



Department of Energy

Portsmouth/Paducah Project Office
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Lexington, Kentucky 40513
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September 20, 2021

Mr. Brian Begley
Federal Facility Agreement Manager
Division of Waste Management
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601

PPPO-02-10016708-21

Mr. Victor Weeks
Federal Facility Agreement Manager
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Dear Mr. Begley and Mr. Weeks:

TRANSMITTAL OF THE SITE EVALUATION REPORT FOR THE C-611-P BUILDING—PUMP HOUSE AT THE PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, DOE/LX/07-2463&D2

References:

1. E-mail from B. Begley to T. Duncan and L. Garner, “Re: Question on last four SERs regarding Section 21 text?,” dated August 13, 2021
2. Letter from T. Duncan to B. Begley and V. Weeks, “Transmittal of the Site Evaluation Report for the C-611-P Building—Pump House at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-2463&D1,” (PPPO-02-10011850-21), dated July 20, 2021

Enclosed for approval is the certified *Site Evaluation Report for the C-611-P Building—Pump House at the Paducah Gaseous Diffusion Plant, Paducah Kentucky, DOE/LX/07-2463&D2* (SER). This version of the SER addresses comments received from the Kentucky Department for Environmental Protection (KDEP) during review of four SERs submitted on July 20, 2021. This SER deletes the text regarding the removal of C-611-P from the Facility Decontamination and Decommissioning Operable Unit. Also provided to assist with the review is a redline version of the document.

Consistent with the D1 version of the document, no information warranting the designation of C-611-P, or portions thereof, as a solid waste management unit or area of concern was identified. As a result, the enclosed SER recommends that a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) action for the facility is not necessary for

demolition of the C-611-P facility and that the facility will be removed outside of CERCLA and the Federal Facility Agreement (FFA) process. Upon approval, Appendix 4 of the Site Management Plan will be updated to indicate the date of the SER and that the facility requires no further action.

In accordance with Section XX of the FFA, the Environmental Protection Agency and KDEP have a 30-day review period to provide comments and/or approval of the document. If you have any questions or require additional information, please contact me at (270) 441-6862.

Sincerely,

Tracey L.
Duncan

Digitally signed by Tracey
L. Duncan
Date: 2021.09.20
10:29:56 -05'00'

Tracey Duncan
Federal Facility Agreement Manager
Portsmouth/Paducah Project Office

Enclosures:

1. Certification Page
2. *Site Evaluation Report for the C-611-P Building—Pump House at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-2463&D2—Clean*
3. *Site Evaluation Report for the C-611-P Building—Pump House at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-2463&D2—Redline*

Administrative Record File—ARF-ARR

cc w/enclosures:

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tracey.duncan@pppo.gov, PPPO
weeks.victor@epa.gov, EPA

CERTIFICATION

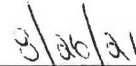
Document Identification: *Site Evaluation Report for the C-611-P Building—Pump House at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-2463&D2*

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

Four Rivers Nuclear Partnership, LLC



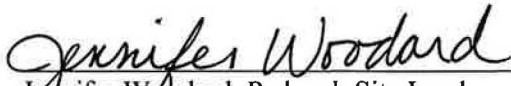
Myrna E. Redfield, Program Manager
Four Rivers Nuclear Partnership, LLC



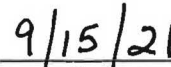
Date Signed

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

U.S. Department of Energy



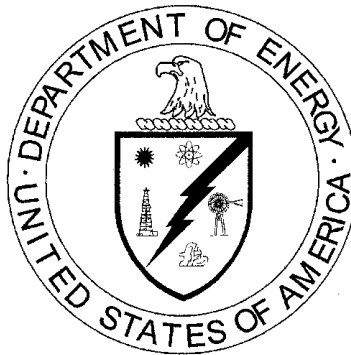
Jennifer Woodard, Paducah Site Lead
Portsmouth/Paducah Project Office
U.S. Department of Energy



Date Signed

**DOE/LX/07-2463&D2
Primary Document**

**Site Evaluation Report for the
the C-611-P Building—Pump House at the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky**



CLEARED FOR PUBLIC RELEASE

**DOE/LX/07-2463&D2
Primary Document**

**Site Evaluation Report for the
the C-611-P Building—Pump House at the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky**

Date Issued—August 2021

U.S. DEPARTMENT OF ENERGY
Office of Environmental Management

Prepared by
FOUR RIVERS NUCLEAR PARTNERSHIP, LLC,
managing the
Deactivation and Remediation Project at the
Paducah Gaseous Diffusion Plant
under Contract DE-EM0004895

CLEARED FOR PUBLIC RELEASE

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ACRONYMS

ACM	asbestos-containing material
AOC	area of concern
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
D&D	decontamination and decommissioning
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
FFA	Federal Facility Agreement
NTCRA	non-time-critical removal action
OU	operable unit
RCRA	Resource Conservation and Recovery Act
RCW	recirculating cooling water
SE	site evaluation
SMP	Site Management Plan
SWMU	solid waste management unit

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1. FACILITY/UNIT NUMBER

C-611-P

2. FACILITY/UNIT NAME

Building—Pump House

3. DATE

August 26, 2021

4. REGULATORY STATUS

A joint policy issued under a U.S. Department of Energy (DOE) and U.S. Environmental Protection Agency (EPA) Memorandum, dated May 22, 1995, *Policy on Decommissioning Department of Energy Facilities Under CERCLA* (DOE 1995), establishes a framework for conducting decommissioning of DOE facilities and provides guidance on the use of Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) response authority to decommission DOE facilities. The Policy states that DOE is required to conduct a removal site evaluation (SE) in accordance with the *National Contingency Plan* and interagency agreements [i.e., Federal Facility Agreement (FFA)] to assess site conditions and determine whether a release or substantial threat of release exists at the facility. At any facility for which DOE conducts a removal SE, DOE will consult with EPA and will provide, as requested, EPA with such information necessary for EPA to review such evaluation. DOE, EPA, and the Commonwealth of Kentucky have agreed to conduct decontamination and decommissioning (D&D) activities at the Paducah Gaseous Diffusion Plant under the existing FFA. Section IX [Site Evaluation(s)] of the FFA requires DOE to conduct integrated SEs that consist of removal SEs, remedial SEs, and solid waste management unit (SWMU) assessment reports. The integrated SEs are to be documented in an SE report consistent with the format in Appendix D of the FFA (EPA 1998).

