PAD-SO-0055

Uranium Enrichment
Toxic Substances Control Act
Compliance Agreement
Quarterly Progress Report for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
April 1 through June 30, 2014

DRAFT

PAD-SO-0055

Uranium Enrichment
Toxic Substances Control Act
Compliance Agreement
Quarterly Progress Report for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
April 1 through June 30, 2014

Date Issued—July 2014

Prepared for the
U.S. DEPARTMENT OF ENERGY
Office of Environmental Management

LATA ENVIRONMENTAL SERVICES OF KENTUCKY, LLC
managing the
Environmental Remediation Activities at the
Paducah Gaseous Diffusion Plant
under contract DE-AC30-10CC40020

DRAFT

CONTENTS

TABLES

FIGURE

ACRONYMS

BEJ	best engineering judgment
CA	Compliance Agreement
CFR	*Code of Federal Regulations*
CY	calendar year
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
NESHAP	National Emission Standard for Hazardous Air Pollutants
PGDP	Paducah Gaseous Diffusion Plant
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substances Control Act
UE	uranium enrichment

1. INTRODUCTION

The Uranium Enrichment (UE) Toxic Substances Control Act (TSCA) Compliance Agreement (CA) signed by the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) on February 20, 1992, and modified in 1997, requires quarterly reports that summarize progress toward completing polychlorinated biphenyl (PCB)-related compliance measures. These measures include troughing, air sampling, process lubrication oil removal, spill cleanup, and disposal. As of March 30, 1994, the troughing interim measure was completed. Ongoing inspections of ventilation duct and troughing systems are performed to identify leaks or spills requiring additional troughing or trough maintenance. The quarterly reports will be maintained at the DOE Site Office and available to EPA, upon request, 45 days following the end of the quarter. The quarterly reports are required to be included in DOE's Annual Compliance Agreement Report. The following summaries satisfy the UE TSCA CA quarterly reporting requirements for April 1 through June 30, 2014.

2. INTERIM MEASURES

2.1 AIR SAMPLING

2.1.1 Requirements

Attachment I, Section 1 (D), of the UE TSCA CA states the following:

> **Air Sampling –** Consistent with DOE's monitoring at the facilities, PCB air sampling will be continued in process buildings with motor exhaust systems. At least 5 samples will be taken per process building per year. For each of these buildings, samples will be taken quarterly every calendar year, at least 30 days apart, with an additional set of samples taken sometime during the year. For each periodic (annual) air monitoring activity in a building, there are two kinds of sampling sites: best engineering judgment (BEJ) selected sites and randomly selected sites. The same BEJ sites may be selected for more than one monitoring period. The randomly selected sites shall be different from the BEJ sites and shall be newly selected for each periodic monitoring activity according to the attached guidance provided in the appended "Selection of Random Sampling Sites." It would be a rare coincidence for the same randomly selected location in the same building to be sampled in more than one periodic monitoring activity. DOE shall report quarterly to the EPA any PCB concentrations greater than 0.5 micrograms per cubic meter measured from any air-monitoring sampler at any location. Upon receipt of any such measurement data, EPA will contact DOE to address further monitoring requirements and any other required actions. Should EPA conclude that air sampling results produced pursuant to this Agreement so warrant, EPA and DOE shall meet and shall agree upon additional protective measures to be taken by DOE.

2.1.2 Work Completion Date

Work must be complete one year after facility shutdown, and notification will be provided to EPA upon work completion.

2.1.3 Activity for this Quarter

The UE TSCA CA requires that PCB air sampling 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. At least five samples are required to be taken per building per year; at least one of the five samples will be taken at a BEJ selected site, with the remainder of the sites to be selected randomly. For each of the buildings, the samples must be taken quarterly every calendar year (CY), at least 30 days apart. DOE is required to report quarterly to EPA any PCB concentrations greater than 0.5 $\mu g/m^3$ measured from any air-monitoring sampler at any location.

