Department of Energy

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June 21, 2023

Ms. Kathryn Caballero, Director
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PPPO-02-10024487-23B

Ms. Kathleen Doster, ESQ
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Ms. Terri Crosby-Vega
Regional PCB Program Coordinator/Team Lead
Resource Conservation and Restoration Division
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center 9T25
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Atlanta, GA 30303-8960

Dear Ms. Caballero, Ms. Doster, and Ms. Crosby-Vega:

TRANSMITTAL OF THE URANIUM ENRICHMENT TOXIC SUBSTANCES CONTROL ACT COMPLIANCE AGREEMENT 2022 ANNUAL COMPLIANCE AGREEMENT REPORT JANUARY 1 THROUGH DECEMBER 31, 2022, FOR THE PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, FRNP-RPT-0300

Please find enclosed the subject report for the U.S. Department of Energy Paducah Site. This annual report is required under the Toxic Substances Control Act (TSCA) Compliance Agreement (CA), as modified on May 30, 2017. This report documents progress on TSCA CA activities at Paducah, Kentucky, for the period from January 1, 2022, through December 31, 2022.

If you have any questions or require additional information, please contact Ryan Callihan at (740) 897-2835.

Sincerely,

APRIL LADD Digitally signed by APRIL LADD
Date: 2023.06.21 15:13:08 -05'00'

April Ladd
Paducah Site Lead
Portsmouth/Paducah Project Office

Enclosure:
Uranium Enrichment Toxic Substances Control Act Compliance Agreement 2022 Annual Compliance Agreement Report January 1 through December 31, 2022, for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, FRNP-RPT-0300

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FRNP-RPT-0300

Uranium Enrichment Toxic Substances Control Act Compliance Agreement
2022 Annual Compliance Agreement Report
January 1 through December 31, 2022,
for the Paducah Gaseous Diffusion Plant,
Paducah, Kentucky

FOUR RIVERS NUCLEAR PARTNERSHIP, LLC

This document is approved for public release per review by:

JACKIE THOMPSON (Affiliate)

Digitally signed by JACKIE THOMPSON (Affiliate)
Date: 2023.06.21 10:43:09 -05'00'

FRNP Classification Support — Date

FRNP-RPT-0300

Uranium Enrichment Toxic Substances Control Act Compliance Agreement 2022 Annual Compliance Agreement Report, January 1 through December 31, 2022, for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky

Date Issued—June 2023

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 No. DE-EM0004895

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PREFACE

The U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency entered into the Toxic Substances Control Act (TSCA) Compliance Agreement (CA) to address TSCA compliance at the Paducah, Portsmouth, and Oak Ridge uranium enrichment (UE) facilities. This agreement, signed on February 20, 1992, was intended to bring DOE's UE facilities into full compliance with the TSCA regulations for the management of polychlorinated biphenyls (PCBs). This agreement was modified on September 25, 1997, and modified again on May 30, 2017. At the Paducah facility, the TSCA CA addresses the following:

- Troughing of ventilation duct gaskets;
- Investigation of historic PCB disposal sites;
- Use and removal of leaking potential PCB devices;
- Sampling of air;
- Process lubrication oil;
- Process lubrication oil removal;
- Spill cleanup;
- Storage of PCB waste;
- Building demolition wastes;
- PCB-contaminated slabs;
- Processing of PCB-contaminated demolition material;
- Nonradioactive PCBs and PCB items storage and disposal;
- Co-contaminated, radioactive PCBs and PCB items storage and disposal;
- Ensurance of worker safety measures; and
- Hydraulic systems at the Paducah Gaseous Diffusion Plant.

This Annual CA Report summarizes TSCA CA activities that occurred at the Paducah facility from January 1, 2022, through December 31, 2022.

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CONTENTS

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TABLES

FIGURES

ACRONYMS

CA	compliance agreement
CD	certificate of disposal
CFR	*Code of Federal Regulations*
CY	calendar year
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
FY	fiscal year
MOA	memorandum of agreement
OSWDF	on-site waste disposal facility
TSCA	Toxic Substances Control Act
UE	uranium enrichment

EXECUTIVE SUMMARY

This Annual Compliance Agreement (CA) Report summarizes the Toxic Substances Control Act (TSCA) CA activities that occurred at the Paducah facility from January 1, 2022, through December 31, 2022.

During calendar year 2022, the Paducah facility continued to address the ongoing elements identified in the TSCA CA, as required by the modified agreement.

The TSCA CA modification, signed on May 30, 2017, requires annual polychlorinated biphenyl (PCB) air sampling. The annual air sampling event took place during June and July, in accordance with the TSCA CA Attachment I, Section 1, Interim Measures, (D) Air Sampling. Results for the annual event did not exceed the TSCA CA reporting level of 0.5 $\mu g/m^3$.

The TSCA CA also includes the following open compliance measures.

- Section 2 (C)—Spill Cleanup
- Section 2 (D)—Storage for Disposal
- Section 2 (E-1)—Building Demolition Wastes
- Section 2 (E-2)—PCB-contaminated Slabs
- Section 2 (E-3)—Processing for the On-Site Waste Disposal Facility
- Section 2 (F)—Other Wastes
  - Nonradioactive PCBs and PCB items
  - Co-contaminated and Radioactive PCBs and PCB items

One PCB gasket and three PCB non-gasket spills were cleaned and closed in accordance with the standards set forth in the TSCA CA Attachment I, Section 2, Compliance Measures, (C) Spill Cleanup. No non-gasket spills were closed as historic spills, in accordance with measures proposed and accepted at previous TSCA Federal Facility Compliance Act Annual Meetings; however, one gasket PCB spill was closed as a historic spill.

The Paducah facility made zero shipments of TSCA-regulated PCB/nonradioactive waste. The Paducah facility shipped for disposal a net weight of approximately 35,725 kg of TSCA-regulated PCB/radioactive waste on 21 Uniform Hazardous Waste Manifests. Twenty-six Certificates of Disposal were received in 2022.

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INTEGRATED SCHEDULE SUMMARY

In accordance with paragraph 36 of the Toxic Substances Control Act (TSCA) Compliance Agreement (CA), an annual update on the status of each item on the Integrated Schedule is provided. The Integrated Schedule for fiscal year (FY) 2022, submitted in May 2021, included four ongoing activities, and six activities are scheduled to begin work in the future.

