Department of Energy

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

June 30, 2025

Mr. Todd Bennett
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, Georgia 30303-8960

PPPO-02-10033320-25B

Ms. Kathryn Caballero, Director
Federal Facilities Enforcement Office
U.S. Environmental Protection Agency, Headquarters
1200 Pennsylvania Avenue NW
Mail Code 2261A
Washington, DC 20460

Ms. Kathleen Doster, ESQ
Federal Facilities Enforcement Office
U.S. Environmental Protection Agency Headquarters
1200 Pennsylvania Avenue NW
Mail Code 2261A
Washington, DC 20460

Dear Mr. Bennett, Ms. Caballero, and Ms. Doster:

TRANSMITTAL OF THE URANIUM ENRICHMENT TOXIC SUBSTANCES CONTROL ACT COMPLIANCE AGREEMENT 2024 ANNUAL COMPLIANCE AGREEMENT REPORT JANUARY 1 THROUGH DECEMBER 31, 2024, FOR THE PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY, FRNP-RPT-0390

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, 2024, through December 31, 2024.

If you have any questions or require additional information, please contact Ryan Callihan at (740) 970-0255.

Sincerely,

APRIL LADD

Digitally signed by APRIL LADD
Date: 2025.06.30 11:19:57 -05'00'

April Ladd
Paducah Site Lead
Portsmouth/Paducah Project Office

Enclosure:
Uranium Enrichment TSCA CA 2024 Annual Compliance Agreement Report January 1 through December 31, 2024, for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, FRNP-RPT-0390

cc w/enclosure:
abigail.parish@pppo.gov, PPPO
april.ladd@pppo.gov, PPPO
bennett.todd@epa.gov, EPA
caballero.kathryn@epa.gov, EPA
carrie.maxie@pad.pppo.gov, FRNP
doster.kathleen@epa.gov, EPA
frnpcorrespondence@pad.pppo.gov
jeff.seaton@pad.pppo.gov, FRNP
joel.bradburne@pppo.gov, PPPO
myrna.redfield@pad.pppo.gov, FRNP
pad.rmc@pad.pppo.gov
reinhard.knerr@pppo.gov, PPPO
ryan.callihan@pppo.gov, PPPO
william.wessel@pppo.gov, PPPO

FRNP-RPT-0390

Uranium Enrichment Toxic Substances Control Act Compliance Agreement 2024 Annual Compliance Agreement Report January 1 through December 31, 2024, for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky

FOUR RIVERS NUCLEAR PARTNERSHIP, LLC

CLEARED FOR PUBLIC RELEASE

FRNP-RPT-0390

Uranium Enrichment Toxic Substances Control Act Compliance Agreement 2024 Annual Compliance Agreement Report, January 1 through December 31, 2024, for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky

Date Issued—June 2025

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

CLEARED FOR PUBLIC RELEASE

THIS PAGE INTENTIONALLY LEFT BLANK

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;
- Assurance 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, 2024, through December 31, 2024.

THIS PAGE INTENTIONALLY LEFT BLANK

CONTENTS

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

THIS PAGE INTENTIONALLY LEFT BLANK

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, 2024, through December 31, 2024.

During calendar year 2024, 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

While no final decision to pursue the on-site waste disposal facility (OSWDF) has been made for the Paducah facility, there have been scheduled activities related to updates to the 2018 *Remedial Investigation/Feasibility Study Report for CERCLA Waste Disposal Alternatives Evaluation at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky*, DOE/LX/07-0244&D2/R2, siting location field geotechnical and seismic data evaluations, and the preliminary design of the OSWDF.

Fourteen PCB 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 nongasket 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 8,780 kg of TSCA-regulated PCB/radioactive waste on 12 Uniform Hazardous Waste Manifests. Thirteen Certificates of Disposal were received in 2024.

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) 2024, submitted in July 2023, 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) 2024 was completed (see Section 1.1).

Section 2 (C), Spill Cleanups, is an ongoing effort and work scheduled for CY 2024 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 2024.

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 2024 (see Section 2.2.2).

