



Department of Energy

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

May 12, 2021

Mr. David Ruckstuhl, Prime Contracts Manager
Four Rivers Nuclear Partnership, LLC
5511 Hobbs Road
Kevil, Kentucky 42053

PPPO-02-10010449-21

Dear Mr. Ruckstuhl:

DE-EM0004895: APPROVAL OF DELIVERABLE NO. 11, URANIUM ENRICHMENT TOXIC SUBSTANCES CONTROL ACT QUARTERLY REPORT, JANUARY 1 THROUGH MARCH 31, 2021

Reference: Letter from M. Redfield to M. Fultz, "Four Rivers Nuclear Partnership, LLC, Deliverable No. 11—*Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, January 1 through March 31, 2021*, FRNP-RPT-0189," (FRNP-21-4954), dated April 29, 2021

The U.S. Department of Energy (DOE) reviewed and has no comments on the referenced document submitted by Four Rivers Nuclear Partnership, LLC. Therefore, DOE approves the document as submitted.

If you have any questions or require additional information, please contact Tracey Duncan at (270) 441-6862.

Sincerely,

Marcia D.
Fultz

Digitally signed by Marcia
D. Fultz
Date: 2021.05.12
14:52:32 -04'00'

Marcia D. Fultz
Contracting Officer
Portsmouth/Paducah Project Office

cc:

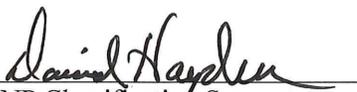
abigail.parish@pppo.gov, PPPO
april.ladd@pppo.gov, PPPO
brandy.mitchell@pad.pppo.gov, FRNP
brian.bell@pad.pppo.gov, FRNP
carrie.maxie@pad.pppo.gov, FRNP
david.ruckstuhl@pad.pppo.gov, FRNP
frnpcorrespondence@pad.pppo.gov
jennifer.woodard@pppo.gov, PPPO

joel.bradburne@pppo.gov, PPPO
marcia.fultz@pppo.gov, PPPO
myrna.redfield@pad.pppo.gov, FRNP
pad.rmc@pad.pppo.gov
robert.edwards@pppo.gov, PPPO
sally.vanhetkaar@pppo.gov, ETAS
tracey.duncan@pppo.gov, PPPO

**Uranium Enrichment Toxic Substances Control Act
Quarterly Report for the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky,
January 1 through March 31, 2021**



This document is approved for public release per review by:


FRNP Classification Support

4-26-2021
Date

**Uranium Enrichment Toxic Substances Control Act
Quarterly Report for the
Paducah Gaseous Diffusion Plant,
Paducah, Kentucky,
January 1 through March 31, 2021**

Date Issued—April 2021

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 DE-EM0004895

THIS PAGE INTENTIONALLY LEFT BLANK

CONTENTS

TABLES	v
ACRONYMS.....	vii
1. INTRODUCTION.....	1
2. COMPLIANCE MEASURES	1
2.1 SPILL CLEANUP.....	1
2.1.1 Requirements.....	1
2.1.2 Work Completion Date	1
2.1.3 Activity for this Quarter	2

THIS PAGE INTENTIONALLY LEFT BLANK

TABLES

1.	Open Gasket Spill Report.....	3
2.	Open Non-Gasket Spill Report	9

THIS PAGE INTENTIONALLY LEFT BLANK

ACRONYMS

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

THIS PAGE INTENTIONALLY LEFT BLANK

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 are 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 CA Report. The following summary satisfies the modified TSCA CA quarterly reporting requirements for January 1, 2021, through March 31, 2021.