Section 1 (D), Air Sampling, is an ongoing effort and work scheduled for calendar year (CY) 2022 was completed (see Section 1.1).

Section 2 (C), Spill Cleanups, is an ongoing effort and work scheduled for CY 2022 was completed (see Section 2.1).

Section 2 (E-1), Building Demolition Waste, is an ongoing effort, however, there were no scheduled activities related to this item during CY 2022.

Section 2 (E-2), polychlorinated biphenyl (PCB)-contaminated slab management/demolition, is an ongoing effort at the Paducah Site. Currently, there are two PCB-contaminated slabs managed on-site; scheduled activities regarding these slabs were completed for CY 2022 (see Section 2.2.2).

The following six activities also are included in the Integrated Schedule.

(1) No decision has been made for the Paducah facility regarding the on-site waste disposal facility (OSWDF); therefore, there were no scheduled activities related to the design phase of the potential OSWDF. Currently, work associated with this item is scheduled beyond FY 2024.

(2) No decision has been made for the Paducah facility regarding the OSWDF; therefore, there were no scheduled activities related to the construction phase for the first cell of the potential OSWDF during CY 2022. Currently, work associated with this item is scheduled beyond FY 2024.

(3) The waste staging and processing/resizing operations have not been determined to be necessary for the Paducah facility; therefore, there were no scheduled activities related to the design phase during the CY 2022. Currently, work associated with this item is scheduled beyond FY 2024.

(4) The waste staging and processing/resizing operations have not been determined to be necessary for the Paducah facility; therefore, there were no scheduled activities related to the construction phase during the CY 2022. Currently, work associated with this item is scheduled beyond FY 2024.

(5) None of the buildings listed in paragraph 11 of the TSCA CA had any demolition activities associated with them during CY 2022. The C-400 Complex demolition that was slated to start in November 2018 was delayed due to regulatory disputes under the Federal Facility Agreement. A Memorandum of Agreement (MOA) was issued in August 2019 concerning the C-400 Complex demolition regulatory disputes. The MOA allowed the C-400 Complex Remedial Investigation/Feasibility Study project to begin; however, the current schedule for initiating demolition activities extends beyond FY 2024. Currently, work associated with other buildings related to this item is scheduled beyond FY 2024.

(6) During CY 2022, no PCB-contaminated slab demolition was scheduled. Currently, work associated with this item is scheduled beyond FY 2024.

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1. INTERIM MEASURES

AIR SAMPLING

Both the original Uranium Enrichment Toxic Substances Control Act (TSCA) Compliance Agreement (CA) and the TSCA CA modification signed on May 30, 2017, require polychlorinated biphenyl (PCB) air sampling to be conducted in process buildings with motor exhaust duct ventilation systems. These buildings include the C-331, C-333, C-335, and C-337 process buildings at the Paducah facility.

The TSCA CA modification signed on May 30, 2017, requires two samples per process building to be taken once annually anytime during the months of June, July, and August. For each annual air monitoring activity in a building, there will be a best engineering judgment-selected site and a randomly selected site. The results for the 2022 PCB air sampling event are shown in Table 1.

The U.S. Department of Energy (DOE) is required to report to the U.S. Environmental Protection Agency (EPA) any PCB concentrations greater than 0.5 $\mu g/m^3$ measured from any air-monitoring sampler at any location.

The sampling was conducted as described in the National Institute for Occupational Safety and Health 5503. The volumes and flow rates, as noted, were necessary to achieve the detection limit required by the TSCA CA.

Table 1. PCB Air Results Annual CY 2022

Calendar Year	Sample Numbers	Sample Date	Building	Floor	Sample Location	Method of Selection	Results[a] (mg/m3)	Qualifier	Pump Flow Rate (liters/minute)	Air Volume Sampled (liters)
2022	PCB22-AIR-01-01	6/29/2022	C-331	CELL	S of P-12	RANDOM	0.150		1	513
2022	PCB22-AIR-01-02	6/29/2022	C-331	GROUND	NE OF F-21	BEJ	0.061		1	522
2022	PCB22-AIR-01-03	6/29/2022	C-333	CELL	At V-5	RANDOM	0.010	U	1	506
2022	PCB22-AIR-01-04	6/29/2022	C-333	CELL	AT P-1	BEJ	0.010	U	1	521
2022	PCB22-AIR-01-05	6/29/2022	C-335	CELL	S of P-3	RANDOM	0.010	U	1	525
2022	PCB22-AIR-01-06	6/29/2022	C-335	CELL	SE of D-20	BEJ	0.010	U	1	525
2022	PCB22-AIR-01-07R[b]	7/19/2022	C-337	CELL	NE of N-8	RANDOM	0.088		0.98	495
2022	PCB22-AIR-01-08	6/29/2022	C-337	CELL	At Ua-44	BEJ	0.079		1	510

[a]The action level for reporting to the EPA is 0.5 µg/m3.
[b]Sample was retaken due to the pump not running for sufficient sample duration.

2. COMPLIANCE MEASURES

2.1 SPILL CLEANUP

The TSCA CA requires that PCB spills and PCB-contaminated oil that may leak onto building floors be cleaned in accordance with the EPA PCB Spill Cleanup Policy in 40 *CFR* Part 761, Subpart G. Reports documenting PCB spills and PCB spill cleanup measures are required to be prepared each quarter and are summarized in this Annual CA Report. Record copies of cleanup documentation are kept on-site and are available for inspection.

The TSCA CA allows historic spills, those that occurred before March 19, 1992, to be left in place until demolition of the facility. PCB high-concentration gasket spills (i.e., from a source of 500 ppm or greater in PCB concentration) that occurred on building floors after March 19, 1992, shall be verified closed, in accordance with the requirements of the TSCA CA.

The following is a summary of PCB gasket spill activities for CY 2022:

- Remaining PCB gasket spill sites awaiting verification of successful cleaning as of December 31, 2021—6
- Number of new PCB gasket spill sites identified during reporting period—5
- Number of total PCB gasket spill sites closed during reporting period—2
- Remaining PCB gasket spill sites awaiting verification of successful cleaning as of December 31, 2022—9
- Number of PCB gasket spill sites closed as a historic spill—1

A quarterly breakdown of PCB gasket spill information can be found in Figure 1.

