 KAR 47:030, and the plans and narratives received on January 24, 1985, and the plans and narratives approved February 5, 1985 and April 25, 2001.
- 2) No additional waste shall be placed in this landfill.
- 3) The Permittee shall comply with 401 KAR 47:120 Section 1 relating to conditions applicable to all permits.
- 4) The permittee shall maintain the final cover to prevent ponding of water and to provide for positive drainage.
- 5) The Permittee shall use agricultural methods to control vegetative growth to prevent weeds, prevent tree and woody plant growth, and prevent roots from entering the low permeability layer.
- 6) The Permittee shall inspect and maintain, as required, all site diversion ditches after every storm event greater than 0.5-inch.
- 7) The permittee shall provide a notice to the deed as required by 401 KAR 48:060 Section 3.

Groundwater Conditions

- 1) The permittee shall comply with all requirements of 401 KAR 48:300.
- 2) At each approved groundwater monitoring location, the permittee shall monitor quarterly for the complete list of parameters listed in 401 KAR 48:300 Section 11(3), plus the following: Aluminum, Boron, Bromide, Calcium, Cyanide, Eh, Fluoride, Gross Alpha, Gross Beta, Iodide, Iodine-131, Magnesium, Manganese, Molybdenum, Dissolved Oxygen, Potassium, Radium, Redox, Rhodium, Strontium-90, Sulfate, Tantalum, Technetium-99, Tritium, Uranium (total). Metals samples shall not be filtered.
- 3) At each approved groundwater monitoring location, the permittee shall monitor annually for PCBs.
- 4) Groundwater and surface water samples shall be taken quarterly and the results submitted to the Cabinet according to the following schedule:

Sample to be Collected During the:

Results Due to the Division of Waste Management by:

First Quarter
 Second Quarter
 Third Quarter
 Fourth Quarter

May 30
 August 30
 November 30
 February 28

JAMES E. BICKFORD
SECRETARY



PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

April 25, 2001

Mr. Don Seaborg, Site Manager
U.S. Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001-1410

CERTIFIED MAIL #7099 3220 0008 0357 7408

RE: Paducah Gaseous Diffusion Plant 073-00015 (C-746-T) Landfill
Renewal of Permit
Pending Applications 073-00015 LI1 PR2
U.S. DOE - Paducah Gaseous Diffusion Plant
Permit Number: 073-00015
McCracken County

Dear Mr. Seaborg:

The Division of Waste Management has approved your permit renewal application (received May 20, 1998) for the 073-00015 (C-746-T) Inert Landfill at the Paducah Gaseous Diffusion Plant.

The groundwater contamination assessment and corrective action provisions of 401 KAR 48:300 remain in effect for this landfill at this time. However, as soon as the appropriate modifications are made to the relevant Hazardous Waste permit, the Solid Waste permit will be reissued in accordance with the modified Hazardous Waste permit. At that time, 401 KAR 48:300 Section 8 will not apply to this facility. Instead, the permittee will be required to perform groundwater contamination assessment and corrective action in accordance with the modified Hazardous Waste permit and 401 KAR 34:060, Section 12.

The revised permit for your landfill is enclosed. You should carefully review the permit and the approved application. In the event that you disagree with the terms of these documents, you must notify this office in writing within thirty (30) days of the receipt of this letter. Unless this permit is modified in accordance with 401 KAR 47:130, you are expected to comply with the terms of all applicable laws, regulations, the approved application, and the permit. You are advised that you have the right to file petition for an administrative hearing pursuant to KRS 224.10-420(2).



Printed on Recycled Paper
An Equal Opportunity Employer M/F/D

Should you have any questions regarding this matter, please contact R. Todd Hendricks at (502) 564-2225, ext. 270.

Sincerely,



Ronald D. Gruzesky, P.E., Manager
Solid Waste Branch
Division of Waste Management

RDG/RTH/rth

Attachments

- c: Gary Vander Boegh, Landfill Manager
- Mike Welch
- Paducah Regional Office
- Madisonville Regional Office
- West File
- Main File
- Reading File



Kentucky Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
 Division of Waste Management

SOLID WASTE DISPOSAL FACILITY PERMIT

Permittee:

U. S. DEPARTMENT OF ENERGY

Oak Ridge Operations
 Paducah Gaseous Diffusion Plant
 P.O. Box 1410
 Paducah, Kentucky 42002-1410

Facility:

U. S. DEPARTMENT OF ENERGY

PADUCAH GASEOUS DIFFUSION PLANT
 5600 Hobbs Road
 Paducah, Kentucky 42001

The Division of Waste Management hereby grants the above-named facility a permit to engage in the activity specified below. This permit has been issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto and are subject to all conditions and operating limitations contained herein. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet and/or other state and local agencies.

--See Page2--

No deviation from the plans and specifications submitted with your application or the conditions specified herein is allowed, unless authorized in writing from the Division of Waste Management. Violation of the terms and conditions specified herein shall render this permit null and void. All rights of inspection by representatives of the Division of Waste Management are reserved. Conformance with all applicable Waste Management Regulations is the responsibility of the permittee. Receipt of the permit fee and bond amount specified below is hereby acknowledged.

PERMIT TYPE:	Operation (Closure Only)	PERMIT NUMBER:	073-00015
TYPE OF ACTIVITY:	Inert Landfill (closure)	FINDS NUMBER:	KY 8890008982
BOND:		COUNTY:	McCracken
INSTRUMENT TYPE:	NA		
INSTRUMENT NUMBER:	NA		
AMOUNT:	NA		
ACRES:			
WASTE DISPOSAL AREA:	10.5 Acres		
PERMIT AREA:	20.1		Issued this 25th day of April 2001
PERMIT FEE:	NA		
EFFECTIVE DATE:	July 3, 1989		
EXPIRATION DATE:	June 11, 2003		


 Robert H. Daniell, Director


 Robert W. Logan, Commissioner

SOLID WASTE DISPOSAL FACILITY PERMIT - Continued

General Conditions

- 1) The Permittee shall complete closure activities in accordance with the environmental performance standards of 401 KAR 47:030, and the plans and narratives received on January 24, 1985, and the plans and narratives approved February 5, 1985 and April 25, 2001.
- 2) No additional waste shall be placed in this landfill.
- 3) The Permittee shall comply with 401 KAR 47:120 Section 1 relating to conditions applicable to all permits.
- 4) The permittee shall maintain the final cover to prevent ponding of water and to provide for positive drainage.
- 5) The Permittee shall use agricultural methods to control vegetative growth to prevent weeds, prevent tree and woody plant growth, and prevent roots from entering the low permeability layer.
- 6) The Permittee shall inspect and maintain, as required, all site diversion ditches after every storm event greater than 0.5-inch.
- 7) The permittee shall provide a notice to the deed as required by 401 KAR 48:060 Section 3.

Groundwater Conditions

- 1) The permittee shall comply with all requirements of 401 KAR 48:300.
- 2) At each approved groundwater monitoring location, the permittee shall monitor quarterly for the complete list of parameters listed in 401 KAR 48:300 Section 11(3), plus the following: Aluminum, Boron, Bromide, Calcium, Cyanide, Eh, Fluoride, Gross Alpha, Gross Beta, Iodide, Iodine-131, Magnesium, Manganese, Molybdenum, Dissolved Oxygen, Potassium, Radium, Redox, Rhodium, Strontium-90, Sulfate, Tantalum, Technetium-99, Tritium, Uranium (total). Metals samples shall not be filtered.
- 3) At each approved groundwater monitoring location, the permittee shall monitor annually for PCBs.

CDM Federal Services Inc.

A subsidiary of CDM Federal Programs Corporation

consulting
engineering
construction
operations

325 Kentucky Avenue
Kevil, KY 42053
Tel: 502 462-3006
Fax: 502 462-3060

January 7, 2000

Mr. Craig S. Jones
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

Subcontract Name: Environmental Services Subcontract
Subcontract No: 23900-SC-RM056F
Subject: Minor Modification for the C-746-T Inert Landfill, Permit Number
073-00015
Document Control No: LTR-PAD-EC-SH-00-0005, Pay Item 310, Change Notice 54
LAN-CON 1.140.206

Dear Mr. Jones:

In accordance with the above-referenced subcontract, CDM Federal Services Inc., is submitting the Minor Modification for the C-746-T Inert Landfill. Also enclosed are letters from Bechtel Jacobs Company LLC to the Department of Energy (DOE) and from DOE to the Kentucky Division of Waste Management (KDWM).

If you have any questions or desire further information, please contact D. F. Hutcheson at 442-2912 or me at 462-3006.

Sincerely,


Joseph J. Tarantino, P.E.
Project Manager

JJT:seh

Enclosures: 1. Minor Modification
2. Letter from Bechtel Jacobs Company to DOE
2. Draft Letter from DOE to KDWM

cc: T. L. Brindley

cc/encs: R. A. Forsee, LAN-CON
S. E. Hankins, Pro-2-Serve
D. F. Hutcheson, LAN-CON
File-CDM/Kevil-RC



DOE Contract No. DE-AC05-98OR22700

Job No. 23900

January 7, 2000

Mr. J. Dale Jackson
Acting Paducah Site Manager
Department of Energy
Post Office Box 1410
Paducah, Kentucky 42002-1410

Subject: Minor Modification of the C-746-T Inert Landfill, Paducah Gaseous Diffusion Plant, Permit Number 073-00015, McCracken County, Kentucky

Dear Mr. Jackson:

Bechtel Jacobs Company LLC is herewith providing to the Department of Energy (DOE), a transmittal cover letter and a request for a minor modification of the above-referenced permit to allow investigative sampling of Solid Waste Management Unit 145, Area P Construction/Demolition Debris Disposal and Spoils Area. Five sets of work details are enclosed, one for your records and four to be submitted to the state. A permit modification fee of \$1000 is also enclosed.

Please forward this information to the following by January 11, 2000:

Mr. Ron Gruzesky, Branch Manager
Kentucky Department for Environmental Protection
Division of Waste Management
14 Reilly Road
Frankfort, Kentucky 40601

If you should have any questions or should require additional information, please contact C. S. Jones at 5114 or D. R. Guminski at 5051.

Sincerely,

A handwritten signature in black ink that reads "Gordon L. Dover".

Gordon L. Dover
Paducah Manager of Projects

GLD:sh
LTR-PAD/EC-SH-00-0006

- Enclosures: I. Draft letter from DOE to KDWM
II. Certification pages
III. Check
IV. Work Details (5 sets)
V. Figures 1-7

c/encs: ~~LAN-CON-Kevil~~
P. A. Gourieux
C. S. Jones/D. R. Guminski
C. J. Marshall
G. S. Vander Boegh
File-EMEF-DMC-PAD-RC



Bechtel Jacobs Company LLC
 P.O. Box 4699, Oak Ridge, TN 37831-4699

DATE 07-JAN-00
 (PLEASE NEGOTIATE PROMPTLY)

Check No. 12009633

PACKING LIST/
 INVOICE NO.

OUR
 ORDER NO.

MATERIAL
 OR SERVICE

REMITTANCE STATEMENT

TRANSPORTATION

DISCOUNT

ADJUSTMENTS

NET

C746ST 07-JAN-00 LANDFILL PERMIT

0.00 1,000.00

THIS DOCUMENT HAS A COLORED BACKGROUND AND AN ARTIFICIAL WATERMARK ON THE REVERSE SIDE.



⑈ 120096333 ⑈ ⑆064202750⑆ 7019004923⑈

DRAFT

Date

Mr. Ron Gruzesky, Branch Manager
Division of Waste Management
14 Reilly Road
Frankfort, Kentucky 40601

Dear Mr. Gruzesky:

MINOR MODIFICATION OF THE C-746-T INERT LANDFILL PERMIT, PERMIT NUMBER 073-00015, PADUCAH GASEOUS DIFFUSION PLANT, MCCRACKEN COUNTY, KENTUCKY

The Department of Energy (DOE) is submitting the enclosed request for a minor modification of the above-referenced permit to allow investigative sampling of Solid Waste Management Unit 145, Area P Construction/Demolition Debris Disposal and Spoils Area. Four sets of the work details are provided for your records. A permit modification fee of \$1000 is also enclosed.

