

**Uranium Enrichment Toxic Substances Control Act
Quarterly Report for the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky,
January 1 through March 31, 2018**



This document is approved for public release per review by:

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FRNP Classification Support

5-10-18
Date

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Paducah Gaseous Diffusion Plant,
Paducah, Kentucky,
January 1 through March 31, 2018**

Date Issued—May 2018

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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ACRONYMS

CA	Compliance Agreement
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
TSCA	Toxic Substances Control Act

1. INTRODUCTION

The Toxic Substances Control Act (TSCA) Compliance Agreement (CA) was signed by the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) on February 20, 1992, modified in 1997, and modified again on May 30, 2017. The original TSCA CA required quarterly reports summarizing progress toward completing polychlorinated biphenyl (PCB)-related compliance measures. These measures included 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. Subsequent to the May 30, 2017, modification, only PCB Spill Cleanup progress is required to be reported on a quarterly basis. 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 summary satisfies the modified TSCA CA quarterly reporting requirements for January 1 through March 31, 2018.

2. COMPLIANCE MEASURES

2.1 SPILL CLEANUP

2.1.1 Requirements

Attachment I, Section 2 (C), of the 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 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 historical spills which are defined as PCB stains resulting from spills which have occurred prior to the effective date of the February 20, 1992 Compliance Agreement. Historical 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 historical 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 historical spill for purposes of the cleanup under this Agreement.

2.1.2 Work Completion Date

None listed.

2.1.3 Activity for this Quarter

2.1.3.1 Gasket spills

Gasket spill sites 1941, 1952, 1953, 1974, 1989, 1992, 2003, 2006, 2011, 2012, 2013, and 2014 were pending post-cleanup verification at the beginning of this reporting period. One new gasket spill, 2015, was identified on the building floor during the reporting period. Gasket spill site 2013 was closed during the reporting period by verifying sampling data. No gasket spills were closed as historical spills this quarter. Twelve gasket spill sites—1941, 1952, 1953, 1974, 1989, 1992, 2003, 2006, 2011, 2012, 2014, and 2015—were pending post-cleanup verification at the end of this reporting period. A detailed description of all open gasket spills is provided in Table 1.

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 original 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 cleanup documentation and the records are available for inspection.

2.1.3.2 Non-gasket spills

Non-gasket spill sites 719, 748, 774, 785, 789, 799, 832, 835, 841, 842, 843, 845, 847, 849, 850, 853, 855, 857, 858, 861, 863, 864, and 866 were pending post-cleanup verification at the beginning of this reporting period. One new non-gasket spill, 867, was identified on the building floor during the reporting period. Non-gasket spill site 845 was closed during the reporting period. No non-gasket spills were closed as historical this quarter. Twenty-three non-gasket spill sites—719, 748, 774, 785, 789, 799, 832, 835, 841, 842, 843, 847, 849, 850, 853, 855, 857, 858, 861, 863, 864, 866, and 867—were pending post-cleanup verification at the end of this reporting period. A detailed description of all open gasket spills in Table 2.

All PCB non-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 original 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 cleanup documentation and the records are available for inspection.

Table 1. Open Gasket Spill Report

OPEN GASKET SPILL REPORT

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>BUILDING</i>	<i>COLUMN</i>	<i>DAYS OPEN</i>	<i>COMMENTS</i>	<i>STATUS</i>
1941	5/10/2011	1230	C-337	GB-6	2542	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 5/16/11 Column Gb-6. Per phone conversation USEC initiated cleanup within 24 hours; further sampling is needed and cleanup will continue. Issued as 1939, USEC to get PSS to correct to 1941. Spill is caused by a hydraulic leak into the instrument duct; instrumentation within the U1C5 heated cubicle is coated, there is no pool [of oil]. Spill site has been flagged and posted. The door and access panel is ready for cleanup per USEC.	Incomplete
1952	1/13/2012	0900	C-337	Gb29	2294	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 1/13/12 Oil dripping from open ductwork onto energized transformer 7-2-6-A. Initial cleanup completed by USEC on 1/13/12 at 1300.	Incomplete
1953	1/13/2012	0900	C-337	La-22	2294	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 1/13/12 Oil dripping from open ductwork onto energized transformer U2-1-A. Initial cleanup completed by USEC on 1/13/12 at 1400.	Incomplete