The following is a summary of PCB non-gasket spill activities for CY 2022:

- Remaining PCB non-gasket spill sites awaiting verification of successful cleaning as of December 31, 2021—10
- Number of new PCB non-gasket spill sites identified during reporting period—1
- Number of total PCB non-gasket spill sites closed during reporting period—3
- Remaining PCB non-gasket spill sites awaiting verification of successful cleaning as of December 31, 2022—8
- Number of PCB non-gasket spill sites closed as a historic spill—0

A quarterly breakdown of PCB non-gasket spill information can be found in Figure 2.

All PCB gasket spills identified were high concentration PCB spills (i.e., from a source of 500 ppm or greater in PCB concentration). Cleanup of each identified spill site was initiated within 24 hours, in accordance with the TSCA CA. Clearly visible signs have been posted at each spill site advising personnel

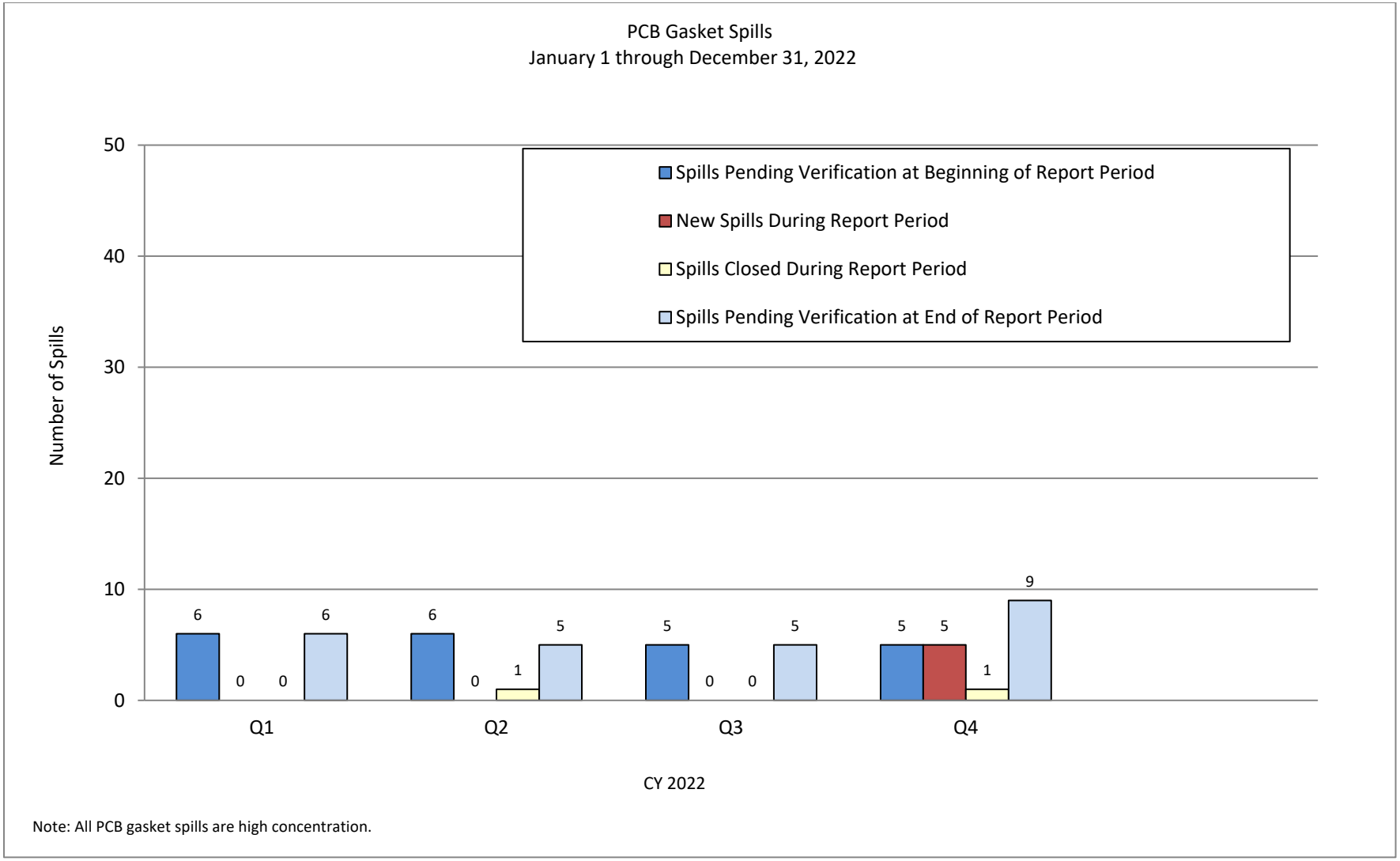

Figure 1. Quarterly Summary of PCB Gasket Spills

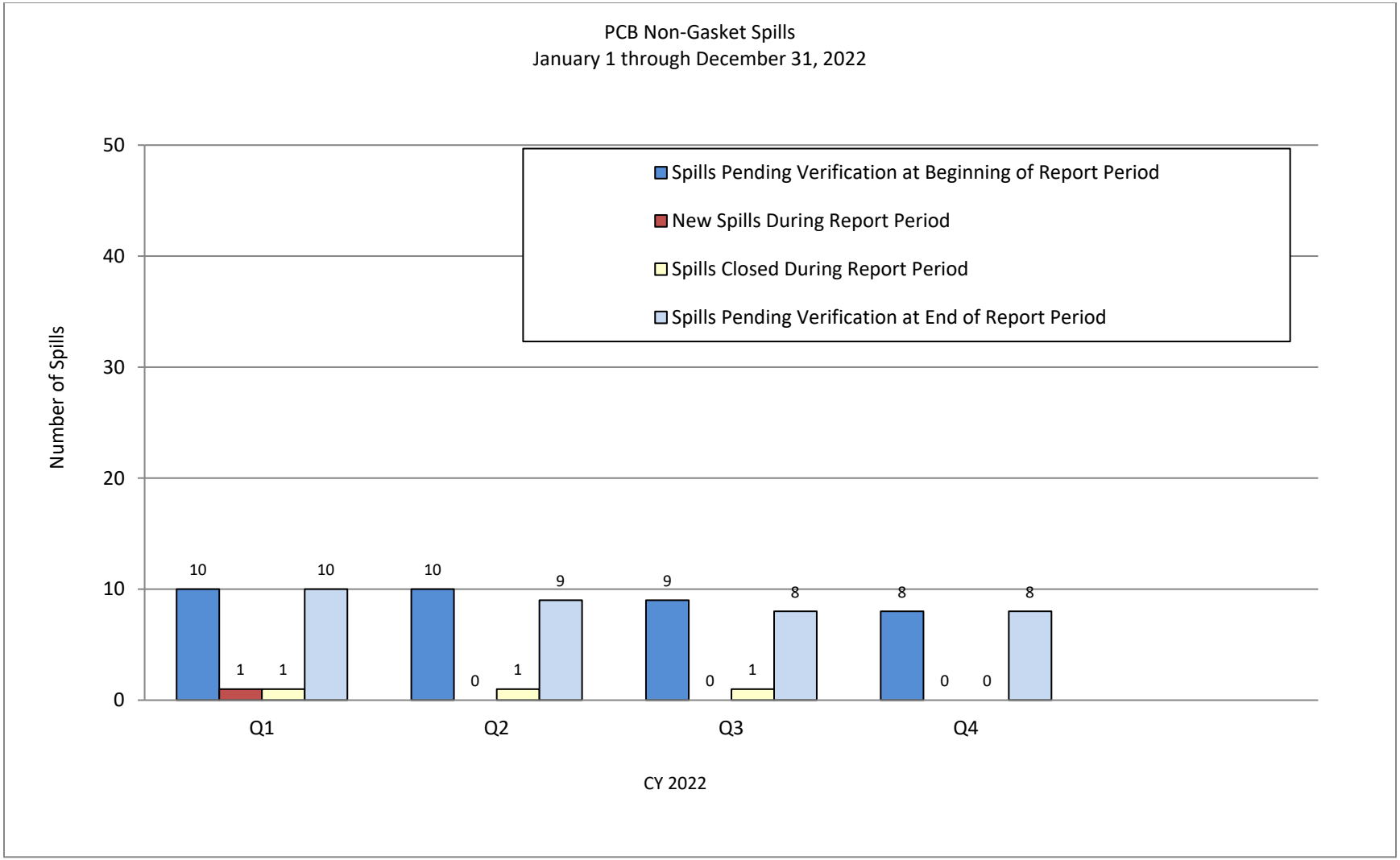

Figure 2. Quarterly Summary of PCB Non-Gasket Spills

to avoid the area in order to minimize the spread of contamination and the potential for human exposure. The cleanup documentation and records are available for inspection. The one PCB non-gasket spill identified was a low concentration PCB spill (i.e., from a source of less than 500 ppm in PCB concentration). Cleanup of the identified spill site was initiated within 24 hours, in accordance with the TSCA CA. Clearly visible signs have been posted at the spill site that advise personnel to avoid the area in order to minimize the spread of contamination and the potential for human exposure. The spill was closed in accordance with 40 *CFR* § 761.125(b)(1)(i), and the cleanup documentation and records are available for inspection.

2.2 BUILDING DEMOLITION

2.2.1 Building Demolition Wastes

The TSCA CA requires building demolition waste comprised of PCBs or PCB items (as defined in 40 *CFR* § 761.3) to be managed and disposed of as directed in 40 *CFR* § 761.50. In particular, building demolition waste comprised of PCB-contaminated ventilation ducts, gaskets, flanges, piping, or other materials containing PCBs as a result of a spill, release, or other unauthorized disposal shall be managed and disposed of as PCB remediation waste in accordance with 40 *CFR* § 761.61. During the CY 2022, no building demolition waste containing PCB waste, PCB items, or PCB remediation waste were generated.