One area to be investigated is inside the permit boundary of the closed C-746-T Inert Landfill. Concerns related to past disposal practices within the old North/South Diversion Ditch (NSDD) during relocation activities in the early 1980s have prompted the Department of Justice (DOJ) to direct DOE to sample and investigate the characteristics of fill materials placed in the ditch during relocation construction. The old NSDD lies within the permit boundaries of the C-746-S&T Landfills, but outside the closed waste cells and surrounding fence. It is proposed that samples will be obtained from one test pit or trench located inside the C-746-T Inert Landfill permit boundary. Other samples will be obtained from test pits located inside the C-746-S Residential Landfill which was modified and approved on December 30, 1999. Based on interviews conducted by DOJ, materials may include (1) roofing debris, (2) crushed metal drums, (3) fly ash, and (4) construction debris. Details of the work are provided in Enclosure III.

This investigation is extremely important to DOJ in light of the recent legal actions. Numerous subcontractors have come together to make this project a success. Bechtel Jacobs Company LLC is providing the project management for this task. SAIC is performing the excavation and sampling. Additional subcontractors include SEC, TetraTech, Inc., LAN-CON, Inc., and CDM Federal Services, Inc. DOE requests approval to start this project by January 12, 2000. Tentatively, the excavation work inside the C-746-T Inert Landfill boundary is planned to begin as early as January 13, 2000, and be completed by January 30, 2000. Further investigation and remedial activities will be conducted under the Comprehensive Environmental Response, Compensation, and Liability Act process in accordance with the Federal Facility Agreement. This area is part of the Burial Grounds Operable Unit, which is scheduled for investigation in calendar year 2003.

Your timely attention to this matter is greatly appreciated. If you have any questions or desire further information please contact M. E. Redfield at (270) 441-6815.

Sincerely,

J. Dale Jackson, Acting Site Manager
Paducah Site Office

Mr. Ron Gruzesky

2

January 7, 2000

Enclosures

c/w/out enclosure

G. L. Dover, Bechtel Jacobs Company/Kevil
S. E. Hankins, Pro-2-Serve/Kevil

ENCLOSURE III

WORK DETAILS

Background

The Department of Energy (DOE) is requesting approval to perform investigative sampling of Solid Waste Management Unit (SWMU)145, Area P Construction/Demolition Debris Disposal and Spoils Area. The area to be investigated is inside the permit boundary of the closed C-746-S&T Landfills. See Figure 1 for the SWMU 145 boundary and the permit boundaries of the C-746-S&T Landfills. Concerns related to past disposal practices within the old North/South Diversion Ditch (NSDD) during relocation activities in the early 1980s have prompted the Department of Justice (DOJ) to request DOE to sample and investigate the characteristics of fill materials placed in the ditch during relocation construction. The old NSDD lies within the permit boundary of the C-746-S&T Landfills, but outside the waste cells and surrounding fence (see Figure 2). It is proposed that one test pit or trench may be excavated inside the C-746-T Inert Landfill boundary. Other test pits are being excavated inside the C-746-S Residential Landfill boundary previously modified and approved on December 30, 1999. Based on interviews conducted by DOJ, materials in the ditch may include (1) roofing debris, (2) crushed metal drums, (3) fly ash, (4) construction debris.

Site Preparation

The centerline of the NSDD has been control surveyed to plant coordinates and plant benchmarks using topographical maps on November 20, 1999, (see Figure 3). In addition, a geophysical survey was performed using magnetometer (EM-61 high-sensitivity metal detector and EM-31 terrain conductivity) and ground penetrating radar to attempt to locate anomalies associated with materials that were placed in the NSDD during construction. The proposed sampling area is depicted on Figure 4. The actual sampling location will be surveyed and logged.

Equipment necessary for conducting this work will be brought to the area and staged. Equipment will be staged prior to approval of this minor modification; however, no excavation and sampling activities will occur prior to approval. Equipment includes, but is not limited to, hypalon, high-density polyethylene (HDPE), track hoe excavator, forklift, strong tight containers such as ST-90 boxes, overpacks, personnel protection equipment (PPE), flagging, signs, etc.

Due to this area being identified as SWMU 145 under the Resource Conservation and Recovery Act (RCRA) permit, activities in the exclusion zone will also meet HAZWOPER requirements. In order to perform work in this area, a regulatory notification has to be submitted to the Kentucky Division of Waste Management (KDWM) for approval. This notification was submitted on January 7, 2000. The Site Specific Work Plan for the Old North/South Diversion Ditch Characterization was approved on December 30, 1999. The Site Specific Work Plan details the work being performed and includes the Waste Management Plan, Safety and Health Plan, Sampling and Analysis Plan, and the Quality Assurance Plan.

Site Access

Temporary roadways will be constructed using portable airport runway material and/or gravel in order to access the test pit areas. This temporary access road will be constructed northward from the current C-746-S access road inside the SWMU 145 boundary, then turn eastward into the permit boundary space of the C-746-S&T Residential Landfill. Said roadways/access links are being installed within the C-746-S Residential Landfill boundary based on approval granted on December 9, 1999, by KDWM. The temporary access road for the C-746-T Inert Landfill may occur prior to approval of this modification, pending approval of the Regulatory Notification for Work in a Solid Waste Management Unit submitted January 7, 2000. After the excavation activities are completed, the portion of the temporary access road using the portable airport runway will be removed and the site restored to its original condition. The gravel roadway will not be removed.

Control of the site will be accomplished by use of temporary fencing (safety and security), flagging, road closure, construction signs, and gates (see Figure 5). In addition, gates may be installed on the access road leading to the landfills to limit public traffic.

The work area will be managed as an exclusion zone. Training requirements for access to this area will include HAZWOPER, Radiation Worker II and General Employee Training. Only trained authorized personnel will be allowed to enter the exclusion zone. No on-site licensed operator's presence will be required due to all work being performed outside the security fence of the C-746-T Inert Landfill.

Sampling and Analysis

It is proposed to obtain approximately ten samples from the trench for analysis. Of the 10 samples, approximately half shall be analyzed and the remainder archived. If water is present within the trench during excavation, one of the samples will be of the water. Parameters to be analyzed include volatiles, metals, and radiological constituents. The approved Site Specific Work Plan submitted to KDWM contains the specific analytes and analytical methods. Results of the analysis will be received, validated, and assessed within 90 days of sampling.

Trenching and Backfilling

The proposed sampling area will not disturb the regulated cap or cell of the C-746-T Inert Landfill. A track hoe excavator will be used to excavate the trench, which will be approximately 25 feet long, 15 feet deep, and 3 feet wide at the bottom. Some variability in the dimensions of the trenches is anticipated once actual excavation is begun in order to meet the objectives of the investigation. The excavation may be stepped or angled to prevent the excavation from becoming unstable. It is estimated that the maximum amount of material excavated for the one trench (if stepped such that the excavation is 8 feet wide at the top) is 2062.5 cubic feet. There are a total 41 ST-90 containers for the excavated material from both the C-746-S&T Landfills. Each ST-90 has a 90-ft³ storage capacity, which corresponds to a maximum excavated material storage capacity of 3690 ft³ for both the C-746-S&T excavation. If and when the storage capacity is reached, whether or not the one trench at the C-746-T Inert Landfill has been excavated, the project will stop and the area will be backfilled and seeded as described in these work details.

Work is planned to facilitate near continuous excavator operation. All site activities associated with the trench excavation, soil sampling, soil storage, and backfill will be video recorded. Still photographs will also be taken as necessary. Recording will include the inside of the trench to extent possible without entering the trench.

Each bucket of excavated material will be surveyed for beta and gamma radioactive contamination and the presence of volatile constituents. Samples will be collected at various depths from the trench. Materials removed from the trench will be handled as Investigation Derived Waste (IDW) in accordance with the Environmental Protection Agency's policy on the "Management of Remediation of Waste Under RCRA," publication Number EP530-F-98-1, and screened in with the approved screening criteria. Clean soils shall be obtained from off-site and used as backfill. Compaction will be achieved by placing the backfill in thin lifts (no more than 8 inches maximum thickness) and tamping the lift with the track hoe excavator bucket to the satisfaction of the oversight engineer. After the trench area has been backfilled, the tracks of the trackhoe shall be utilized to achieve compaction. Additional clean fill will be added as necessary and recompact to achieve positive drainage of the sampling area. The area will then be smoothed and seeded. The excavator bucket will be decontaminated and surveyed after the trenching is completed. Precautions will be taken to secure the site in the event of inclement weather. The open trench, any open boxes, and the soil piles will be covered with hypalon or other suitable material in compliance with alternative daily cover requirements to prevent run-on/run-off.

Erosion controls will be in place during all excavation/backfill activities. Excavated materials, generated wastes, and decontamination waters will be properly containerized, stored, and disposed of in accordance with applicable regulations. Decontamination waters will not be considered leachate.

Waste Management

All waste materials will be stored in approved containers. Containers will be properly labeled and managed in accordance with on-site procedures. When containers are full, they will be transferred to a storage location at the plant. Wastes will be characterized and disposal options determined based upon analytical results. Wastes expected to be generated include soil, hypalon, PPE, and decontamination water.

Excavated materials shall be evaluated against the approved waste screening criteria. Excavated materials which are intact waste containers, any visibly discolored soils which appear to have resulted from a breached container, materials which exceed 500 ppm trichloroethylene equivalents (1000 ppm as measured with a photo ionization detector [PID]), or any material having a radiological surface scan above 50,000 dpm/100 cm² shall be considered waste and shall be placed in approved containers, such as ST-90 boxes or overpacks, and handled appropriately. Excavated materials, which do not meet the waste screening criteria, shall be utilized as backfill and returned to the trench.

Waste hypalon or HDPE sheeting will be either placed in 55-gallon drums or in the ST-90 boxes with excavated waste materials. PPE and other miscellaneous wastes generated during these activities will be placed in 55-gallon drums. Decontamination water shall be stored in 1200-gallon polyethylene containers. Leachate water, if generated, shall be segregated from the decontamination water and stored in 1200-gallon polyethylene containers.

Leachate Management

Water encountered during the course of excavation will be removed from the trench. The liquid will be transferred to 1200-gallon polyethylene containers and handled in accordance with the approved site procedures as leachate. This waste will be segregated from decontamination waters.

Decontamination water

Water from the decontamination of excavation and sampling equipment may become contaminated through exposure to residual contaminated material on the equipment. This water will be segregated from any leachate. This waste will be stored in 1200-gallon polyethylene containers and handled in accordance with the approved site procedures.

Site Erosion/Water Control

The site will be maintained as to eliminate/minimize erosion of the trench and surrounding area. A temporary diversion structure will be constructed around the trench to minimize surface drainage run-on in case of a rainfall event. In addition, erosion controls (i.e., silt fencing, hay bales, etc.) will be utilized to minimize run-off from the work area. See Figure 6 for typical silt fence installation design and Figure 7 for typical straw bale barrier design. The backfilled areas shall be seeded and graded to achieve positive drainage and eliminate the ponding of water.

As part of the post-closure care of the C-746-T Inert landfill, this area will be inspected on a regular basis. If any subsidence is noted, additional clean backfill shall be added and compacted to prevent ponding of water and maintain positive drainage. The area will be seeded as outlined in the Vegetation Plan below.

Vegetation Plan

Due to the winter months, seeding will be delayed until spring. As an interim measure, an 8-foot excelsior blanket shall be placed and pinned on all disturbed areas. This blanket shall be inspected and maintained as necessary to prevent erosion until the spring seeding occurs. Silt fencing shall remain in place until the re-vegetation is complete.