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, 2019, 2022, and 2023 were pending post-cleanup verification at the beginning of this reporting period. Three new gasket spills, 2024, 2025, and 2026, were identified on the building floor during the reporting period. No gasket spill sites were closed during the reporting period by verifying sampling data. Nine gasket spill sites—1941, 1952, 1953, 2019, 2022, 2023, 2024, 2025, and 2026—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 748, 774, 785, 789, 847, 849, 850, 853, 857, 858, 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. Eleven non-gasket spill sites—748, 774, 785, 789, 847, 849, 850, 853, 857, 858, and 867—were pending post-cleanup verification at the end of this reporting period. A detailed description of all open non-gasket spills is provided 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	3635	3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 11/7/2018 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. Requesting allowance to close as historic due to inaccessible areas in accordance with 40 CFR 761.30(p)(1)(iii)(A)(2). 9/20/2018 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. 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

3

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>
1952	1/13/2012	0900	C-337	Gb29	3387	<p>4/2021 Update: New SW sealer arrives onsite under going QC process.</p> <p>3/2021 Update: PR submitted and Sherwin-Williams product ordered.</p> <p>3/2021 Update; Develop Variance Request for Closure of PCB Spills for EPA decision. 1/2021 Update: FLS is working with IH for guidance on products suggested by SW Rep. 12/2/2020 Update: FLS has spoken with a Protective Coating Representative from Sherwin-Williams and expects some guidance from the company in the near future. 11/2020 Update: Begin researching a new primer for a better seal against concrete to improve durability of encapsulations. 9/2020 Update: Walked down area for re-encapsulation. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 6/6/2019 Update: Flagging and barricade reduced to area around equipment. Pictures taken. 6/5/2019 Update: Marking and labels applied to floor. One coat of clear coat added to floor. 6/4/2019 Update: Second coat of gray paint applied to floor. 6/3/2019 Update: First coat of gray paint applied to floor. 5/29/2019 Update: Second coat of white paint applied to floor. 5/28/2019 Update: First coat of white paint applied to floor. 5/21/2019 Update: Floor of spill site double washed and rinsed in preparation for encapsulation. 3/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/7/2018 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. Requesting allowance to close as historic due to inaccessible areas in accordance with 40 CFR 761.30(p)(1)(iii)(A)(2). 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.</p>	Incomplete

4

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>
1953	1/13/2012	0900	C-337	La-22	3387	3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 11/7/2018 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. Requesting allowance to close as historic due to inaccessible areas in accordance with 40 CFR 761.30(p)(1)(iii)(A)(2). 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

