

Fluor Federal Services, Inc.
Paducah Deactivation Project
P.O. Box 369
Kevil, KY 42053
USA

February 9, 2016

FPAD-16-1311

Ms. Marcia Fultz, Contracting Officer
U.S. Department of Energy
Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, KY 40513

Dear Ms. Fultz:

**Task Order DE-DT0007774: Fluor Federal Services, Inc., Paducah Deactivation Project
Deliverable No. 84—*Uranium Enrichment Toxic Substances Control Act Compliance Agreement
Quarterly Progress Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, October 1
through December 31, 2015, FPDP-RPT-0009***

Enclosed is the *Uranium Enrichment Toxic Substances Control Act Compliance Agreement Quarterly Progress Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, October 1 through December 31, 2015, FPDP-RPT-0009 (UE TSCA CA)*. This document incorporates comments received from the U.S. Department of Energy January 29, 2016.

The UE TSCA CA Quarterly Progress Report is a shelf document that is required to be available for U.S. Environmental Protection Agency inspection. The information within this report will be included in the 2015 UE TSCA CA Annual Compliance Report.

If there are any questions, please contact Mark Duff at (270) 816-5434.

Sincerely,



Joseph C. Poniatowski
Director, Prime Contract Management

Enclosures:

1. UE TSCA CA (clean and redlined)
2. Comment Response Summary

e-copy:

J. Woodard, PPPO/PAD
K. Knerr, PPPO/PAD
R. Knerr, PPPO/PAD
M. Duff, FPDP/PAD

**Uranium Enrichment
Toxic Substances Control Act
Compliance Agreement
Quarterly Progress Report for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
October 1 through December 31, 2015**

FLUOR[®]

This document is approved for public release per review by:


FPDP Classification Support

2-1-16
Date

FPDP-RPT-0009

**Uranium Enrichment
Toxic Substances Control Act
Compliance Agreement
Quarterly Progress Report for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
October 1 through December 31, 2015**

Date Issued—February 2016

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

FLUOR FEDERAL SERVICES, INC.,
Paducah Deactivation Project
managing the
Deactivation Project at the
Paducah Gaseous Diffusion Plant
under Task Order DE-DT0007774

CONTENTS

TABLES	iii
FIGURE	iii
ACRONYMS	iv
1. INTRODUCTION	1
2. INTERIM MEASURES	1
2.1 AIR SAMPLING	1
2.1.1 Requirements	1
2.1.2 Work Completion Date	1
2.1.3 Activity for this Quarter	2
3. COMPLIANCE MEASURES	3
3.1 PROCESS LUBRICATION OIL REMOVAL	3
3.2 SPILL CLEANUP	3
3.2.1 Requirements	3
3.2.2 Work Completion Date	3
3.2.3 Activity for this Quarter	3
3.3 ELECTRICAL CABLES AND ASSOCIATED EQUIPMENT	5
3.3.1 Requirements	5
3.3.2 Work Completion Date	5
3.3.3 Activity for this Quarter	5
3.4 DISPOSAL	5
3.4.1 Requirements	5
3.4.2 Work Completion Date	5
3.4.3 Activity for this Quarter	6

TABLES

1. Fourth Quarter CY 2015 TSCA CA Air Sampling Results	2
2. PCB Waste Shipped Off-Site Disposal Activities: Waste Shipped Off-Site and Certificates of Disposal Received October 1 through December 31, 2015.....	7

FIGURE

1. Quarterly Summary of PCB Gasket Spills	4
---	---

ACRONYMS

BEJ	best engineering judgment
CA	Compliance Agreement
<i>CFR</i>	<i>Code of Federal Regulations</i>
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 October 1 through December 31, 2015.

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

USEC stopped enriching uranium in May 2013 and transitioned facility operations to DOE on October 21, 2014. DOE continues deactivation activities in the facility and has continued air monitoring in accordance with the requirement above. The agreement stated that work must be complete one year after facility shutdown, and notification will be provided to EPA upon work completion. DOE currently is in discussions with EPA Region 4 concerning future implementation of the agreement.

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 $0.5 \mu\text{g}/\text{m}^3$ measured from any air-monitoring sampler at any location.

Air samples for the fourth quarter were collected October 14, 2015. The results of all the samples collected for the fourth quarter of CY 2015 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 $0.5 \mu\text{g}/\text{m}^3$.

