



Paducah Gaseous Diffusion Plant
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Department of Energy

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

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JUN 24 2008

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Dear Sirs:

SUBMISSION OF THE CALENDAR YEAR 2007 ANNUAL NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS REPORT, PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY

Enclosed is the calendar year 2007 Annual National Emission Standards for Hazardous Air Pollutants Report, required by 40 CFR § 61, Subpart H. This report summarizes airborne radionuclide emissions from the Paducah Site, including both U.S. Department of Energy and United States Enrichment Corporation emissions for calendar year 2007. A certification statement signed by the U.S. Department of Energy and Paducah Remediation Services, LLC, is also enclosed.

If you have any questions or require additional information, please contact Rob Seifert at (270) 441-6823.

Sincerely,

A handwritten signature in blue ink, appearing to read "Reinhard Kherr".

Reinhard Kherr
Paducah Site Lead
Portsmouth/Paducah Project Office

Enclosures:

1. 2007 Annual National Emissions Standards for Hazardous Air Pollutants Report
2. Certification Statement

cc w/enclosures:

DCC/Kevil
G. Vazquez, EH-412
L. Generette, EPA/Region 4
R. Seifert, PPPO/PAD

e-copy w/enclosures:

annemarie.bird@emcbc.doe.gov, CBC/Cincinnati
ballard.turpin@epa.gov, EPA/Atlanta
donna.perry@prs-llc.net, PRS/Kevil
janet.miller@lex.doe.gov, PRC/PAD
jennifer.blewett@prs-llc.net, PRS/Kevil
marjorie.dulatt@lex.doe.gov, PPPO/LEX
msmith@techlawinc.com, TLI/Atlanta
myrna.redfield@prs-llc.net, PRS/Kevil
rob.seifert@lex.doe.gov, PPPO/PAD
sally.cooper@prs-llc.net, PRS/Kevil
tracey.duncan@prs-llc.net, PRS/Kevil
tufts.jennifer@epa.gov, EPA/Atlanta

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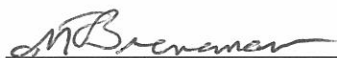
Mr. Alan Farmer, Director
U.S. Environmental Protection Agency
Region 4
Air, Pesticides, and Toxics Management Division
61 Forsyth
Atlanta, Georgia 30303

Mr. John S. Lyons
Kentucky Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601-1403

Mr. Behram Shroff
U.S. Environmental Protection Agency
Office of Radiation and Indoor Air
Radiation Protection Division
6608J, Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, District of Columbia 20460

**National Emissions Standards for Hazardous Air Pollutants
Annual Report for 2007 U.S. Department of Energy
Emissions at the Paducah Gaseous Diffusion Plant**

This document is approved for public release per review by:



Paducah Classification and Control Office
Swift and Staley Team

JUN 23 08

Date

**National Emissions Standards for Hazardous Air Pollutants
Annual Report for 2007 U.S. Department of Energy
Emissions at the Paducah Gaseous Diffusion Plant**

Date Issued June 2008

Prepared for the
U.S. DEPARTMENT OF ENERGY
Office of Environmental Management

Prepared by
PADUCAH REMEDIATION SERVICES, LLC
managing the
Environmental Management activities at the
Paducah Gaseous Diffusion Plant
under contract DE-AC30-06EW05001

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ACRONYMS

<i>CFR</i>	<i>Code of Federal Regulations</i>
DOE	U.S. Department of Energy
EDE	effective dose equivalent
ED	effective dose
EPA	U.S. Environmental Protection Agency
HEPA	high-efficiency particulate air
<i>KAR</i>	<i>Kentucky Administrative Regulations</i>
NESHAP	National Emission Standards for Hazardous Air Pollutants
PGDP	Paducah Gaseous Diffusion Plant
USEC	United States Enrichment Corporation

EXECUTIVE SUMMARY

The Kentucky Division for Air Quality regulates air emissions of radionuclides, other than radon, from the U.S. Department of Energy (DOE) facilities under 401 *Kentucky Administrative Regulations (KAR) 57:002*. The U.S. Environmental Protection Agency (EPA) also regulates air emissions of radionuclides from DOE facilities under 40 *Code of Federal Regulations (CFR) § 61, Subpart H*. Submission of this report fulfills the annual reporting requirements of 40 *CFR § 61.94*.