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Table 1. Open Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>BUILDING</i>	<i>COLUMN</i>	<i>DAYS OPEN</i>	<i>COMMENTS</i>	<i>STATUS</i>
1974	8/21/2013	1300	C-337	W-43	1708	10/26/17 update: A recent smaller spill area, within the existing, open 1974 spill area, cleaned and plastic put down. Recent smaller spill area given designation of #1974A to denote being an additional spill but still part of the original 1974 spill area. 10/25/17 update: Smaller spill occurred within boundary 1974 existing, open spill site. 10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 6/14/17 update: 4S analytical data received - Above regulatory limits. 4/19/17 update: Area recleaned and 4S sampled. 3/27/17 update: requested 4S sampling. 1/13/16 update: 3S analytical data received - Above regulatory limits. Reclean/resample required. 12/10/15 update: Spill site recleaned and 3S sample collected. 8/18/15 update: 2S analytical data received - Above regulatory limits. Reclean/resample required. 6/24/15 update: spill site recleaned and 2S sample collected. 5/7/15 update: analytical data - Above regulatory limits. Reclean/resample required. 4/1/15 update: 1S sample collected. 2/12/15 update: requested 1 S sampling. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 8/21/13: An area ~40 feet by 50 feet containing potentially PCB contaminated water. Estimated volume is 5 gallons of low concentration PCB water (No oil sheen). Quantity is less than RQ. The water is being sampled for PCB concentration.	Incomplete
1989	2/21/2015	0330	C-337	B-36	1159	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 6/14/17 update: 7S Above regulatory limits. 4/19/17: area recleaned and resampled. 3/27/17 update: requested 7S sampling event. 11/29/16 update: 6S sample has 3 locations above regulatory limits. 9/1/16 update: 6S sample collected. 12/22/15 update: 5S sample above regulatory limit. Additional sampling required. 11/18/15 update: spill site cleaned and 5S sample collected. 11/5/15 update: 5S sample requested. 10/29/15 update: 4S Above regulatory limit. Additional sampling required. 09/24/14 update: spill site cleaned and 4S sample collected. 07/08/15 update: requested 4S sample. 07/07/15 update 1S, 2S, 3S All above regulatory limits. Required additional sampling. 05/07/15 update: 1S, 2S, 3S sample collected with cleaning between each sampling event. 04/16/15 update: requested 1S, 2S, 3S sampling. Water leaking from broken PCB trough. ~ 3 foot wet spot on floor. Drum placed under leak. Absorbent pads used to collect water. Initial cleaning completed. Area posted and flagged off.	Incomplete

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Table 1. Open Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>BUILDING</i>	<i>COLUMN</i>	<i>DAYS OPEN</i>	<i>COMMENTS</i>	<i>STATUS</i>
1992	11/17/2015	1259	C-337	Y-27	890	11/6/17 update: 5S Above regulatory limits. 10/20/2017 update: FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 6/14/17 update: 4S Above regulatory limits. 4/19/17 4S area clean and sample collected. 3/8/17 update; 3S sample above regulatory limits. 2/7/17 update: area cleaned and 3S sample collected. 11/29/16 update: Received 2S spill data. One area above regulatory limits. 9/1/16 update: resampled spill area. 5/26/16 update: 1S sample Above regulatory limits. 1/12/16 update: Maintenance complete. Replaced strap that was causing pan to tip to one side. Repositioned straps to inside pan. Water in area 4'3" by 4'9". Water from PCB trough. Area roped and posted. Initial cleanup completed.	Incomplete
2003	3/28/2016	1230	C-333	P-12	758	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 10/18/17 update: 5S sample Above regulatory limits. 7/19/17 update: 4S sample Above regulatory limits. 5/11/17 update: 4S Sampling completed. 10/17/16 update: all sample points were above regulatory limits. 8/25/16 update: sampled 1S, 2S, and 3S, 1 sample point. 3/30/16 update: maintenance complete, installed new 90 degree elbow and coupling. 3/28/16 update: 1S, 2S, 3S sampling requested. 3 drops on floor in 100 cm2 area. Roped off, posted, initial clean up complete.	Incomplete
2006	8/24/2016	0835	C-337	X-23	609	1/2/2018 Update: 3S sample return above regulatory limits. 11/28/2017 update: Site recleaned and sample 3S was taken. 11/6/17 update: 3S sample request submitted. 10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 10/18/17 update: 2S sample Above regulatory limits. 7/19/17 update: 1S sample Above regulatory limits. 5/11/17 update: Sampling completed. Column X-23, Water 20" by 20" area of PCB contaminated water. Initial cleanup completed, posted, and flagging in progress.	Incomplete
2011	11/6/2017	1145	C-337	X-48	170	3/20/2018 Update: 2S sampling performed. 1/30/2018 Update: 2s sample requested. 1/2/2018 Update: 1S sample return above regulatory limit. 2S sample to be requested. 11/28/2017 update: 1S samples taken. 11/6/2017 1 drip approximately 100 cm sq and 3 small drips roughly 1 inch in diameter from broken PVC pipe in 90 degree elbow and end cap. Location was double washed and rinsed within 24 hours. 1S sample requested	Incomplete