Table 1. Fourth Quarter CY 2015 TSCA CA Air Sampling Results

Sample Numbers	Sample Date	Building	Floor	Sample Coordinates	Method of Selection	Results* ($\mu\text{g}/\text{m}^3$)	Pump Flow Rate (liters/minute)	Air Volume Sampled (liters)
PCB16-AIR-01-01	10/14/2015	C-331	Ground	NE of T-26	Random	PCBs not detected above laboratory reporting limits	1.08	559
PCB16-AIR-01-02	10/14/2015	C-333	Cell	NE of Ca-46	Random	PCBs not detected above laboratory reporting limits	1.05	554
PCB16-AIR-01-03	10/14/2015	C-335	Ground	N of M-10	Random	PCBs not detected above laboratory reporting limits	1.04	533
PCB16-AIR-01-04	10/14/2015	C-337	Ground	N of Nb-11	Random	PCBs not detected above laboratory reporting limits	1.05	543
PCB16-AIR-01-05	10/14/2015	C-337	Ground	At Gb-06	BEJ	PCBs not detected above laboratory reporting limits	1.03	530

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

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 cm² 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 cm² 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

Eight gasket spill sites were pending post-cleanup verification at the beginning of this reporting period. Seven new 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. Fourteen gasket spill sites were pending post-cleanup verification at the end of this reporting period. PCB spill cleanup progress for CY 2015 is illustrated in Figure 1.