DOE owns the Paducah Gaseous Diffusion Plant (PGDP), which has radionuclide air emissions from DOE operations as well as from United States Enrichment Corporation (USEC) operations. Because all regulated airborne radionuclide emissions are subject to the regulation, both DOE and USEC operations were included in the estimate of the Paducah Site resultant dose to the public. DOE certifies the information relating to its operation only. USEC submits a separate National Emission Standards for Hazardous Air Pollutants (NESHAP) report relating to emissions from its activities. The dose to the public is calculated using a computer modeling program (CAP-88) specified in 40 *CFR § 61.93*. Inputs to the computer program for both DOE and USEC sources are obtained through continuous monitoring, periodic confirmatory measurements, engineering estimates, emission factors, and other EPA-approved methods. Subpart H requires an annual compliance report covering site emissions from the previous year. This report meets the annual reporting requirements and establishes the total annual dose to the maximally exposed member of the public in 2007 at 0.0042 mrem, including USEC and DOE contributions. DOE emissions contribution to this total was 0.00015 mrem. This is well below the annual limit of 10 mrem per year.

1. FACILITY DESCRIPTION

Site Name: Paducah Gaseous Diffusion Plant

Location: Paducah, Kentucky

Owner: U.S. Department of Energy
Portsmouth/Paducah Project Office
P. O. Box 1410
Paducah, Kentucky 42002-1410
Reinhard Knerr
(270) 441-6825

Operator: Paducah Remediation Services, LLC
761 Veterans Avenue
Kevil, Kentucky 42053
Russell Boyd, P.E.
(270) 441-5100

2. INTRODUCTION

The U.S. Department of Energy (DOE) Paducah Site includes the Paducah Gaseous Diffusion Plant (PGDP), which is leased to the United States Enrichment Corporation (USEC). DOE manages the remaining, nonleased facilities at the Paducah Site. The DOE-managed facilities consist of various waste management facilities, inactive buildings, depleted uranium storage facilities, and environmental restoration facilities. Paducah Remediation Services, LLC, is the operator of the DOE managed facilities.

Emissions from both USEC and DOE activities were analyzed together. DOE certifies only the information related to its emissions. The results from the single combined analysis are presented in separate DOE and USEC reports. The reports have been separated to ease review and approval by the separate organizations.

3. SITE DESCRIPTION

PGDP is an active uranium enrichment facility consisting of a diffusion cascade and extensive support facilities. The cascade, including product and tails withdrawal, is housed in 6 large process buildings. The plant is located on a reservation consisting of approximately 3,500 acres in western McCracken County, 10 miles west of Paducah, Kentucky, and 3.5 miles south of the Ohio River. The facility is on approximately 1,350 acres with controlled access. Roughly 650 acres of the reservation are enclosed within a fenced security area. An uninhabited buffer zone of at least 400 yards surrounds the entire fenced area. During World War II, the Kentucky Ordnance Works, a trinitrotoluene production facility, was operated in an area southwest of the plant on what is now a wildlife management area.

Construction of the PGDP facility began in 1951 and the plant was fully operational by 1955, supplying enriched uranium for commercial reactors and military defense reactors. Enriched uranium is defined as

uranium in which the concentration of the fissionable uranium-235 (^{235}U) isotope has been increased from its natural assay. Natural uranium is primarily uranium-238 (^{238}U), with about 0.71 percent ^{235}U and 0.0055 percent uranium-234 (^{234}U). Uranium mills process the ores to produce concentrated uranium oxide (U_3O_8), which then is converted commercially to uranium hexafluoride (UF_6) for enrichment at a gaseous diffusion plant.

The radioactive materials used at the PGDP are associated with enrichment of the uranium isotope, ^{235}U , by utilizing a gaseous diffusion process [40 *CFR* § 61.94 (a) (2)]. During enriching operations from 1953 to 1975, feed material (called “reactor tails”) from government reactors also was used intermittently in addition to the UF_6 typically used. Reactor tails were the spent fuel from nuclear reactors that is depleted in ^{235}U content and has been reprocessed to remove most of the fission products. The reactor fuel rods were processed at other DOE facilities (where most of the fission products were removed) and the enriched uranium and the remaining fission products were fed into the PGDP cascade system. Use of the reactor tails resulted in the introduction of technetium-99 (^{99}Tc), a fission by-product, and transuranics, most notably neptunium-237 (^{237}Np) and plutonium-239 (^{239}Pu), into the cascade. ^{99}Tc is a man-made radioactive substance (radionuclide) having a half-life estimated at between 212,000 and 250,000 years. ^{99}Tc decays by emitting beta radiation.