A seed mixture containing 20-25 percent annual rye and 75-80 percent Kentucky 31 fescue will be applied to the disturbed areas in the spring. Application of the seed mixture will be completed by drilling, as currently utilized at the C-746-U Contained Landfill, the C-746-S Residential Landfill and the C-746-T Inert Landfill. Straw shall be blown on and crimped after seeding. A commercial fertilizer conforming to a 15-15-15 formula will be applied on the topsoil after seeding at a rate of 250 pounds/acre.

CERTIFICATION

Document Identification: **Paducah Gaseous Diffusion Plant**
 C-746-T Inert Landfill
 Minor Modification
 Permit No. 073-00015

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

U.S. Department of Energy (DOE)
Owner and Operator

J. Dale Jackson
Acting Paducah Site Manager

Date Signed

INFORMATION
ONLY

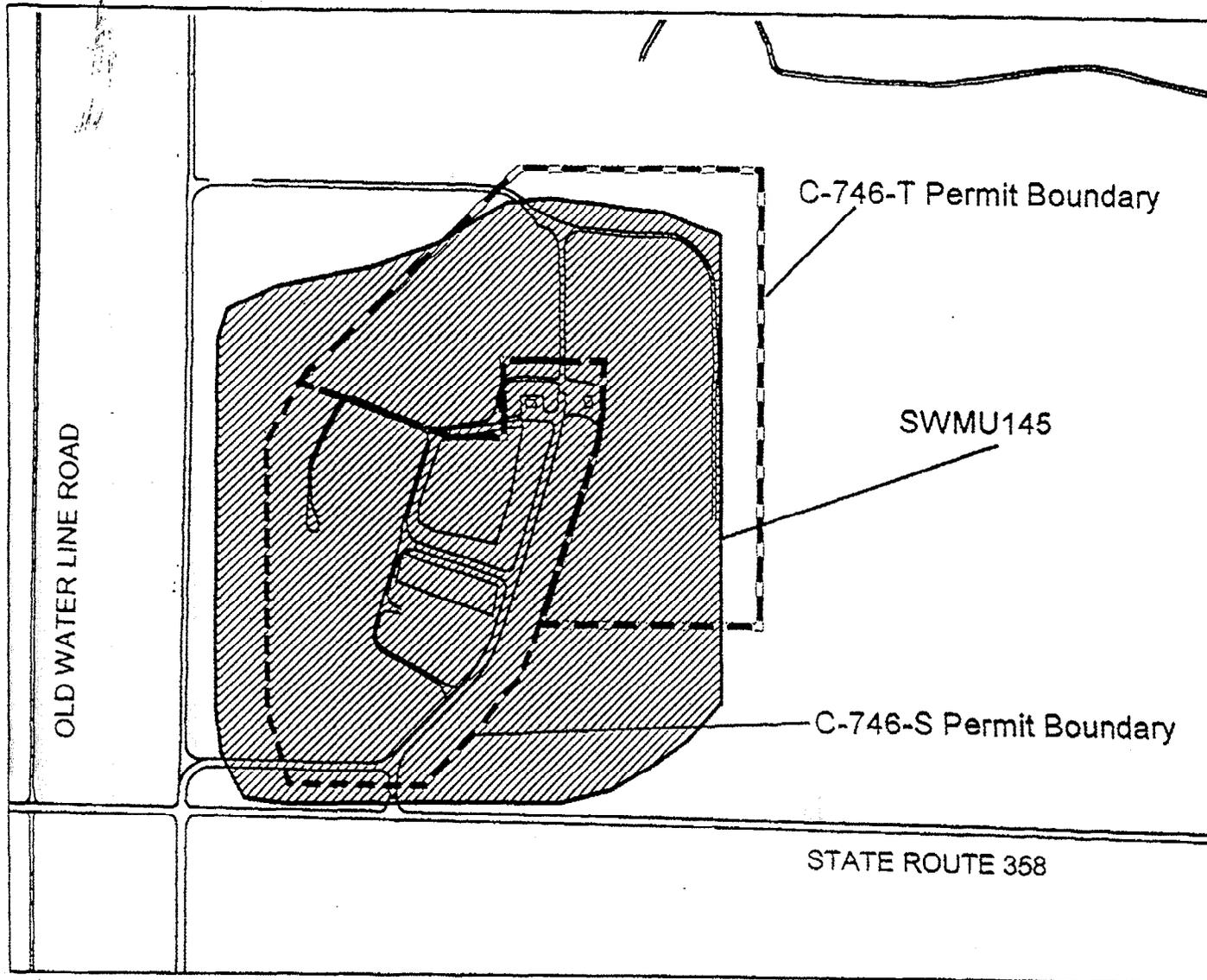


Figure 1. SWMU 145 and C-746-S and T Permit Boundaries

TRUE NORTH
PLANT NORTH

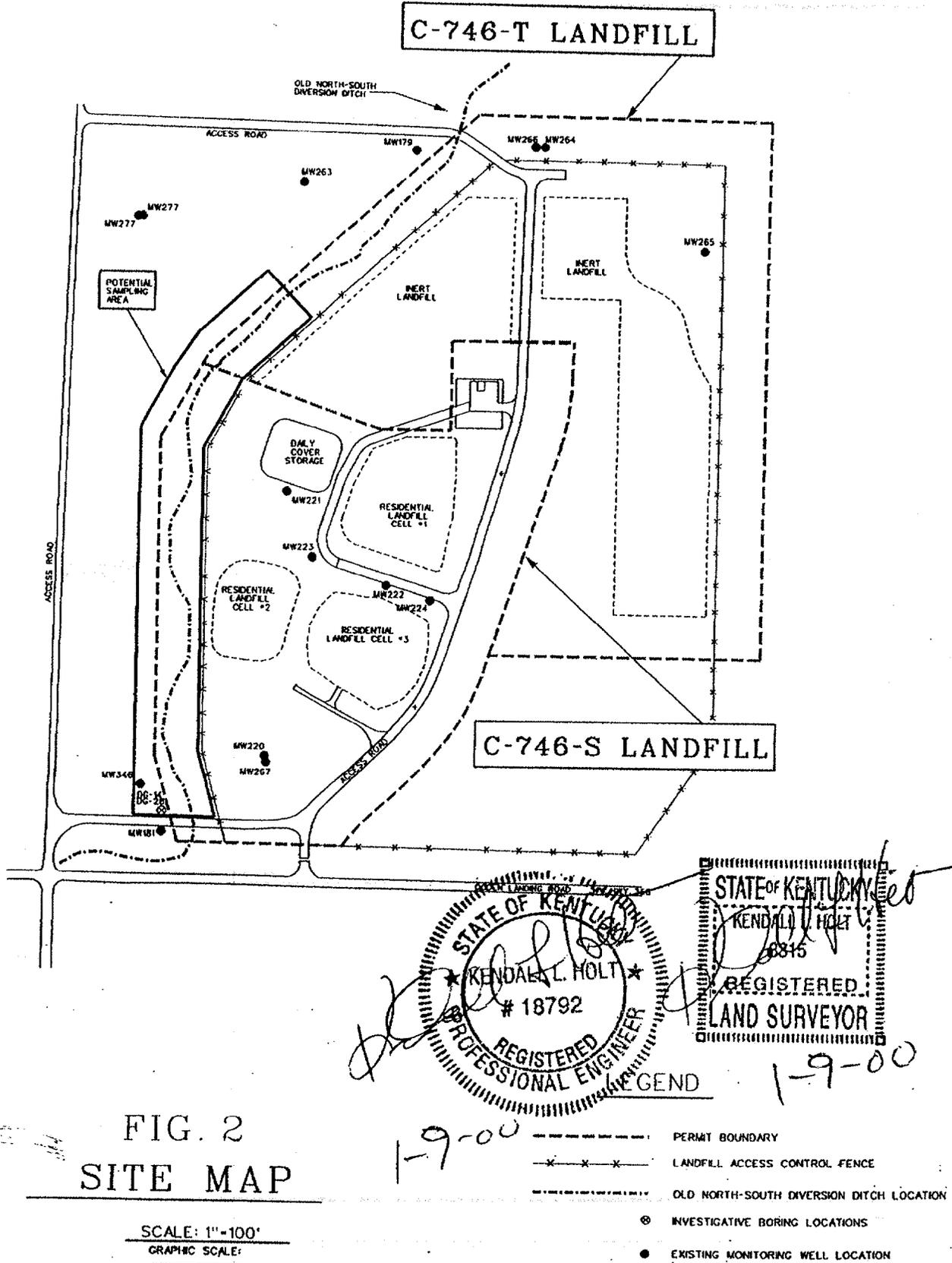
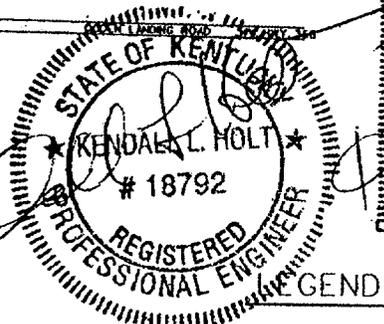
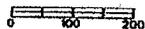


FIG. 2
SITE MAP

SCALE: 1"=100'

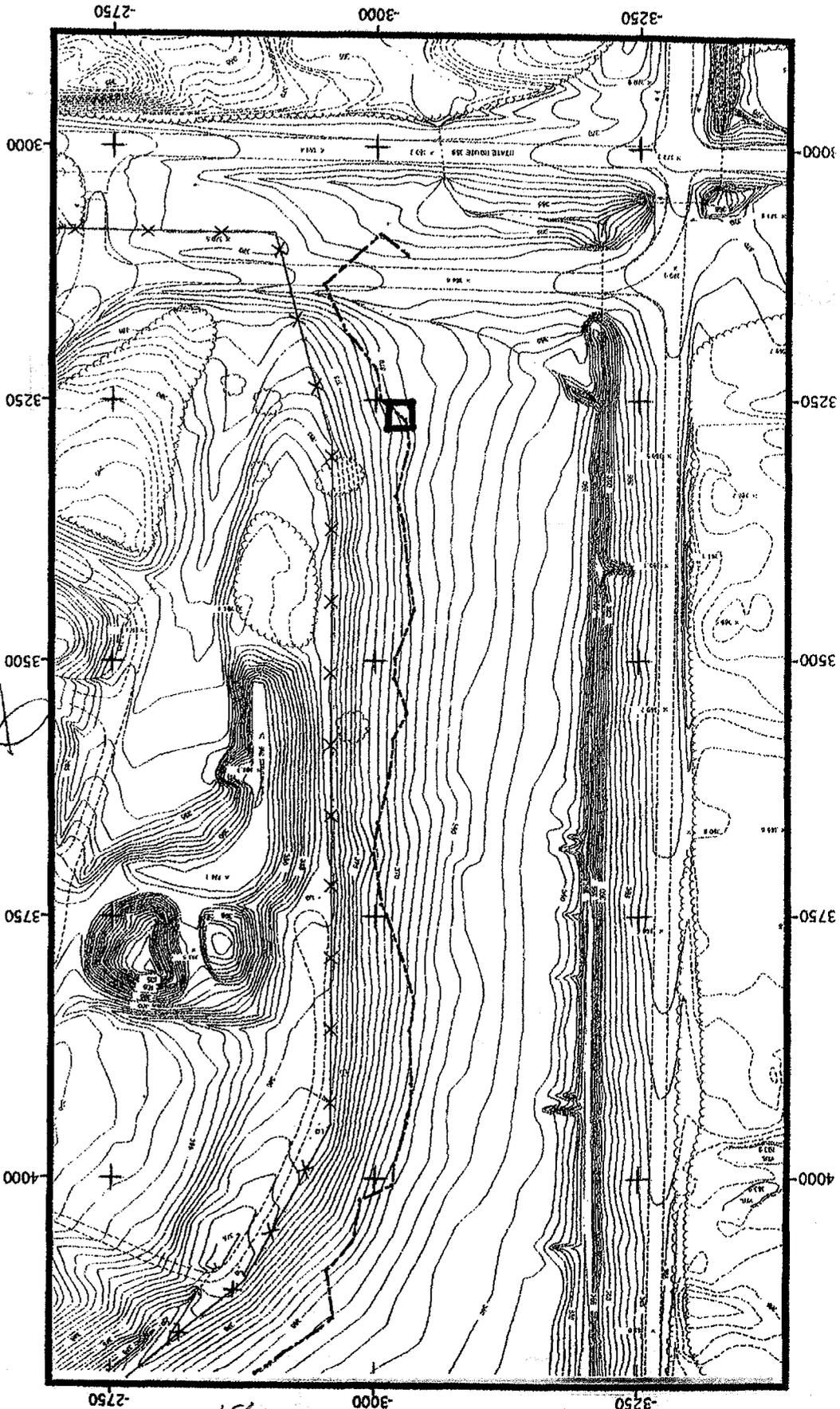
GRAPHIC SCALE:



