

# **Department of Energy**

Portsmouth/Paducah Project Office 1017 Majestic Drive, Suite 200 Lexington, Kentucky 40513 (859) 219-4000

March 18, 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

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-724-C PAINT SHOP AT THE PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, DOE/LX/07-2456&D1

In accordance with Appendix 4 of the approved Site Management Plan of the Paducah Federal Facility Agreement (FFA), the U.S. Department of Energy (DOE) is submitting the D1 Site Evaluation Report for the C-724-C Paint Shop at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-2456&D1 (SE), to the U.S. Environmental Protection Agency (EPA) and the Kentucky Department for Environmental Protection (KDEP) for review and comment. A joint policy issued under the DOE and EPA memorandum, dated May 22, 1995, Policy on Decommissioning Department of Energy Facilities Under CERCLA, establishes a framework for conducting the decommissioning of DOE facilities and also provides guidance on the use of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response authority to decommission DOE facilities. This policy states that DOE is required to conduct a removal site evaluation, in accordance with the National Contingency Plan and interagency agreements (i.e., FFA), to assess site conditions and determine whether a release or substantial threat of release exists at the facility. DOE, EPA, and KDEP have agreed to conduct decontamination and decommissioning activities for facilities that pose an environmental release threat at the Paducah Site under the existing FFA. Section IX, Site *Evaluation(s)*, of the FFA requires DOE to conduct integrated site evaluations that consist of the removal site evaluation, remedial site evaluation, and solid waste management unit (SWMU) assessment reports. These integrated site evaluations are to be documented in an SE Report.

Per the enclosed SE, a portion of the C-724-C facility contains the C-724-A Paint Spray Booth (area of concern [AOC] 178). This is the only portion of the C-724-C facility that previously has

PPPO-02-10009621-21

been determined to require designation as a SWMU or AOC. No other spills or releases of material from the C-724-C facility to the environment are known to have occurred, nor has any new information been identified warranting the additional designation of the C-724-C facility, or portions thereof, as a SWMU or AOC. As a result, the enclosed SE recommends that CERCLA action for the facility is not necessary for demolition of the C-724-C facility aboveground structure or demolition of the aboveground structure associated with AOC 178. Any past releases that may have previously occurred during historical operation of the C-724-A Paint Spray Booth (AOC 178) would have impacted the underlying slab and soils, which are part of the Soils and Slabs Operable Unit that is subject to a separate remedial investigation. Upon approval, the *Detailed Facility D&D OU Facilities List* in Appendix 4 will be updated to indicate that the C-724-C facility requires no further action.

In accordance with Section XX of the FFA, EPA 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: 2021.03.18 13:53:13 -05'00'

Tracey Duncan Federal Facility Agreement Manager Portsmouth/Paducah Project Office

Enclosures:

- 1. Certification Page
- 2. D1 Site Evaluation C-724-C

Administrative Record File—DDARC

cc w/enclosures: abigail.parish@pppo.gov, PPPO april.ladd@pppo.gov, PPPO april.webb@ky.gov, KDEP arcorrespondence@pad.pppo.gov brian.begley@ky.gov, KDEP bruce.ford@pad.pppo.gov, FRNP bwhatton@tva.gov, TVA christopher.travis@ky.gov, KDEP frnpcorrespondence@pad.pppo.gov hjlawrence@tva.gov, TVA jana.white@pad.pppo.gov, FRNP jennifer.woodard@pppo.gov, PPPO joel.bradburne@pppo.gov, PPPO

leanne.garner@pad.pppo.gov, FRNP leo.williamson@ky.gov, KDEP mkbottorff@tva.gov, TVA mmcrae@TechLawInc.com, EPA myrna.redfield@pad.pppo.gov, FRNP nathan.garner@ky.gov, KYRHB pad.rmc@pad.pppo.gov rlhoope0@tva.gov, TVA robert.edwards@pppo.gov, PPPO stephaniec.brock@ky.gov, KYRHB tracey.duncan@pppo.gov, EPA

#### CERTIFICATION

**Document Identification:** 

Site Evaluation Report for the C-724-C Paint Shop at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, DOE/LX/07-2456&D1

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

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

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

18/2021 Signed

DOE/LX/07-2456&D1 Primary Document

Site Evaluation Report for the C-724-C Paint Shop at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky



# **CLEARED FOR PUBLIC RELEASE**

# DOE/LX/07-2456&D1 Primary Document

# Site Evaluation Report for the C-724-C Paint Shop at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky

Date Issued—March 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

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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
GSA	generator staging area
NTCRA	non-time-critical removal action
OU	operable unit
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RMA	radioactive material area
SAA	satellite accumulation area
SE	site evaluation
SMP	Site Management Plan
SWMU	solid waste management unit

# **1. FACILITY/UNIT NUMBER**

С-724-С

# 2. FACILITY/UNIT NAME

Paint Shop

# 3. DATE

March 18, 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 site evaluation, 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 site evaluation, remedial site evaluation, and solid waste management unit (SWMU) assessment reports. The integrated SEs are to be documented in a Site Evaluation 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).

# **5. LOCATION**

A review of engineering drawings and historical reports have identified inconsistencies between the C-724-A and C-724-B facility designations and locations. Based on the earliest engineering drawings, the C-724-A facility was constructed in 1955 and the C-724-B/-C facility was constructed in 1956. C-724-C is located in the southeast corner of C-724-B. A women's change house was added to the southern part of C-724-C in 1975. Figure 1 identifies the correct facility designations and locations which are consistent with the physical facility numbers mounted on each facility.

The C-724-C facility is located in the south-central portion of the Paducah Site industrialized area, northwest of the C-720 Maintenance and Storage Building. See Figure 2, Aerial Photograph Showing the C-724-C Paint Shop Location, and Figure 3, Map Showing C-724-C Paint Shop Location, for C-724-C facility location.

### 6. APPROXIMATE DIMENSION OR CAPACITY

The C-724-C facility is located in the southeast corner of C-724-B. The C-724-B/C facility is a one-story concrete block building built in 1956. The building has a flat 4-ply and tar built up roof and an 8-inch concrete floor slab. The women's change house portion of C-724-C has a 4-ply built up roof with gravel and a 5-1/2 inch concrete floor slab. As shown on Figure 4, Engineer Drawing D-S-10021-J Rev. 0, the C-724-C facility measures 48 ft 3 inches  $\times$  50 ft 2 inches ( $\sim$  2,421 ft<sup>2</sup>). As shown on Figure 5, Engineering Drawing E-A-14342-B Rev 0, the women's change house measures 13 ft 4 inches  $\times$  22 ft 8 inches ( $\sim$  302 ft<sup>2</sup>). Based on the combined square footage from Figures 4 and 5, the total square footage of the C-724-C facility is approximately 2,723 ft<sup>2</sup>.

An aerial photograph is provided in the appendix to this report.

### 7. FUNCTION

C-724-C was used as a paint shop from 1958 to 2014. From 2014 to present, the C-724-C facility has been utilized as a garage maintenance area for small mobile equipment.

#### 8. BRIEF HISTORY

C-724-C was constructed in 1956 and became operational in 1958. It was used as a paint shop from 1958 until 2014. C-746-C was leased to the United States Enrichment Corporation in the early 1990s and continued to be used as a paint shop until the Paducah Gaseous Diffusion Plant was deleased and returned to DOE in 2014. Since 2014, C-724-C has been utilized as a garage maintenance area for small mobile equipment.

#### 9. OPERATIONAL STATUS

Operating

#### **10. DATES OPERATED**

1958 to present

#### **11. SITE/PROCESS DESCRIPTION**

C-724-C was used as a paint shop from 1958 to 2014. Figure 6 shows the exterior of C-724-C. The prefabricated metal building to the right of the east entrance to C-724-C is C-724-A. Figure 7 shows the east side of C-724-C and the women's change house that was added in 1975. Within the paint shop was a spray paint booth (Figure 8); a storage area; paint oven (Figure 9); and a sign shop (Figure 10).

C-724-C is currently being utilized as a garage maintenance area for small mobile equipment (e.g., forklifts, skid steers, golf carts) and miscellaneous power equipment. Floor drains in the building discharge to the sanitary sewer system. The entire facility has been designated as a Radioactive Material Area (RMA) since most of the equipment serviced in C-724-C requires the equipment to be maintained in an RMA.