The West Kentucky Wildlife Management Area and lightly populated farmlands are in the immediate environs of PGDP. The population within the 50-mile radius is approximately 520,000 persons. Of these, 44,000 live within 10 miles of the plant and 104,000 live within 20 miles of the plant. Population data were determined from the LandView 6 Census 2000 population estimator computer program. The unincorporated communities of Grahamville and Heath are 1.24 and 1.86 miles east of the plant, respectively. Portions of 28 counties, 11 of which are in Kentucky, 4 in Missouri, 10 in Illinois, and 3 in Tennessee, are included within the 50-mile radius of the plant. Larger cities in the region include Paducah, Kentucky, located 10 air miles east of the plant; Cape Girardeau, Missouri, located 40 air miles to the west; and Metropolis, Illinois, located 6 air miles to the northeast.

Paducah is located in the humid continental zone. Summers generally are dry; precipitation occurs mainly in the spring and fall. Winters are characterized by moderately cold days; the average temperature during the coldest month, January, is about 35 °F. Summers are warm and humid; the average temperature in July is 79 °F. Yearly precipitation averages about 44 inches. The prevailing wind direction is south to southwest.

In July 1993, USEC was formed as a government corporation and became a private corporation in July 1998. Although DOE still owns all the facilities at PGDP, the uranium enrichment enterprise is now the responsibility of USEC.

4. DOE SOURCE HANDLING AND PROCESSING DESCRIPTION

The description of the handling and processing that the radioactive materials undergo with DOE operations at the PGDP is described in the following sections.

4.1 NORTHWEST PLUME INTERIM REMEDIAL ACTION PROJECT

On September 1, 1995, DOE began operation of a groundwater treatment plant designed for the removal of trichloroethene and ⁹⁹Tc. The facility is located at the northwest corner of the PGDP site security area. The facility consists of an air stripper to remove volatile organics and an ion exchange unit to remove of ⁹⁹Tc from the groundwater. The air stripper is located upstream of the ion exchange unit.

Emissions of ⁹⁹Tc were estimated using the analysis of the groundwater. Comparison of the ⁹⁹Tc concentration in the influent and the quantity of the water passing through the stripper were used to estimate the total quantity of ⁹⁹Tc emitted from the facility. The exhaust from the air stripper is passed through a carbon adsorption unit prior to exhaust. Extensive sampling has shown that ⁹⁹Tc is not retained in the carbon; therefore, no reduction in ⁹⁹Tc emissions due to the use of the adsorption unit were assumed. The resultant estimated emissions are shown in Table 4.

4.2 NORTHEAST PLUME CONTAINMENT SYSTEM

DOE began normal operation of a groundwater treatment system on February 28, 1997, as an interim remedial action. The system extracts contaminated groundwater and pumps it to the C-637 Cooling Towers operated by USEC. Initially, the contaminated groundwater did not contain radionuclides; however, ⁹⁹Tc has been detected continuously in the groundwater and consequently emitted to the air since 2005. Emissions of ⁹⁹Tc were estimated using 40 *CFR* § 61, Subpart H, Appendix D, emission factors and the analysis of the groundwater. The resultant estimated emissions are shown in Table 4.

4.3 C-752-A WASTE MANAGEMENT ACTIVITIES

Waste containing fine particulate radioactive material was repackaged. The particulate waste was repackaged in a ventilated enclosure within C-752-A. The ventilation for the enclosure passes through high-efficiency particulate air (HEPA) filters and then is exhausted through two stacks. The airborne concentration of radionuclides was estimated using emission factors in Appendix D of 40 *CFR* § 61.

4.4 C-301 DOE MATERIAL STORAGE AREA OUTSIDE-12 METAL REDUCTION PROJECT

Contaminated metal components were size reduced in DOE Material Storage Area Outside-12 to facilitate disposal. During 2007, fugitive airborne radionuclide emissions may have resulted from dust created by size reduction and loading the metal into transportation containers. The amount of radionuclides released was estimated based on emission factors from the *Compilation of Air Emission Factors*, AP-42, U.S. Environmental Protection Agency (EPA), Fifth Edition, January 1995.

4.5 C-405 DEMOLITION

The C-405 building, the Contaminated Item Incinerator, was demolished during 2007. Fugitive airborne radionuclide emissions may have resulted from dust created by demolition and removal of the debris. The amount of radionuclides released was estimated based on emission factors from the *Compilation of Air Emission Factors*, AP-42, U.S. Environmental Protection Agency, Fifth Edition, January 1995.