1-9-00

1-9-00

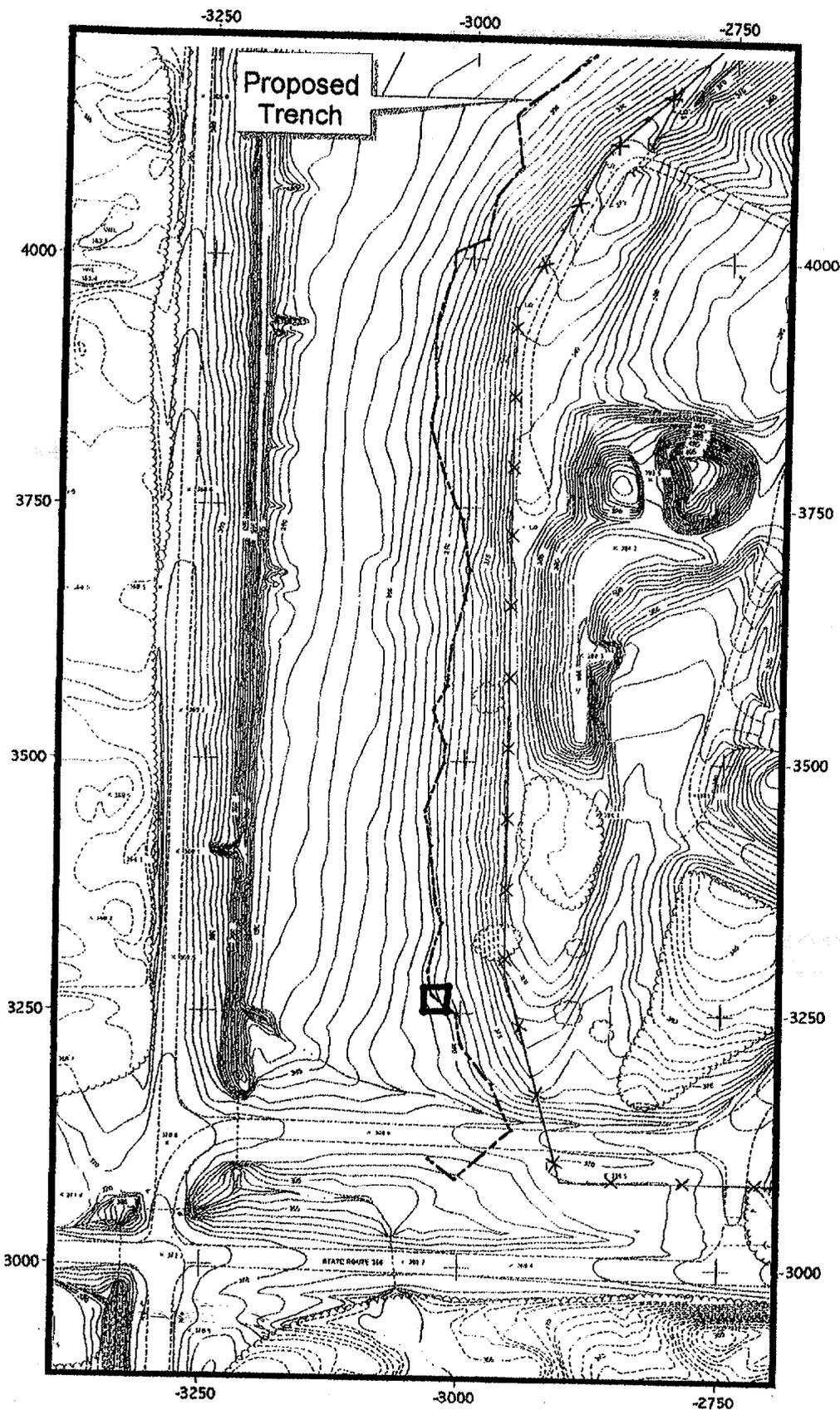
Figure 3. Flowline of the Old North/South Diversion Ditch at the Paducah Gaseous Diffusion Plant



NO. DATE	DESCRIPTION	BY	CHKD.
0	REV. 02/17/95		
U.S. DEPARTMENT OF ENERGY			
DOE OAK RIDGE OPERATIONS			
ENVIRONMENTAL MANAGEMENT - MAINTENANCE & RESTORATION			
BECKMAN, JACOBS COMPANY, L.P.C.			
OAK RIDGE, TENNESSEE			
Flowline of the Old North/South			
Diversion Ditch at the			
Paducah Gaseous Diffusion Plant			
JOB NO.	JOB CONTRACT NO.	JOB PURPOSE	
23960	DM-403-98022700	PAWELSKI, JARR	
CLIENT NO.	PLANT NO.	PLANT NAME	
0-148-B AREA		PODP	
DATE	BY	CHKD.	
02/17/95			
CSX148B002			
0			

REGISTERED PROFESSIONAL ENGINEER
 STATE OF KENTUCKY
 #27982
 KENDALL HOLT
 LAND SURVEYOR
 REGISTERED
 #8375
 KENDALL HOLT
 STATE OF KENTUCKY
 PLANT NORTH
 20
 PLANT NORTH
 1-9-02
 1-9-02

- ~ Previous Flowline
- Surveyed Points
- ▭ Radiologically Marked Area
- ~ 5 Foot Contours
- ~ 1 Foot Contours
- ~ Flowlines
- ~ Roads
- ~ Treelines



- Previous Flowline of N/S Div. Ditch
- Surveyed Points
- Radiologically Marked Area
- 5 Foot Contours
- 1 Foot Contours
- Flowlines
- Roads
- Treelines

STATE OF KENTUCKY
 KENDALL L. HOLT
 3315
 REGISTERED
 LAND SURVEYOR
 1-9-00

STATE OF KENTUCKY
 KENDALL L. HOLT
 18792
 REGISTERED
 PROFESSIONAL ENGINEER
 1-9-00

NO.	DATE	DESCRIPTION	DRAWN BY	DATE	BY	PROJ. NO.
1	01/00	For Permit Modification				
SCALE 1:250						
U.S. DEPARTMENT OF ENERGY DOE OAK RIDGE OPERATIONS ENVIRONMENTAL MANAGEMENT - MANAGEMENT & INTERACTION						
HECHTEL JACOBS COMPANY LLC OAK RIDGE, TENNESSEE			TETRA TECH, INC. OAK RIDGE, TENNESSEE			
Old North-South Diversion Ditch Proposed Trench Locations Topographic Site Plan						
JOB NO.	23960	DOB (CONTRACT NO.)	DE-AC05-98OR22700	OLD FAS/NAME	PLANTS 1C2-APR	
CLASS NO.	U	WDO NO.	C-746-W AREA	EGDP	REV. 01	
HECHTEL JACOBS	C58C746B08D03		1			