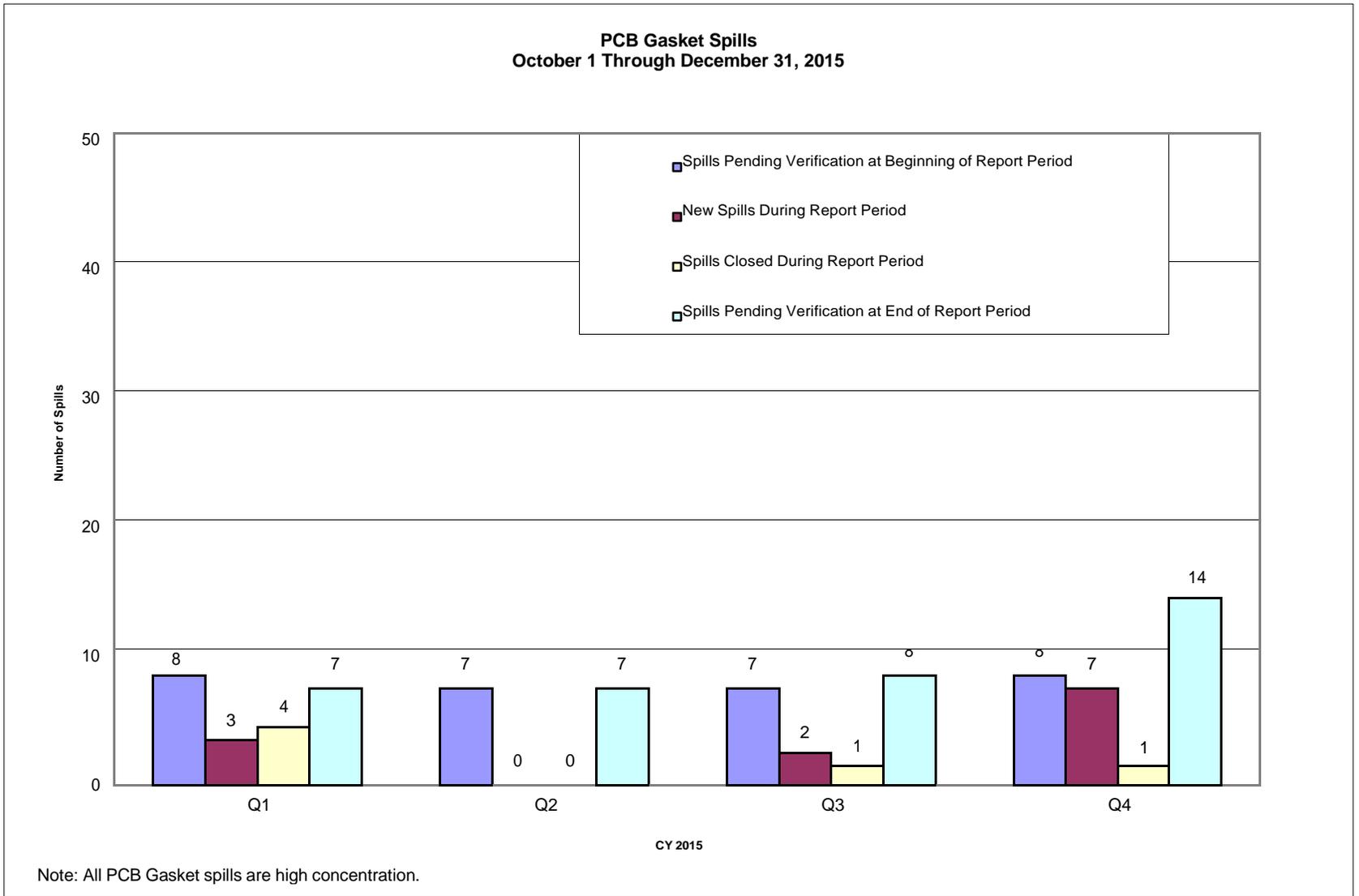


Figure 1. Quarterly Summary of PCB Gasket Spills

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 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. Fluor Federal Services, Inc., Paducah Deactivation Project maintains the cleanup documentation, and the records are available for inspection.

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 cm² or 100 µg PCB/100 cm² 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 fourth quarter of CY 2015.

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 fourth quarter CY 2015, 471,069 kg of PCB waste was shipped for disposal. Thirty-six Certificates of Disposal were received for 75 disposed of items totaling 555,593 kg. 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
October 1 through December 31, 2015**

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
1	Tanker of PCB Transformer Oil	18951	10/1/2015	10/1/2015	006841746JJK	FLR15-HSPCB_026	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/9/2015	11/23/2015
										1
1	Tanker of PCB Transformer Oil	19033	10/1/2015	10/1/2015	006841747JJK	FLR15-HSPCB_027	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/12/2015	12/18/2015
										1
1	Tanker of PCB Transformer Oil	18724	10/5/2015	10/5/2015	006841748JJK	FLR15-HSPCB_028	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/12/2015	12/18/2015
										1
1	Tanker of PCB Transformer Oil	18933	10/5/2015	10/5/2015	006841749JJK	FLR15-HSPCB_029	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/13/2015	12/21/2015
										1
1	Tanker of PCB Transformer Oil	19214	10/5/2015	10/6/2015	006841750JJK	FLR15-HSPCB_030	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/19/2015	10/27/2015
										1
1	Tanker of PCB Transformer Oil	19477	10/7/2015	10/7/2015	006841752JJK	FLR15-HSPCB_031	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/16/2015	10/27/2015
										1
1	Tanker of PCB Transformer Oil	14624	10/16/2015	10/16/2015	006841753JJK	FLR15-HSPCB_032	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/20/2015	12/11/2015
										1
1	Tanker of PCB Transformer Oil	16338	10/20/2015	10/20/2015	006841754JJK	FLR15-HSPCB_033	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/30/2015	11/10/2015
										1
1	Tanker of PCB Transformer Oil	13680	10/22/2015	10/22/2015	006841756JJK	FLR15-HSPCB_034	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/31/2015	11/10/2015
										1
1	Tanker of PCB Transformer Oil	16483	10/26/2015	10/26/2015	006841758JJK	FLR15-HSPCB_035	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/3/2015	11/10/2015
										1

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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
1	Tanker of PCB Transformer Oil	16347	10/30/2015	10/30/2015	006841759JJK	FLR15-HSPCB_036	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/5/2015	11/19/2015 1
1	Tanker of PCB Transformer Oil	15703	11/3/2015	11/3/2015	006841760JJK	FLR15-HSPCB_037	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/8/2015	11/19/2015 1
1	Tanker of PCB Transformer Oil	12882	11/4/2015	11/5/2015	006841761JJK	FLR15-HSPCB_038	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/10/2015	11/24/2015 1
1	Tanker of PCB Transformer Oil	16075	11/6/2015	11/6/2015	006841765JJK	FLR15-HSPCB_039	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/12/2015	11/24/2015 1
1	Tanker of PCB Transformer Oil	15930	11/9/2015	11/9/2015	006841766JJK	FLR15-HSPCB_040	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/14/2015	11/24/2015 1
1	Tanker of PCB Transformer Oil	17155	11/13/2015	11/13/2015	006841767JJK	FLR15-HSPCB_041	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/18/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16175	11/17/2015	11/17/2015	006841768JJK	FLR15-HSPCB_042	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/23/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	13853	11/18/2015	11/18/2015	006841769JJK	FLR15-HSPCB_043	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/24/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16991	11/23/2015	11/23/2015	006841772JJK	FLR15-HSPCB_044	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/2/2015	12/21/2015 1
1	Tanker of PCB Transformer Oil	16257	11/23/2015	11/23/2015	006841773JJK	FLR15-HSPCB_045	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/28/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16737	11/30/2015	11/30/2015	006841774JJK	FLR15-HSPCB_046	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/5/2015	12/21/2015 1
1	Tanker of PCB Transformer Oil	16747	12/3/2015	12/3/2015	006841775JJK	FLR15-HSPCB_047	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/8/2015	12/21/2015 1