4.6 FUGITIVE AND DIFFUSE SOURCES

Diffuse/fugitive sources include any source that is distributed spatially, diffuse in nature, or not emitted with forced air from a stack, vent, or other confined conduit. Diffuse/fugitive sources also include emissions from sources where forced air is not used to transport the radionuclides to the atmosphere. In this case, radionuclides are transported entirely by diffusion and/or thermally driven air currents. Typical examples of diffuse/fugitive sources include emissions from building breathing; resuspension of contaminated soils, debris, or other materials; unventilated tanks; ponds, lakes, and streams; wastewater treatment systems; outdoor storage and processing areas; and leaks in piping, valves, or other process equipment. DOE has identified many potential fugitive and diffuse sources such as inactive facilities, building roofs, scrap metal storage yards, landfills, and various contamination areas. The use of ambient air monitors to evaluate emissions from fugitive and diffuse sources is described in Section 9.

4.7 MISCELLANEOUS SOURCES

DOE identified transport and disposal of contaminated materials in the C-746-U Landfill and decontamination of machinery and equipment used in remediation activities (e.g., well drilling) as miscellaneous sources. The use of ambient air monitors to evaluate emissions from these sources is described in Section 9. DOE understands that USEC will be submitting a separate NESHAP report addressing emissions of radionuclides from USEC operations.

5. CONSTRUCTION AND MODIFICATION ACTIVITIES

No construction or modification activities were waived under 40 *CFR* § 61.96.

6. DOE SOURCE CHARACTERISTICS AND AIR EMISSIONS DATA

The Tables 1 through 4 contain specific emission information for each DOE emission point. Table 1 lists the emission points and efficiency of control devices as required by 40 *CFR* § 61.94 (a) (4) & (5). Table 2 lists the distances from each emission point to receptors of concern as listed in 40 *CFR* § 61.94 (a) (6). Table 3 contains emission point information required to estimate the resulting potential exposure as required by 40 *CFR* § 61.94 (a) (7). Table 4 contains a list of site radioactive materials and their emission rates as required by 40 *CFR* § 61.94 (a) (2).

Table 1. Emission Point Effluent Controls and Efficiencies

Minor Point and Area Sources	Type Control	Efficiency%	Distance (m) and Direction to Nearest Receptor
Northwest Plume Treatment Facility	None	0	1080 NNE
C-752-A Waste Management Activities	HEPA	99	1695 N
Northeast Plume Treatment Facility	None	0	1360 SE
C-405	None and HEPA	0 and 99	1579 N
C-301 OS-12	None	0	1554 SE

Table 2. Distances to Selected Receptors

Source Name	Distances (m) to Selected Receptors		
	Nearest Individual/Farm	Nearest Business	Nearest School
Northwest Plume Treatment Facility	1080	2550	5150
C-752-A Waste Management Activities	1695	3202	4270
Northeast Plume Treatment Facility	1268	2073	4207
C-405	1579	2969	3170
C-301 OS-12	3475	2490	4565

Table 3. Characteristics of Stacks, Vents, or Other Emission Points that Emit Radionuclides

Source Name	Type	Height (m)	Diameter (m)	Gas Exit Velocity (m/s)	Gas Exit Temp. (°C)	Distance (m) & Direction to <u>Maximally Exposed Individual</u> (MEI)
Northwest Plume Treatment Facility	Point	7.0	0.35	9.45	37.8	1080 NNE
C-752-A Waste Management Activities	Point	5.5	0.3	6.47	Ambient	2180 NNW
Northeast Plume Treatment Facility	Point	10.22	8.18	4.84	Ambient	1360 SE
C-405	Point	1	NA	0	Ambient	2067 ESE 2377 NW
C-301 OS-12	Point	1	NA	0	Ambient	1554 SE

Table 4. Radionuclide Materials and Emissions Data (Curies)