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

(1) While no final decision to pursue the on-site waste disposal facility (OSWDF) has been made for the Paducah facility, there have been scheduled activities related to the preliminary design information of the potential OSWDF to begin in FY 2025, in support of developing the necessary Comprehensive Environmental Response, Compensation, and Liability Act documentation leading to a record of decision.

(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 2024. Currently, work associated with this item is scheduled beyond FY 2025.

(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 2024. Currently, work associated with this item is scheduled beyond FY 2025.

(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 2024. Currently, work associated with this item is scheduled beyond FY 2025.

(5) None of the buildings listed in paragraph 11 of the TSCA CA had any demolition activities associated with them during CY 2024. 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 2025. Currently, work associated with other buildings related to this item is scheduled beyond FY 2025.

(6) During CY 2024, no PCB-contaminated slab demolition was scheduled. Currently, work associated with this item is scheduled beyond FY 2025.

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 calendar year (CY) 2024 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. Annual CY 2024

Calendar Year	Sample Numbers	Sample Date	Building	Floor	Sample Location	Method of Selection	Results[a] (µg/m3)	Qualifier	Pump Flow Rate (liters/minute)	Air Volume Sampled (liters)
2024	PCB24-AIR-01-01	8/1/2024	C-331	CELL	W of N-14	RANDOM	0.220		1.02	502
2024	PCB24-AIR-01-02	8/1/2024	C-331	GROUND	N of Q-13	BEJ	0.050		1.01	493
2024	PCB24-AIR-01-03	8/1/2024	C-333	CELL	SW of L-31	RANDOM	0.030		1	478
2024	PCB24-AIR-01-04	8/1/2024	C-333	GROUND	At Na-38	BEJ	0.130		1	485
2024	PCB24-AIR-01-05	8/1/2024	C-335	GROUND	W of Q-29	RANDOM	0.110		1	504
2024	PCB24-AIR-01-06	8/1/2024	C-335	GROUND	E of S-2	BEJ	0.080		1	500
2024	PCB24-AIR-01-07	8/1/2024	C-337	CELL	W of Na-35	RANDOM	0.130		0.98	467.7
2024	PCB24-AIR-01-08	8/1/2024	C-337	GROUND	N of C-10	BEJ	0.030		1	490

[a]The action level for reporting to the EPA is 0.5µg/m^3.

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 2024:

- Remaining PCB gasket spill sites awaiting verification of successful cleaning as of December 31, 2023—11
- Number of new PCB gasket spill sites identified during reporting period—11
- Number of total PCB gasket spill sites closed during reporting period—14
- Remaining PCB gasket spill sites awaiting verification of successful cleaning as of December 31, 2024—8
- Number of PCB gasket spill sites closed as a historic spill—0

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 2024:

- Remaining PCB non-gasket spill sites awaiting verification of successful cleaning as of December 31, 2023—8
- Number of new PCB non-gasket spill sites identified during reporting period—0
- Number of total PCB non-gasket spill sites closed during reporting period—0
- Remaining PCB non-gasket spill sites awaiting verification of successful cleaning as of December 31, 2024—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

