FRNP-RPT-0046

Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, April 1 through June 30, 2018



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U.S. DEPARTMENT OF ENERGY Office of Environmental Management

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ACRONYMS

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

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 April 1 through June 30, 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, 2014, and 2015 were pending post-cleanup verification at the beginning of this reporting period. Two new gasket spills 2016 and 2017 were identified on the building floor during the reporting period. Gasket spills.—1989, 1992, 2003, and 2006—were closed as historical spills this quarter and were added to the list of historical spill sites. Each of the four sites had been sampled a minimum of three times with the last sampling results being in excess of 10 μ g PCB/100 cm². Each spill site then was encapsulated with two coats of white epoxy paint followed by two coats of gray epoxy paint. A PCB M_L marking and a stencil of the spill site number along with the date of encapsulation were affixed to the gray paint and covered with a single layer of clear coat. Eight gasket spill sites—1941, 1952, 1953, 1974, 2011, 2012, 2016, and 2017—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, 847, 849, 850, 853, 855, 857, 858, 861, 863, 864, 866, and 867 were pending post-cleanup verification at the beginning of this reporting period. No new non-gasket spills were identified during the reporting period. No non-gasket spill sites were closed during the reporting period by verifying sampling data. Non-gasket spill 866 was closed as a historic spill this quarter and was added to the list of historical spill sites. The site had been sampled a minimum of three times with the last sampling results being in excess of 10 μ g PCB/100 cm². The spill site then was encapsulated with two coats of white epoxy paint followed by two coats of gray epoxy paint. A PCB M_L marking and a stencil of the spill site number along with the date of encapsulation were affixed to the gray paint and covered with a single layer of clear coat. Twenty-two non-gasket spill sites—719, 748, 774, 785, 789, 799, 832, 835, 841, 842, 843, 847, 849, 850, 853, 857, 858, 861, 863, 864, 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.

OPEN GASKET SPILL REPORT

| REPORT | DATE | TIME | BUILDING | COLUMN | DAYS OPEN | COMMENTS | STATUS |
|--------|-----------|------|----------|--------|-----------|--|------------|
| 1941 | 5/10/2011 | 1230 | C-337 | GB-6 | 2627 | 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 | 2379 | 4/12/2018 Update: Installed Aluminum pan under existing pan and ductwork. 3/7/2018 Update: PR submitted for aluminum pans to place under active leak. 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 | 2379 | 4/12/2018 Update: Installed Aluminum pan under existing pan and ductwork. 3/7/2018 Update: PR submitted for aluminum pans to place under active leak. 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 |

| REPORT | DATE | TIME | BUILDING | COLUMN | DAYS OPEN | COMMENTS | STATUS |
|------------|-----------|------|----------|--------|-----------|---|------------|
| 1974 | 8/21/2013 | 1300 | C-337 | W-43 | 1793 | 10/26/17 update: A recent smaller spill area, within the exitsting, 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 |
| 2011 | 11/6/2017 | 1145 | C-337 | X-48 | 255 | 4/23/2018 Update: 2S sample return above regulatory limits. 3S sample to be requested. 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 |
| 2012 | 11/6/2017 | 1145 | C-337 | Wb-47 | 255 | 4/23/2018 Update: 2S sample return above regulatory limits. 3S sample to be requested. 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 |

| REPORT | DATE | TIME | BUILDING | COLUMN | DAYS OPEN | COMMENTS | STATUS |
|--------|--------------|------|----------|--------|-----------|---|------------|
| 2016 | 4/25/2018 | 0743 | C-337 | D-28 | 85 | 5/24/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/22/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/14/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/1/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 4/25/2018 Update: Spill from PCB Ventilation Duct Troughing. Leak from L joint on pvc connection coming off trough above area between columns Cb28 and D28. Signage and Flagging added to area restricting access. Area double wash and double rinsed using the solvent Soy Gold 1000 followed by a rinse of cleaner Formula 409, as necessary to remove oily residue remaining on the cleaned surface. PSS, Env. Comp., Facility Manager, and PCB Coordinator notified. | Incomplete |
| 2017 | 4/25/2018 | 0825 | C-337 | Nb-38 | 85 | 4/25/2018 Update: Spill from PCB Ventilation Duct Troughing with leak from PVC elbow connection on pan under PCB trough above substation 74P2B. Signage and Flagging added to area restricting access. Area double wash and double rinsed using the solvent Soy Gold 1000 followed by a rinse of cleaner Formula 409, as necessary to remove oily residue remaining on the cleaned surface. PSS, Env. Comp., Facility Manager, and PCB Coordinator notified. | Incomplete |
| | Open Spills: | 0 | | | | | |

