



Department of Energy

Portsmouth/Paducah Project Office
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MAR 15 2017

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By Carolee.Thompson at 2:44 pm, Mar 15, 2017

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

PPPO-02-4071106-17

Dear Mr. Hatton:

2016 SITE TREATMENT PLAN ANNUAL UPDATE FOR THE U.S. DEPARTMENT OF ENERGY, PADUCAH GASEOUS 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. Subsequently, it was agreed that the WM/PP could also 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, 2016, confirming no addition of mixed low-level waste (MLLW) to the STP.

Fluor Federal Services, Inc., Paducah Deactivation Project (FPDP) is the contractor responsible, programmatically and operationally, for managing MLLW. FPDP 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 2016.

Volume of STP MLLW: Currently, no waste is being managed under the STP at the Paducah Gaseous Diffusion Plant (PGDP).

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:

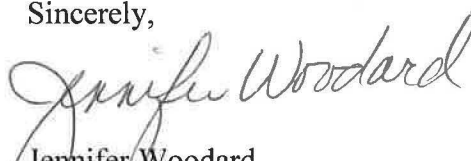
- Reducing the quantity of wastes generated at their sources;
- Treating wastewaters on-site to meet discharge limitations;
- Draining, decanting, drying, dewatering, evaporating, and otherwise removing liquid from wastes when possible;
- Segregating, sorting, consolidating, and reducing the volume of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

Following is a brief discussion of the main accomplishments in 2016:

- Regenerated 29,340 pounds of activated carbon—averting disposal;
- Recycled 272,680 pounds of scrap metal from demolition of C-601-D, C616-G, and C-801;
- Recycled 10,901 pounds of various light bulbs;
- Recycled 69,734 pounds of various batteries; and
- Shipped 9,226 pounds of miscellaneous liquids from radiological areas to be burned for energy recovery.

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

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Woodard".

Jennifer Woodard

Paducah Site Lead

Portsmouth/Paducah Project Office

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