Table 1. Open Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>BUILDING</i>	<i>COLUMN</i>	<i>DAYS OPEN</i>	<i>COMMENTS</i>	<i>STATUS</i>
2012	11/6/2017	1145	C-337	Wb-47	170	3/20/2018 Update: 2S sampling performed. 1/30/2018 update: 2s sample requested. 1/2/2018 Update: 1S sample return above regulatory limit. 2S sample to be requested. 11/28/2017 update: 1S samples taken. 11/6/2017 2 drips approximately 100 cm sq each from overflow of 3 inch PVC trough. Location was double washed and rinsed within 24. 1S sample requested.	Incomplete
2014	12/19/2017	1030	C-337	D-29	127	3/19/2018 Update: Aluminum pans arrive at stores. Pans still need to be QC'ed. 3/7/2018 Update: PR submitted for aluminum pans to place under active leak. 12/19/2017 Update: 1S sample requested. Double wash and Double rinsed area using the solvent Soy Gold 1000 followed by a rinse of cleaner Formula 409, as necessary to remove oily residue remaining on cleaned surfaces. Two drops (dime sized each) from PVC elbow attached to metal pan above transformer 72P10A dripped on floor within dike. Gasket spill 2014 is on top of open PCB non-gasket spill #863. Still actively leaking	Incomplete
2015	1/6/2018	2136	C-333	U-12	109	3/20/2018 Update: 1S sampling performed. 1/8/2018 Update: New PVC piping installed in break. Leak stopped. Sampling Requested. 1/7/2018 Update: C-333 Columns T11/12 - U11/12 Double washed and double rinsed the areas using the solvent Soy Gold 1000 followed by rinse of cleaner Formula 409, as necessary to remove oily residue remaining on the cleaned surfaces. 1/6/2018 Update: 1" 90 degree PVC fitting broke above column U-12. Four pieces of PVC pipe found between columns T11/12 and U11/12. No visible PCBs from two small pieces. Three Large Areas of PCB oil (2 areas greater than 100 cm square but less than 500 square cm; 1 area around 100 square cm) found. Several additional dime and quarter sizes around the three large areas. Area underneath where pipe broke still actively leaking.	Incomplete

Open Spills: 12

Table 2. Open Non-Gasket Spill Report

OPEN NON-GASKET SPILL REPORT

REPORT	DATE	TIME	FACILITY	DAYS OPEN	DESCRIPTION	COORDINATOR	STATUS
719	3/19/2003		C-337	5516	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10: Still active, no change. 7/30/09: TSCA Compliance audit, tiny intermittent drip of thick high concentration PCB sludge, maintained by keeping pad beneath the drip and changing when needed. 4/14/08 update: still active leak. 2/20/06 update: thick clear oil still showing, must shut down to fix, spill is active with daily checks; 4/5/05 update: active leak, cleaned numerous times, inspected daily, repairs to be made when cell is taken offline, no schedule. 71P4B transformer, brief info from phone conversation with USEC, PCB per discovery sample >100000 ug/100cm2 wipe, material like corn syrup under XF cooling fins, XF 71P4B GE B983175; is on top of old historic spill; area approx 6 in by 9 in.	Lonnie Bertram	Incomplete
748	6/27/2004	1555	C-337	5050	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: Floor has been encapsulated, other areas have not. Access is restricted. 4/14/08 updated: not active, recleaning and resampling ongoing to reduce area to encapsulate. 2/20/06 update: partially encapsulated last week (over cart path), transf in place but not energized, when running can reclean and encapsulate per USEC; 4/5/05 update: to be recleaned and encapsulated once transformer is replaced. C-337 E-30, U/2 C/8 B-transformer RIJL101 sprayed approx 2 gallons from pressure relief device on transfromer tank. Fluid is on transformer and inside and outside the diked area, ~60 ft radius.	Lonnie Bertram	Incomplete

