



Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
(859) 219-4000
MAR 17 2016

RECEIVED
By Darla Bowen at 1:55 pm, Mar 17, 2016

Mr. Anthony R. Hatton, Director
Division of Waste Management
Kentucky Department for Environmental Protection
200 Fair Oaks Lane, 2nd Floor
Frankfort, Kentucky 40601

PPPO-02-3434390-16

Dear Mr. Hatton:

2015 SITE TREATMENT PLAN ANNUAL UPDATE FOR THE U.S. DEPARTMENT OF ENERGY, PADUCAH DIFFUSION PLANT, PADUCAH, KENTUCKY, AND PADUCAH SITE TREATMENT PLAN WASTE MINIMIZATION PROGRESS REPORT

References:

1. E-mail from L. Williamson to M. Redfield, "Re: PGDP Site Treatment Plan Reporting requirements," dated April 20, 2012
2. Letter from A. Webb to R. Knerr, "Approval of the Department of Energy's 2010 Site Treatment Annual Update Report and Request to Cease Quarterly Site Treatment Reporting Requirements," dated July 28, 2011

Background

The September 10, 1997, Agreed Order (File No. DWM-30039-042) between the Kentucky Department for Environmental Protection (KDEP) and the U.S. Department of Energy (DOE) requires submittal of an annual update regarding implementation of the Site Treatment Plan (STP). Additionally, the Agreed Order requires that DOE implement a Waste Minimization and Pollution Prevention (WM/PP) Awareness Program to minimize the amount of new wastes added to the STP each year. The Agreed Order requires that a progress report be submitted annually on or before March 31 of each year for the previous calendar year (CY).

On July 9, 2009, discussions between Paducah DOE Site Office personnel and KDEP personnel resulted in agreement that both the quarterly progress report and the required annual STP update could be submitted in letter format. It subsequently was agreed the WM/PP also could be included in letter format with this submittal.

On July 28, 2011, KDEP approved the suspension of the quarterly and annual reporting requirements in the Agreed Order until any additional waste is added to the STP. In further discussions, KDEP requested an annual letter confirming no waste was added. This letter constitutes submittal of DOE's annual update for the reporting period January 1 to December 31, 2015, confirming no addition of Mixed Low-Level Waste (MLLW) to the STP.

Fluor Federal Services, Inc., (FFS) is the contractor responsible programmatically and operationally for managing MLLW. FFS is responsible for ensuring overall compliance with the STP/Agreed Order.

Annual STP Update

Approved Amendments or Revisions: No amendments or revisions were approved by the Cabinet during CY 2015.

Volume of STP MLLW: Currently, no waste is being managed under the STP at the Paducah Gaseous Diffusion Plant (PGDP). There was an inventory of MLLW remaining in storage at the end of December 2014 that was shipped off-site on February 10, 2015. Addition of this inventory to the STP and the subsequent shipment were documented in the in the 2014 annual update.

Annual WM/PP Progress Report

The waste minimization goals related to the STP are as follows:

- Minimize the generation of hazardous and mixed waste;
- Segregate hazardous waste from radioactive mixed waste; and
- Reduce the volume, toxicity, and mobility of waste generated.

Implementation of these goals continues to ensure that the amount of waste that requires being added to the STP each year is minimized to the extent practicable.

Information regarding the PGDP WM/PP Program is provided in the current version of the *Fluor Federal Services, Inc., Paducah Deactivation Project Waste Management Plan*, CP2-WM-0001. All PGDP projects are evaluated for WM/PP opportunities. WM/PP activities at PGDP related to the STP WM/PP goals include the following:

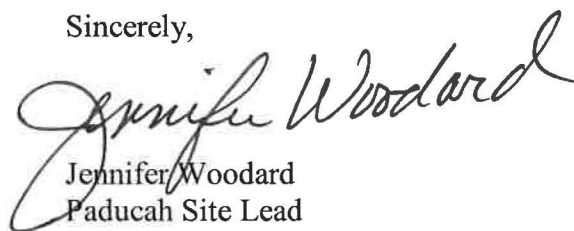
- Reducing the quantity of wastes generated at their sources;
- Treating wastewaters on-site to meet discharge limitations;
- Draining, decanting, drying, dewatering, evaporating, and otherwise removing liquid from wastes when possible;
- Segregating, sorting, consolidating, and reducing the volume of like wastes; and
- Reusing or recycling materials.

The following is a brief discussion of the main accomplishments in 2015:

- Regenerated 26,626 pounds of activated carbon averting disposal;
- Recycled 1,545 pounds of various light bulbs from radiological areas; and
- Shipped 3,807 pounds of miscellaneous liquids to be burned for energy recovery from radiological areas.

If you have any questions or require additional information, please contact Cynthia Zvonar at (859) 219-4066.

Sincerely,



Jennifer Woodard
Paducah Site Lead
Portsmouth/Paducah Project Office

e-copy:

anthony.hatton@ky.gov, KDEP/Frankfort
april.webb@ky.gov, KDEP/Frankfort
brian.begley@ky.gov, KDEP/Frankfort
corkran.julie@epa.gov, EPA/Atlanta
craig.jones@ffspaducah.com, FFS/Kevil
cynthia.zvonar@lex.doe.gov, PPPO/LEX
ffscorrespondence@ffspaducah.com, FFS/Kevil
gaye.brewer@ky.gov, KDEP/PAD
jennifer.woodard@lex.doe.gov, PPPO/PAD
leo.williamson@ky.gov, KDEP/Frankfort
mark.duff@ffspaducah.com, FFS/Kevil
mike.guffey@ky.gov, KDEP/Frankfort
myrna.redfield@ffspaducah.com, FFS/Kevil
pad.rmc@swiftstaley.com, SSI/Kevil
reinhard.knerr@lex.doe.gov, PPPO/PAD
richards.jon@epamail.epa.gov, EPA/Atlanta
stephaniec.brock@ky.gov, KYRHB/Frankfort