Industrial facilities that DOE has determined to pose a potential threat of release of hazardous substances to the environment are listed as part of the facility D&D Operable Unit (OU) in Appendix 4 of the Site Management Plan (SMP) (DOE 2020). The SE report shall state whether demolition of the facility should be conducted using a CERCLA Non-Time-Critical Removal Action (NTCRA) and will serve to designate any facility, or portions thereof, that are related to any identified release as a SWMU and/or area of concern (AOC).

Based on the historical information associated with past operations at the C-611-P Building—Pump House (C-611-P), there is no evidence of a release, or threat of any release, to the environment from the building, and C-611-P is not believed to pose a risk to human health or the environment. As a result, a CERCLA NTCRA action is not warranted for demolition of the C-611-P facility structure. Additionally, there is no historical information warranting the designation of C-611-P, or portions thereof, as a SWMU or AOC; therefore, a Resource Conservation and Recovery Act (RCRA) Facility Investigation is not recommended as necessary for C-611-P. As a result, the removal of the structure will be conducted outside of CERCLA.

5. LOCATION

C-611-P is located in the west-central portion of the industrialized area of the Paducah Site and is south of and adjacent to the C-600 Steam Plant. Figures 1 and 2 provide the location of C-611-P within the Paducah Site.

6. APPROXIMATE DIMENSION OR CAPACITY

C-611-P is a one-story, rectangular plan building constructed of structural steel and corrugated siding (i.e., transite), with a concrete slab floor (6-inch thickness) and a roof of metal decking covered with roofing material. The approximate dimensions of C-611-P are 26.5 ft × 34 ft, with a footprint of approximately 901 ft². Figure 3 provides a portion of Engineering Drawing C-12-1-A that shows the building floor plan. Note that a third pump foundation, located north of the two foundations indicated, is not shown in this figure. Figures 4 and 5 are photographs of the east and west exterior sides of the facility, respectively.

Additional engineering drawings are provided in the appendix of this report.

7. FUNCTION

C-611-P was used for the distribution of the plant water system and primarily served the recirculating cooling water (RCW) systems at C-631, C-633, C-635 and C-637, and the C-600 chiller operations. The water that passed through this system was processed in the same manner as the sanitary water process, except (1) rapid sand filtration, (2) post-chlorination, and (3) sodium hexametaphosphate (phosphate) treatment were not used. The water distributed through C-611-P was never chromated. Supporting documentation is provided in the appendix of this report.

C-611-P is adjacent and connected to the C-600 Steam Plant and is on the northern loop of the plant water system, with the booster pumps located aboveground inside the building. During uranium enrichment operations, these pumps were used to boost pressure on the water system and flows were controlled based on temperatures and other operating conditions. The facility is currently in standby mode, and miscellaneous equipment (e.g., hoses, chairs, empty buckets, cables, rods, tools, refrigerator, refrigerant gas cylinders, ladders, etc.) is currently stored in open areas of the facility.

8. BRIEF HISTORY

C-611-P was constructed in 1953 and was utilized (as described above) from its construction until the cessation of uranium enrichment operations in 2013. C-611-P was leased to the United States Enrichment Corporation in the early 1990s until 2014, when the gaseous diffusion plant was deleased and returned to DOE. Since cessation of uranium enrichment operations, C-611-P has been in standby mode.

9. OPERATIONAL STATUS

Standby

10. DATES OPERATED

1953 to 2013

11. SITE/PROCESS DESCRIPTION

C-611-P consists of three pumps and associated piping located adjacent to the C-600 Steam Plant. While in operation, C-611-P was used for plant water distribution and primarily served the RCW systems at C-631, C-633, C-635 and C-637, and the two C-600 chillers. C-611-P is on the northern loop of the plant water system, with three booster pumps located aboveground inside the building. During uranium enrichment operations, the pumps in this facility were used to boost pressure on the water system. Figures 6 through 9 provide interior views of C-611-P.

The facility is currently in standby mode, and miscellaneous equipment is currently stored in open areas of the facility.

12. WASTE DESCRIPTION

The primary waste stream generated during D&D of C-611-P would be nonhazardous demolition debris. This demolition debris will be comprised primarily of concrete and metal structural components, transite siding, metal piping, miscellaneous equipment, insulation, and roofing. Waste such as polychlorinated biphenyl (PCB)-containing liquids and electrical components and/or RCRA-mixed waste sludges or liquids are not anticipated to be generated with exceptions noted below. During the facility walkdown inspection, transite siding was identified and it was noted that the pipe insulation likely includes asbestos-containing material (ACM).

Limited infrastructure items remain in the facility (e.g., light fixtures, exit lights, alarms) that could contain *de minimis* quantities of regulated items (e.g., mercury, lead, PCBs), which will be removed to the extent practicable during deactivation. Building materials used for construction could contain lead-based paints and ACM. C-611-P, while physically connected to the C-600 Steam Plant, does not contain ventilation duct work with PCB-impregnated gaskets (EPA 2017). Generation of any residual amounts of these materials during demolition will be properly containerized, characterized, and dispositioned in accordance with applicable regulatory requirements.

13. WASTE QUANTITY

Based on the waste forecast information available in the *Remedial Investigation/Feasibility Study Report for CERCLA Waste Disposal Alternatives Evaluation at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky* (DOE 2018), the waste volume associated with C-611-P is approximately 303 yd³. Approximately 298 yd³ is categorized as nonhazardous solid waste, with 5 yd³ estimated to be Toxic Substances Control Act waste due to ACM.

14. SUMMARY OF ENVIRONMENTAL SAMPLING DATA

No sampling of environmental media has occurred within 50 ft of C-611-P (see Figure 10).