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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
1	Tanker of PCB Transformer Oil	16991	12/7/2015	12/7/2015	006841776JJK	FLR15-HSPCB_048	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/11/2015	12/21/2015
										1
1	Tanker of PCB Transformer Oil	17019	12/10/2015	12/10/2015	006841778JJK	FLR15-HSPCB_049	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/17/2015	12/29/2015
										1
1	Tanker of PCB Transformer Oil	16620	12/14/2015	12/14/2015	006841779JJK	FLR15-HSPCB_050	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/20/2015	12/29/2015
										1
1	Tanker of PCB Transformer Oil	14415	12/21/2015	12/21/2015	006841786JJK	FLR15-HSPCB_051	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	13326	12/22/2015	12/22/2015	006841787JJK	FLR15-HSPCB_052	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	13834	12/29/2015	12/29/2015	006841788JJK*	FLR15-HSPCB_053	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	12555	12/31/2015	12/31/2015	006841789JJK*	FLR15-HSPCB_054	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	18506	9/17/2015	9/17/2015	006841737JJK**	FLR15-HSPCB_018	Veolia Technical Solutions, Port Arthur, TX	Incineration	10/24/2015	11/23/2015
										1 ***
1	Tanker of PCB Transformer Oil	19196	9/17/2015	9/17/2015	006841738JJK**	FLR15-HSPCB_019	Veolia Technical Solutions, Port Arthur, TX	Incineration	10/22/2015	11/23/2015
										1 ***
1	Tanker of PCB Transformer Oil	19014	9/23/2015	09/23/2015	006841740JJK**	FLR15-HSPCB_021	Clean Harbors, Deer Park, LaPorte, TX	Incineration	9/30/2015	10/13/2015
										1 ***
1	Tanker of PCB Transformer Oil	17572	9/24/2015	9/24/2015	006841742JJK**	FLR15-HSPCB_022	Clean Harbors, Deer Park, LaPorte, TX	Incineration	9/29/2015	10/13/2015

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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
										1 ***
1	Tanker of PCB Transformer Oil	19305	9/24/2015	9/24/2015	006841743JJK**	FLR15-HSPCB_023	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/13/2015	10/22/2015
										1 ***
1	Tanker of PCB Transformer Oil	18588	9/28/2015	9/28/2015	006841744JJK**	FLR15-HSPCB_024	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/13/2015	12/18/2015
										1 ***
1	Tanker of PCB Transformer Oil	17654	9/28/2015	9/28/2015	006841745JJK**	FLR15-HSPCB_025	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/4/2015	11/23/2015
										1 ***
8	(4) Drums of TSCA/LLW, (4) Drums of TSCA/LLW/ACM	746	10/29/2014	7/23/2015	006841708JJK	9501-21-0013	EnergySolutions, Clive, Utah	Landfill	9/24/2015	11/17/2015
										8 ***
1	Drum of RCRA/TSCA/LLW	9	8/14/2014	11/17/2014	006841690JJK	9501-07-0010	EnergySolutions, Clive UT	Landfill	6/30/2015	10/5/2015
										1 ***
32	(31) Drums RCRA/TSCA/LLW Waste Liquids, (1) Drum of TSCA/LLW Waste Liquid	6385	1/19/2012	6/29/2015	006841705JJK	DSSI-15-071	DSSI Perma-Fix, Kingston, TN	Alternate Thermal Treatment	11/10/2015	12/21/2015
										32 ***

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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	
10	Drums of Liquid RCRA/TSCA/LLW	1679	11/18/2013	2/10/2015	006841700JJK	DSSI-15-010	DSSI Perma-Fix, Kingston, TN	Alternate Thermal Treatment	10/21/2015	11/3/2015	
										2 ****	
										Total CDs Received	36
										Total No. of Items Disposed Of	75
	Total Shipped	471069									
	Total Disposed Of	555593									

CD = Certificate of Disposal
LLW = low-level waste
PCB = polychlorinated biphenyl

All PCB waste listed is PCB/radioactive waste.
Weights and volumes are taken from the Uniform Hazardous Waste Manifests.