5

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>
2019	3/6/2019	1211	C-333	C-11	778	3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 3/31/2021 Update: 2s sampling event of area CN completed. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 3/16/2020 Update: Signs and flagging removed around Areas A, B, and CS of this spill. Signs and flagging around area CN left in place. Spill site is still considered active. 3/12/2020 Update: Data received, assessed, and deemed usable. 3 of the 4 areas within in the spill can be closed. The area nearest the door in the filter house had one hit over 10 ug/100 cm ² . This area to remain open to be recleaned and sampled. 1/23/2020 Update: 1s Sampling event completed. 12/2/2019 Update: Sampling request submitted to SMO. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 10/23/2019 Update: Additional measurements provided to GIS Specialist. 9/2019 Update: Additional measurements requested by GIS Specialist in order to create sampling grid. 8/2019 Update: Flagging requires straightening due to wing from rollup door being open. 7/24/2019 Update: Spill site is cleaned. Sampling to be requested. 6/2019 Update: Due to size of spill area double wash/double rinse continues on multiple days. 5/2019 Update: Due to size of spill area double wash/double rinse cleaning continues on multiple days. 5/8/2019 Update: Mini-scrubbers received. 5/1/2019 Update: Due to size of spill site cleanup is ongoing. Mini-scrubbers ordered for spill cleanup. 4/2019 Update: Due to size of spill cleanup is ongoing. 3/6/2019 Sprinkler head in ventilation ductwork started spraying water into ductwork. Water spilled over onto filter wall, filter room, filter room basin, and onto floor. Absorbent pads laid around area to contain leak. Area taped to identify areas where water had leaked onto floor. Area posted with PCB spill signs, flagging, and PCB Caution signs. Cleanup initiated within 24 hours.	Incomplete
2022	8/24/2020	1046	C-333	S-15	241	3/2021 Update: 1S, 2S, and 3S sampling request submitted to sample management office. 8/24/2020 Update: Drip discovered from lever that connects to the ventilation duct work at column S-15. Drip is approximately half dollar size. Notifications made to PSS and PCB FLS. Double wash/rinse cleanup completed at 1233.	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>
2023	9/23/2020	1304	C-337	Y-16	211	9/23/2020 Update: Drip from duct work housing onto piping and onto floor. Largest Drip on floor approximately 3 inch diameter. Splatters from drip discovered in other areas around it. Area marked off 4'9" x 5'. 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
2024	1/6/2021	1015	C-333	FY-11	106	3/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/18/2021 Update: Completed maintenance repairs of PVC piping above spill site. 2/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/6/2021 Update: Oil dripping from elbow on PVC piping connected to PCB Trough. Approximately 3 ft x 3 ft area where oil dripped and splattered. 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
2025	2/16/2021	0927	C-333	U-44	65	3/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/18/2021 Update: Completed maintenance repairs of PVC piping above spill site. 2/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/16/2021 Update: Elbow from PVC piping broke off and landed on the floor at Column U-44. Approximately 1/4 cup to 1/2 cup of PCB liquid spilled onto the floor with splatters all around the area. An area of 5 ft 3 in by 5 ft 7 in was taped as the PCB spill area. Area posted with PCB spill signs, flagging, and PCB caution signs. The area was double washed using the solvent Soy Gold 1000 followed by a double rinse of cleaner Formula 409 as necessary to remove residue remaining on the cleaned surfaces per PCB procedure CP3-WM-0034 for new spill sites.	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>
2026	3/9/2021	1615	C-337	Lb-31	44	3/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/26/2021 Update: Performed inspection and cleaning of piping above spill area. 3/9/2021 Update: Potential PCB oil dripping from unknown source. Possibly lube oil from cell floor. Oil residue found on red fire suppression piping and 6" white piping above area. Discoloration found on 1" PVC piping connected to PCB troughs but does not appear to be wet. Size of spill was approximately 22" x 26.5". Further investigation will be conducted. Area posted with PCB spill signs, flagging, and PCB caution signs. The area was double washed using the solvent Soy Gold 1000 followed by a double rinse of cleaner Formula 409 as necessary to remove residue remaining on the cleaned surfaces per PCB procedure CP3-WM-0034 for new spill sites.	Incomplete

Open Spills: 9

Table 2. Open Non-Gasket Spill Report

OPEN NON-GASKET SPILL REPORT

REPORT	DATE	TIME	FACILITY	DAYS OPEN	DESCRIPTION	COORDINATOR	STATUS
748	6/27/2004	1555	C-337	6136	<p>3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 8/30/2020 Update: Postings and flagging reduced to just around the transformer. Photos taken of encapsulation. 8/12/2020 Update: Finished applying clear coat. 8/10/2020 Update: Completed applying second coat of gray paint. 8/5/2020 Completed applying first coat of gray paint. 8/4/2020 Update: Completed applying second coat of white paint. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 3/3/2020 Update: Began second coat of white paint. Purchase Order created for more paint. 2/27/2020 Update: First coat of white paint completed. 2/20/2020 Update: Completed cleaning of spill area. 7/24/2019 Update: All concrete inside of affected spray area to be cleaned and encapsulated/re-encapsulated. The spill area will be left open pending a decision by the EPA for the questions concerning closure of spills on equipment. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 1/28/2019 Update: Approximately 1 quart of oil drained from sight glass. 11/7/2018 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. Requesting allowance to close as historic in accordance with 40 CFR 761.30(p). 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.</p>	Lonnie Bertram	Incomplete

6

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	5748	3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 7/24/2019 Update: Faulted Transformer 107839-01. Two areas on hypalon to be sampled. Sampling request to be completed. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 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

10

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>
785	3/22/2006	1129	C-337	5503	<p>3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 7/24/2019 Update: Spill occurred on the gauges on the east end of the transformer. The spill has similarities with spills 1952, 1953, and 748 in that it is on equipment. These spills were all discussed at the 2018 TSCA CA Annual Meeting. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 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.</p>	Lonnie Bertram	Incomplete

