



Department of Energy

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MAR 27 2019

RECEIVED

By Carolee Thompson at 9:36 am, Mar 27, 2019

Mr. Jon Maybriar
Division of Waste Management
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601

PPPO-02-5458126-19A

Dear Mr. Maybriar:

2018 ANNUAL SITE TREATMENT PLAN UPDATE AND WASTE MINIMIZATION PROGRESS REPORT FOR THE U.S. DEPARTMENT OF ENERGY, PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY

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 Plan Reporting Requirements," Paducah Gaseous Diffusion Plant, Paducah, McCracken County, Kentucky, KY8-890-008-982, 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 Annual Progress Report 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 additional waste is added to the STP. In further discussions, KDEP requested an annual letter confirming no waste was added. This letter constitutes the submittal of DOE's annual update for the reporting period January 1 to December 31, 2018, confirming no addition of mixed low-level waste (MLLW) to the STP. Four Rivers Nuclear Partnership, LLC (FRNP) is the contractor responsible for performing Resource Conservation and Recovery Act generator requirements on behalf of both FRNP and

DOE for all activities under the scope of FRNP's contract. FRNP 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 2018.

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

Waste Minimization Annual Progress Report

The waste minimization goals specifically 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 CP2-WM-0001, *Four Rivers Nuclear Partnership, LLC, Paducah Deactivation and Remediation Project Waste Management Plan*. All PGDP projects are evaluated for WM/PP opportunities. WM activities at the PGDP related to STP WM goals include the following:

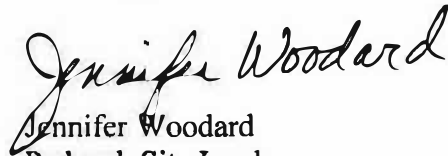
- Reducing the quantity of wastes generated at their sources;
- Draining, decanting, drying, dewatering, evaporating, and otherwise removing liquid from wastes when possible;
- Segregating, sorting, consolidating, and reducing the volume of like wastes; and
- Reusing or recycling materials that otherwise would be managed as hazardous or radioactive mixed waste.

Following is a brief discussion of the main STP WM accomplishments in 2018:

- Regenerated 21,820 pounds of activated carbon, averting disposal;
- Recycled 8,210 pounds of scrap metal;
- Recycled 4,144 pounds of various light bulbs;
- Recycled 41,932 pounds of various batteries;
- Recycled 490,059 gallons of non-polychlorinated biphenyl oil from C-535 and C-537 Switchyards;
- Reduced the amount of hazardous chemicals at the PGDP by returning 3,300 pounds of fluorine to the vendor for reprocessing for future use; and
- Shipped 7,938 pounds of miscellaneous liquids from radiological areas to be burned for energy recovery.

If you have any questions or require additional information, please contact Tracey Duncan at (270) 441-6862.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Woodard". The signature is fluid and cursive, with the first name "Jennifer" written in a larger, more prominent script than the last name "Woodard".

Jennifer Woodard
Paducah Site Lead
Portsmouth/Paducah Project Office

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