*At the end of the quarter the signed manifests were not received.

**Shipment was captured in a previous report; however signed manifests were received during this quarter.

***Shipment was captured in a previous report; however certificate of disposal was received during this quarter.

**** Eight of the ten items under UHWM# 006841700JJK were captured in the 2015 3rd quarter report as disposed of. The last two items were disposed of in this quarter and captured in this report.

FPDP-RPT-0009

**Uranium Enrichment
Toxic Substances Control Act
Compliance Agreement
Quarterly Progress Report for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
October 1 through December 31, 2015**



This document is approved for public release per review by:

FPDP Classification Support _____ Date

Deleted: **DRAFT**

FPDP-RPT-0009

**Uranium Enrichment
Toxic Substances Control Act
Compliance Agreement
Quarterly Progress Report for the
Paducah Gaseous Diffusion Plant, Paducah, Kentucky
October 1 through December 31, 2015**

Date Issued—February 2016

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

FLUOR FEDERAL SERVICES, INC.,
Paducah Deactivation Project
managing the
Deactivation Project at the
Paducah Gaseous Diffusion Plant
under Task Order DE-DT0007774

Deleted: 20160129 TSCA Q4 Quarterly Report
FINAL20160121 TSCA Q4 Quarterly Report
DRAFT

CONTENTS

TABLES	iii
FIGURE.....	iii
ACRONYMS.....	iv
1. INTRODUCTION.....	1
2. INTERIM MEASURES.....	1
2.1 AIR SAMPLING.....	1
2.1.1 Requirements.....	1
2.1.2 Work Completion Date.....	1
2.1.3 Activity for this Quarter	2
3. COMPLIANCE MEASURES.....	3
3.1 PROCESS LUBRICATION OIL REMOVAL	3
3.2 SPILL CLEANUP	3
3.2.1 Requirements.....	3
3.2.2 Work Completion Date.....	3
3.2.3 Activity for this Quarter	3
3.3 ELECTRICAL CABLES AND ASSOCIATED EQUIPMENT	5
3.3.1 Requirements.....	5
3.3.2 Work Completion Date.....	5
3.3.3 Activity for this Quarter	5
3.4 DISPOSAL	5
3.4.1 Requirements.....	5
3.4.2 Work Completion Date.....	5
3.4.3 Activity for this Quarter	6

TABLES

1. Fourth Quarter CY 2015 TSCA CA Air Sampling Results..... 2
2. PCB Waste Shipped Off-Site Disposal Activities: Waste Shipped Off-Site and Certificates of Disposal Received October 1 through December 31, 2015..... 7

FIGURE

1. Quarterly Summary of PCB Gasket Spills 4

ACRONYMS

BEJ	best engineering judgment
CA	Compliance Agreement
<i>CFR</i>	<i>Code of Federal Regulations</i>
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 October 1 through December 31, 2015.

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

USEC stopped enriching uranium in May 2013 and transitioned facility operations to DOE on October 21, 2014. DOE continues deactivation activities in the facility and has continued air monitoring in accordance with the requirement above. The agreement stated that work must be complete one year after facility shutdown, and notification will be provided to EPA upon work completion. DOE currently is in discussions with EPA Region 4 concerning future implementation of the agreement.

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 µg/m³ measured from any air-monitoring sampler at any location.

Air samples for the fourth quarter were collected October 14, 2015. The results of all the samples collected for the fourth quarter of CY 2015 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 µg/m³.

Table 1. Fourth Quarter CY 2015 TSCA CA Air Sampling Results

Sample Numbers	Sample Date	Building	Floor	Sample Coordinates	Method of Selection	Results* (µg/m ³)	Pump Flow Rate (liters/minute)	Air Volume Sampled (liters)
PCB16-AIR-01-01	10/14/2015	C-331	Ground	NE of T-26	Random	PCBs not detected above laboratory reporting limits	1.08	559
PCB16-AIR-01-02	10/14/2015	C-333	Cell	NE of Ca-46	Random	PCBs not detected above laboratory reporting limits	1.05	554
PCB16-AIR-01-03	10/14/2015	C-335	Ground	N of M-10	Random	PCBs not detected above laboratory reporting limits	1.04	533
PCB16-AIR-01-04	10/14/2015	C-337	Ground	N of Nb-11	Random	PCBs not detected above laboratory reporting limits	1.05	543
PCB16-AIR-01-05	10/14/2015	C-337	Ground	At Gb-06	BEJ	PCBs not detected above laboratory reporting limits	1.03	530

*Limit of detection 0.01 µg/m³

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 cm² 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 cm² 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.