2.2.2 PCB-Contaminated Slabs

The TSCA CA requires that PCB-contaminated slabs from buildings listed in paragraph 11 of the agreement shall be maintained according to the requirements of 40 *CFR* § 761.30, except that historical spills, as defined in Section 2 (C), shall be maintained in accordance with Section 2 (C). The previous demolition of the buildings associated with the C-340-A Powder Building, C-340-B Metals Building, C-340-C Slag Building, C-410 Feed Plant, C-410-A Hydrogen Holder (slab only), C-410-C HF Neutralization Building, C-410-F HF Storage Building (north), C-410-G HF Storage Building (center), C-410-H HF Storage (south), C-410-I Ash Receiver Shelter, C-410-J HF Storage Building (east), C-411 Cell Maintenance Building, and C-420 Green Salt Building did result in PCB-contaminated slabs. The slabs were double washed and rinsed, and two contrasting colors of epoxy fixative were applied. The documentation of these actions can be found in the documents DOE/LX/07-1286&D1, *Removal Action Report for the C-340 Metals Reduction Plant at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, for C-340 and DOE/LX/07-2182&D1, *Removal Action Report for the C-410 Complex Infrastructure Decontamination and Decommissioning Project at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, for the C-410 complex. During CY 2020 routine inspections/radiological surveys of the C-340 and C-410 slabs, loose fixative was discovered. Maintenance activities for the C-340 and C-410 slabs commenced in CY 2021 and the efforts continued into CY 2022 with the removal of loose fixative and resealing of the slabs. The resealing efforts began in CY 2021 and continued into CY 2022. The areas were resealed with two contrasting colors of epoxy fixative. The loose fixative material was containerized as radioactively-contaminated PCB waste following removal. No discharges or releases of PCB-contaminated material were detected or reported for the associated slabs for CY 2022.

2.2.3 Processing of PCB-Contaminated Demolition Material for On-Site Waste Disposal

The TSCA CA requires the processing of any PCB-contaminated demolition material before disposal in the on-site waste disposal facility (OSWDF) must be in compliance with 40 *CFR* § 761.20(c). The requirements of this section are not applicable at this time because the OSWDF has not been constructed.