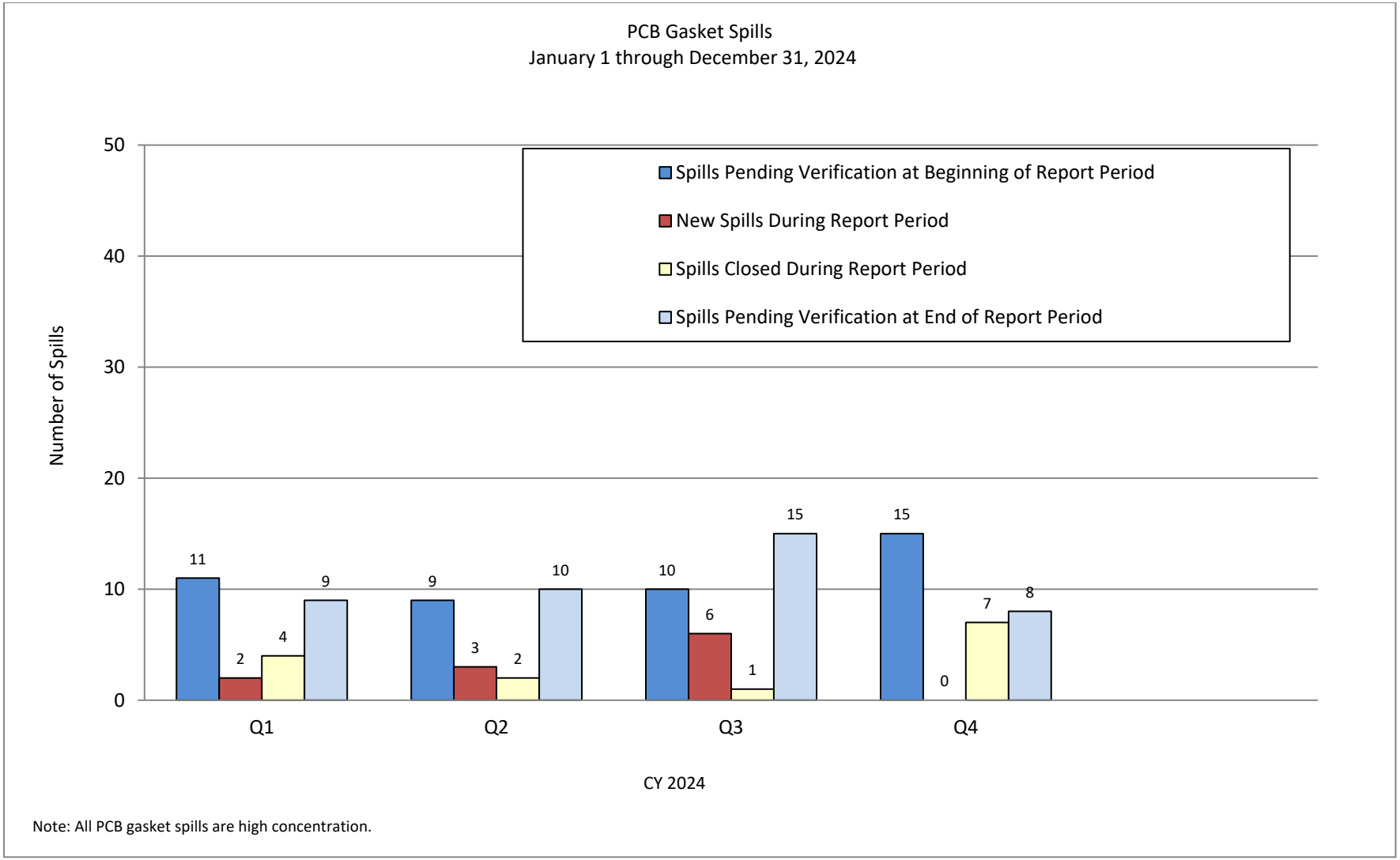

Figure 1. Quarterly Summary of PCB Gasket Spills

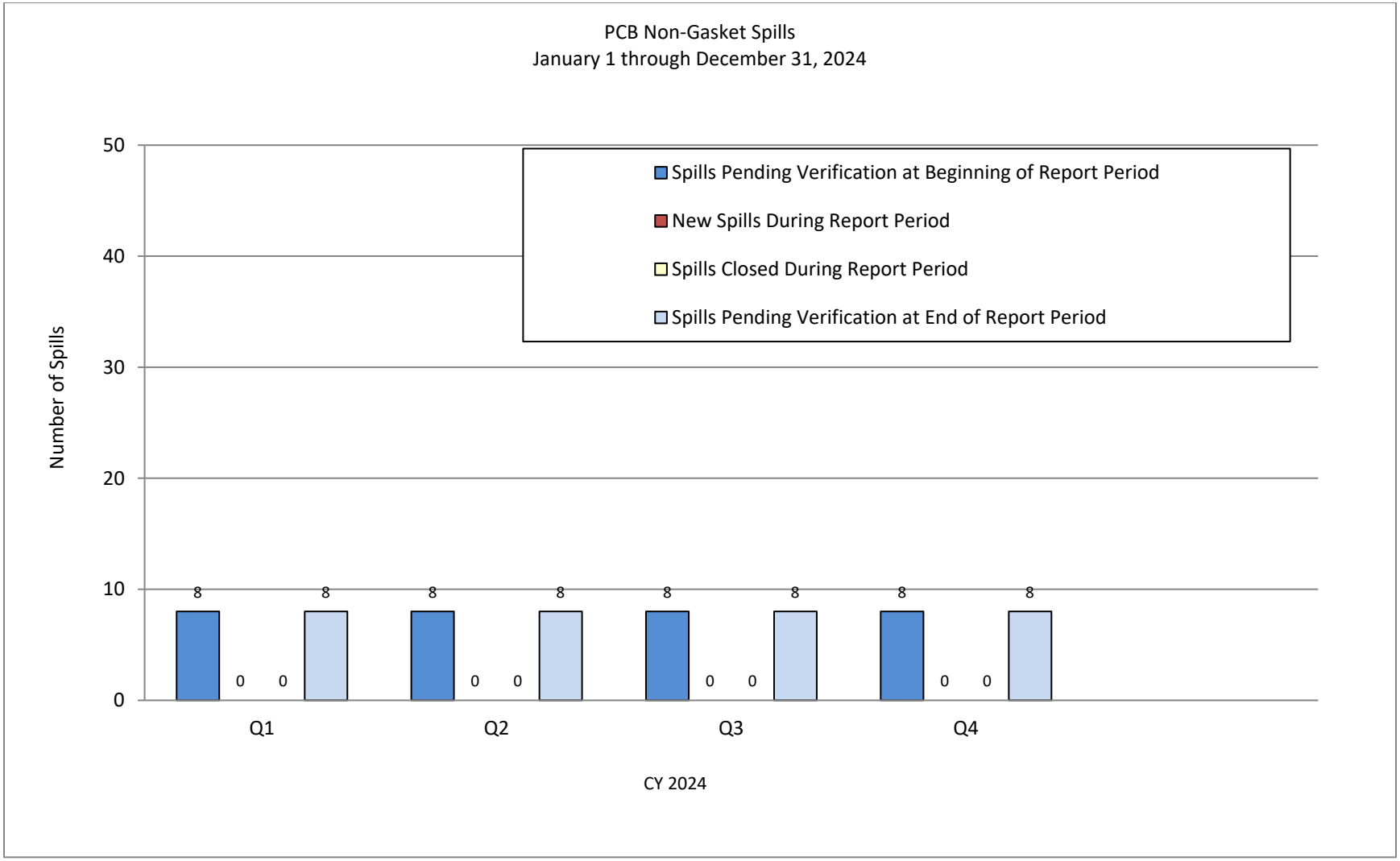

Figure 2. Quarterly Summary of PCB Non-Gasket Spills

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. Some PCB spills have occurred, which involve equipment, and the cleanup to meet the specified standards and/or CA allowances is not practical due to the configuration of the equipment. Some equipment is still in use and unless the equipment is removed from service and dismantled for disposal, there is no means with which to clean or to meet the intent of the TSCA CA requirements. For these spills, DOE has proposed that the safest and most practical approach to address the equipment is to encapsulate the contaminated surface or otherwise restrict access and remove the equipment as part of the future building demolition and dispose of the equipment at that time. The spills were originally cleaned to the extent practical, and regular inspections are performed to ensure that further leaking materials, if any, are addressed appropriately. A variance was developed in March 2021 and delivered to the EPA in May 2021. At the CY 2024 Annual TSCA CA Meeting on November 21, 2024, EPA Region 4 gave verbal approval to encapsulate the PCB spills located on PCB-contaminated equipment.

2.2 BUILDING DEMOLITION

2.2.1 Building Demolition Wastes

During the CY 2024, no building demolition waste containing PCB waste, PCB items, or PCB remediation waste were generated.

2.2.2 PCB-Contaminated Slabs

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. As a best management practice to further protect the sealant encapsulating the C-340 and C-410 PCB-contaminated slabs, a covering of geotextile fabric was placed directly on the slab and a minimum of 6 inches of gravel was spread over the entirety of the fabric in CY 2023. No discharges or releases of PCB-contaminated material were detected or reported for the associated slabs for CY 2024.