Nuclide	NW Plume Treatment Facility	C-752-A Waste Management Activities	NE Plume Treatment Facility	C-405	C-301 OS-12	Total
²³⁴ U	0	1.45E-07	0	1.16E-05	3.02E-06	1.47E-05
²³⁵ U	0	7.26E-09	0	1.0E-05	1.19E-07	1.02E-05
²³⁶ U	0	7.26E-10	0	0	0	7.26E-10
²³⁸ U	0	1.45E-07	0	2.07E-05	9.04E-07	2.17E-05
⁹⁹ Tc	9.68E-05	1.82E-06	4.0E-06	1.92E-05	2.14E-05	1.43E-04
²³⁰ Th	0	1.45E-09	0	3.29E-06	0	3.29E-06
²³⁷ Np	0	1.45E-09	0	1.72E-07	2.96E-07	4.69E-07
²³⁹ Pu	0	7.26E-10	0	7.57E-07	2.58E-07	1.02E-06
²⁴⁰ Pu	0	7.26E-10	0	7.57E-07	0	7.58E-07
²³⁸ Pu	0	1.45E-10	0	8.67E-08	0	8.68E-08
²²⁸ Th	0	1.45E-10	0	3.89E-08	0	3.91E-08
²³² Th	0	1.45E-10	0	2.29E-08	0	2.31E-08
²³⁴ Th	0	0	0	7.86E-05	0	7.86E-05
²⁴¹ Am	0	7.26E-10	0	2.24E-07	0	2.25E-07
⁶⁰ Co	0	7.26E-10	0	0	0	7.26E-10
¹³⁷ Cs	0	7.26E-10	0	3.12E-08	0	3.19E-08
⁴⁰ K	0	7.26E-08	0	0	0	7.26E-08
²²⁶ Ra	0	1.45E-10	0	0	0	1.45E-09
²¹⁰ Pb	0	2.91E-10	0	0	0	2.91E-10
⁹⁰ Sr	0	1.45E-10	0	3.83E-08	0	3.84E-08
Total	9.68E-05	2.20E-06	4.0E-06	1.46E-04	2.60E-05	2.74E-04

7. DOSE ASSESSMENT

7.1 DESCRIPTION OF DOSE MODEL

The radiation dose calculations were performed using the CAP-88PC Version 3. The CAP88 model is a set of computer programs, databases, and associated utility programs for estimation of dose and risk from radionuclide emissions to air. CAP88 is composed of modified versions of AIRDOS-EPA and DARTAB. CAP88PC contains EPA's version of the AIRDOS-EPA computer code, which implements a steady-state, Gaussian plume, atmospheric dispersion model to calculate environmental concentrations of released radionuclides and then food chain models are used to calculate human exposures, both internal and external, to the environmental concentrations.

This is the first year CAP88PC Version 3 has been used. A major difference between the earlier CAP88 and the CAP88 PC Version 3 is the use of dose factors from Federal Guidance Report Number 13. The Federal Guidance Report 13 dose factors are based on the methods in Publication 72 of the International Commission on Radiological Protection. The dose factors are used to calculate effective dose (ED), instead of effective dose equivalent (EDE), which were calculated in earlier CAP88 versions. The ED is essentially equivalent to the term EDE. The ED, as was the EDE, is the weighted sum of equivalent dose over specified tissues or organs. For the ED, there are tissue weighting factors for twelve tissues or organs (as well as one for remainder organs and tissues), as compared to the EDE for which there were six tissue weighting factors (and one for remainder organs and tissues). In addition to tissue weighting factor modifications, there have been updates to the lung model, gastrointestinal absorption fractions, and biokinetic models used for selected elements.

7.2 SUMMARY OF INPUT PARAMETERS

Except for the radionuclide parameters given in the previous tables and those given below, all other important input parameter values used are the default values provided with the CAP-88 computer codes and data bases.

Joint frequency distribution: Five-year STAR distribution from 60-meter station on PGDP meteorological tower for the years 1988 through 1992.

Rainfall rate: 116.3 centimeters/year

Average air temperature: 14.7 °C

Average mixing layer height: 930 meters

Fraction of foodstuffs from (rural default values):

	<u>Local Area</u>	<u>50-Mile Radius</u>	<u>Beyond 50 Miles</u>
Vegetables and produce:	0.700	0.300	0.000
Meat:	0.442	0.558	0.000
Milk:	0.399	0.601	0.000

7.3 DOSE ESTIMATE

Effective dose (mrem) to maximally exposed individual for each individual source and the plant is provided in Table 5. The dose estimate is based on both the DOE and USEC sources combined (data provided by USEC).