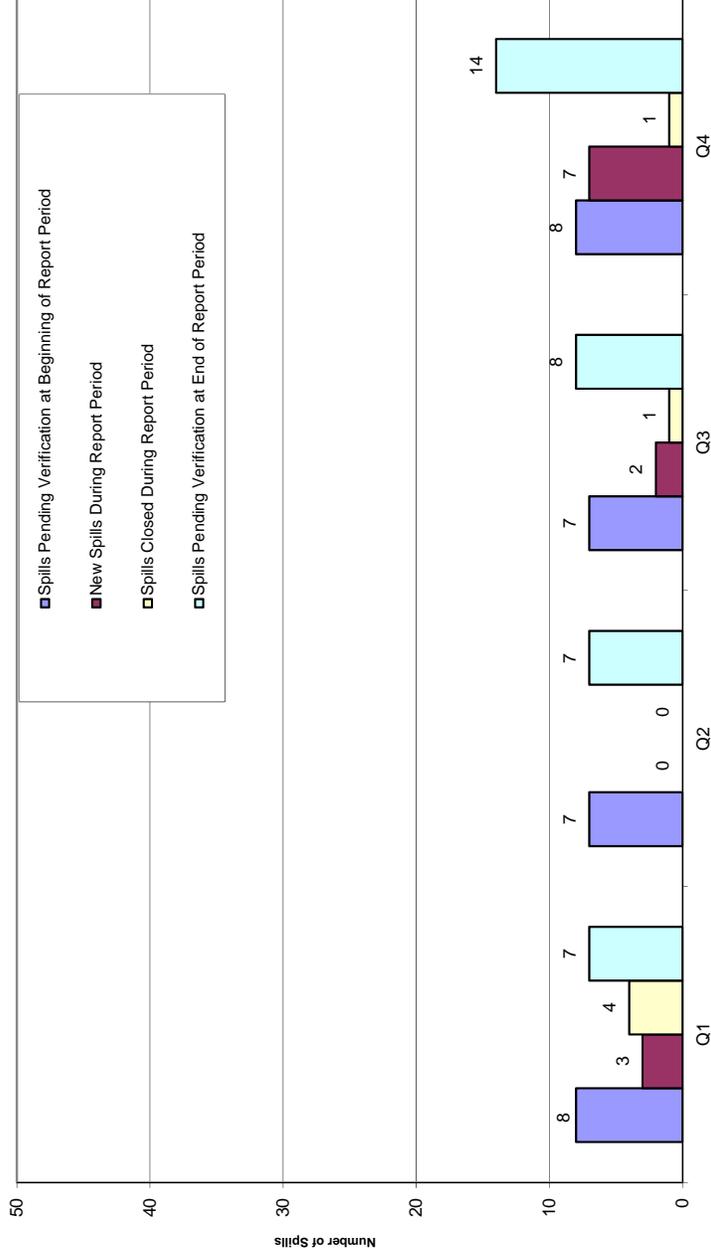
3.2.2 Work Completion Date

None listed.

3.2.3 Activity for this Quarter

Eight gasket spill sites were pending post-cleanup verification at the beginning of this reporting period. Seven new 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. Fourteen gasket spill sites were pending post-cleanup verification at the end of this reporting period. PCB spill cleanup progress for CY 2015 is illustrated in Figure 1.

**PCB Gasket Spills
October 1 Through December 31, 2015**



Note: All PCB Gasket spills are high concentration.

Figure 1. Quarterly Summary of PCB Gasket Spills

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 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. Fluor Federal Services, Inc., Paducah Deactivation Project maintains the cleanup documentation, and the records are available for inspection.

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 cm² or 100 µg PCB/100 cm² 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 fourth quarter of CY 2015.

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 fourth quarter CY 2015, 471069 kg of PCB waste was shipped for disposal. Thirty-six Certificates of Disposal were received ~~for 75 disposed of items totaling 555,593 kg.~~ 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.

Deleted: .