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

The requirements of this section are not applicable at this time because the decision to build an OSWDF has not been made; therefore, the OSWDF has not been constructed yet.

2.3 OTHER WASTES

2.3.1 Nonradioactive PCBs and PCB Items

There were no nonradioactive PCBs or PCB items in the inventory, as of December 31, 2024. Nonradioactively contaminated PCBs and PCB items are shipped for disposal to commercial facilities. During CY 2024, no non-radioactive PCBs or PCB items were shipped off-site for disposal.

2.3.2 Co-contaminated, Radioactive PCBs and PCB Items

The inventory, as of December 31, 2024, 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).

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 2024, 15 co-contaminated, radioactive PCBs or PCB items with a net weight of approximately 8,780 kg were shipped off-site for disposal on 12 hazardous waste manifests.

During CY 2024, no Certificates of Disposal (CDs) were received for nonradioactive PCBs or PCB waste items. Also, during CY 2024, 13 CDs were received for PCB/radioactive waste that had been disposed of, representing a total net weight of 9,007 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, 2024

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
130116-04	PCB SOLIDS WITH CADMIUM, CHROMIUM, AND LEAD	1/10/2024	SOLID (S)	110	50	50	23	7.4	C-752-A	C-333	RCRA/TSCA Mixed (RTM)
130362-02	PCB LIGHT BALLASTS/CAPACITORS/TRANSFORMERS/ETC.	3/19/2024	S	568	258	508	230	7.4	C-752-A	PlantWide	TSCA Mixed (TM)
122623-16	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	4/16/2024	S	124	56	64	29	7.4	C-752-A	Proc Bldgs	TM
122622-05[a]	VENTILATION DUCT OIL AND WATER	4/25/2024	LIQUID (L)	276	125	220	100	7.4	C-337	Proc Bldgs	TM
122623-17	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	5/9/2024	S	142	64	92	42	7.4	C-752-A	Proc Bldgs	TM
122621-03[a]	LUBE OIL / PCB RINSATE COLLECTED FROM SITE GLASSES FROM TRANSFORMER DRAINING	7/1/2024	L	96	44	56	25	7.4	C-337	C-337	RTM
130116-05[a]	PCB SOLIDS WITH CADMIUM, CHROMIUM, AND LEAD	8/14/2024	S	60	27	10	5	7.4	C-333	C-333	RTM
122623-18	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	8/20/2024	S	124	56	74	34	7.4	C-752-A	Proc Bldgs	TM
122623-19	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	9/12/2024	S	107	49	57	26	7.4	C-752-A	Proc Bldgs	TM
130567-01[a]	PCB LIGHT BALLASTS/CAPCITORS/TRANSFORMERS/ETC	10/16/2024	S	185	84	125	57	7.4	C-757	PlantWide	TM
122623-20[a]	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	12/16/2024	S	53	24	3	1	7.4	C-337	Proc Bldgs	TM
11	**Total Containers**		**Totals[b]**	**1,845**	**837**	**1,259**	**571**	**81**			

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

[b]Totals may vary due to rounding.

Table 3. Waste Shipped Off-Site and/or Disposed of January 1, 2024 through December 31, 2024