15. DESCRIPTION OF RELEASE AND MEDIA AFFECTED

<u>Groundwater:</u>	None Known
<u>Surface Water:</u>	None Known
<u>Soil:</u>	None Known
<u>Ecology Affected</u> (i.e., threatened/endangered species):	None Known
<u>Air:</u>	None Known

There have been no known documented spills or releases of materials reported from this facility to the environment. During a March 2021 walkdown inspection, paint chips were noted on the ceiling and floor and there was some minor staining on the floor. The staining on the floor, located mainly beneath piping, pumps, and valves, was rusty in color and not indicative of a release of a petroleum product. There was no evidence of oil leaks from any of the equipment. A floor drain in the building discharges to the storm-water sewer system. By virtue of the nature of past operations within the C-611-P building, and the equipment and materials contained therein, the building is not considered a potential risk to human health and the environment.

16. DOCUMENTATION OF NO RELEASE

There have been no known spills or releases of materials from C-611-P to soil, groundwater, or surface water. C-611-P has not been identified as a SWMU or AOC, nor does it contain any areas designated as a SWMU or AOC. No information was identified warranting the designation of the C-611-P building or portions thereof as a SWMU or AOC.

17. IMPACT ON OR BY OTHER SWMU/AOC

There is no evidence that this facility impacts or is being impacted by other SWMUs and/or AOCs.

18. PRELIMINARY REMEDIATION GOAL COMPARISON

Not Applicable. No sampling of environmental media has occurred near C-611-P.

19. RCRA FACILITY INVESTIGATION NECESSARY

A RCRA Facility Investigation is not recommended as necessary for C-611-P. There is no evidence of a release, or threat of any release, to the environment from the building; the facility is not believed to pose a risk to human health or the environment.

20. CERCLA NTCRA NECESSARY

A CERCLA NTCRA is not recommended as necessary for the demolition of the facility structure. Limited infrastructure items that potentially contain *de minimis* quantities of regulated items and any potentially RCRA-regulated items that remain in the building will be removed, to the extent practicable, during deactivation. Building materials used for construction could contain lead-based paints and ACM, both of which can be verified effectively during a predemolition inspection and then contained and properly managed using standard demolition and waste management practices. Deactivation will include the removal of any accessible loose items being stored, to the extent practicable, prior to demolition. Any floor drains will be delineated and isolated prior to demolition.

A March/April 2021 walkdown inspection of the facility, employee interviews, and other reviewed historical information did not identify any unusual conditions that would pose a potential threat of environmental release during future demolition of the structure and, therefore, the demolition and disposal of the facility can be conducted outside of the FFA/CERCLA process.

All applicable laws, regulations, DOE procedures, and/or DOE protocols will be followed to ensure the demolition and disposal of the aboveground structure occurs in a safe and compliant manner. Additional radiological characterization through confirmation radiological surveys will be conducted, as necessary, to support demolition and waste disposition.

21. OU ASSIGNMENT

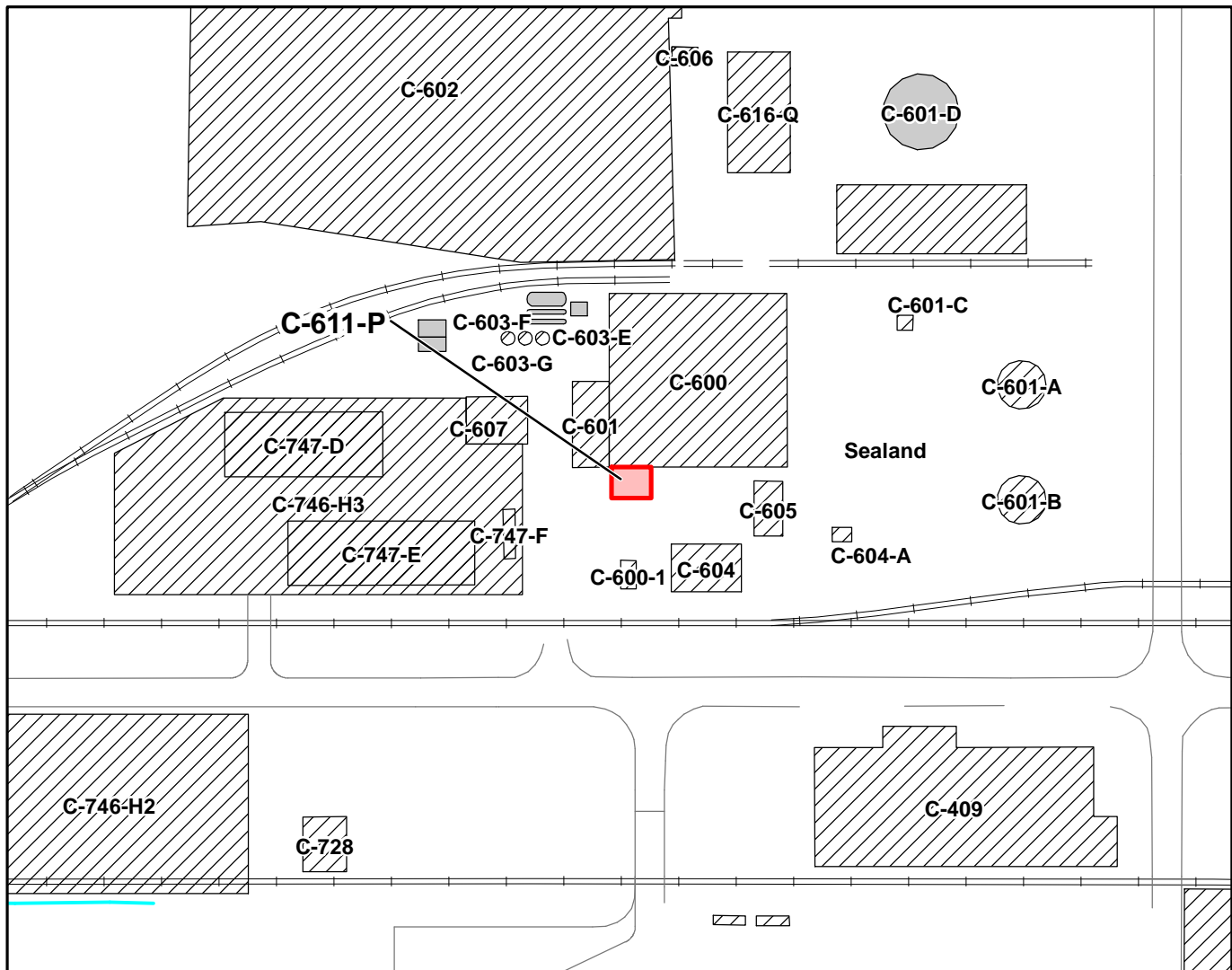
C-611-P currently is assigned to the Facility D&D OU, Sewage System and Water Treatment Ancillary Facilities (SMP Appendix 4) (DOE 2020).