Table 5. Dose Analysis

USEC Emission Sources¹	Maximum for Source (mrem)	Maximum for Plant (mrem)
C-400 Group	2.1E-03	2.1E-03
C-400 Cylinder Drying Station	2.9E-05	2.9E-05
C-709/C-710 Laboratory Hoods	2.1E-04	2.1E-04
C-310 Stack	1.2E-04	1.2E-04
Seal Exhaust/Wet Air Group	1.5E-03	1.5E-03
C-409 Dissolver	2.3E-07	2.3E-07
C-360	1.1E-03	4.8E-05
Total From USEC Sources	N/A	4.0E-03
DOE Emission Sources	Maximum for Source (mrem)	Maximum for Plant (mrem)
Northwest Plume Treatment Facility	6.3E-05	6.3E-05
C-752-A Waste Activities	7.6E-07	7.6E-07
Northeast Plume Treatment Facility	8.9E-07	6.2E-07
C-405 D&D	8.1E-05	8.1E-05
C-301 OS-12	1.8E-05	8.6E-06
Total From DOE Sources	N/A	1.5E-04
Total From All Sources	N/A	4.2E-03

The maximally exposed individual from all plant emissions is located 2,040 meters north of the C-400 Group source (a USEC source).

Based on 2000 census data obtained from the LandView 6 software, the total collective effective dose to the 50-mile population (approximately 531,000 persons) was 0.03 person-rem.

8. UNPLANNED RELEASES

There were no unplanned releases in 2007.

¹ Certified by USEC in its annual report

9. AMBIENT AIR MONITORING

In accordance with the *Paducah Gaseous Diffusion Plant Department of Energy National Emission Standards for Hazardous Air Pollutants (NESHAP) Management Plan*, BJC/PAD-141, February 2000, DOE utilized ambient air monitoring data to verify insignificant levels of radionuclides in off-site ambient air. Ambient air stations collect radionuclide samples at sites surrounding the plant. The ambient air monitors capture airborne radionuclides emitted from all sources including fugitive and diffuse sources. Ambient air monitoring locations are shown in Figure 1. The Radiation/Environmental Monitoring Section of the Radiation Health and Toxic Agents Branch of the Department for Public Health of the Kentucky Cabinet for Health Services operates the ambient air monitors.

The Radiation Health and Toxic Agents Branch reports that air filters were screened weekly for gross alpha and beta activity and then composited on a quarterly basis. The quarterly composites were analyzed by gamma spectroscopy using a thin window 40 percent high purity germanium detector, which allows for detection of low energy gamma emitters. Americium-241 (^{241}Am) and thorium-234 (^{234}Th) were not detected by gamma spectroscopy for the quarterly composites.

In accordance with the Radiation Health and Toxic Agents Branch's protocol, plutonium and uranium isotopic analyses were not performed on the quarterly composites since ^{241}Am and ^{234}Th were not detected. Since ^{241}Am and ^{234}Th were not present, the quarterly composites were analyzed for ^{99}Tc . ^{99}Tc also was not detected in the quarterly composites.

Ambient air monitoring conducted by the Kentucky Radiation Health and Toxics Branch did not detect plant-derived radionuclides above background levels. The actual results, though less than the measurement error, of each air monitor are listed in Table 6 of this report.

10. STATUS OF 40 CFR § 61 SUBPART H COMPLIANCE

DOE has remained in compliance with 40 *CFR* § 61, Subpart H, since 1993. Kentucky Division of Air Quality received a delegation of authority to administer the NESHAP program in July 1999. A NESHAP Management Plan has been developed by DOE that addresses fugitive and diffuse emissions. EPA Region 4 concurred with the DOE NESHAP Management Plan on September 19, 2000. In accordance with the management plan, ambient air monitoring was utilized to verify compliance of the Paducah Site with 40 *CFR* § 61, Subpart H, for all emissions. Ambient air monitoring conducted by the Kentucky Radiation Health and Toxics Branch did not detect plant derived radionuclides above background levels during calendar year 2007; therefore, the facility is in compliance with 40 *CFR* § 61 Appendix E, Table 2, values and the management plan.

Based on the results included in this report, during 2007, the facility was in compliance with 40 *CFR* §61, Subpart H, for all airborne radionuclide emissions.