11

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>
789	4/5/2006	1245	C-337	5489	<p>3/2021 Update: Crew walked down spill site for cleaning and sampling. Spill area has a steel plate in the spill area than cannot be removed. Steel plate extends under faulted transformer.</p> <p>6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds.</p> <p>7/24/2019 Update: Faulted Transformer 106744-01. Spill area is 8-12 inches under the fins on top of a steel plate that is on top of hypalon. Sample request to be completed. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation.</p> <p>5/22/2019 Update: Sampling request paused in order to further evaluate area that requires sampling. 5/9/2019 Update: Sampling request submitted. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 8/23/2018 Update: Spill area double washed/rinsed. Sampling to be requested. 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.</p>	Lonnie Bertram	Incomplete

12

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	3677	3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 7/24/2019 Update: Spill occurred from top sampling valve onto three gauges below and floor. Floor was encapsulated on 8/10/2011. The spill has similarities with spills 1952, 1953, and 748 in that it is on equipment. These spills were all discussed at the 2018 TSCA CA Annual Meeting. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 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
13 849	9/27/2011	0820	C-337	3488	6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 7/24/2019 Update: This spill occurred in a pan, but the dike area is covered in kitty litter. Clean area, decon area, and encapsulate. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 5/2/2019 Update: Walked down spill site in anticipation of encapsulation. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 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

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>
850	12/21/2011	0830	C-337	3403	<p>3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 1/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 3/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 8/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/24/2019 Update: The spill is entirely located on the side of the transformer. The same area already has historic spill 834 encapsulated in the same exact location as this spill. The spill has similarities with spills 1952, 1953, and 748 in that it is on equipment. These spills were all discussed at the 2018 TSCA CA Annual Meeting. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 5/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 4/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/28/2019 Update: .5 gallon of oil drained from sight glass. 1/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 12/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/20/2017 FRNP becomes managing contractor for</p>	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>
853	3/21/2012	0853	C-337	3312	<p>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.</p> <p>3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 7/24/2018 Update: The spill occurred from the top sampling valve resulting in guages, lines, and the floor being contaminated. Decon and encapsulate the floor portion. The rest of the spill has similarities with spills 1952, 1953, and 748 in that it is on equipment. These spills were all discussed at the 2018 TSCA CA Annual Meeting. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 2/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 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.</p>	Lonnie Bertram	Incomplete

15

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	2218	<p>2/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 3/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/24/2019 Update: Decon and encapsulate spill area both inside and outside of dike area. Then close using inaccessible area allowance for the area under the transformer. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 5/2/2019 Update: Walked down spill site in anticipation of encapsulation. 4/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/28/2019 Update: Approximately 1 quart of oil drained from sight glass. 12/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/20/2017 FRNP becomes managing contractor for the Deactivation and Remediation Project at</p>	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>
					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.		

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>
858	5/27/2015	1745	C-337	2150	<p>3/2021 Update: Developed Variance Request for Closure of PCB Spills for EPA review and approval. 2/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 3/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/19/2019 Update: Spill site was discussed with EPA at Annual TSCA CA meeting. 7/24/2019 Update: Spill area has a continuing drip of non-PCB oil occurring from above. Building Operations is developing a plan to deal with this drip. After building operations is successful the area will be encapsulated. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 1/28/2019 Update: Walkdown spill site. Verified no residual oils to be drained. 8/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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.</p>	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>
867	1/10/2018	0925	C-337	1191	2/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. Flagging replaced as necessary as well. 12/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/8/2020 Update: PCB Crews return to onsite work and begin performing daily site inspections. 3/23/2020 Update: Non-critical PCB related work was halted in March 2020 due to the COVID-19 related Reduced Operating Posture. Daily spill site inspections were maintained by essential employees during routine rounds. 3/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 182020 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/26/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/23/2019 Update: Walkdown of spill site to evaluate the possibility of encapsulation. 4/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2019 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/28/2019 Update: Approximately 1 quart of oil drained from sight glass. 12/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2018 Update: Material observed on absorbent pads. Absorbent pads cleaned up and	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>
Open Spills		11			replaced as necessary. 4/2018 Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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.		