22. REFERENCES

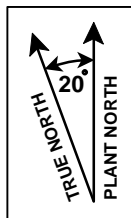
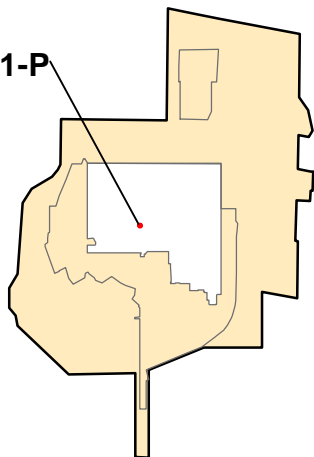
- DOE (U.S. Department of Energy) 1995. *Policy on Decommissioning of Department of Energy Facilities Under CERCLA*, Joint policy from the U.S. Department of Energy and U.S. Environmental Protection Agency, May 22, 1995.
- DOE 2018. *Remedial Investigation/Feasibility Study Report for CERCLA Waste Disposal Alternatives Evaluation at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/LX/07-0244&D2/R2, U.S. Department of Energy, Paducah, KY, July.
- DOE 2020. *Site Management Plan Paducah Gaseous Diffusion Plant Paducah, Kentucky Annual Revision—FY 2021*, DOE/LX/07-2450&D1, U.S. Department of Energy, Paducah, KY, November.
- EPA (U.S. Environmental Protection Agency) 1998. *Federal Facility Agreement for the Paducah Gaseous Diffusion Plant*, DOE/OR/07-1707, U.S. Environmental Protection Agency, Atlanta, GA, February.
- EPA 2017. Toxic Substance Control Act Federal Facility Compliance Agreement, effective date February 20, 1992, modification May 30, 2017.



Figure 1. Aerial Photograph Showing the C-611-P Building—Pump House Location



C-611-P



0 75 150 300 Feet



LEGEND

- C-611-P
- Facility
- Demolished Facility
- DOE Property, outside Limited Area
- Road
- ++ Railroad
- Stream

U.S. DEPARTMENT OF ENERGY
DOE PORTSMOUTH/PADUCAH PROJECT OFFICE
PADUCAH GASEOUS DIFFUSION PLANT



MAP SOURCE INFORMATION

Map Generation Date and Location: 4/20/2021 G:\GIS\ARCVIEWS\PROJECTS\SMP\Facilities\C611P_Location_20210420.mxd
 Facilities: G:\GIS\IPEGASIS.gdb\Facilities; Roads: G:\GIS\IPEGASIS.gdb\roadrow;
 Railroads: G:\GIS\IPEGASIS.gdb\railroad; Streams: G:\GIS\IPEGASIS.gdb\streams
 DOE Property Boundary: G:\GIS\IPEGASIS.gdb\doebnd; Limited Area: G:\GIS\IPEGASIS.gdb\limited_area
 229 Boundary: G:\GIS\IPEGASIS.gdb\Security_229