Air samples for the second quarter were collected April 28, 2014. The results of all the samples collected for the second quarter of CY 2014 are shown in Table 1. The quarterly sample sets were obtained more than 30 days apart, as required. The sampling was conducted as described in 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 UE TSCA CA. All samples met the required detection limit and sample results did not exceed the UE TSCA CA reporting level of 0.5 $\mu g/m^3$.

Table 1. Second Quarter CY 2014 TSCA CA Air Sampling Results

Sample Numbers	Sample Date	Building	Floor	Sample Coordinates	Method of Selection	Results* ($\mu g/m^3$)	Pump Flow Rate (liters/ minute)	Air Volume Sampled (liters)
PCB14-AIR-03-01	04/28/2014	C-331	Cell	N of S-5	Random	PCBs not detected above laboratory reporting limits	1.01	521
PCB14-AIR-03-02	04/28/2014	C-333	Ground	N or Mb-44	Random	PCBs not detected above laboratory reporting limits	1.02	524
PCB14-AIR-03-03	04/28/2014	C-333	Ground	At K-4	BEJ	PCBs not detected above laboratory reporting limits	1.01	518
PCB14-AIR-03-04	04/28/2014	C-335	Cell	At K-30	Random	PCBs not detected above laboratory reporting limits	1.02	535
PCB14-AIR-03-05	04/28/2014	C-337	Ground	S or X-23	Random	PCBs not detected above laboratory reporting limits	1.01	524

*Limit of detection 0.01 $\mu g/m^3$

3. COMPLIANCE MEASURES

3.1 PROCESS LUBRICATION OIL REMOVAL

Section 3.1 does not apply to Paducah Gaseous Diffusion Plant (PGDP). There are no PCB process lubrication oil systems at PGDP.

3.2 SPILL CLEANUP

3.2.1 Requirements

Attachment I, Section 2 (C), of the UE TSCA CA states the following:

> **Spill Cleanup –** PCBs and PCB contaminated oil that may leak onto building floors shall be cleaned up in accordance with the EPA Spill Cleanup Policy. For spills > 500 parts per million (ppm) PCBs, this shall consist of cleanup to 10 μg PCB/100 cm^2 with 95% confidence, based on the statistical sampling approach set forth in Attachment III, which shall be used within the spill area to verify cleanup to appropriate levels or, alternatively, to 100 μg PCB/100 cm^2 with 95% confidence, based on the statistical sampling approach set forth in Attachment III, which shall be used within the spill area to verify cleanup to appropriate levels followed by application of an appropriate sealant, such as a 2-layered epoxy type paint. All spill cleanups will be initiated within 24 hours of discovery, excluding historic spills which are defined as PCB stains resulting from spills which have occurred prior to the effective date of this Agreement. Historic spills may be left in place until demolition of the facility, provided public access to the facility is restricted to prevent unauthorized entry. In the event that a new spill should occur on a historic spill site, and the appropriate standard specified above cannot be met after best efforts to meet the standard are made, DOE may request that EPA consider the efforts DOE has made and classify the spill area as a historic spill for purposes of the cleanup under this Agreement.

3.2.2 Work Completion Date

None listed.

3.2.3 Activity for this Quarter

Seven gasket spill sites were pending post-cleanup verification at the beginning of this reporting period. No gasket spills to the building floor were identified during the reporting period. One gasket spill site was closed during the reporting period by verifying sampling data. Six gasket spill sites were pending post-cleanup verification at the end of this reporting period. PCB spill cleanup progress for CY 2014 is illustrated in Figure 1.

All PCB 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 UE TSCA CA. Clearly visible signs have been posted at each spill site advising personnel to avoid the area in order to minimize the spread of contamination and the potential for human exposure. The DOE remediation contractor maintains the cleanup documentation, and the records are available for inspection.