#### **12. WASTE DESCRIPTION**

The primary waste stream that would be generated during D&D of C-724-C would be nonhazardous construction/demolition debris. This demolition debris will be comprised primarily of concrete blocks, metal structural components, piping, equipment, and insulation. Wastes such as polychlorinated biphenyl (PCB)-containing liquids and electrical components, non-radioactive Resource Conservation Recovery Act

(RCRA) and/or mixed waste sludges or liquids, are not anticipated to be generated with exceptions noted below.

Limited infrastructure items remain in the facility (e.g., light fixtures, exit lights, instrumentation panels, alarms) that could potentially contain *de minimis* quantities of regulated items (e.g., mercury, lead, PCBs), which will be removed to the extent practicable during deactivation. Generation of any residual amounts of regulated items will be properly containerized, characterized, and dispositioned in accordance with applicable regulatory requirements. Building materials used for construction could contain lead-based paints and asbestos-containing materials (ACMs).

The entire facility has been designated as an RMA since most of the equipment serviced in C-724-C required the equipment to be maintained in an RMA; however, no specific areas within the building are currently designated as a radiological contamination area.

Four satellite accumulation areas (SAAs) are located in C-724-C. SAAs S-724-03 and S-724-05 are located in the paint spray booth. SAAs S-724-04 and S-724-07 are located along the south wall near the paint oven. Generator staging area (GSA) 724-01 is located in the paint spray booth. The GSA and SAAs are currently in use; managed in accordance with applicable RCRA regulations and site procedures; and will be removed during deactivation.

# **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 projected waste volume associated with the C-724-C aboveground structure is approximately 8 yd<sup>3</sup> of LLW and 271 yd<sup>3</sup> of nonhazardous solid waste for a total of 279 yd<sup>3</sup>.

#### 14. SUMMARY OF ENVIRONMENTAL SAMPLING DATA

Figure 11, SWMUs and Sampling Locations Near C-724-C, shows one sample location, WC-172, located within C-724-C. Sample location WC-172 is a water sample collected in 1992 from the collection pit associated with AOC 178, C-724-A Paint Spray Booth, which is located inside C-724-C. No additional samples are known to have been collected at this location. Quantitative PCB data concentrations ranged from < 4.0 ppb to 0.3 ppb. Subsequently, water from the collection pit was treated prior to discharge. Historical data are provided in the appendix to this report. Due to its age, lack of other corroborating sampling points, and consistent with use of historical data in Paducah Site projects, data from that sample have not been utilized for determining representativeness of current conditions.

#### **15. DESCRIPTION OF RELEASE AND MEDIA AFFECTED**

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

AOC 178, C-724-A Paint Spray Booth, is located inside C-724-C. It is approximately 3 ft deep by 15 ft wide by 8 ft high. The paint spray booth captured and collected paint drift during paint operations. The system operated similar to a vent hood pulling paint drift through a cascade of water. The water would then collect in a tank at the base of the system. The waste was drained from the tank; drummed to be characterized; and disposed of. PCBs ranging from 0.3 to 4.0 ppb were identified as present in the waste. Possible releases

could have occurred through the vent of the plant sanitary and/or storm sewer system. The C-724-A Paint Spray Booth was designated as an AOC in 1992 (DOE 1992). The paint spray booth is no longer active as a paint spray booth and has been used for storage since 2010.

Figure 12 shows floor stains located across from and outside of the footprint of the paint spray booth. Stains appear to be contained within the building; there is no visible evidence that spills or releases associated with the floor stains were released to the environment.

No other areas were visually observed to have had a spill or release during walkdowns conducted in October 2020.

# **16. DOCUMENTATION OF NO RELEASE**

AOC 178 is in a discrete location in C-724-C and is the only portion of C-724-C that has been previously determined to require designation as a SWMU or AOC. No other spills or releases of materials from the C-724-C facility to the environment are known to have occurred. No information was identified warranting the designation of the C-724-C facility as a SWMU or AOC.

# **17. IMPACT ON OR BY OTHER SWMU/AOC**

A portion of C-724-C is potentially impacted by AOC 178.

# **18. PRELIMINARY REMEDIATION GOAL COMPARISON**

Surface water sample location, WC-172, was located inside the facility and is a water sample collected in 1992 from the collection pit associated with AOC 178, C-724-A Paint Spray Booth, which is located inside C-724-C. No additional samples are known to have been collected at this location. Quantitative PCB data concentrations ranged from < 4.0 ppb to 0.3 ppb. Subsequently, water from the collection pit was treated prior to discharge. Historical data are provided in the appendix to this report. Due to its age, lack of other corroborating sampling points, and consistent with use of historical data in Paducah Site projects, data from that sample have not been utilized for determining representativeness of current conditions.