2.3 OTHER WASTES

2.3.1 Nonradioactive PCBs and PCB Items

The TSCA CA requires an annual progress update on the storage and disposal of nonradioactive PCBs and PCB items. At the Paducah facility, PCB waste generated on-site is assumed to contain a radioactive component. After radiological characterization for disposal, Paducah nonradiological PCB waste is stored in accordance with the requirements of the TSCA CA, Attachment I, Section 2(D), Storage; 40 *CFR* § 761.65, *Storage for Disposal*; and associated concurrences. There were no nonradioactive PCBs or PCB items in the inventory, as of December 31, 2022. Nonradioactively contaminated PCBs and PCB items are shipped for disposal to commercial facilities. During CY 2022, no non-radioactive PCBs or PCB items were shipped off-site for disposal.

2.3.2 Co-contaminated, Radioactive PCBs and PCB Items

The TSCA CA requires an annual progress update on the storage and disposal of co-contaminated, radioactive PCB and PCB items. At the Paducah facility, all PCB waste generated on-site is assumed to contain a radioactive component. Pending radiological characterization for disposal, Paducah radiological PCB waste is stored in accordance with the requirements of the TSCA CA, Attachment I, Section 2(D), Storage; 40 *CFR* § 761.65, *Storage for Disposal*; and associated concurrences. The inventory, as of December 31, 2022, of radiologically contaminated PCBs and PCB items is reflected in Table 2. Radioactive PCBs and PCB items stored in TSCA-compliant storage areas may be stored for more than one year prior to disposal, pursuant to 40 *CFR* § 761.65(a)(1). Six radioactive PCB waste items did exceed the one-year storage limitation. A summation of the records documenting the efforts to secure disposal of these items can be found in the Appendix.

Radioactively contaminated PCBs and PCB items are shipped for disposal to DOE-owned facilities, Nuclear Regulatory Commission-licensed facilities, or facilities that have received authorized limits approval from DOE and the facility's host state. During CY 2022, 46 co-contaminated, radioactive PCBs or PCB items with a net weight of approximately 35,725 kg were shipped off-site for disposal on 21 hazardous waste manifests.

During CY 2022, no Certificates of Disposal (CDs) were received for nonradioactive PCBs or PCB waste items. Also, during CY 2022, 26 CDs were received for PCB/radioactive waste that had been disposed of, representing a total net weight of 43,453 kg of radiologically contaminated PCBs and PCB items. The PCB waste off-site shipping and disposal information for this reporting period is shown in Table 3. Waste generated as a result of site cleanup and operations is included in this report, including Comprehensive, Environmental Response, Compensation, and Liability Act waste, which is provided for information only and is intended to show progress toward the removal of PCBs at the Paducah facility.

Table 2. PCB Waste Inventory as of December 31, 2022

Waste ID	Description	Earliest Date Removed from Service	Physical	Gross Wt (lbs)	Gross Wt (kg)	Net Wt (lbs)	Net Wt (kg)	Gross Vol (ft3)	Current Facility	Source	Waste Cat
122193-10[a]	EPOXY PAINT CHIPS, VEGETATION AND PPE	6/21/2022	SOLID (S)	1,299	589	507	230	90	C-333	C-410	TSCA Mixed (TM)
122235-05	EPOXY PAINT CHIPS, VEGETATION, PPE, BERYLLIUM	5/15/2022	S	1,000	454	212	96	90	C-333	C-746-B	TM
122621-01	LUBE OIL/PCB RINSATE COLLECTED FROM SITE GLASSES FROM TRANSFORMER DRAINING	8/23/2022	LIQUID (L)	60	27	4	2	7.4	C-337	C-337	RCRA/TSCA Mixed (RTM)
122622-02	VENTILATION DUCT OIL AND WATER	2/21/2022	L	460	209	404	183	7.4	C-752-A	Proc Bldgs.	TM
122622-03[a]	VENTILATION DUCT OIL AND WATER	11/17/2022	L	60	27	4	2	7.4	C-337	Proc Bldgs.	TM
122623-08	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	8/2/2022	S	179	81	123	56	7.4	C-752-A	Proc Bldgs.	TM
122623-09	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	9/27/2022	S	187	85	127	58	7.4	C-752-A	Proc Bldgs.	TM
122623-10	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	10/7/2022	S	216	98	156	71	7.4	C-752-A	Proc Bldgs.	TM
122623-11[a]	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	11/17/2022	S	60	27	10	5	7.4	C-337	Proc Bldgs.	TM
122667-01	POTHEAD WITH ELECTRICAL CABLE. POTHEAD CONTAINS PETROLATUM. CABLE IS PAPER AND LEAD INSULATED. PAPER IS IMPREGNATED WITH OIL	3/7/2022	S	1258	571	465	211	90	C-752-A	C-531	RTM
122668-01	PCB LIGHT BALLASTS/CAPACITORS/TRANSFORMERS/ETC.	3/10/2022	S	183	83	153	69	4	C-757	Various	TM
130083-01	CAPACITORS FROM CHARGERS IN BATTERY ROOMS AND ASSOCIATED BCS	9/7/2022	S	11	5	2	1	0.74	C-752-A	Proc Bldgs.	TM
130099-01[a]	PCB LIQUIDS WITH CADMIUM, CHROMIUM, AND LEAD	11/8/2022	L	60	27	20	9	7.4	C-337	C-333	RTM
130106-01[a]	PCB LIGHT BALLASTS	10/27/2022	S	62	28	6	3	7.4	C-720	Various	TM
14	**Total Containers**		**Totals[b]**	**5,092**	**2,310**	**2,193**	**995**	**341**			

[a]Indicates a collection container that remains in use unless otherwise noted.

[b]Totals may vary due to rounding.