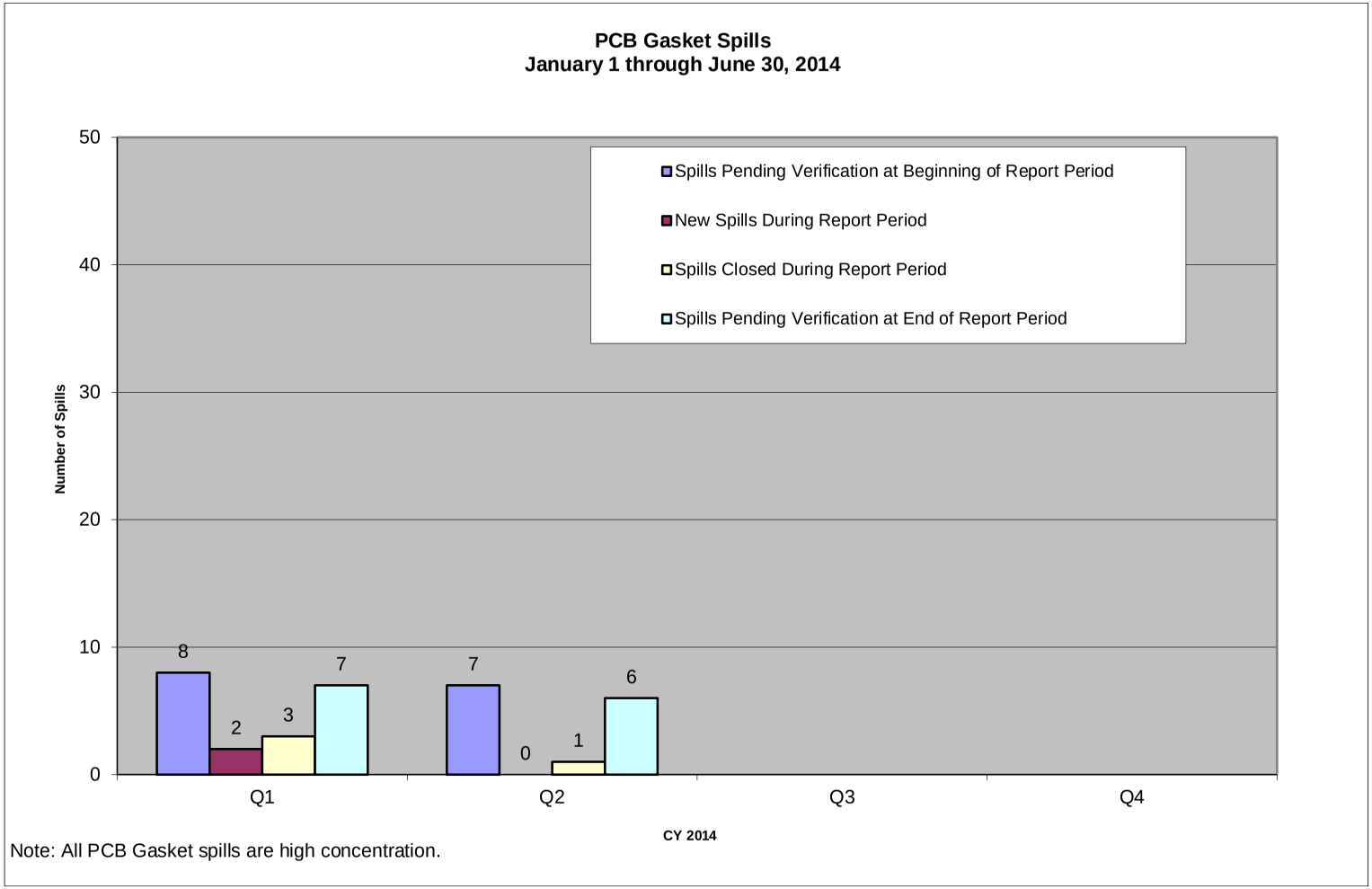

Figure 1. Quarterly Summary of PCB Gasket Spills

3.3 ELECTRICAL CABLES AND ASSOCIATED EQUIPMENT

3.3.1 Requirements

Attachment I, Section 2 (F), of the UE TSCA CA states the following:

> **Electrical Cables and Associated Equipment –** PCB contaminated electrical cables and associated equipment shall be removed from the facilities upon decommissioning, unless they require maintenance, servicing or replacement during plant operations, or gasket removal. If maintained or serviced, the cables, cable trays, and associated equipment shall be removed or cleaned up to 10 μg PCB/100 cm^2 or 100 μg PCB/100 cm^2 with 95% confidence followed by application of appropriate sealant.