Figure 4

20

DIVERSION STRUCTURE

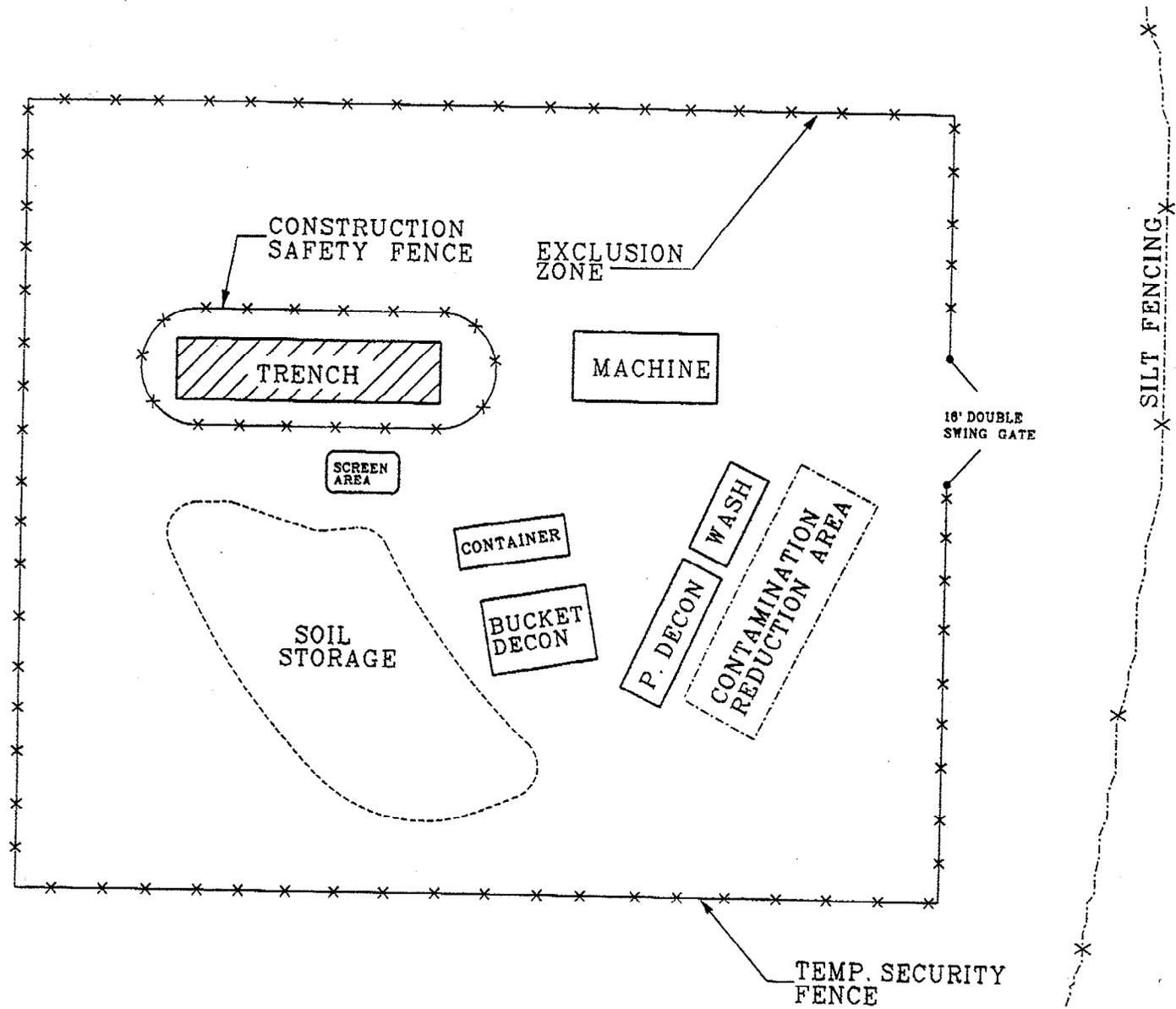


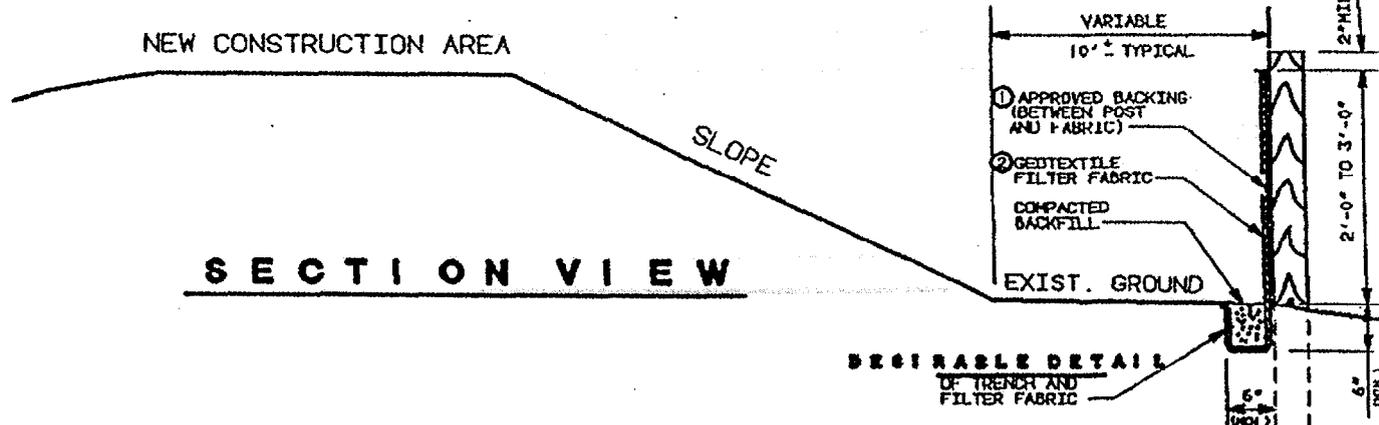
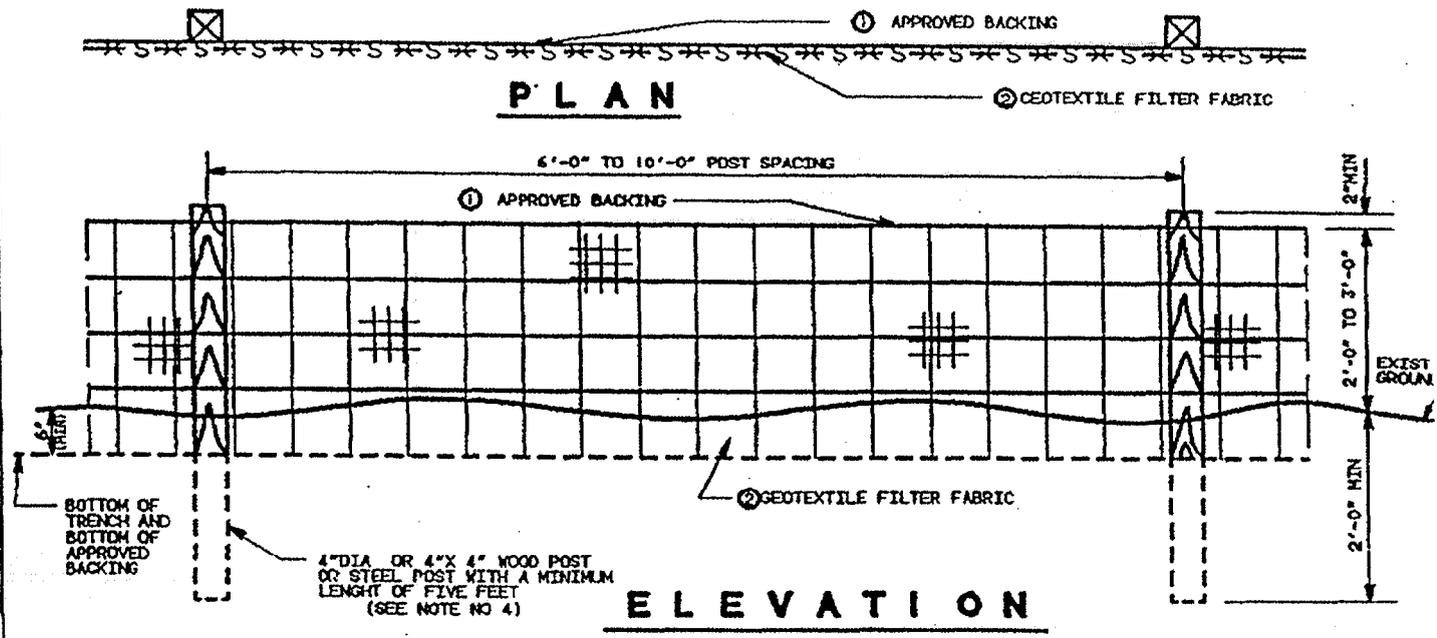
FIG. 5
CONCEPTUAL WORK AREA

ENGINEERING STANDARD

OAK RIDGE, TENNESSEE - PADUCAH, KENTUCKY

NUMBER	ES-7.16-1
DATE	10-3-88
REVISED	
PAGE	1 OF 1

TEMPORARY SILT FENCE



NOTES

- ① GEOTEXTILE FILTER FABRIC SHALL HAVE APPROVED BACKING SUCH AS WIRE MESH FENCE, OR A REINFORCED STRUCTURE AS RECOMMENDED BY THE MANUFACTURER TO SUPPORT THE FILTER FABRIC. WIRE FENCE SHALL BE LIVESTOCK TYPE WIRE, AT LEAST 14-GAGE, A MINIMUM OF 36 INCHES IN HEIGHT, AND HAVE A MAXIMUM SPACING OF 6 INCHES.
- ② GEOTEXTILE FILTER FABRIC SHALL MEET THE REQUIREMENTS OF FABRIC MANUFACTURED FOR THE SPECIFIC PURPOSE OF SILT CONTROL.
- ③ ACCEPTABLE SILT FENCE FABRICS INCLUDE AMOCO SILTSTOP, MIRAFI 100X AND TREVIRA 1115.
- ④ A PREASSEMBLED SILT FENCE MEETING THE REQUIREMENTS OF THIS DRAWING IS ACCEPTABLE IN LIEU OF A FIELD CONSTRUCTED SILT FENCE.
- ⑤ SILT FENCE SHALL BE MAINTAINED IN A SATISFACTORY CONDITION FOR THE DURATION OF THE PROJECT.

EROSION CONTROL PLAN LEGEND: $\rightarrow S \leftarrow S \rightarrow S \leftarrow$ (TEMP. SILT FENCE)

APPROVED BY

[Signature] Figure 6

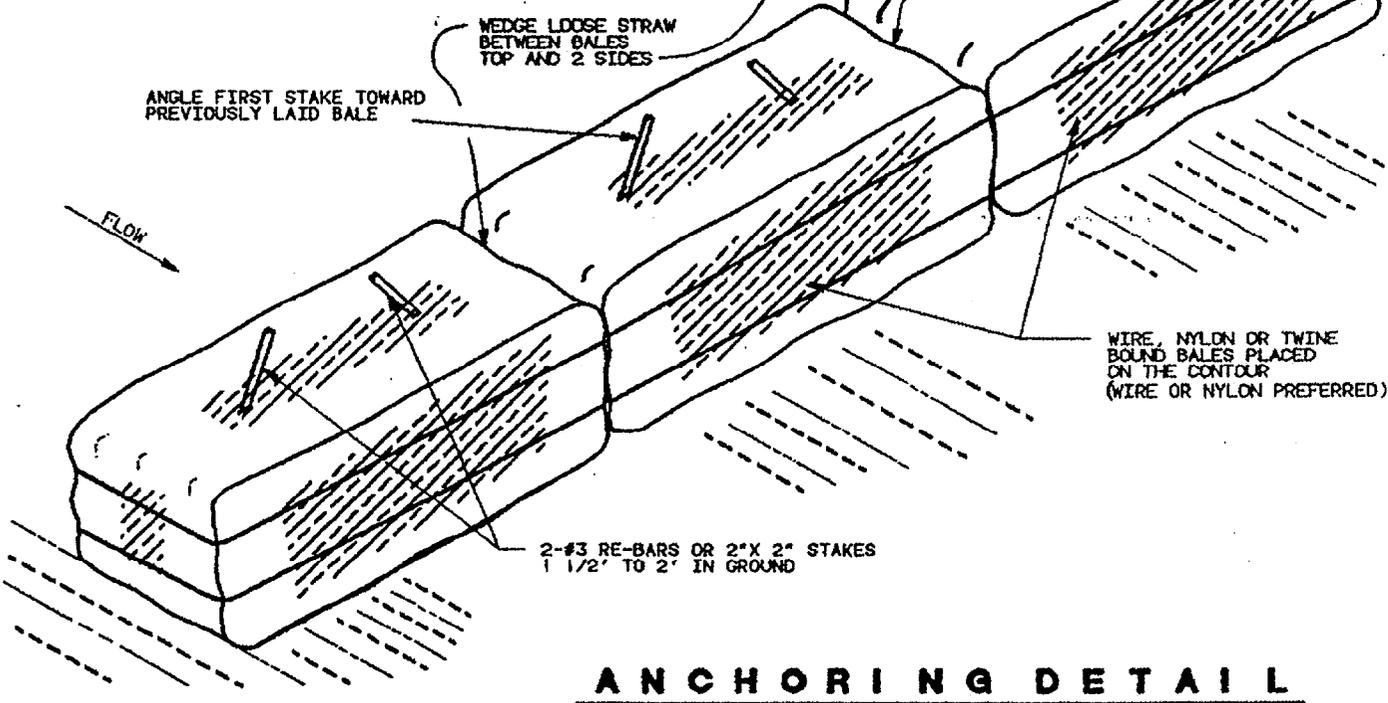
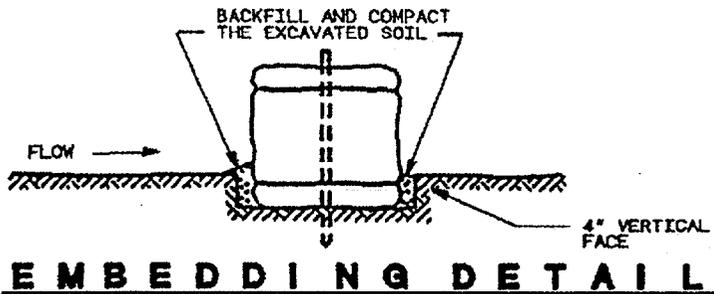
NUMBER
ES-7.16-

ENGINEERING STANDARD

OAK RIDGE, TENNESSEE - PADUCAH, KENTUCKY

NUMBER	ES-7.16-2
DATE	10-3-88
REVISED	
PAGE	1 OF 1

STRAW BALE BARRIERS



CONSTRUCTION SPECIFICATIONS

- 1 BALES SHALL BE PLACED IN A ROW WITH ENDS TIGHTLY ABUTTING ADJACENT BALES.
- 2 EACH BALE SHALL BE EMBEDDED IN THE SOIL A MINIMUM OF 4".
- 3 BALES SHALL BE SECURELY ANCHORED IN PLACE BY STAKES OR RE-BARS DRIVEN THROUGH THE BALES, THE FIRST STAKE IN EACH BALE SHALL BE ANGLED TOWARD PREVIOUSLY LAID BALE TO FORCE BALES TOGETHER.
- 4 TRENCH ON EACH SIDE OF BALES SHALL BE BACKFILLED AND COMPACTED WITH THE EXCAVATED SOIL TO PREVENT PIPING.
- 5 INSPECTION SHALL BE FREQUENT AND REPAIR OR REPLACEMENT SHALL BE MADE PROMPTLY AS NEEDED.
- 6 BALES SHALL BE REMOVED WHEN THEY HAVE SERVED THEIR USEFULNESS SO AS NOT TO BLOCK OR IMPEDE STORM FLOW OR DRAINAGE.