Table 3. PCB Waste Activities: Waste Shipped Off-Site and/or Disposed of January 1, 2022 through December 31, 2022

Waste ID	Description	Gross Wt (lbs)	Gross Wt (kg)	Net Wt (lbs)	Net Wt (kg)	Earliest Date Removed from Service	Date Shipped	Manifest	Shipment No	Disposal Location	Disposal Method	Disposal Date	CoD Rec'd
121255-04	LUBE OIL/PCB RINSEATE COLLECTED IN SIGHT GLASSES FROM TRANSFORMER DRAINING	518	235	462	210	9/16/2021	1/25/2022	019695351JJK	9750-09-0024	Energy*Solutions*, Clive, UT	Landfill	3/11/2022	3/23/2022
122253-04	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	130	59	74	34	8/2/2021	1/25/2022	019695351JJK	9750-09-0024	Energy*Solutions*, Clive, UT	Landfill	3/11/2022	3/23/2022
122253-05	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	101	46	45	20	10/19/2021	1/25/2022	019695351JJK	9750-09-0024	Energy*Solutions*, Clive, UT	Landfill	3/11/2022	3/23/2022
122235-04	EPOXY PAINT CHIPS, VEGETATION, PPE, BERYLLIUM	1,519	689	483	219	8/26/2021	1/25/2022	019695353JJK	7340-08-0018	Energy*Solutions*, Clive, UT	Landfill	2/4/2022	2/11/2022
122430-01	CAPACITORS THAT CONTAIN PCB OIL	186	84	130	59	9/1/2021	3/17/2022	019695411JJK	9750-90-0001	Energy*Solutions*, Clive, UT	Landfill	3/24/2022	3/29/2022
122430-02	CAPACITORS THAT CONTAIN PCB OIL	135	61	79	36	9/1/2021	3/17/2022	019695411JJK	9750-90-0001	Energy*Solutions*, Clive, UT	Landfill	3/24/2022	3/29/2022
122253-06	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	136	62	80	36	11/2/2021	3/17/2022	019695416JJK	9750-09-0025	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122253-07	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	156	71	100	45	12/20/2021	3/17/2022	019695416JJK	9750-09-0025	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122623-01	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	504	229	448	203	1/23/2022	3/17/2022	019695416JJK	9750-09-0025	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122623-02	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	127	58	70	32	1/23/2022	3/17/2022	019695416JJK	9750-09-0025	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122623-04	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	97	44	41	19	1/25/2022	3/17/2022	019695416JJK	9750-09-0025	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122494-01	FLUORESCENT LIGHT FIXTURES, LIGHT BALLASTS AND WIRING, CONTAINER PCB (50-499 PPM) AND ASBESTOS CONTAINING MATERIAL (ACM)	1,410	640	374	170	8/19/2021	3/17/2022	019695420JJK	7340-08-0019	Energy*Solutions*, Clive, UT	Landfill	3/29/2022	4/4/2022
122252-08	VENTILATION DUCT OIL AND WATER	509	231	453	205	10/25/2021	3/22/2022	019695436JJK	9750-04-0011	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
106744-01	DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	21,966	9,964	21,966	9,964	11/7/2005	4/7/2022	019695368JJK	WP-9519-03	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-04	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,340	608	1,286	583	11/7/2005	4/7/2022	019695368JJK	WP-9519-03	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-05	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,322	600	1,268	575	11/7/2005	4/7/2022	019695368JJK	WP-9519-03	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
122431-02	C-333 UNIT 5 CELLS 1-10, UNIT 6 CELLS 1-10 AND PCB/ASBESTOS WASTE - THIS MATERIAL WAS REPACKED INTO THIS CONTAINER (122431-02) (C-631-3 WASTE ADDED TO THIS CONTAINER PBI - 0101-A.1, NENDST)	10,980	4,980	3,480	1,579	6/1/2021	4/12/2022	019695446JJK	7340-08-0020	Energy*Solutions*, Clive, UT	Landfill	5/12/2022	5/13/2022
122396-01	PCB LIGHT BALLASTS/TRANSFORMERS/CAPACITORS/ETC	93	42	63	29	5/20/2021	4/12/2022	019695450JJK	9750-90-0002	Energy*Solutions*, Clive, UT	Landfill	4/25/2022	4/29/2022
122623-03	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	133	60	77	35	1/24/2022	4/12/2022	019695453JJK	9750-09-0026	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122193-08	EPOXY PAINT CHIPS, VEGETATION AND PPE	1,614	732	578	262	11/15/2021	4/12/2022	019695455JJK	7340-08-0021	Energy*Solutions*, Clive, UT	Landfill	4/26/2022	4/29/2022
107839-01	DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	36,700	16,647	36,700	16,647	6/27/2004	5/5/2022	019695369JJK	WP-9519-04	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
107839-02	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	678	308	643	292	6/27/2004	5/5/2022	019695369JJK	WP-9519-04	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
122645-01	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	426	193	370	168	3/2/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-02	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	398	181	342	155	3/2/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-03	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	412	187	356	161	3/2/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-04	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	412	187	356	161	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022

Table 3. PCB Waste Activities: Waste Shipped Off-Site and/or Disposed of January 1, 2022 through December 31, 2022 (Continued)