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015**

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
1	Tanker of PCB Transformer Oil	18951	10/1/2015	10/1/2015	006841746JJK	FLR15-HSPCB_026	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/9/2015	11/23/2015 1
1	Tanker of PCB Transformer Oil	19033	10/1/2015	10/1/2015	006841747JJK	FLR15-HSPCB_027	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/12/2015	12/18/2015 1
1	Tanker of PCB Transformer Oil	18724	10/5/2015	10/5/2015	006841748JJK	FLR15-HSPCB_028	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/12/2015	12/18/2015 1
1	Tanker of PCB Transformer Oil	18933	10/5/2015	10/5/2015	006841749JJK	FLR15-HSPCB_029	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/13/2015	12/21/2015 1
1	Tanker of PCB Transformer Oil	19214	10/5/2015	10/6/2015	006841750JJK	FLR15-HSPCB_030	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/19/2015	10/27/2015 1
1	Tanker of PCB Transformer Oil	19477	10/7/2015	10/7/2015	006841752JJK	FLR15-HSPCB_031	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/16/2015	10/27/2015 1
1	Tanker of PCB Transformer Oil	14624	10/16/2015	10/16/2015	006841753JJK	FLR15-HSPCB_032	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/20/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16338	10/20/2015	10/20/2015	006841754JJK	FLR15-HSPCB_033	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/30/2015	11/10/2015 1
1	Tanker of PCB Transformer Oil	13680	10/22/2015	10/22/2015	006841756JJK	FLR15-HSPCB_034	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/31/2015	11/10/2015 1
1	Tanker of PCB Transformer Oil	16483	10/26/2015	10/26/2015	006841758JJK	FLR15-HSPCB_035	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/3/2015	11/10/2015 1

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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
1	Tanker of PCB Transformer Oil	16347	10/30/2015	10/30/2015	006841759JJK	FLR15-HSPCB_036	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/5/2015	11/9/2015 1
1	Tanker of PCB Transformer Oil	15703	11/3/2015	11/3/2015	006841760JJK	FLR15-HSPCB_037	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/8/2015	11/19/2015 1
1	Tanker of PCB Transformer Oil	12882	11/4/2015	11/5/2015	006841761JJK	FLR15-HSPCB_038	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/10/2015	11/24/2015 1
1	Tanker of PCB Transformer Oil	16075	11/6/2015	11/6/2015	006841765JJK	FLR15-HSPCB_039	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/12/2015	11/24/2015 1
1	Tanker of PCB Transformer Oil	15930	11/9/2015	11/9/2015	006841766JJK	FLR15-HSPCB_040	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/14/2015	11/24/2015 1
1	Tanker of PCB Transformer Oil	17155	11/13/2015	11/13/2015	006841767JJK	FLR15-HSPCB_041	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/18/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16175	11/17/2015	11/17/2015	006841768JJK	FLR15-HSPCB_042	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/23/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	13853	11/18/2015	11/18/2015	006841769JJK	FLR15-HSPCB_043	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/24/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16991	11/23/2015	11/23/2015	006841772JJK	FLR15-HSPCB_044	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/2/2015	12/21/2015 1
1	Tanker of PCB Transformer Oil	16257	11/23/2015	11/23/2015	006841773JJK	FLR15-HSPCB_045	Clean Harbors, Deer Park, LaPorte, TX	Incineration	11/28/2015	12/11/2015 1
1	Tanker of PCB Transformer Oil	16737	11/30/2015	11/30/2015	006841774JJK	FLR15-HSPCB_046	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/5/2015	12/21/2015 1
1	Tanker of PCB Transformer Oil	16747	12/3/2015	12/3/2015	006841775JJK	FLR15-HSPCB_047	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/8/2015	12/21/2015 1

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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
1	Tanker of PCB Transformer Oil	16991	12/7/2015	12/7/2015	006841776JJK	FLR15-HSPCB_048	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/11/2015	12/21/2015
1	Tanker of PCB Transformer Oil	17019	12/10/2015	12/10/2015	006841778JJK	FLR15-HSPCB_049	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/17/2015	12/29/2015
1	Tanker of PCB Transformer Oil	16620	12/14/2015	12/14/2015	006841779JJK	FLR15-HSPCB_050	Clean Harbors, Deer Park, LaPorte, TX	Incineration	12/20/2015	12/29/2015
1	Tanker of PCB Transformer Oil	14415	12/21/2015	12/21/2015	006841786JJK	FLR15-HSPCB_051	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	13326	12/22/2015	12/22/2015	006841787JJK	FLR15-HSPCB_052	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	13834	12/29/2015	12/29/2015	006841788JJK*	FLR15-HSPCB_053	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	12555	12/31/2015	12/31/2015	006841789JJK*	FLR15-HSPCB_054	Clean Harbors, Deer Park, LaPorte, TX			
1	Tanker of PCB Transformer Oil	18506	9/17/2015	9/17/2015	006841737JJK**	FLR15-HSPCB_018	Veolia Technical Solutions, Port Arthur, TX	Incineration	10/24/2015	11/23/2015
1	Tanker of PCB Transformer Oil	19196	9/17/2015	9/17/2015	006841738JJK**	FLR15-HSPCB_019	Veolia Technical Solutions, Port Arthur, TX	Incineration	10/22/2015	11/23/2015
1	Tanker of PCB Transformer Oil	19014	9/23/2015	09/23/2015	006841740JJK**	FLR15-HSPCB_021	Clean Harbors, Deer Park, LaPorte, TX	Incineration	9/30/2015	10/13/2015
1	Tanker of PCB Transformer Oil	17572	9/24/2015	9/24/2015	006841742JJK**	FLR15-HSPCB_022	Clean Harbors, Deer Park, LaPorte, TX	Incineration	9/29/2015	10/13/2015