STANDARD SYMBOL _____ SBB _____

APPROVED BY

W. E. Weather Figure 7

NUMBER
ES-7.16-2

PROFESSIONAL ENGINEER'S CERTIFICATION

Document Identification: Paducah Gaseous Diffusion Plant
C-746-T Inert Landfill
Minor Modification
Permit No. 073-00015

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

Prepared under the supervision of, and approved by:



Christopher J. Marshall
Bechtel Jacobs Company LLC
Senior Engineer

January 10, 2000
Date Signed



COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

March 14, 2002

Mr. Don Seaborg, Site Manager
U.S. Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001-1410

cc: T. Wheeler
C. Jones
M. Gage
L. Young
J. Young
T. Brindley EDM
B. Phillips SAIC
B. Clayton SAIC/GEO
J. Ballard SAIC/GEO
R. Miller GEO
D. Hutcheson LAN/C
J. Farrell

CERTIFIED MAIL #7000 1670 0000 7828 1256

RE: Paducah Gaseous Diffusion Plant 073-00015 (C-746-T) Inert Landfill
Approval of Groundwater Monitoring Plan
Pending Application # 073-00015 LI1 MOGW1
U.S. DOE - Paducah Gaseous Diffusion Plant
Permit Number: 073-00015
McCracken County

Dear Mr. Seaborg:

The Division of Waste Management has approved your *Groundwater Monitoring Plan for the 073-00015 (C-746-T) Inert Landfill, Paducah Gaseous Diffusion Plant, Paducah, Kentucky* (received February 12, 2002).

The groundwater contamination assessment and corrective action provisions of 401 KAR 48:300 remain in effect for this landfill at this time. However, as soon as the appropriate modifications are made to the relevant Hazardous Waste permit, the Solid Waste permit will be reissued in accordance with the modified Hazardous Waste permit. At that time, 401 KAR 48:300 Section 8 will not apply to this facility. Instead, the permittee will be required to perform groundwater contamination assessment and corrective action in accordance with the modified Hazardous Waste permit and 401 KAR 34:060, Section 12.

The revised permit for your landfill is enclosed. You should carefully review the permit and the approved application. In the event that you disagree with the terms of these documents, you must notify this office in writing within thirty (30) days of the receipt of this letter. Unless this permit is modified in accordance with 401 KAR 47:130, you are expected to comply with the terms of all applicable laws,



regulations, the approved application, and the landfill permit. You are advised that you have the right to file petition for an administrative hearing pursuant to KRS 224.10-420(2).

Should you have any questions regarding this matter, please contact R. Todd Hendricks at (502) 564-2225, ext. 270.

Sincerely,



Robert H. Daniell, Director
Division of Waste Management

RHD/RTH/rth

Attachments

- c: Gary Vander Boegh, Landfill Manager
- Mike Welch
- Paducah Regional Office
- Madisonville Regional Office
- West File
- Main File
- Reading File



Kentucky Natural Resources and Environmental Protection Cabinet
 Department for Environmental Protection
 Division of Waste Management

SOLID WASTE DISPOSAL FACILITY PERMIT

Permittee:

U. S. DEPARTMENT OF ENERGY
 Oak Ridge Operations
 Paducah Gaseous Diffusion Plant
 P.O. Box 1410
 Paducah, Kentucky 42002-1410

Facility:

U.S. DEPARTMENT OF ENERGY
PADUCAH GASEOUS DIFFUSION PLANT
 5600 Hobbs Road
 Paducah, Kentucky 42001

The Division of Waste Management hereby grants the above-named facility a permit to engage in the activity specified below. This permit has been issued under the provisions of KRS Chapter 224 and regulations promulgated pursuant thereto and are subject to all conditions and operating limitations contained herein. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet and/or other state and local agencies.

--See Page 1-2

No deviation from the plans and specifications submitted with your application or the conditions specified herein is allowed, unless authorized in writing from the Division of Waste Management. Violation of the terms and conditions specified herein shall render this permit null and void. All rights of inspection by representatives of the Division of Waste Management are reserved. Conformance with all applicable Waste Management Regulations is the responsibility of the permittee. Receipt of the permit fee and bond amount specified below is hereby acknowledged.

PERMIT TYPE:	Operation (Closure Only)	PERMIT NUMBER:	073-00015
TYPE OF ACTIVITY:	Inert Landfill (closure)	FINDS NUMBER:	KY 8890008982
BOND:		COUNTY:	McCracken
INSTRUMENT TYPE:	NA		
INSTRUMENT NUMBER:	NA		
AMOUNT:	NA		
ACRES:			
WASTE DISPOSAL AREA:	10.5 Acres		
PERMIT AREA:	20.1		Issued this 14th day of March 2002
PERMIT FEE:	NA		
EFFECTIVE DATE:	July 3, 1989		
EXPIRATION DATE:	June 11, 2003		

Robert H. Daniell, Director

Robert W. Logan, Commissioner

SOLID WASTE DISPOSAL FACILITY PERMIT - Continued

General Conditions

- 1) The Permittee shall complete closure activities in accordance with the environmental performance standards of 401 KAR 47:030, and the plans and narratives received on January 24, 1985, and the plans and narratives approved February 5, 1985 April 25, 2001, and March 14, 2002.
- 2) No additional waste shall be placed in this landfill.
- 3) The Permittee shall comply with 401 KAR 47:120 Section 1 relating to conditions applicable to all permits.
- 4) The permittee shall maintain the final cover to prevent ponding of water and to provide for positive drainage.
- 5) The Permittee shall use agricultural methods to control vegetative growth to prevent weeds, prevent tree and woody plant growth, and prevent roots from entering the low permeability layer.
- 6) The Permittee shall inspect and maintain, as required, all site diversion ditches after every storm event greater than 0.5-inch.
- 7) The permittee shall provide a notice to the deed as required by 401 KAR 48:060 Section 3.

Groundwater Conditions

- 1) The permittee shall comply with all requirements of 401 KAR 48:300.
- 2) At each approved groundwater monitoring location, the permittee shall monitor quarterly for the complete list of parameters listed in 401 KAR 48:300 Section 11(3), plus the following: Aluminum, Boron, Bromide, Calcium, Cyanide, Eh, Fluoride, Gross Alpha, Gross Beta, Iodide, Iodine-131, Magnesium, Manganese, Molybdenum, Dissolved Oxygen, Potassium, Radium, Rhodium, Strontium-90, Sulfate, Tantalum, Technetium-99, Tritium, Uranium (total). Metals samples shall not be filtered.
- 3) At each approved groundwater monitoring location, the permittee shall monitor annually for PCBs.
- 4) Groundwater and surface water samples shall be taken quarterly and the results submitted to the Cabinet according to the following schedule.

Sample to be Collected During the :Results Due to the Division of Waste Management by:

First Quarter
 Second Quarter
 Third Quarter
 Fourth Quarter

May 30
 August 30
 November 30
 February 28

SOLID WASTE DISPOSAL FACILITY PERMIT - Continued

- 5) Groundwater and surface water samples shall be taken quarterly and the results submitted to the Cabinet according to the following schedule.

Sample to be Collected During the :

Results Due to the Division of Waste Management by:

First Quarter
Second Quarter
Third Quarter
Fourth Quarter

May 30
August 30
November 30
February 28

Attachment 11

Form DEP7087

\$1,500 Check for Permit Application Fee



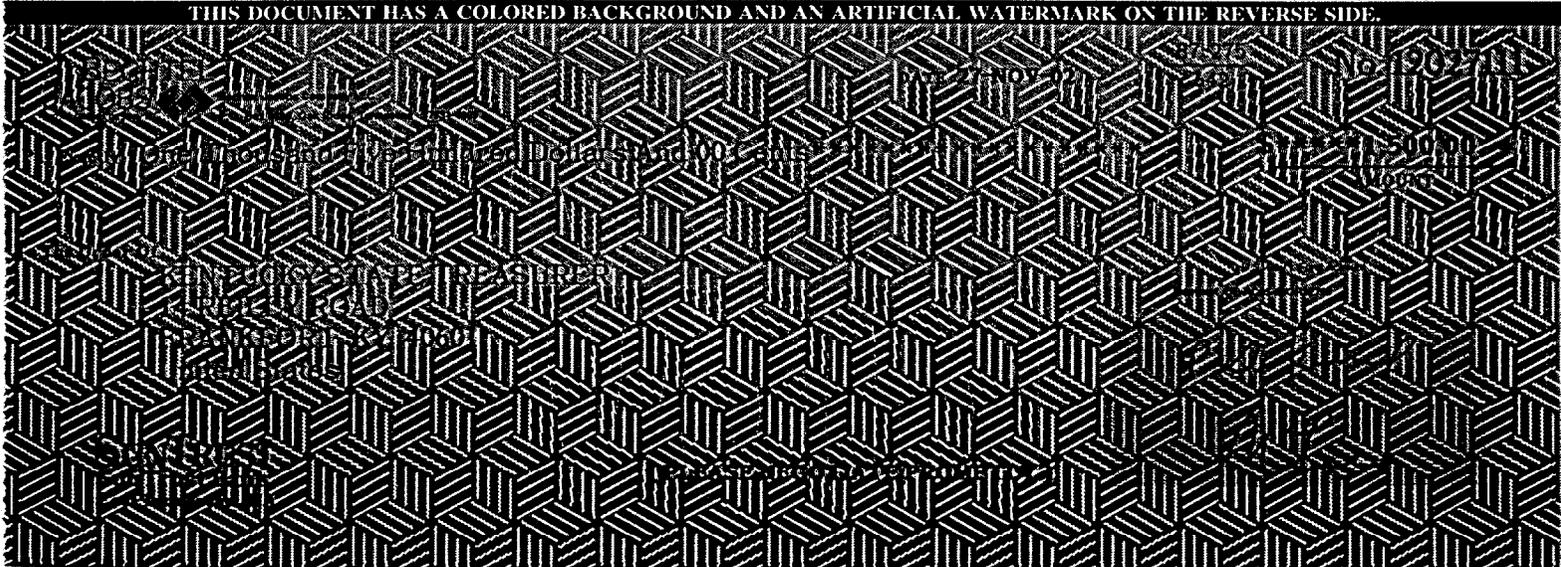
Bechtel Jacobs Company LLC
P.O. Box 4699, Oak Ridge, Tennessee 37831-4699

DATE 7 NOV-02 Check No. 12027111
(PLEASE SETTLE PROMPTLY)

REMITTANCE STATEMENT

PACKING LIST/ INVOICE NO.	OUR ORDER NO.	REL NO.	MATERIAL OR SERVICE	TRANSPORTATION	DISCOUNT	ADJUSTMENTS	NET
20021125	25-NOV-02		INERT LANDFILL		0.00	1,500.00	

THIS DOCUMENT HAS A COLORED BACKGROUND AND AN ARTIFICIAL WATERMARK ON THE REVERSE SIDE.



⑈ 120271113 ⑈ ⑆064202750⑆ 7019004923⑈

**FILE
COPY**

Mr. W. Don Seaborg
Paducah Site Manager
Department of Energy
P.O. Box 1410
Paducah, KY 42002-1410

Subject: C-746-T Inert Landfill Permit (073-00015) Renewal Application for the Department of Energy (DOE), Paducah Gaseous Diffusion Plant (PGDP), Paducah, Kentucky (BJC/PAD-200) McCracken County, Kentucky

Dear Mr. Seaborg:

Bechtel Jacobs Company LLC (BJC) is submitting an application for renewal of a formal permit for the inactive C-746-T Inert Landfill for PGDP. Also attached is a check for \$1500.00, the required application fee.

Prior to submittal to the state, this application requires your notarized signature. Enclosed for your convenience is a draft letter from DOE to Kentucky Division of Waste Management.

Please forward the signed original and three copies of the completed application by December 11, 2002, to the following:

Department of Environmental Protection
Solid Waste Branch
Division of Waste Management
14 Reilly Road
Frankfort, Kentucky 40601

If you have questions or comments or require additional information, please contact J. D. Young at 5077 or D. R. Guminski at 5051.