Waste ID	Description	Gross Wt (lbs)	Gross Wt (kg)	Net Wt (lbs)	Net Wt (kg)	Earliest Date Removed from Service	Date Shipped	Manifest	Shipment No	Disposal Location	Disposal Method	Disposal Date	CoD Rec'd
122645-05	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	424	192	368	167	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-06	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	422	191	366	166	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-07	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	418	190	362	164	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-08	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	420	191	364	165	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-09	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	420	191	364	165	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-10	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	423	192	367	166	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-11	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	440	200	384	174	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-12	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	414	188	358	162	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122645-13	USED PCB CONTAMINATED OIL DRAINED FROM TRANSFORMERS	163	74	107	49	3/3/2022	6/10/2022	023682004JJK	9750-09-0028	Energy*Solutions*, Clive, UT	Landfill	12/6/2022	12/15/2022
122473-01	MISC PART AND FROM TWO PCB TRANSFORMER IN C-337 - RECEIVED MATERIAL FROM 107839-01.	2,574	1,168	1,782	808	6/27/2004	7/26/2022	023682090JJK	9750-04-0012	Energy*Solutions*, Clive, UT	Landfill	9/29/2022	9/30/2022
122431-04	C-333 UNIT 5 CELLS 1-10, UNIT 6 CELLS 1-10 AND PCB/ASBESTOS WASTE	9,080	4,119	1,580	717	3/23/2022	8/4/2022	023682097JJK	7340-08-0023	Energy*Solutions*, Clive, UT	Landfill	9/20/2022	9/28/2022
130060-01	GLASS APARATUS CONTAINING ELEMENTAL MERCURY/AMALGUM FROM LAB	38	17	1	1	8/2/2022	8/16/2022	023531984JJK	023531984JJK	Perma-Fix of Florida Gainesville, FL			
122193-09	EPOXY PAINT CHIPS, VEGETATION AND PPE	1,816	824	780	354	3/24/2022	8/23/2022	023682104JJK	7340-08-0024	Energy*Solutions*, Clive, UT	Landfill	9/12/2022	9/29/2022
122717-01	PCB/HAZ VACUUM AND VACUUM DEBRIS FROM CLEAN UP OF NON-GASKET SPILL 774	86	39	30	14	5/17/2022	8/29/2022	023682106JJK	9750-03-0007	Energy*Solutions*, Clive, UT	Landfill	9/29/2022	9/30/2022
122622-01	VENTILATION DUCT OIL AND WATER	450	204	394	179	1/12/2022	8/29/2022	023682110JJK	9750-04-0013	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122540-01	PCB LIGHT BALLAST (FY22PBI 05/20 0105-A.4 AND FY22PBI 05/01 0105-A.7)	179	81	149	68	1/31/2022	8/29/2022	023682111JJK	7340-08-0025	Energy*Solutions*, Clive, UT	Landfill	9/12/2022	9/28/2022
121255-05	LUBE OIL/PCB RINSEATE COLLECTED IN SIGHT GLASSES FROM TRANSFORMER DRAINING	497	225	441	200	10/19/2021	8/29/2022	023682112JJK	9750-09-0030	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122623-05	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	143	65	87	39	1/25/2022	8/29/2022	023682112JJK	9750-09-0030	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122623-06	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	129	59	73	33	3/10/2022	8/29/2022	023682112JJK	9750-09-0030	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
122623-07	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	135	61	79	36	6/9/2022	8/29/2022	023682112JJK	9750-09-0030	Energy*Solutions*, Clive, UT	Landfill	12/9/2022	12/27/2022
46	**Total Weight Shipped for CY 2022[a]**	**100,673**	**45,665**	**78,760**	**35,725**								
121999-04	PCB VENTILATION DUCT LIQUIDS FROM VENTILATION TROUGHS IN PROCESS BUILDINGS	500	227	444	201	9/29/2020	5/25/2021	019695128JJK	9750-04-0009	Energy*Solutions*, Clive, UT	Landfill	12/30/2021	1/4/2022
121999-05	PCB VENTILATION DUCT LIQUIDS FROM VENTILATION TROUGHS IN PROCESS BUILDINGS	506	230	450	204	10/29/2020	5/25/2021	019695128JJK	9750-04-0009	Energy*Solutions*, Clive, UT	Landfill	12/30/2021	1/4/2022
122252-01	VENTILATION DUCT OIL AND WATER	351	159	295	134	1/25/2021	5/25/2021	019695128JJK	9750-04-0009	Energy*Solutions*, Clive, UT	Landfill	12/30/2021	1/4/2022
122252-02	VENTILATION DUCT OIL AND WATER	503	228	447	203	3/15/2021	9/28/2021	019695234JJK	9750-04-0010	Energy*Solutions*, Clive, UT	Landfill	12/30/2021	1/4/2022
122252-03	VENTILATION DUCT OIL AND WATER	475	215	419	190	5/13/2021	10/28/2021	019695261JJK	9750-09-0022	Energy*Solutions*, Clive, UT	Landfill	3/29/2022	4/4/2022
122252-04	VENTILATION DUCT OIL AND WATER	496	225	440	200	7/1/2021	10/28/2021	019695261JJK	9750-09-0022	Energy*Solutions*, Clive, UT	Landfill	3/29/2022	4/4/2022
122252-05	VENTILATION DUCT OIL AND WATER	482	219	426	193	7/14/2021	10/28/2021	019695261JJK	9750-09-0022	Energy*Solutions*, Clive, UT	Landfill	3/29/2022	4/4/2022
122252-06	VENTILATION DUCT OIL AND WATER	496	225	440	200	8/5/2021	10/28/2021	019695261JJK	9750-09-0022	Energy*Solutions*, Clive, UT	Landfill	3/29/2022	4/4/2022
122252-07	VENTILATION DUCT OIL AND WATER	436	198	380	172	8/30/2021	12/14/2021	019695309JJK	9750-09-0023	Energy*Solutions*, Clive, UT	Landfill	3/11/2022	3/23/2022

Table 3. PCB Waste Activities: Waste Shipped Off-Site and/or Disposed of January 1, 2022 through December 31, 2022 (Continued)

Waste ID	Description	Gross Wt (lbs)	Gross Wt (kg)	Net Wt (lbs)	Net Wt (kg)	Earliest Date Removed from Service	Date Shipped	Manifest	Shipment No	Disposal Location	Disposal Method	Disposal Date	CoD Rec'd
106744-06	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,302	591	1,248	566	11/7/2005	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-07	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,174	533	1,120	508	11/7/2005	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-11	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,322	600	1,268	575	11/7/2005	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
107839-03	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	678	308	643	292	6/27/2004	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
107839-04	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	690	313	655	297	6/27/2004	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
107839-05	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	676	307	641	291	6/27/2004	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
107839-06	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	672	305	637	289	6/27/2004	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
107839-07	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER RHL-0610. FORMERLY STAGED AT C-337 U2C8 "B" LOCATION.	784	356	741	336	6/27/2004	12/14/2021	019695317JJK	WP-9519-01	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-02	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,320	599	1,266	574	11/7/2005	12/14/2021	019695318JJK	WP-9519-02	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-03	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,330	603	1,276	579	11/7/2005	12/14/2021	019695318JJK	WP-9519-02	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-08	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,320	599	1,266	574	11/7/2005	12/14/2021	019695318JJK	WP-9519-02	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-09	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,318	598	1,264	573	11/7/2005	12/14/2021	019695318JJK	WP-9519-02	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
106744-10	FINS FROM DAMAGED, DISCONNECTED, DE-ENERGIZED, AND DRAINED PCB TRANSFORMER B983126. FORMERLY STAGED AT C-337 U2C3 "B" LOCATION.	1,326	601	1,272	577	11/7/2005	12/14/2021	019695318JJK	WP-9519-02	Waste Control Specialist, Andrews, TX	Landfill	12/2/2022	12/7/2022
67	**Total Weight for Certificate of Disposal Received for CY 2022[a]**	**118,792**	**53,883**	**95,797**	**43,453**								

[a]Totals may vary due to rounding.