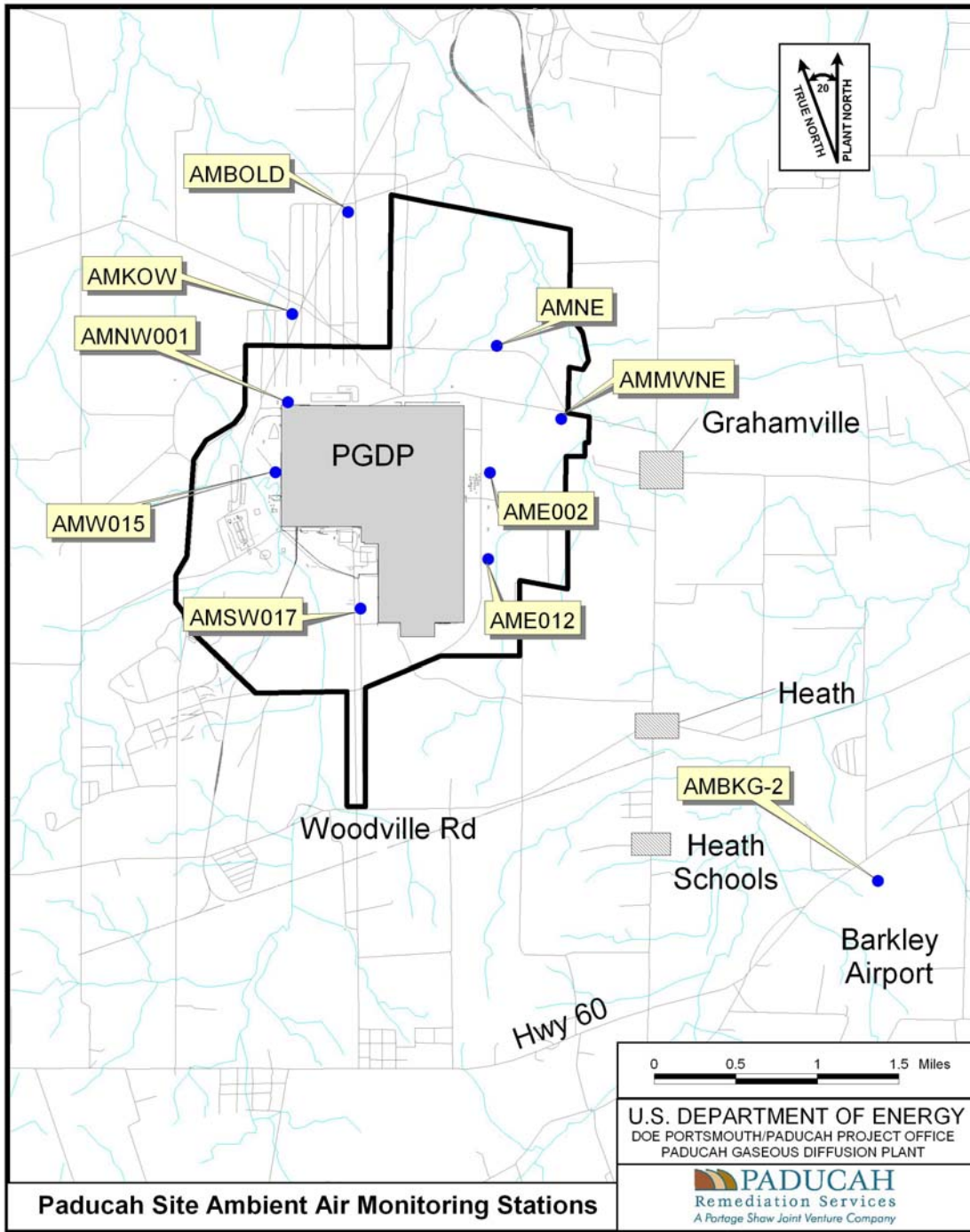


FIGURE No. c5ac9000sk640.apr
 DATE 04-19-07

Figure 1. Location of Paducah Site Ambient Air Monitors

Table 6. Kentucky Radiation Health and Toxics Branch Ambient Air Monitoring Results^{2,3}