Table 2. Open Non-Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>FACILITY</i>	<i>DAYS OPEN</i>	<i>DESCRIPTION</i>	<i>COORDINATOR</i>	<i>STATUS</i>
774	7/20/2005	0805	C-337	4662	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: No changes. 4/14/08 update: incomplete spill, on waste transformer, will close out with disposal. 2/20/06 update: lube oil leak over area, cannot distinguish between PCB spill and lube oil - once drained trans is moved, it will be cleaned before wrapped for shipping & contaminated hypalon will be disposed as PCB per USEC. 7/20/05: declared a PCB spill, out of Service PCB Transformer from U/2 C/8 [RFD 107839] had residual oil forced from insulating coils during the fault that caused the transformer to fail, area cleaned but continues to leak.	Lonnie Bertram	Incomplete
785	3/22/2006	1129	C-337	4417	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: Spill corrected week of 12/3/10, Chem Ops will decon and area will be encapsulated. 7/30/09: TSCA Compliance audit, minor spigot leak with occasional drop of oil that does not reach the floor; drip is monitored. 4/14/08 update: incomplete, still active leak. U1 C10 Transformer 71P10B GE B983187 east end on plug at top of transformer side, leak onto side and gauge.	Lonnie Bertram	Incomplete
789	4/5/2006	1245	C-337	4403	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: No changes. 4/14/08 update: incomplete spill, on waste transformer, close out with disposal. Continues to leak, pads changed daily; original spill was 6 oz on hypalon covered dike floor from PCB Transformer radiator fin plug.	Lonnie Bertram	Incomplete
799	6/29/2007	0700	C-337	3953	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: Still dripping/active. 4/14/08 update: incomplete, still active leak. Posted, absorbent laid; 72P6A transformer RIA-0004 leaked inside dike area, 2 by 4 inches.	Lonnie Bertram	Incomplete

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Table 2. Open Non-Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>FACILITY</i>	<i>DAYS OPEN</i>	<i>DESCRIPTION</i>	<i>COORDINATOR</i>	<i>STATUS</i>
832	11/30/2009	2045	C-337	3068	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: still dripping/active. PCB Transformer 71P3B, GE B983161. Several drops on an absorbent pad. USEC to clean/sample.	Lonnie Bertram	Complete
835	12/17/2009	1100	C-337	3051	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: leaking at transformer U6C1 B-substation, few spots on floor; flagged off and posted, cleanup initiated.	Lonnie Bertram	Incomplete
841	6/24/2010	1054	C-337	2862	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: No longer active drip, to be cleaned and sampled/encapsulated. 6/24/10: Less than 1 pound, appx one half cup on floor at transformer 72P3A, GE B983125, from cooling fin.	Lonnie Bertram	Incomplete
842	6/25/2010	0845	C-337	2861	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: no longer active drip, to be cleaned and sampled/encapsulated. 6/25/10: U/1 C/5 B transformer, GE B983114, drip from plug in top sample, 12 drops on floor in dike.	Lonnie Bertram	Incomplete
843	6/25/2010	0846	C-337	2861	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 12/15/10 update: no longer active drip, to be cleaned and sampled/encapsulated. 6/25/10: U/1 C/8 B transformer, GE B983206, 1 drop on pad inside dike, leak is under drain valve; area is flagged off.	Lonnie Bertram	Complete

Table 2. Open Non-Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>FACILITY</i>	<i>DAYS OPEN</i>	<i>DESCRIPTION</i>	<i>COORDINATOR</i>	<i>STATUS</i>
847	3/22/2011	0845	C-337	2591	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. 3/22/11: Spill site to be cleaned/sampled. Few drops on top sample valve of transformer Unit 6 Cell 1 A transformer.	Lonnie Bertram	Incomplete
849	9/27/2011	0820	C-337	2402	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. C-337 U/1 C/4 B-Transformer. Columns J/Ja-14/13. Small puddle in pan ~1 tablespoon	Lonnie Bertram	Incomplete
850	12/21/2011	0830	C-337	2317	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. C-337 Unit 2 cell 1 tap sample valve on B transformer. A couple of drops.	Lonnie Bertram	Incomplete
10 853	3/21/2012	0853	C-337	2226	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 11/21/2014 management of open PCB spills transferred to DOE upon de-lease of operations at PGDP. DOE is responsible for the cleanup of all open PCB spills generated under the USEC lease period which ended in 2014. Transformer 1-2-A leaking top sample valve. Few drips on guage and floor.	Lonnie Bertram	Incomplete
855	6/25/2012	1230	C-337	2130	11/21/17 update: two new drips (half dollar size each) on top of dike and one area (~100 cm2) on floor inside transformer dike area. The oil was found to be coming through bolts on the cable housing that connects Transformer 72P8A and the Ground Resister. Oil streamed down from bolts to bottom of housing and dripped onto the top of dike. Some material from dike ran down inside of the dike to the floor. 10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP U/2 C/8 "A" transformer. Column Eb-29 on top of dike wall. Two spots approximately 1 1/2".	Lonnie Bertram	Incomplete