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APPENDIX

WRITTEN RECORD DEMONSTRATING COMPLIANCE WITH 40 *CFR* § 761.65 (a)(1) REGARDING PCB-MIXED WASTE CONTAINERS STORED IN EXCESS OF ONE YEAR PRIOR TO SHIPPING DURING CALENDAR YEAR 2022

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Written Record Demonstrating Compliance with 40 *CFR* § 761.65 (a)(1) Regarding PCB-Mixed Waste Containers in Storage Exceeding One Year Disposal Requirement during First Quarter 2022

The following radioactively contaminated polychlorinated biphenyl (PCB) waste items remained in storage past the one-year regulatory time frame specified in 40 *CFR* § 761.65(a)(1), *Storage for Disposal—Storage limitations,* during the first quarter of 2022.

Waste items No. 106744-01 and No. 107839-01 are faulted transformers that have removed from service dates of November 7, 2005, and June 27, 2004, respectively. Due to their size and the structural and/or equipment interferences in the process buildings, options for disposal of these items were evaluated and it was determined the transformers could be disassembled for removal from the facility. After detailed assessment of the building, a safe path was found to allow access for these transformers to be removed from the building.

Waste items No. 106744-01 and No. 107839-01 have been prepped for shipment. The cooling radiator fins for each have been removed and packaged. The packages of fins for No. 106744-01 remaining in current inventory are No. 106744-04 and No. 106744-05. The package of fins for No. 107839-01 remaining in current inventory is No. 107839-02.

Several containers of radiator fins have been shipped off-site. While preparing the transformers for shipment, it was determined that the pipe fittings needed to be removed from the top of the transformers. These fittings were placed in container No. 122473-01. In accordance with 40 *CFR* § 761.65(c)(8), *Storage for disposal—PCB items*, the PCB date-to-storage of this container was June 27, 2004. The remaining waste containers and the transformer bodies, No. 106744-01 and No. 107839-01, are currently scheduled to ship in the second quarter of calendar year 2022 pending the availability of appropriate conveyances.

Written Record Demonstrating Compliance with 40 *CFR* § 761.65 (a)(1) Regarding PCB-Mixed Waste Containers in Storage Exceeding One Year Disposal Requirement during Second Quarter 2022

The following radioactively contaminated polychlorinated biphenyl (PCB) waste items remained in storage past the one-year regulatory time frame specified in 40 *CFR* § 761.65(a)(1), *Storage for disposal—Storage limitations,* during the second quarter of 2022.

Waste items No. 106744-01 and No. 107839-01 are faulted transformers that have removed from service dates of November 7, 2005, and June 27, 2004, respectively. Due to their size and the structural and/or equipment interferences in the process buildings, options for disposal of these items were evaluated and it was determined the transformers could be disassembled for removal from the facility. After detailed assessment of the building, a safe path was found to allow access for these transformers to be removed from the building.

Waste items associated with No, 106744 and No. 107839 were shipped during the second quarter of 2022. The cooling radiator fins for each transformer were removed and packaged separately. The transformer and the remaining packaged fins for No. 106744 were shipped off-site on April 7, 2022. While the transformer and remaining packaged fins for No. 107839 were shipped off-site on May 5, 2022.

While preparing the transformers for shipment, it was determined that the pipe fittings needed to be removed from the top of the transformers. These fittings were placed in container No. 122473-01. In accordance with 40 *CFR* § 761.65(c)(8), *Storage for disposal—PCB items*, the PCB date-to-storage of this container was June 27, 2004. The remaining waste container, No. 122473-01, is currently scheduled to be shipped off-site on July 26, 2022.

Written Record Demonstrating Compliance with 40 *CFR* § 761.65 (a)(1) Regarding PCB-Mixed Waste Containers in Storage Exceeding One Year Disposal Requirement during Third Quarter 2022

The following radioactively contaminated polychlorinated biphenyl (PCB) waste item remained in storage past the one-year regulatory time frame specified in 40 *CFR* § 761.65(a)(1), *Storage for disposal—Storage limitations,* during the third quarter of 2022.

Waste item No. 107839-01 was a faulted transformer with a removed-from-service date of June 27, 2004. Due to the size of the item and the structural and/or equipment interferences of the process buildings, options for disposal of this item were evaluated and it was determined that the transformer could be disassembled for removal from the facility. After a detailed assessment of the building, a safe path was found that allowed access for the transformer so that it could be removed from the building.

Waste items associated with No. 107839-01 were shipped during the second quarter of 2022. The cooling radiator fins for the transformer were removed and packaged separately. The transformer and the remaining packaged fins for No. 107839-01 were shipped off-site on April 7, 2022.

While preparing the transformer for shipment, it was determined that pipe fittings would need to be removed from the top of transformer No. 107839-01. These fittings were removed and placed in container No. 122473-01. In accordance with 40 *CFR* § 761.65(c)(8), *Storage for disposal—PCB items*, the PCB date-to-storage of this container was June 27, 2004. The remaining waste container, No. 122473-01, was shipped off-site on July 26, 2022.

Currently there are no PCB waste items remaining in storage with a removed-from-service date exceeding the one-year regulatory time frame specified in 40 *CFR* § 761.65(a)(1).

Written Record Demonstrating Compliance with 40 *CFR* § 761.65 (a)(1) Regarding PCB-Mixed Waste Containers in Storage Exceeding One Year Disposal Requirement during Fourth Quarter 2022

There were no PCB waste items remaining in storage with a removed-from-service date exceeding the one-year regulatory time frame specified in 40 *CFR* § 761.65(a)(1), *Storage for disposal—Storage limitations*, during the fourth quarter of 2022.