Figure 2. Map Showing the C-611-P Building—Pump House Location

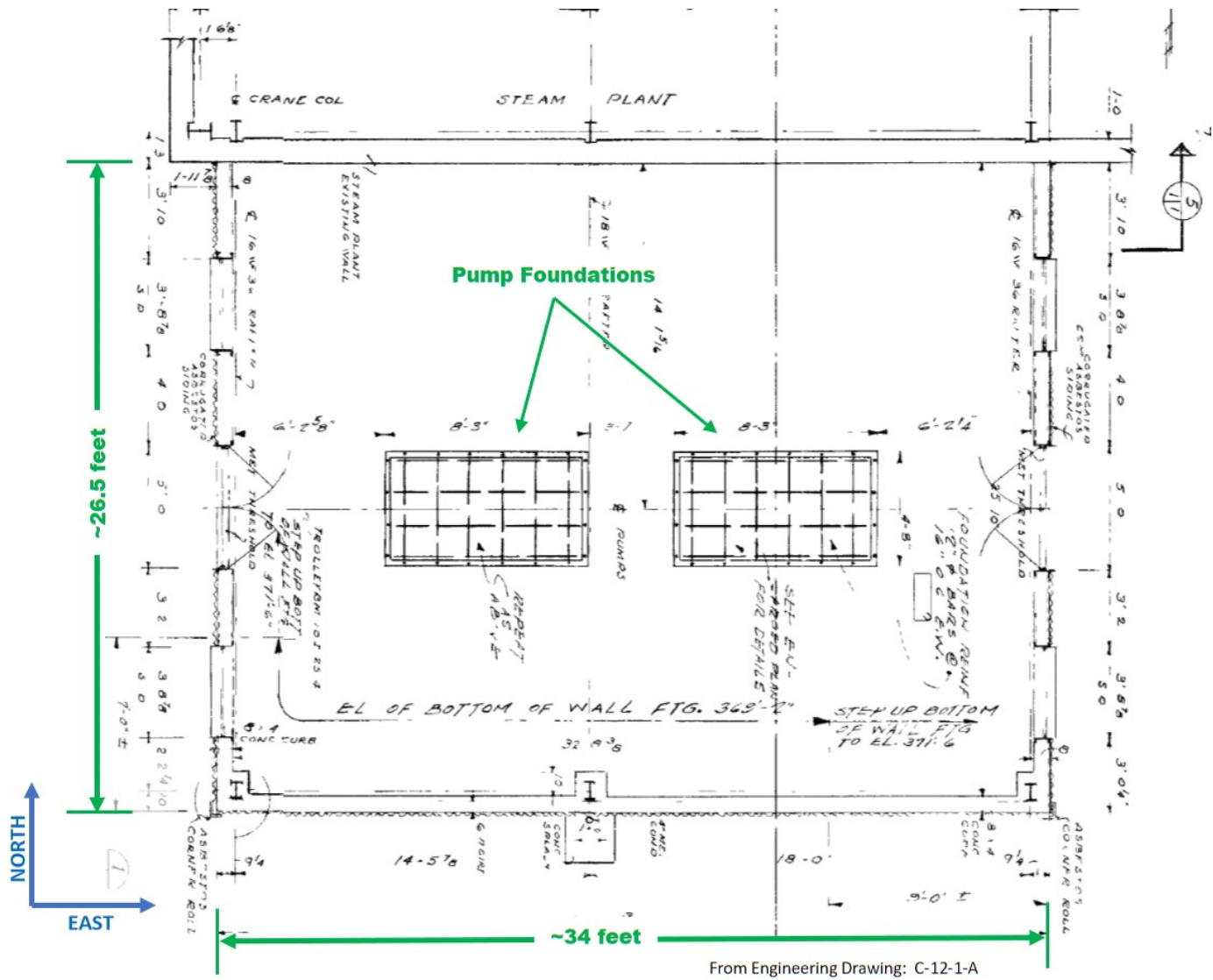


Figure 3. Floor Plan for C-611-P



Figure 4. Exterior View of the East Side of C-611-P (Looking West)



Figure 5. Exterior View of the West Side of C-611-P (Looking East)



Figure 6. Interior View of C-611-P Showing the No. 1 Booster Pump and Motor



Figure 7. Interior View of C-611-P Looking Northeast Showing the No. 2 Booster Pump and Piping