Table 2. Open Non-Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>FACILITY</i>	<i>DAYS OPEN</i>	<i>DESCRIPTION</i>	<i>COORDINATOR</i>	<i>STATUS</i>
857	3/20/2015	2208	C-337	1132	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 5/10/16 update: Work Request No. 16050091 submitted to encapsulate. 5/5/16 update: 4S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 3/24/16 update: 4S sampling completed. 2/26/16 update: 4S sampling requested. 2/17/16 update: 3S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 12/21/15 update: Sampling completed. 12/7/15 update: Sampling requested. 3/20/15: C-337 72P4A transformer. Diked area around transformer and approx 10' by 10' area east of dike. Area between col Jb-29 to Jb-31 and col K-29 to K-31. Oil sheen spots on water in diked area and spot where water leaked from dike.	Lonnie Bertram	Incomplete
858	5/27/2015	1745	C-337	1064	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 3/25/16 update: Work Request No. 16031461 submitted to encapsulate. 3/3/16 update: 3S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 12/29/15 update: Sampling completed. 12/7/15 update: Sampling requested. 5/27/15: C-337 transformer 72P1B. West side of the transformer inside and outside the diked area at col. Lb-21. Spill is from leaking gaskets/grommets around the rod bushings through the duct.	Lonnie Bertram	Incomplete
861	10/5/2015	1045	C-337	933	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 3/25/16 update: Work Request No. 16031461 submitted to encapsulate. 3/16/16 update: 4S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 2/24/16 update: 4S sampling completed. 2/5/16 update: 4S sampling requested. 1/25/16 update: 3S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 12/16/15 update: Sampling completed. 11/30/15 update: Sampling requested. 10/5/15: Transformer at Unit 2 Cell 7 A sub. PCB rinseate oil dripping from bottom radiator gasket. Leaking 1 drop per second. Less than 3 gallons are on floor inside the dike. Setting up to pump the oil to a truck.	Lonnie Bertram	Incomplete

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Table 2. Open Non-Gasket Spill Report (Continued)

<i>REPORT</i>	<i>DATE</i>	<i>TIME</i>	<i>FACILITY</i>	<i>DAYS OPEN</i>	<i>DESCRIPTION</i>	<i>COORDINATOR</i>	<i>STATUS</i>
863	11/5/2015	1245	C-337	902	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 3/28/16 update: Work Request No. 16031482 submitted to encapsulate. 3/16/16 update: 4S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 2/24/16 update: 4S sampling completed. 2/5/16 update: 4S sampling requested. 1/25/16 update: 3S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 12/17/15 update: Sampling completed. 12/7/15 update: Sampling requested. 11/5/15: 37 U2/C10/A Trans. Sight glass valve. South side of diked area around A Trans. Failed to fully close valve. Closed valve. Called & Reported and covered oil absorbent to soak up oil.	Lonnie Bertram	Incomplete
864	4/1/2016	1543	C-337	754	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 9/12/16 update: 3S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 7/28/16 update: Sampling completed. 7/13/16 update: Sampling requested. 4/1/16: Transformer U/1 C/6 "A" Transformer, column GB-13. A couple drops on floor. Placed absorbent down, flagged area off, and posted as a PCB spill area. Initial cleanup is complete. On a previous spill site.	Lonnie Bertram	Incomplete
866	4/1/2016	1543	C-337	754	10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at PGDP. 7/26/16 update: Work Request No. 16070183 submitted to encapsulate. 7/8/16 update: 3S spill sampling results exceeded the TSCA clean-up level of <10 ug/100 cm2. 5/18/16 update: Sampling completed. 4/14/16 update: Sampling requested. 4/1/16: C-337 U/6 C/1 "A" Transformer, column P-13. A couple drops on floor. Placed absorbent down, flagged off, and posted as a PCB spill area. Initial cleanup is completed. Approximately 1" in diameter.	Lonnie Bertram	Incomplete
867	1/10/2018	0925	C-337	105	1/10/2018 Update: Residual PCB oil leaking from bolts on cable housing of Transformer 72P6B onto plastic on floor and supports. There are two oil drops about half dollar size, two oil drops about quarter size, and five drops about dime size on plastic. Stain observed under plastic. Unsure if stain is related to spill but will be included as part of cleanup. Per Deactivation Manager, oil suspected to be from bushings inside of housing. Double washed and double rinsed the areas using the solvent SoyGold 1000 followed by a rinse of cleaner Formula 409, as necessary to remove oily residue remaining on the cleaned surfaces.	Lonnie Bertram	Incomplete

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