Waste ID	Description	Gross Wt (lbs)	Gross Wt (kgs)	Net Wt (lbs)	Net Wt (kgs)	Earliest Date Removed from Service	Date Shipped	Manifest	Shipment No	Disposal Location	Disposal Method	Disposal Date	CoD Rec'd
130228-03	MATERIALS GENERATED FROM REMOVAL OF HVAC SYSTEM. METAL, INSULATION, PLASTIC, CONCRETE, ASBESTOS. PCB GASKET, LEAD AND PCB CONTAMINATED	10,660	4,835	3,160	1,433	9/15/2023	1/23/2024	025264525JJK	9750-01-0104	Energy*Solutions*, Clive, UT	Landfill	1/29/2024	2/9/2024
130228-25	MATERIALS GENERATED FROM REMOVAL OF HVAC SYSTEM. METAL, INSULATION, PLASTIC, CONCRETE, ASBESTOS. PCB GASKET, LEAD AND PCB CONTAMINATED	13,700	6,214	6,200	2,812	10/2/2023	1/23/2024	025264525JJK	9750-01-0104	Energy*Solutions*, Clive, UT	Landfill	1/29/2024	2/9/2024
130228-04	MATERIALS GENERATED FROM REMOVAL OF HVAC SYSTEM. METAL, INSULATION, PLASTIC, CONCRETE, ASBESTOS. PCB GASKET, LEAD AND PCB CONTAMINATED	15,700	7,121	7,740	3,511	9/14/2023	1/30/2024	025264530JJK	9750-01-0105	Energy*Solutions*, Clive, UT	Landfill	7/2/2024	7/26/2024
122193-11	EPOXY PAINT CHIPS, VEGETATION AND PPE	878	398	112	51	3/29/2023	2/27/2024	025264545JJK	7340-08-0033	Energy*Solutions*, Clive, UT	Landfill	3/8/2024	3/15/2024
122623-13	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	130	59	80	36	5/11/2023	2/27/2024	025264545JJK	7340-08-0033	Energy*Solutions*, Clive, UT	Landfill	3/8/2024	3/15/2024
122623-14	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	140	64	80	36	10/12/2023	2/27/2024	025264545JJK	7340-08-0033	Energy*Solutions*, Clive, UT	Landfill	3/8/2024	3/15/2024
130116-02	PCB SOLIDS WITH CADMIUM, CHROMIUM, AND LEAD	150	68	90	41	5/10/2023	4/11/2024	025264587JJK	9750-01-0107	Energy*Solutions*, Clive, UT	Landfill	5/16/2024	6/5/2024
130225-01	PCB LIGHT BALLAST/CAPACITORS/TRANSFORMERS/ETC	230	104	200	91	7/25/2023	4/23/2024	025264590JJK	7340-08-0034	Energy*Solutions*, Clive, UT	Landfill	5/23/2024	5/31/2024
122622-04	VENTILATION DUCT OIL AND WATER	197	89	157	71	7/21/2023	5/14/2024	025264634JJK	9750-09-0039	Energy*Solutions*, Clive, UT			
130116-03	PCB SOLIDS WITH CADMIUM, CHROMIUM, AND LEAD	84	38	26	12	8/10/2023	5/14/2024	025264631JJK	9750-01-0108	Energy*Solutions*, Clive, UT	Landfill	6/13/2024	6/26/2024
130342-01	PCB LIGHT BALLASTS/CAPACITORS/TRANSFORMERS/ETC.	236	107	206	93	2/22/2024	5/14/2024	025264635JJK	7340-96-0046	Energy*Solutions*, Clive, UT	Landfill	5/20/2024	6/5/2024
130362-01	PCB LIGHT BALLASTS/CAPACITORS/TRANSFORMERS/ETC.	729	331	673	305	3/13/2024	5/14/2024	025264641JJK	7340-08-0035	Energy*Solutions*, Clive, UT	Landfill	5/23/2024	6/10/2024
122621-02	LUBE OIL / PCB RINSATE COLLECTED FROM SITE GLASSES FROM TRANSFORMER DRAINING	328	149	288	131	8/22/2023	7/25/2024	025264686JJK	9750-09-0040	Energy*Solutions*, Clive, UT	Landfill	10/4/2024	11/8/2024
122623-15	PCB SPILL CLEANUP DEBRIS/ENCAPSULATION WASTE	106	48	46	21	11/16/2023	7/25/2024	025264685JJK	7340-08-0036	Energy*Solutions*, Clive, UT	Landfill	8/5/2024	8/16/2024
130099-02	PCB LIQUIDS WITH CADMIUM, CHROMIUM, AND LEAD	337	153	297	135	12/12/2023	12/17/2024	025264719JJK	DSSI-24-129	DSSI, Inc., Kingston, TN			
15	**Total Weight Shipped CY for 2024[a]**	**43,605**	**19,779**	**19,355**	**8,780**								
122621-01	LUBE OIL / PCB RINSATE COLLECTED FROM SITE GLASSES FROM TRANSFORMER DRAINING	208	94	152	69	8/23/2022	8/17/2023	023682410JJK	9750-09-0036	Energy*Solutions*, Clive, UT	Landfill	11/30/2024	1/30/2024
122622-03	VENTILATION DUCT OIL AND WATER	412	187	372	169	11/17/2022	11/2/2023	023682469JJK	9750-04-0015	Energy*Solutions*, Clive, UT	Landfill	2/29/2024	3/15/2024
130099-01	PCB LIQUIDS WITH CADMIUM, CHROMIUM, AND LEAD	436	198	396	180	12/28/2022	11/2/2023	023682464JJK	9750-09-0037	Energy*Solutions*, Clive, UT	Landfill	3/29/2024	4/9/2024
130135-01	LLW PCB OIL FROM C-337	68	31	35	16	12/12/2022	11/2/2023	023682469JJK	9750-04-0015	Energy*Solutions*, Clive, UT	Landfill	2/29/2024	3/15/2024
17	**Total Weight for Certificate of Disposal Received for CY 2024[a]**	**44,195**	**20,047**	**19,856**	**9,007**								