3.3.2 Work Completion Date

Work must be complete upon demolition.

3.3.3 Activity for this Quarter

No Request for Disposal forms for cables, cable trays, and associated equipment were received, and no maintenance activities were performed during the second quarter of CY 2014.

3.4 DISPOSAL

3.4.1 Requirements

Attachment I, Section 2 (G) of the UE TSCA CA states the following:

> **Disposal –** All waste PCBs, PCB Items and ventilation ducts (and associated flanges), electrical cables and associated equipment contaminated with PCBs which were not decontaminated pursuant to Sections 2(C), 2(E), and 2(F) of this Attachment, shall be disposed of in accordance with 40 *CFR* § 761.60. All waste PCBs and PCB Items contaminated with hazardous waste and/or asbestos shall be disposed of in accordance with TSCA, NESHAP [National Emission Standard for Hazardous Air Pollutants] and RCRA [Resource Conservation and Recovery Act] requirements, and/or alternate disposal methods approved by EPA.

3.4.2 Work Completion Date

- Nonradioactive PCBs and PCB Items—within one year after the date the materials were placed into storage for disposal in accordance with Section 2(D) of the attachment of the UE TSCA CA.

- Co-contaminated, radioactive PCBs, and PCB items stored for disposal—within 10 years of work initiation date for materials already in storage; 2016, or within 10 years of storage, whichever date is earlier, for materials placed into storage after the effective date of the UE TSCA CA.

- Ventilation gaskets, ductwork and flanges, electrical cable, associated equipment, and historic spill material—2016 or within 10 years of work initiation date, whichever date is earlier.

3.4.3 Activity for this Quarter

During the second quarter CY 2014, 5,470 kg of PCB waste was shipped for disposal and one notification of receipt were received. Two Certificates of Disposal were received. The PCB waste disposal summary for this reporting period is shown in Table 2. 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 removal of PCBs at Paducah.

Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
April 1 through June 30, 2014

PCB Item Count	Description	Weight (kg)	Earliest Date Removed from Service	Date Shipped	Manifest	Shipment No.	Disposal Location	Disposal Method	Disposal Date	CD Rec'd No. of Items Disposed Of
2	Two Drums of PCB Capacitors	2,250	3/27/2012	3/19/2014	007077589FLE	CH577260	Clean Harbors, Deer Park, TX	Landfill	4/21/2014	5/30/14 2
4	Four Drums of PCB Ballasts	1,361	11/12/2008	3/19/2014	005077585FLE	CH737296	Clean Harbors, Grassy Mountain, Grantsville, UT	Incineration	4/30/2014	5/15/2014 4
1	(1) ST-90 Container of RCRA/PCB/LLW Debris	989	9/15/2011	6/12/2014	006841672JJK	9501-02-0011	Energy*Solution s*,Clive, UT			
1	(1) Drum of RCRA/PCB/LLW Debris	5	8/2/2005	6/24/2014	006841673JJK	ETTP-14-133	M&EC-PermaFix, Oak Ridge, TN			
27*	(27) Drums of RCRA/PCB Waste	4,476	3/16/2012	6/24/2014	006841674JJK	DSSI-14-071	DSSI-PermaFix-Kingston, TN			
29	**Total Shipped**	**5,470**						**Total CDs Received**		**2**
6	**Total Disposed Of**	**3,611**						**Total No. of Items Disposed Of**		**6**

CD = Certificate of Disposal
LLW = low-level waste
PCB = polychlorinated biphenyl
RCRA = Resource Conservation and Recovery Act
*Weights and volumes are taken from the Uniform Hazardous Waste Manifests. Signed manifest has been received from treatment/disposal facility; however, additional analysis is pending. Handling codes will be added to the manifest when analysis is completed.