Sincerely,



Gordon L. Dover
Paducah Manager of Projects

Mr. W. Don Seaborg

Page 2

December 4, 2002

GLD:bar

LTR-PAD/ESH-BR-02-0048

Enclosures: 1. Subject documents
2. Suggested text

c: D. L. Ashburn, LAN-CON
K. W. Barber
B. Bell, WESKEM
S. J. Davis
D. R. Guminski/ J. D. Young
M. S. Hayden
G. Vander Boegh, WESKEM
G. E. VanSickle
P. W. Willison

c/enc 1: Environmental Information Center

c/enc 1 and 2: File-EMEF-DMC-PAD-RC

Date

Mr. Robert H. Daniel, Director
Department for Environmental Protection
Kentucky Division of Waste Management
14 Reilly Road
Frankfort, Kentucky 40601

Dear Mr. Daniell:

**C-746-T INERT LANDFILL PERMIT (073-00015) RENEWAL APPLICATION FOR THE U.S.
DEPARTMENT OF ENERGY, PADUCAH SITE, PADUCAH, KENTUCKY**

Enclosed is an application for renewal of the inactive C-746-T Inert Landfill Permit (073-00015) and a check for \$1500.00.

If you have any questions or desire further information, please contact W. David Tidwell at (270) 441-6807.

Sincerely,

W. Don Seaborg, Site Manager
Paducah Site Office

Enclosure

cc w/enclosure:
D. F. Feireisel
W. D. Tidwell

Natural Resources and Environmental Protection Cabinet

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY ROAD
FRANKFORT, KENTUCKY 40601
TELEPHONE NUMBER (502) 564-6716

APPLICATION FOR RENEWAL OF A FORMAL PERMIT DEP 7095 (3/92)

GENERAL INSTRUCTIONS

1. **USE OF THIS APPLICATION** - This form is to be used to apply for renewal of a formal permit that has been issued by the Division of Waste Management.
2. **PREPARATION ASSISTANCE** - Questions regarding this application form should be directed in writing to the Division of Waste Management, Solid Waste Branch, at the address provided above, or by calling (502) 564-6716.
3. **SUBMISSION** - Submit the original and three (3) copies of the completed application to the Division of Waste Management at the address listed above. If an item does not appear to be applicable to your application, write "N/A" for not applicable. The Cabinet may require additional information upon review of this application.
4. **FILING FEES** - Applicants, except publicly owned facilities, must submit filing fees at the time of application submittal in accordance with regulatory and statutory requirements.
5. **LAWS AND REGULATIONS** - Applicants are expected to understand and comply with all laws and regulations applicable to the proposed facility.

APPLICATION FOR RENEWAL OF A FORMAL PERMIT

Permit Number 073-0015

Permit Expiration Date June 11, 2003

County McCracken

Fee Submitted \$1500

Method of Payment: Check Money Order X Cashier's Check Other:

Exempt (Publicly Owned Facility)

Date November 27, 2002

Number of Years for which Renewal is Requested 5

1. Permittee U.S. Department of Energy

Address Paducah Gaseous Diffusion Plant PO Box 1410

City Paducah State Kentucky Zip Code 42001

Phone No. (270) 441-6800

Contact Person/Process Agent W. David Tidwell

2. Facility Name U. S. Department of Energy

Address Paducah Gaseous Diffusion Plant PO Box 1410

City Paducah State Kentucky Zip Code 42001

Phone No. (270) 441-6807

Contact Person/Process Agent W. David Tidwell

3. Facility mailing address (if different from above)

Address

City State Zip Code

4. Certified Manager G. S. Vander Boegh
Address Paducah Gaseous Diffusion Plant PO Box 1410
City Paducah State Kentucky Zip Code 42001
Phone No. (270) 441-5214
(Provide attachment if more than one)

5. Certified Operator K. G. Stone
Address Paducah Gaseous Diffusion Plant PO Box 1410
City Paducah State Kentucky Zip Code 42001
Phone No. (270) 441-5143
(Provide attachments if more than one)

6. Corrections to this application requested by the Cabinet are to be accepted from:
Name W. David Tidwell
Address Paducah Gaseous Diffusion Plant PO Box 1410
City Paducah State Kentucky Zip Code 42001
Phone No. (270) 441-6807

7. Permit Type:
- Residential Landfill Facility
 - Contained Landfill Facility
 - Construction/Demolition Debris Landfill Facility
 - Residual Landfill Facility
 - Special Waste Landfill Facility
 - Special Waste Landfarm Facility
 - Special Waste Composting Facility
 - Other. Explain Inert

8. Financial Assurance Information.

Current amount of Financial Assurance: \$ _____

Check type of Financial Assurance Mechanism(s) on file:

	Amount	Acreage
_____ Letter of Credit	\$ _____	_____
_____ Surety Bond	\$ _____	_____
_____ Certificate of Deposit	\$ _____	_____
_____ Escrow Agreement	\$ _____	_____

Other. Explain: Not Applicable per KRS 224.40-110 and 40 CFR 258.70

\$ _____

Attach to this application a current worst-case closure and post-closure maintenance cost estimate.

- 9. Complete the attached draft public notice form. A public notice is required for all renewal applications.
- 10. Complete and attach a Past Performance Information statement, form DEP 7094J or DEP 7087.
- 11. Provide the following information concerning the current approved permit:

Permitted Acreage 20.1

Permitted Fill Acreage 10.5

Facility currently accepting waste? yes no

If yes, anticipated closure date: _____

Remaining air space as of last annual survey 0

(If remaining air space is calculated by any method other than an annual survey, describe method used) _____

Not Applicable (NA)

Current Average Fill Rate: NA Tons Per Day NA Days Per Week.

An individual, by executing this document on behalf of a corporation or other entity, certifies that she or he is duly authorized to act on behalf of the corporation or other entity and provide the information contained herein.

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

W. Don Seaborg
Print Name

Paducah Site Manager
Title

Signature

Date

STATE OF Kentucky

COUNTY OF McCracken

Subscribed and sworn to before me by _____ this the
_____ day of _____, 2002.

NOTARY PUBLIC

My Commission Expires: _____

Notary Public's Name _____

Address _____

City _____ State _____ Zip Code _____

Attachment 1
Form DEP7095

Attachment 1

PUBLIC NOTICE

PURSUANT TO APPLICATION NO. _____ (For Department Use Only)

The Natural Resources and Environmental Protection Cabinet, Division of Waste Management has received a permit renewal application for a Closed Inert Landfill from U. S. Department of Energy
(Facility Type) (Applicant)

The renewal application proposes to extend the expiration date of Permit No. 073-00015 to June 11, 2013
(Date)

The site or facility is located in McCracken County, Kentucky.

The name and address of the applicant for the permit renewal is:

U. S. Department of Energy

Paducah Gaseous Diffusion Plant P.O. Box 1410

Paducah Kentucky 42001

Contact Person: W. David Tidwell

Any person may submit comments on whether the renewal of the permit should be approved. Written comments may be submitted for a period of thirty (30) days following the date of publication of this notice. Written comments must be addressed to:

Director
Division of Waste Management
14 Reilly Road
Frankfort, Kentucky 40601

Please refer to Permit No. 073-00015 in any comments submitted on this renewal application.



NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
SOLID WASTE BRANCH
14 REILLY ROAD
FRANKFORT, KENTUCKY 40601-1190
(502) 564-6716

DISCLOSURE INFORMATION

Required by Kentucky Revised Statute 224.40-330

DEP 7087
9/99

TYPE OR PRINT IN INDELIBLE INK

Any person who knowingly provides false information in any document filed or required to be maintained under KRS Chapter 224 shall be guilty of a Class D felony and upon conviction thereof shall be punished by a fine not to exceed twenty-five thousand dollars (\$25,000), or by imprisonment for a term of not less than one year and not more than five years, or by both fine and imprisonment.

The NREPC does not discriminate on the basis of race, color, national origin, sex, religion, age, or disability in the employment or provision of services. Upon request, the NREPC will provide reasonable accommodations including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in programs and activities. To request an alternate format for this registration, contact the Solid Waste Branch at (502) 564-6716.

Section I
APPLICANT DISCLOSURE STATEMENT

1. Applicant's complete name (print) US. Department of Energy
(Applicant is the corporation, business, person, or government agency that owns or operates the facility.)
2. State of Incorporation or Application Paducah, Kentucky 42001
3. Mailing Address Paducah Gaseous Diffusion Plant PO Box 1410
4. City Paducah 5. State KY 6. Zip 42001
7. Phone Number (270) 441-6807 8. Fax Number (270) 441-6801
9. Submit a description of the applicant's and the applicant's key personnel's experience in managing solid waste including any past or present permits or licenses held by the applicant or the applicant's key personnel within the previous five (5) years. **LABEL AS ATTACHMENT 1.** If not applicable, check here .
10. Submit a description of the applicant's and the applicant's key personnel's experience in managing hazardous waste including any past or present permits or licenses held by the applicant within the previous five (5) years. **LABEL AS ATTACHMENT 2.** If not applicable, check here .
11. Submit a description of all civil and administrative complaints against the applicant and its key personnel for the violation of any state or federal environmental protection law that have resulted in a fine or penalty of more than one thousand dollars (\$1,000) within five (5) years before the date of the submission of this application. If not applicable, check here .
- If applicable, each description shall include the following: the style of the complaint, the case, file, or other identifying number, the identity of all parties named in the complaint, the forum in which the complaint was filed, the identity of each state or federal agency involved with or named in the complaint, the amount of the fine or penalty, whether the fine or penalty has been paid, the identity and description of each law or regulation violated or alleged to have been violated and upon which the fine or penalty is based; and state whether the fine was the result of settlement or agreed order, an administrative order, or a court judgment. If litigation is ongoing, describe any orders or judgments entered and describe the current status of the litigation. **LABEL AS ATTACHMENT 3.**
12. Submit a description of all civil and administrative complaints against the applicant and its key personnel for the violation of any state or federal environmental protection law that allege an act or omission that constitutes a violation of a state or federal environmental protection law and that presented a substantial endangerment to the public health or the environment. If not applicable, check here .

APPLICANT DISCLOSURE STATEMENT continued

If applicable, each description shall include the following: the style of the complaint, the case, file, or other identifying number, the identities of each party to the complaint, the forum in which the complaint was brought, the identity of each state or federal agency involved with or named in the complaint, an explanation of the alleged act or omission, the identity and a description of the environmental protection law or regulation alleged to have been violated, an explanation of all corrective action measures performed to correct or mitigate the alleged violation, and a description of the alleged endangerment to public health or to the environment. State whether the issues raised in the complaint have been resolved and whether the resolution was the result of a settlement or agreement, an administrative order, or a court order of judgment. If litigation on the allegation is ongoing, describe any orders or judgments entered and describe the present status of the litigation. **LABEL AS ATTACHMENT 4.**

13. Submit a description of all pending criminal complaints alleging the violation of any state or federal environmental protection law that have been filed against the applicant and its key personnel within five (5) years before the date of submission of this application. If not applicable, check here .

If applicable, each description shall include the following: the style of the case and the identifying case number, the date the complaint was filed, the forum in which the complaint is pending, the identity of the law or regulation allegedly violated and a narrative description of the law or regulation, whether the alleged violation is a misdemeanor or a felony, and all actions and pleadings which have occurred or have been filed in association with the complaint. **LABEL AS ATTACHMENT 5.**

14. Submit a description of all judgments of criminal conviction entered against the applicant and its key personnel within five (5) years before the date of submission of this application for the violation of any state or federal environmental protection law. If not applicable, check here .

If applicable, each description shall include the following: style, case number, forum in which the complaint was entered, date of judgement, sentence imposed, the identity and a description of each law the applicant was convicted of violating, whether the conviction was the result of a plea agreement or a trial, and, if currently on appeal, the status of the appeal. **LABEL AS ATTACHMENT 6.**

15. Submit a description of all judgements of criminal conviction of a felony under the laws of any state or the United States that are entered against the applicant and its key personnel within five (5) years before the date of submission of this application. If not applicable, check here .