		Ambient Air Station									
Quarter	Nuclide	AMSW017	AMW015	AMNW001	AMNE	AME002	AME012	AMBKG2	AMBOLD	AMKOW	AMMWNE
		Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³	Ci/m ³
1	²⁴¹ Am	-1.19E-15	-7.95E-17	-6.55E-16	-7.99E-16	-1.67E-16	-9.83E-16	8.04E-18	-9.45E-16	2.86E-17	-2.86E-16
	²³⁷ Np	-1.33E-16	3.47E-16	-3.06E-16	1.64E-16	2.85E-16	1.11E-16	3.59E-16	-1.43E-16	-2.25E-16	1.68E-16
	⁹⁹ Tc	-1.25E-16	7.26E-17	-8.71E-17	-5.62E-17	1.82E-16	4.38E-17	1.68E-16	1.34E-16	3.76E-17	3.55E-17
	²³⁸ U/ ²³⁴ Th	1.96E-16	1.59E-16	1.89E-16	2.66E-16	2.06E-16	1.63E-16	1.30E-16	1.86E-16	1.93E-16	2.14E-16
2	²⁴¹ Am	2.36E-16	-1.12E-16	3.46E-16	3.17E-16	-7.29E-16	2.20E-16	-7.34E-16	-1.10E-15	1.05E-16	3.19E-16
	²³⁷ Np	2.13E-16	-4.50E-17	-2.45E-17	1.79E-16	-2.52E-16	2.98E-16	-3.33E-16	-1.08E-16	-6.51E-17	-2.21E-17
	⁹⁹ Tc	4.55E-17	2.63E-16	4.93E-16	3.24E-16	4.79E-16	3.99E-16	4.70E-16	3.41E-16	4.16E-16	9.34E-16
	²³⁸ U/ ²³⁴ Th	1.07E-16	1.29E-16	1.22E-16	1.40E-16	1.20E-16	1.03E-16	8.53E-17	1.82E-16	1.36E-16	7.67E-17
3	²⁴¹ Am	1.33E-17	1.13E-16	-4.04E-16	7.15E-17	6.13E-18	-5.79E-16	1.37E-17	-5.67E-19	-2.07E-16	-4.30E-16
	²³⁷ Np	-5.15E-16	2.02E-17	1.84E-17	-1.23E-16	2.12E-16	7.09E-17	1.93E-16	-3.11E-16	-2.09E-16	-1.38E-16
	⁹⁹ Tc	-5.80E-17	3.25E-16	3.87E-16	-1.25E-16	3.94E-16	-2.99E-16	2.16E-16	-3.38E-17	0.00E+00	9.45E-17
	²³⁸ U/ ²³⁴ Th	2.56E-16	2.87E-16	3.04E-16	3.02E-16	2.48E-16	2.65E-16	1.53E-16	3.80E-16	3.33E-16	2.12E-16
4	²⁴¹ Am	4.67E-16	2.16E-17	-6.29E-16	-9.02E-17	5.08E-17	-5.14E-16	-1.27E-16	-5.55E-18	1.78E-16	-2.85E-16
	²³⁷ Np	4.87E-16	2.08E-16	-2.75E-17	-2.33E-16	5.98E-17	-1.06E-16	1.67E-17	-1.62E-16	-1.31E-16	-1.60E-16
	⁹⁹ Tc	4.25E-16	-4.33E-17	5.09E-16	2.31E-16	2.54E-16	3.62E-16	3.08E-17	2.39E-16	2.92E-16	-1.05E-15
	²³⁸ U/ ²³⁴ Th	7.12E-17	5.83E-17	6.93E-17	1.49E-16	1.13E-16	1.13E-16	5.05E-17	1.03E-16	1.13E-16	1.15E-16

² All results were considered nondetect.

³ 40 CFR § 61, Table 2, Limiting Values (Ci/m³): ²⁴¹Am 1.9E-15, ²³⁷Np 1.2E-15, ⁹⁹Tc 1.4E-13, and ²³⁸U 8.3E-15.

CERTIFICATION

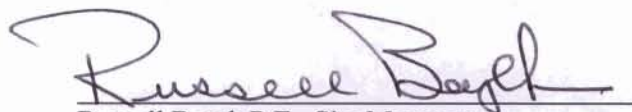
Document Identification: *NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS ANNUAL REPORT FOR 2007 U.S. DEPARTMENT OF ENERGY EMISSIONS AT THE PADUCAH GASEOUS DIFFUSION PLANT (PRS-REG-0007)*

This certification pertains to the following DOE emission sources:

C-752-A Waste Activities
Northwest Plume Treatment Facility
Northeast Plume Treatment Facility
C-405 Demolition
C-301, DOE Material Storage Area Outside 12
Fugitive and Diffuse Sources

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. (See 18 USC 1001.)

Paducah Remediation Services, LLC

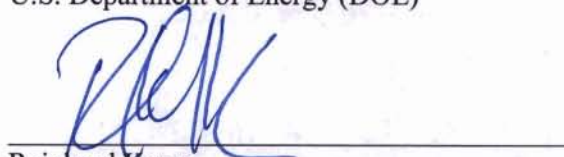


Russell Boyd, P.E., Site Manager
Paducah Remediation Services, LLC
Operator, Paducah Gaseous Diffusion Plant

6/24/2008
Date Signed

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment. (See 18 USC 1001.)

U.S. Department of Energy (DOE)



Reinhard Knerr
Paducah Site Lead
Portsmouth/Paducah Project Office
U.S. Department of Energy

6/24/08
Date Signed