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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	
1	Tanker of PCB Transformer Oil	19305	9/24/2015	9/24/2015	006841743JJK**	FLR15-HSPCB_023	Clean Harbors, Deer Park, LaPorte, TX	Incineration	10/13/2015	10/22/2015	1 ***
1	Tanker of PCB Transformer Oil	18588	9/28/2015	9/28/2015	006841744JJK**	FLR15-HSPCB_024	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/13/2015	12/18/2015	1 ***
1	Tanker of PCB Transformer Oil	17654	9/28/2015	9/28/2015	006841745JJK**	FLR15-HSPCB_025	Veolia Technical Solutions, Port Arthur, TX	Incineration	11/4/2015	11/23/2015	1 ***
8	(4) Drums of TSCA/LLW, (4) Drums of TSCA/LLW/ACM	746	10/29/2014	7/23/2015	006841708JJK	9501-21-0013	EnergySolutions, Clive, Utah	Landfill	9/24/2015	11/17/2015	8 ****
1	Drum of RCRA/TSCA/LLW	9	8/14/2014	11/17/2014	006841690JJK	9501-07-0010	EnergySolutions, Clive UT	Landfill	6/30/2015	10/5/2015	1 ****
32	(31) Drums RCRA/TSCA/LLW Waste Liquids, (1) Drum of TSCA/LLW Waste Liquid	6385	1/19/2012	6/29/2015	006841705JJK	DSSI-15-071	DSSI Perma-Fix, Kingston, TN	Alternate Thermal Treatment	11/10/2015	12/21/2015	32 ***

**Table 2. PCB Waste Shipped Off-Site Disposal Activities:
Waste Shipped Off-Site and Certificates of Disposal Received
October 1 through December 31, 2015 (Continued)**

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
10	Drums of Liquid RCRA/TSCA/LLW	1679	11/18/2013	2/10/2015	006841700JK	DSSI-15-010	DSSI Perma-Fix, Kingston, TN	Alternate Thermal Treatment	10/21/2015	11/3/2015 2 *****
Total CDs Received										36
Total No. of Items Disposed Of										75
Total Shipped		471069								
Total Disposed Of		555593								

CD = Certificate of Disposal
LLW = low-level waste
PCB = polychlorinated biphenyl

All PCB waste listed is PCB/radioactive waste.
Weights and volumes are taken from the Uniform Hazardous Waste Manifests.

*At the end of the quarter the signed manifests were not received.

**Shipment was captured in a previous report; however signed manifests were received during this quarter.

***Shipment was captured in a previous report; however certificate of disposal was received during this quarter.

**** Eight of the ten items under UHWM# 006841700JK were captured in the 2015 3rd quarter report as disposed of. The last two items were disposed of in this quarter and captured in this report.

Response to U.S. Department of Energy Comments
Submitted January 29, 2016,
Draft Toxic Substances Control Act Compliance Agreement
Quarterly Progress Report for the Paducah Gaseous Diffusion Plant,
Paducah, Kentucky, October 1 through December 31, 2015,
FPDP-RPT-0009, Dated January 22, 2016

Specific Comments:

Comment 1, Section 3.2.3 Activity for this Quarter, page 5: Recommend clarifying that these spills are gasket spills.

Response 1: Agree. “Gasket” added to sentence.

Comment 2, Section 3.4.3 Activity for this Quarter, page 6: Please add “for 75 disposed items totaling 555,593 kg”

Response 2: Agree. Sentence revised as follows, “Thirty-six Certificates of Disposal were received for 75 disposed of items totaling 555,593 kg.”