Figure 8. Electrical Switchgear for the Booster Pump Motors



Figure 9. Piping and Valving Near the North Wall of the Building

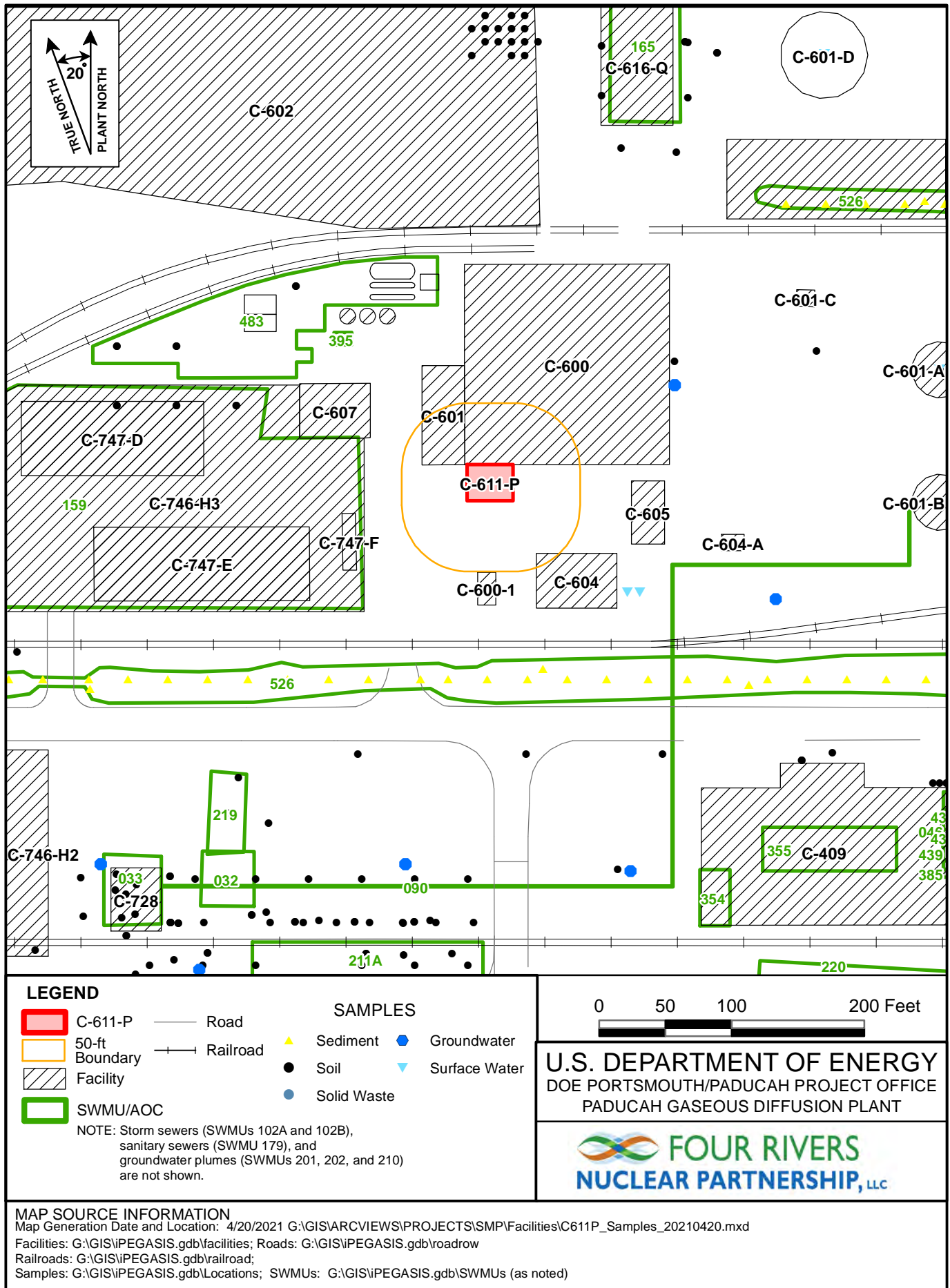


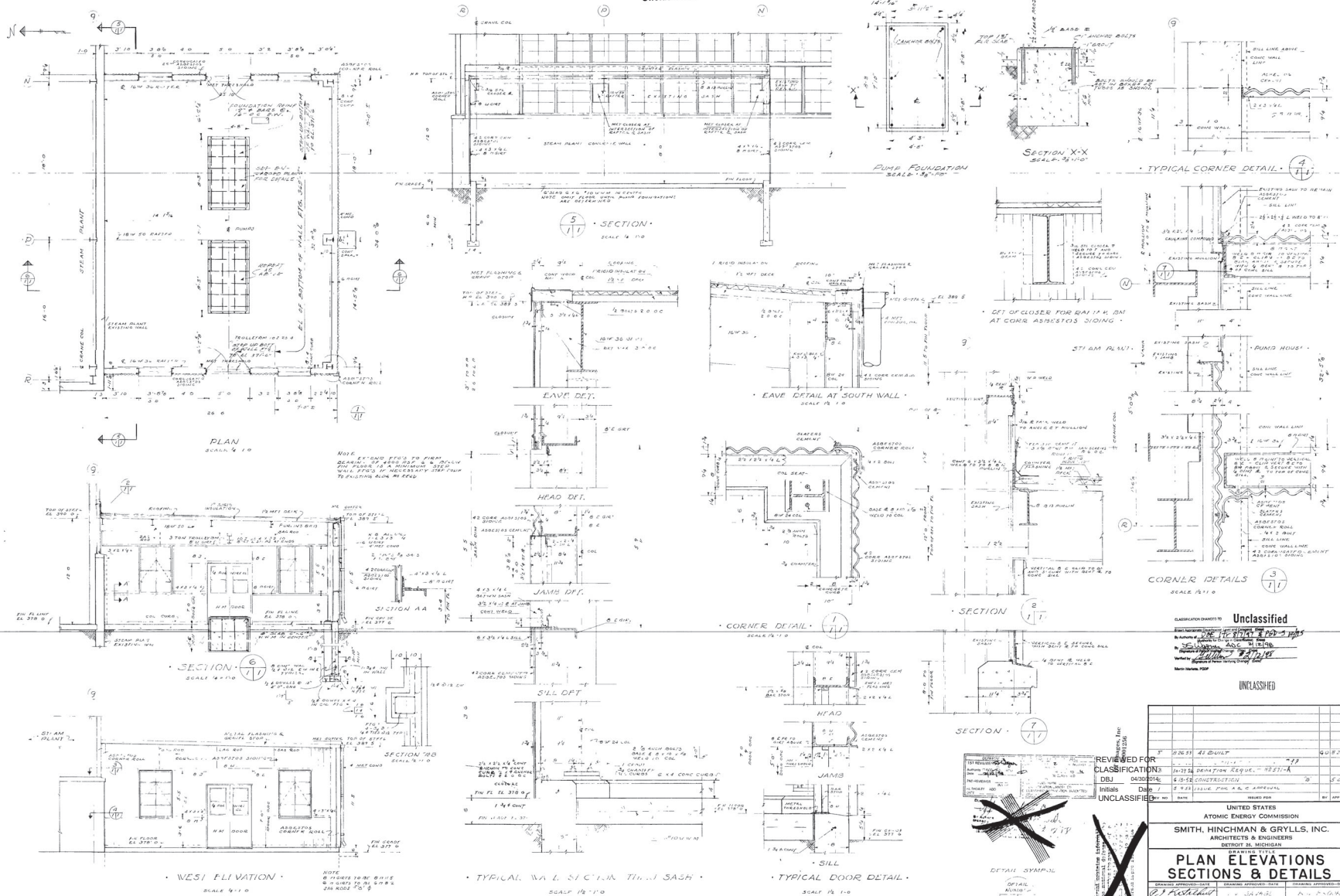
Figure 10. SWMU and Sample Locations near C-611-P