If applicable, each description shall include the following: style, case number, forum in which the complaint was entered, date of judgement, sentence imposed, the identity and a description of each law the applicant was convicted of violating, whether the conviction was the result of a plea agreement or a trial, and, if currently on appeal, the status of the appeal. **LABEL AS ATTACHMENT 7.**

16. Submit a list of the names and addresses of all waste sites or facilities and solid waste management facilities in which the applicant or any of its key personnel has a financial or equitable interest, or is an officer, director, or manager. **LABEL AS ATTACHMENT 8.** If not applicable, check here .

DEP 7087

9/99

2

APPLICANT DISCLOSURE STATEMENT continued

17. Provide the names of all key personnel. KRS 224.01-010(44) defines key personnel as an officer, partner, director, manager, or shareholder of five percent (5%) or more of stock or financial interest in a corporation, partnership, or association or parent, subsidiary, or affiliate corporation and its officers, directors, or shareholders of five percent (5%) or more of stock or financial interest. Attach additional pages if necessary and LABEL AS ATTACHMENT 9. A completed Key Personnel Disclosure Statement (Section II) must be submitted with the application for each individual listed below.

Sole proprietors and government agencies are not required to submit key personnel disclosure statements. If not applicable, check here .

Key Person	Title/Position
a. _____	_____
b. _____	_____
c. _____	_____
d. _____	_____
e. _____	_____

18. Pursuant to 401 KAR 47:160, Section 6(4), "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for such violations."

Name of key person (print) W. Don Seaborg Title Paducah Site Manager

Signature _____

Subscribed and sworn to before me this _____ day of _____, Year _____

Notary Public Signature _____

State of _____ County of _____ My commission expires _____

Disclosure information required by Kentucky Revised Statute 224.40-330 Form DEP
7087

Attachment 1.

DOE and DOE's key personnel have managed solid waste at this site since initiation of activities in 1951. The plant is currently operating a contained landfill permit # 073-00045. That permit has been maintained at the site for more than the last five years. This application is associated with the closed inert landfill permit #073-00015 which was operated at the site from 1985 through 1992. The plant also operated a residential landfill, permit # 073-00014 from the early 1980s through 1990.

Attachment 2.

DOE and DOE's key personnel have managed hazardous waste since the initiation of operations in 1951. The site has a RCRA/HSWA permit #KY8-890008982. That permit details the proper treatment, storage, and disposal of hazardous waste. A large technical staff is maintained on site with expertise in the RCRA/HSWA/TSCA areas.

Attachment 3

Not Applicable

Attachment 4

DOE Paducah Gaseous Diffusion Plant received an administrative complaint in 2001, File No. DWM-31434-030. This complaint alleges that various violations with regards to hazardous waste management in DOE material storage areas and violations of certain conditions of DOE's hazardous waste management permit issued by the Kentucky Natural Resources and Environmental Protection Cabinet. The alleged violations are pending resolution, although DOE has initiated corrective action as described in the compliant A copy of the complaint is attached as attachment 10.

Attachment 10

Form DEP7087

Administrative Complaint

File No. DWM -31434-30

FILED

OCT 26 2001

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND
ENVIRONMENTAL PROTECTION CABINET
FILE NO. DWM-31434-030

Office of Administrative Hearings

NATURAL RESOURCES AND
ENVIRONMENTAL PROTECTION CABINET

PETITIONER

VS.

ADMINISTRATIVE COMPLAINT

UNITED STATES DEPARTMENT OF ENERGY

RESPONDENT

SERVE: Stephen B. Pence, United States Attorney
Western District of Kentucky
Bank of Louisville Building, 10th Floor
510 West Broadway
Louisville, Kentucky 40202

John Ashcroft
Attorney General of the United States
5111 Main Justice Building
10th Street and Constitution Avenue NW
Washington, D.C. 20530

United States Department of Energy
Paducah Site Office
Attn: Don Seaborg
P.O. Box 1410
Paducah, Kentucky 42001

1. The Natural Resources and Environmental Protection Cabinet (hereinafter the "Cabinet") is charged with the statutory duty of enforcing the statutes and administrative regulations of the Commonwealth of Kentucky relating to waste management as provided for under Kentucky Revised Statutes (KRS) Chapter 224 and the regulations promulgated thereunder.

2. The Respondent is the United States Department of Energy (hereinafter "DOE"). DOE is the owner of the Paducah Gaseous Diffusion Plant (hereinafter "PGDP"), a uranium enrichment facility, located near Paducah, Kentucky in McCracken county. PGDP is a "facility" as that term is defined in 401 KAR 30:010, Section 1, (73).

3. DOE is a "person" as that term is defined by KRS 224.01-010(17) and 401 KAR 30:010, Section 1, (153).

4. On July 16, 1991, the Cabinet issued a Hazardous Waste Permit to DOE for the operation of treatment and storage units and post-closure care for a disposal unit and for conducting corrective action at all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at the facility.

5. The United States Enrichment Corporation ("USEC") has, since July 1, 1993, leased, and operated portions of the PGDP, subject to the lease provisions between DOE and USEC.

6. On or about December 31, 1996, the lease with USEC was modified deleting certain areas from those previously leased by USEC. DOE refers to the areas deleted from the USEC lease as DOE Material Storage Areas (DMSAs). As of December 7, 2000, DOE has identified one hundred sixty (160) DMSAs.

7. On or about April 4, 2000, pursuant to 42 U.S.C.A. 6907, the U.S. Environmental Protection Agency (EPA) issued a request for information to DOE with respect to the DMSAs.

8. On or about May 17, 2000, DOE submitted a response to EPA's request for information.

9. Beginning on or about June 12, 2000, the Cabinet conducted a series of inspections of the DMSAs.

DMSA VIOLATIONS

10. On September 5, 2000, the Cabinet issued a Notice of Violation (NOV) to DOE based on the Cabinet's evaluation of information contained in the response to EPA's information request and based on inspections of the DMSAs conducted between June 12 and August 9, 2000. DOE violated KRS 224.46-520 and 401 KAR 32:010 by failing to conduct a waste determination for wastes generated at the facility and managed in the DMSAs; violated Part IV. B. of the hazardous waste permit and 401 KAR 34:060 by failing to notify the Cabinet of newly discovered SWMUs and AOCs; and violated KRS 224.46-520, 401KAR 38:010, 401 KAR 32:030, Section 5 and Part II of the permit with respect to hazardous and or mixed wastes stored in the C-400-04 building.

11. On July 31, 2001, the Cabinet issued a NOV to DOE for violating KRS 224.46-520, 401KAR 38:010, 401 KAR 32:030, Section 5 and Part II of the permit with respect to hazardous and or mixed wastes stored in the C-331-10 DMSA.

12. On October 9, 2001, the Cabinet issued a NOV to DOE for violating KRS 224.46-520, 401KAR 38:010, 401 KAR 32:030, Section 5 and Part II of the permit with respect to hazardous and or mixed wastes stored in the C-335-05, C-331-15 and C-333-31 DMSAs.

13. To date, DOE has not corrected the September 5, 2000, July 31, 2001 and October 9, 2001 NOV's.

OTHER VIOLATIONS

14. On September 28, 1999, the Cabinet issued a NOV to DOE for violation of certain conditions of DOE's hazardous waste permit (failure to report planned changes in SWMU 194). DOE completed the required remedial measures on or about October 1, 1999.

15. On January 14, 2000, the Cabinet issued a NOV to DOE for violation of certain conditions of DOE's hazardous waste permit (failure to maintain systems of treatment and control and failure to take reasonable steps to minimize releases on the northern boundary of SWMUs 12, 14, and 15). DOE completed the required remedial measures on or about March 21, 2000.

16. On May 23, 2000 the Cabinet issued a NOV to DOE for violation of certain conditions of DOE's hazardous waste permit (failure to analyze leachate from the C-404 landfill for all parameters). DOE completed the required remedial measures on or about July 7, 2000.

17. On August 8, 2000 the Cabinet issued a NOV for a violation of 401 KAR 34:180, Section 8 in the C-752-A storage facility.

WHEREFORE, the Cabinet respectfully requests the following relief:

1. That the Respondent DOE be found to have failed to make a waste determination on wastes generated and managed in the one hundred sixty (160) DMSAs in violation of KRS 224.46-520 and 401 KAR 32:010.

2. That the Respondent DOE be found to have failed to notify the Cabinet of newly discovered solid waste management units in violation of 401 KAR 34:060 and Part IV.B. of DOE's hazardous waste permit.

3. That the Respondent DOE be found to have operated a hazardous waste storage unit in the C-400-04 building without a permit in violation of KRS 224.46-520, 401 KAR 38:010, 32:030, section 5 and part II of the hazardous waste permit.

4. That the Respondent DOE be found to have operated a hazardous waste storage unit in the C-331-10 DMSA without a permit in violation of KRS 224.46-520, 401 KAR 38:010, 32:030, section 5 and part II of the hazardous waste permit.

5. That the Respondent DOE be found to have operated a hazardous waste storage unit in the C-335-05 DMSA without a permit in violation of KRS 224.46-520, 401 KAR 38:010, 32:030, section 5 and part II of the hazardous waste permit.

6. That the Respondent DOE be found to have operated a hazardous waste storage unit in the C-331-15 DMSA without a permit in violation of KRS 224.46-520, 401 KAR 38:010, 32:030, section 5 and part II of the hazardous waste permit.

7. That the Respondent DOE be found to have operated a hazardous waste storage unit in the C-333-31 DMSA without a permit in violation of KRS 224.46-520, 401 KAR 38:010, 32:030, section 5 and part II of the hazardous waste permit.

8. That the Respondent DOE be found to have failed to report planned changes to SWMU 194 in violation of hazardous waste permit conditions III.E.5 and III.E.6.

9. That the Respondent DOE be found to have failed to maintain systems of treatment and control and failed to take reasonable steps to control releases at SWMUs 12, 14 and 15 in violation of hazardous waste permit conditions III.E.10 and IV.J.1.

10. That the Respondent DOE be found to have failed to properly analyze the leachate from the C-404 landfill in violation of hazardous waste permit condition II.J.9.a.

11. That the Respondent DOE be found to have failed to separate containers of hazardous waste from incompatible materials in the C-752-A storage facility in violation of 401 KAR 34:180.

12. That the Respondent DOE be ordered to make a waste determination for all wastes being managed in the DMSAs.

13. That the Respondent DOE be ordered to manage waste (both solid and hazardous) identified in the DMSAs in accordance with all applicable statutes and regulations.

14. That the Respondent DOE be ordered to close the unpermitted storage units located in the C-400-04 building and the C-331-10, C-335-05, C-331-15 and the C-333-31 DMSAs in accordance with KRS 224.46-520 and 401 KAR 34:070.

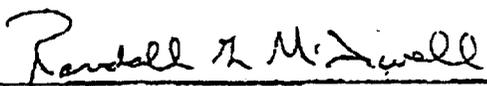
15. That the Respondent DOE be ordered to notify the Cabinet of all newly discovered SWMUs and AOCs in accordance with its hazardous waste permit.

16. That the Respondent DOE be ordered to perform corrective action for all newly identified SWMUs and AOCs in accordance with KRS 224.46-530 and 401 KAR 34:060, section 12.

17. That the Respondent DOE be ordered to pay a civil penalty of \$25,000 dollars for each violation and an additional \$25,000 dollars for each day that each violation occurred and/or continues to occur.

18. That the Cabinet be granted any other relief to which it is entitled.

NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET



RANDALL G. MCDOWELL
Office of Legal Services
Fifth Floor, Capital Plaza Tower
Frankfort, Kentucky 40601
Telephone: (502) 564-5576
Facsimile: (502) 564-6131

COUNSEL FOR PETITIONER