# **19. RCRA FACILITY INVESTIGATION NECESSARY**

A RCRA Facility Investigation (RFI) is necessary for the AOC 178 portion of the C-724-C Paint Shop because there were possible releases through the vent/floor drain which discharges to the plant sanitary and/or storm sewer system. There is no evidence of a release, or threat of any release, to the environment from the remainder of the facility, and the facility is not believed to pose a risk to human health or the environment. The plant sanitary and storm sewers have been designated as SWMUs.

# 20. CERCLA NTCRA NECESSARY

A CERCLA NTCRA is not recommended as necessary for demolition of the C-724-C facility aboveground structure or demolition of the aboveground structure associated with the C-724-A Paint Spray Booth (AOC 178). Any past releases that may have previously occurred during historical operation of the spray booth would have impacted the underlying slab and soils which are part of the Soils and Slabs OU that is subject to a separate RFI. After demolition of the aboveground structure is complete, the slab will be managed in a manner to prevent any residual contamination from migrating until the Soils and Slabs OU action is completed. Limited infrastructure items potentially containing *de minimis* quantities of regulated items remaining in the building will be removed, to the extent practicable, during deactivation. Building materials used for construction could contain lead-based paints and ACMs, both of which can be effectively

verified during a predemolition inspection, contained, and properly managed using standard demolition and waste management practices. Deactivation will include removal of any accessible loose items being stored, including those areas designated as RMAs, to the extent practicable, prior to demolition.

An October 2020 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 aboveground structure; therefore, the demolition and disposal of the facility is recommended to be conducted outside of the FFA and/or CERCLA process.

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

### **21. OU ASSIGNMENT**

C-724-C currently is assigned to the Facility D&D OU, Other Buildings (non-SWMUs) and AOC 178 is currently assigned to the Soil and Slabs OU (SMP Appendix 4) (DOE 2020).

# **22. REFERENCES**

DOE (U.S. Department of Energy) 1992. SWMU/AOC Assessment Report for AOC 178, November 4.

- DOE 1995. Policy on Decommissioning of Department of Energy Facilities under the Comprehensive Environmental Response, Compensation, and Liability Act (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.



Note: Figure is not to scale and is intended to show the building layout and nomenclature of the C-724 complex.

Figure 1. Facility Designation for C-724-A, -B, and -C



Figure 2. Aerial Photograph Showing the C-724-C Paint Shop Location



DOE Property Boundary: G:\GIS\ARCVIEWS\geodatabases\cercla.gdb Limited Area and 229 Boundary: G:\GIS\SHAPES\BOUNDS\229 and LA - R2\

Figure 3. Map Showing C-724-C Paint Shop Location



Figure 4. Engineering Drawing D-S-10021-J Rev. 0 of C-724-B and C-724-C



Figure 5. Engineering Drawing D-S-10021-Q Rev. 1 of Dust Collection System



Figure 6. East Entrance to C-724-C (Looking West)



Figure 7. East Side of C-724-C Showing the Women's Change House Added in 1975 (Looking West)



Figure 8. Spray Paint Booth



Figure 9. C-724-C Southeast Corner Showing Storage Area, Paint Oven, and Sign Shop



Figure 10. Interior of Sign Shop



Figure 11. SWMU and Sample Locations near C-724-C

![](_page_29_Picture_0.jpeg)

Figure 12. Floor Stains Across from and Outside of the Footprint of the Spray Paint Booth

APPENDIX

AERIAL PHOTOGRAPH AND HISTORICAL DATA

![](_page_33_Picture_0.jpeg)

Figure A.1. Aerial Photograph ADZ-4LL-53 070371

# Historical Water Sample Data from the Collection Pit Associated with Unit 178, C-724-A Paint Spray Booth, Located Inside C-724-C

	Sample						Lab
Station	ID	Collected	Medium Type	Result	Units	Analysis	Qualifier
WC-172	WC-172	8/11/1992	Water/sediment	4.0	μg/L	Polychlorinated biphenyl	<
WC-172	WC-172D	8/11/1992	Water/sediment	0.3	μg/L	Polychlorinated biphenyl	

< = Numerical value reported was less than the requested reporting limit.