APPENDIX

ENGINEERING DRAWINGS AND SUPPORTING DOCUMENTATION

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Unclassified



A-3

CLASSIFICATION DATED TO **Unclassified**

REVIEWED FOR CLASSIFICATION BY **DBJ** ON **04/29/94**

UNCLASSIFIED

UNITED STATES
ATOMIC ENERGY COMMISSION

SMITH, HINCHMAN & GRYLLS, INC.
ARCHITECTS & ENGINEERS
DETROIT 24, MICHIGAN

**PLAN ELEVATIONS
SECTIONS & DETAILS**

PROJECT	C-12-1-A
DATE	1978
BY	DBJ
CHECKED	DBJ
APPROVED	DBJ
SCALE	AS SHOWN
NO.	8768

SMITH, HINCHMAN & GRYLLS, INC.
8768

C-12-1-A

MICROFILM

Figure A.1. Engineering Drawing C-12-1-A

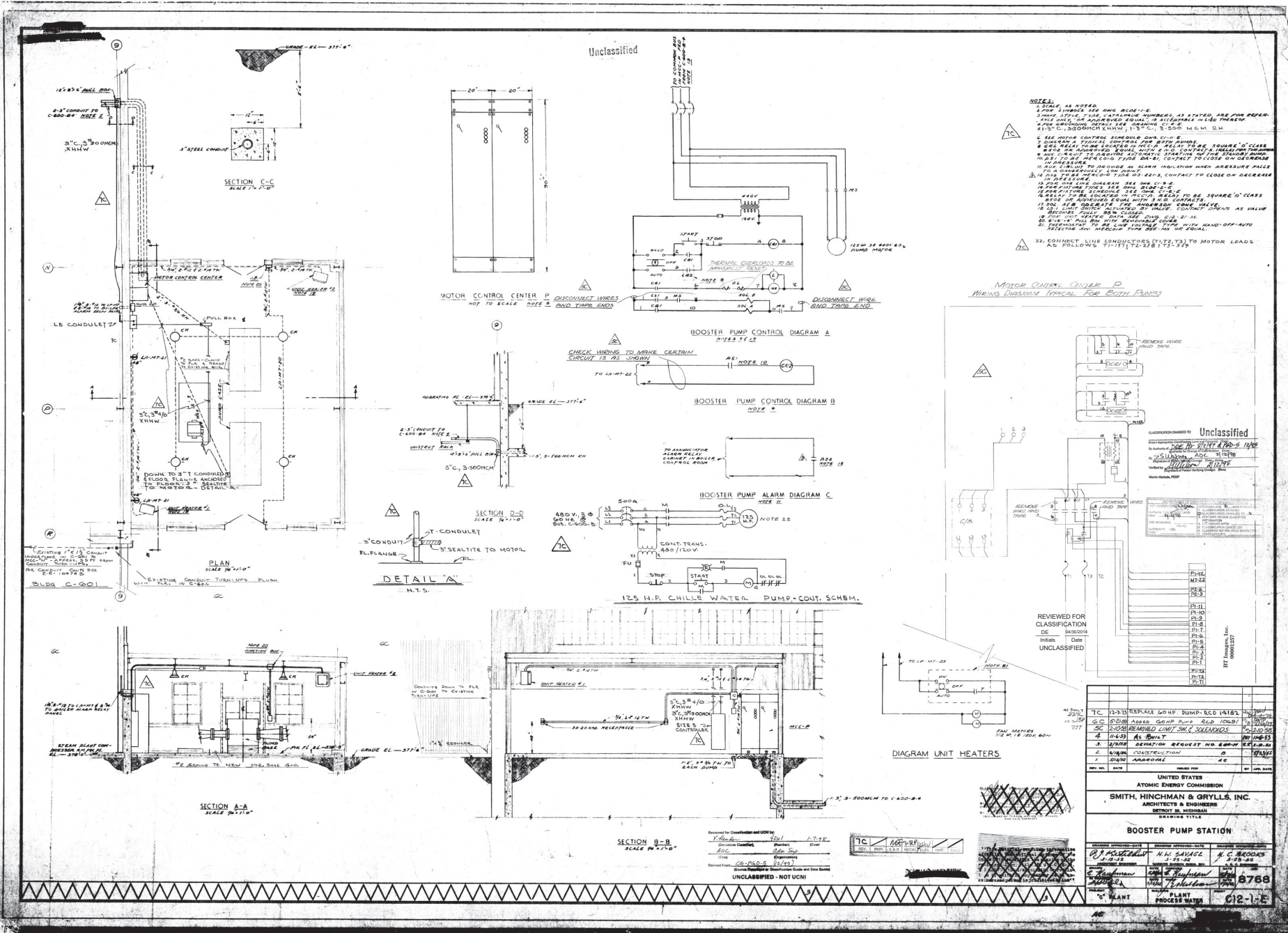


Figure A.2. Engineering Drawing C12-1-E

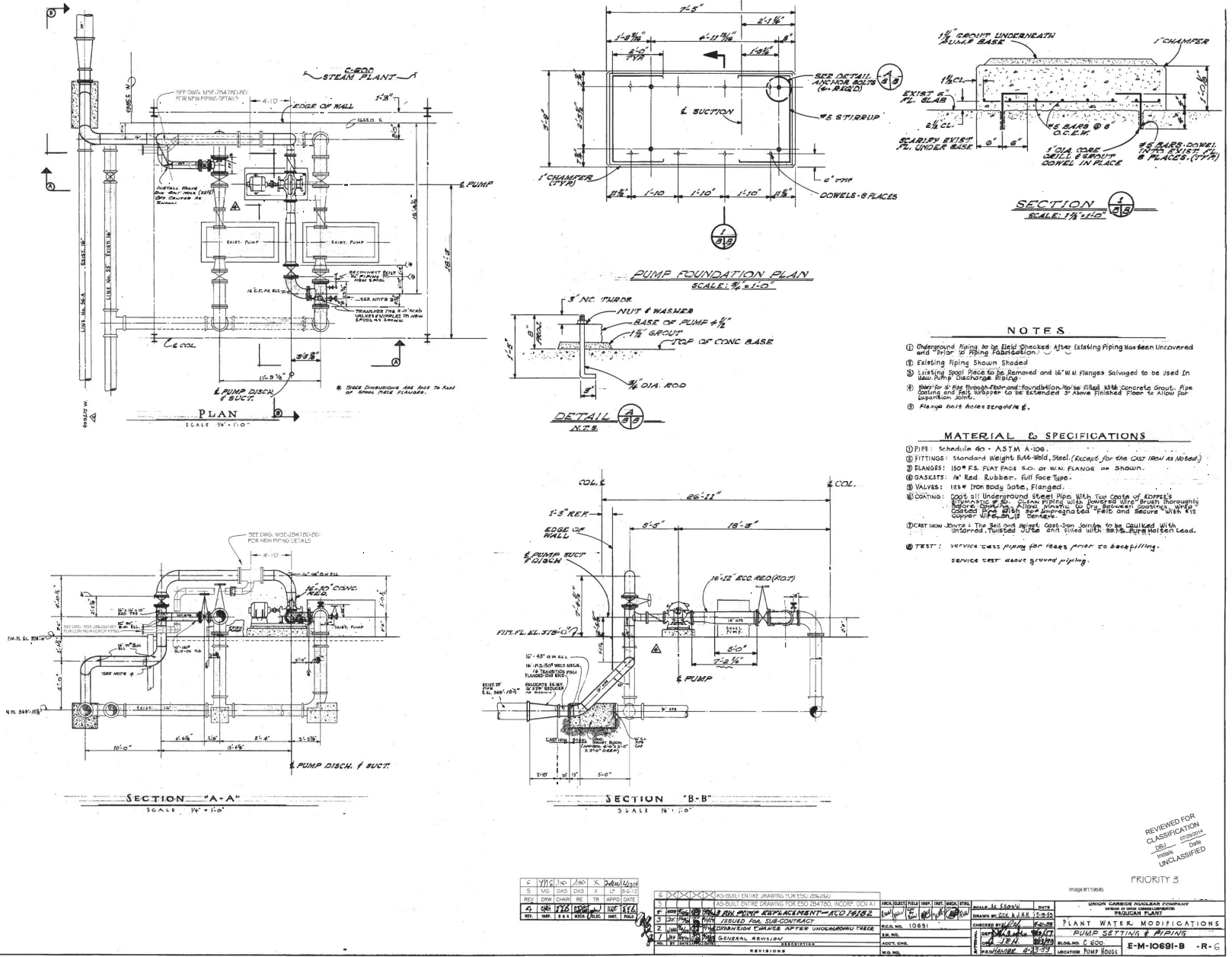


Figure A.3. Engineering Drawing E-M-10691-B

9-V

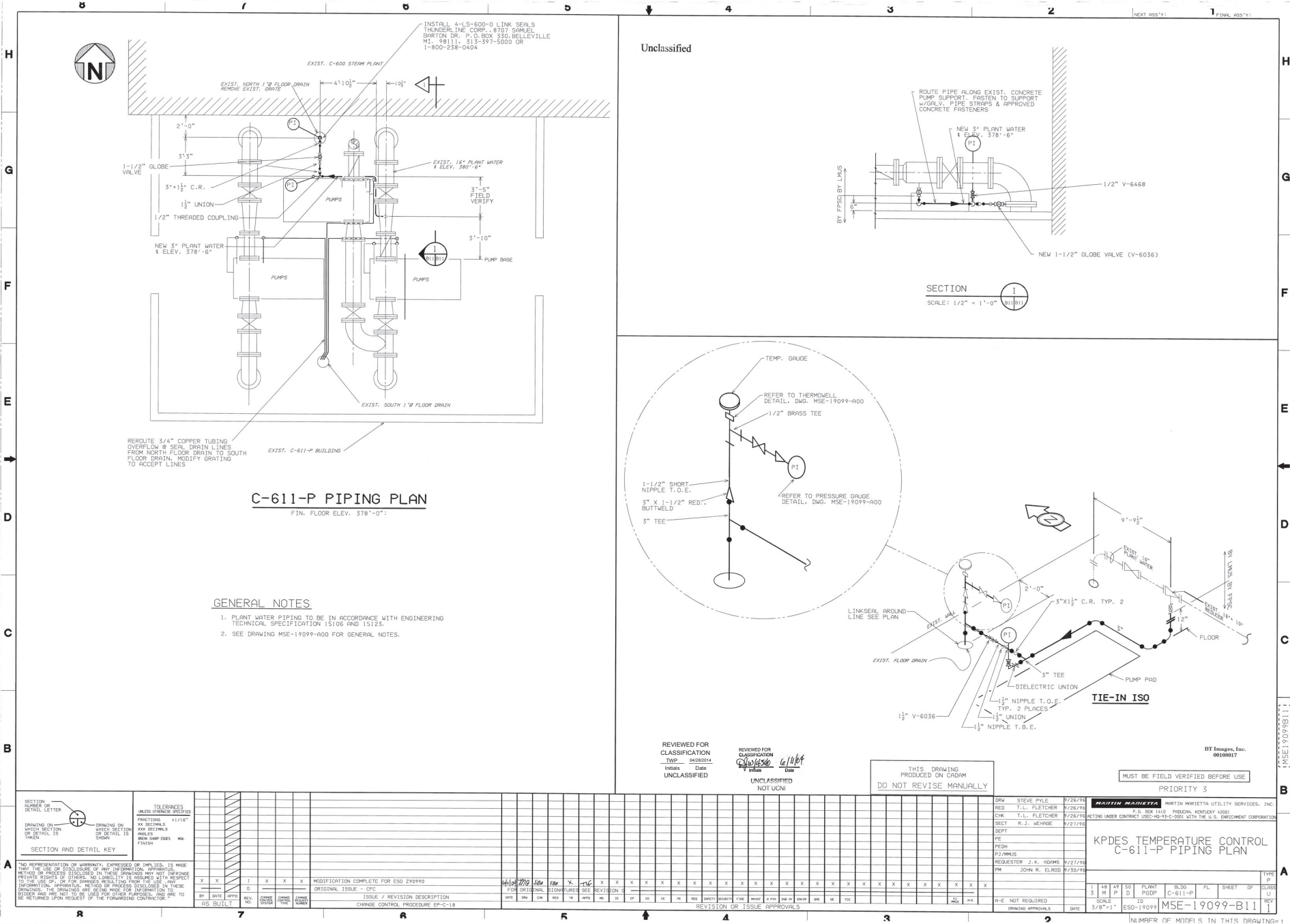


Figure A.4. Engineering Drawing MSE-1909-B11

Figure A.5. C-611-P and C-611-T Correspondence, dated April 14, 2021

bphillips@stratag.org

From: Anderson, Andy <Andy.Anderson@pad.pppo.gov>
Sent: Wednesday, April 14, 2021 1:41 PM
To: bphillips@stratag.org
Cc: Summers, Ronald; Maurer, Matt; Donohoo, Dale
Subject: RE: [EXTERNAL SENDER] RE: [EXTERNAL SENDER] RE: C-611-P and C-611-T

C-611-P and C-611-T pump plant (process) water to the cooling towers as well as through the chilled water units for condenser cooling as it traveled to the cooling towers. Plant or process water was treated to soften the water for greater cycles in the Recirculating Circulating Water Cooling towers. It was the same as potable water minus filtration and post chlorination. IT DID NOT HAVE CHROMATE added to it.

This help?

Andy

From: bphillips@stratag.org <bphillips@stratag.org>
Sent: Wednesday, April 14, 2021 12:34 PM
To: Anderson, Andy <Andy.Anderson@pad.pppo.gov>; Donohoo, Dale <Dale.Donohoo@pad.pppo.gov>
Cc: Summers, Ronald <Ronald.Summers@pad.pppo.gov>; Maurer, Matt <Matt.Maurer@pad.pppo.gov>
Subject: [EXTERNAL SENDER] RE: [EXTERNAL SENDER] RE: C-611-P and C-611-T
Importance: High

Did C-611-P and T distribute "raw" water, or was it chromated (prior to 1991) water being pumped??

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