 \boldsymbol{v}

Open Spills: 8

OPEN NON-GASKET SPILL REPORT

| R | EPORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|---|-------|-----------|------|----------|-----------|--|----------------|------------|
| 6 | 719 | 3/19/2003 | | C-337 | 5601 | 6/28/2018 Update: Eight months of inpsections under FRNP have shown no signs of drips. Leak has stopped but will continure to be inspected since spill is still open. 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 | 5135 | 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), transformer 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 |

Thursday, July 19, 2018

| R | EPORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|---|-------|-----------|------|----------|-----------|---|----------------|------------|
| | 774 | 7/20/2005 | 0805 | C-337 | 4747 | 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 transformer is moved, it will be cleaned before being 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 |
| 7 | 785 | 3/22/2006 | 1129 | C-337 | 4502 | 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. 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 | 4488 | 6/28/2018 Update: Eight months of inspections under FRNP have shown no signs of drips. Leak has stopped but will continue to be inspected since spill is still open. 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 |

| RI | PORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|----|------|------------|------|----------|-----------|---|----------------|------------|
| | 799 | 6/29/2007 | 0700 | C-337 | 4038 | 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 |
| | 832 | 11/30/2009 | 2045 | C-337 | 3153 | 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 | Incomplete |
| 8 | 835 | 12/17/2009 | 1100 | C-337 | 3136 | 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 | 2947 | 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 | 2946 | 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 |

| REPO | ORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|--------|-----|------------|------|----------|-----------|---|----------------|------------|
| 8 | 843 | 6/25/2010 | 0846 | C-337 | 2946 | 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 | Incomplete |
| 8 | 847 | 3/22/2011 | 0845 | C-337 | 2676 | 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 |
| 8 9 | 849 | 9/27/2011 | 0820 | C-337 | 2487 | 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 |
| 8 | 850 | 12/21/2011 | 0830 | 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 Unit 2 cell 1 tap sample valve on B transformer. A couple of drops. | Lonnie Bertram | Incomplete |
| 8 | 853 | 3/21/2012 | 0853 | C-337 | 2311 | 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 |

| RI | EPORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|----|-------|-----------|------|----------|-----------|--|----------------|------------|
| | 855 | 6/25/2012 | 1230 | C-337 | 2215 | 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 Resistor. Oil leaked down from bolts to the bottom of the housing and dripped onto the top of the dike. Some material from dike ran down inside of the dike to the floor. New area was double washed and rinsed within 24 hours. Plastic and absorbent pads were put in place. 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 |
| 10 | 857 | 3/20/2015 | 2208 | C-337 | 1217 | 5/14/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/1/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 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 | 1149 | 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 |

| RE | PORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|----|------|-----------|------|----------|-----------|--|----------------|------------|
| | 861 | 10/5/2015 | 1045 | C-337 | 1018 | 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 |
| 11 | 863 | 11/5/2015 | 1245 | C-337 | 987 | 5/24/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/14/2018 Update: Material observed on aborbent pads. Absorbent pads cleaned up and replaced. 5/8/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/1/2017 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 4/26/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 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 asborant to soak up oil. | Lonnie Bertram | Incomplete |
| | 864 | 4/1/2016 | 1543 | C-337 | 839 | 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 |

| REPORT | DATE | TIME | FACILITY | DAYS OPEN | DESCRIPTION | COORDINATOR | STATUS |
|--------|-----------|------|----------|-----------|--|----------------|------------|
| 867 | 1/10/2018 | 0925 | C-337 | 190 | 5/24/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/14/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/8/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 5/1/2018 Updated: Material observed on absorbent pads. Absorbent pads cleaned up and replaced. 4/26/2018 Material observed on absorbent pads. Absorbent pads cleaned up and replaced. Changed 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 |
| | 0 0 11 0 | 20 | | | | | |

Open Spills 22