[a]Totals may vary due to rounding.

THIS PAGE INTENTIONALLY LEFT BLANK

APPENDIX

WRITTEN RECORD DEMONSTRATING COMPLIANCE WITH 40 *CFR* § 761.65 (a)(1) REGARDING PCB-MIXED WASTE CONTAINERS IN STORAGE EXCEEDING ONE YEAR DISPOSAL REQUIREMENT DURING CALENDAR YEAR 2024

THIS PAGE INTENTIONALLY LEFT BLANK

Written Record Demonstrating Compliance with 40 *CFR* § 761.65 (a)(1) Regarding PCB-Mixed Waste Containers in Storage Exceeding One Year Disposal Requirement during Calendar Year 2024

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).

PCB Container 130099-02 was a drum of PCB liquids contaminated with cadmium, chromium, and lead with a removed from service date of December 12, 2023. In accordance with 40 CFR § 761.65(c)(8) the PCB Date to Storage of this container is December 12, 2023. The container shipped on December 17, 2024.

40 *CFR* § 761.65 (a)(1) states "PCB/radioactive waste removed from service for disposal is exempt from the 1-year time limit provided that the provisions at paragraph (a)(2)(ii) and (a)(2)(iii) of this section are followed and the waste is managed in accordance with all other Federal, State, and local laws and regulations for the management of radioactive material."

40 *CFR* § 761.65 (a)(2)(ii) states "A written record documenting all continuing attempts to secure disposal is maintained until the waste is disposed of."

October 16, 2024. Email from J. Seaton, Four Rivers Nuclear Partnership, LLC, (FRNP), to L. Williams-Anderson, Perma-Fix Environmental Services, Inc., notified Perma-Fix of FRNP's desire to ship waste in late December 2024/early January 2025, and for the need for profiles, which would be provided by Lonnie Bertram (FRNP). The response email stated that Doug Beard (Perma-Fix) would be transitioning to take over the FRNP account. Jeff Seaton, Laura Williams-Anderson, and Doug Beard exchange several related emails to discuss pricing proposal.

November 19, 2024. Email from L. Bertram, FRNP, to D. Beard et al., Perma-Fix, sending the fully signed profiles for shipment.

December 4, 2024. Email from D. Beard, Perma-Fix, to B. Cleary and L. Bertram, FRNP, providing shipment notification to verify that the receiving facility could accept the waste on December 17, 2024.

December 17, 2024, container 130099-02 ships to Diversified Scientific Services, Inc., treatment facility in Kingston, Tennessee, as planned.

40 *CFR* § 761.65 (a)(2)(iii) states "The written record required by paragraph (a)(2)(ii) of this section is available for inspection or submission if requested by EPA." The initial information about container 130099-02 was included in FRNP submittal FRNP-25-9037, *Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, October 1 through December 31, 2024*, dated January 30, 2025. These quarterly reports are shelf documents located in the DOE Paducah Site office and available for U.S. Environmental Protection Agency review, upon request.

THIS PAGE INTENTIONALLY LEFT BLANK