Department of Energy

Portsmouth/Paducah Project Office
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513
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May 14, 2025

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

PPPO-02-10032762-25

Dear Mr. Ruckstuhl:

DE-EM0004895: APPROVAL OF DELIVERABLE NO. 11, URANIUM ENRICHMENT TOXIC SUBSTANCES CONTROL ACT QUARTERLY REPORT, JANUARY 1, THROUGH MARCH 31, 2025, FRNP-RPT-0384

Reference: Letter from M. Redfield to J. Stokes, "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, 2025*, FRNP-RPT-0384," (FRNP-25-9258), dated May 1, 2025

The U.S. Department of Energy reviewed and approves the Four Rivers Nuclear Partnership, LLC Deliverable No. 11, *Uranium Enrichment Toxic Substances Control Act Quarterly Report, January 1 through March 31, 2025*, FRNP-RPT-0384, as submitted.

If you have any questions or require additional information, please contact Ryan Callihan at (740) 897-2835.

Sincerely,

JENNIFER STOKES
Digitally signed by JENNIFER STOKES
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Jennifer A. Stokes
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FRNP-RPT-0384

Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, January 1 through March 31, 2025

FOUR RIVERS NUCLEAR PARTNERSHIP, LLC

CLEARED FOR PUBLIC RELEASE

FRNP-RPT-0384

Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, January 1 through March 31, 2025

Date Issued—April 2025

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

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CONTENTS

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TABLES

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ACRONYMS

CA	Compliance Agreement
CFR	*Code of Federal Regulations*
DOE	U.S. Department of Energy
EPA	U.S. Environmental Protection Agency
FLS	front line supervisor
FRNP	Four Rivers Nuclear Partnership, LLC
GIS	geographic information system
IH	industrial hygiene
PGDP	Paducah Gaseous Diffusion Plant
PSS	plant shift superintendent
PVC	polyvinyl chloride
QC	quality control
SMO	sample management office
SW	Sherwin-Williams Company
TSCA	Toxic Substances Control Act
USEC	United States Enrichment Corporation

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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, 2025, through March 31, 2025.

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 cm^2 with 95% confidence, based on the statistical sampling approach set forth in Attachment III, which shall be used within the spill area to verify cleanup to appropriate levels or, alternatively, to 100 µg PCB/100 cm^2 with 95% confidence, based on the statistical sampling approach set forth in Attachment III, which shall be used within the spill area to verify cleanup to appropriate levels followed by application of an appropriate sealant, such as a 2-layered epoxy- type paint. All spill cleanups will be initiated within 24 hours of discovery, excluding 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

Closure of four gasket spill sites—1941, 1952, 1953, and 2019—received verbal approval from EPA during the 2024 annual meeting on November 21, 2024, for the variance request submitted by DOE and was pending at the beginning of this reporting period. One gasket spill site—2038—was pending post-cleanup verification at the beginning of this reporting period. Three gasket spill sites—2042, 2044, and 2048—were pending encapsulation or repair after receiving post-cleanup data at the beginning of this reporting period. Seven new gasket spill sites—2053, 2054, 2055, 2056, 2057, 2058, and 2059— were identified in the process buildings during the reporting period. No gasket spill sites were closed during the reporting period. At the end of this reporting period, closure of four gasket spill sites—1941, 1952, 1953, and 2019—received verbal approval from EPA during the 2024 annual meeting on November 21, 2024, for the variance request submitted by DOE. Eight gasket spill sites—2038, 2053, 2054, 2055, 2056, 2057, 2058, and 2059—were pending post-cleanup verification at the end of this reporting period. Three gasket spill sites—2042, 2044, and 2048—were pending encapsulation or repair after receiving post-cleanup data. 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 parts per million (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

Closure of eight non-gasket spill sites—748, 785, 847, 850, 853, 857, 858, and 867—received verbal approval by EPA for the variance request submitted by DOE during the 2024 annual meeting on November 21, 2024. No new non-gasket spills were identified during the reporting period. No non-gasket spill sites were closed during the 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 were posted at the 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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
1941	5/10/2011	1230	C-337	Gb-6	5098	3/2023 Update: Additonal PCB Caution signs added to barricade. 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

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
1952	1/13/2012	0900	C-337	Gb-29	4850	3/2023 Update: Additonal PCB Spill signs and PCB Caution signs added to barricade. 9/29/2022 Update: Completed applying grey coat of paint. Barricade and signage to remain in place. 9/22/2022 Update: Completed applying white coat of paint to concrete floor. 3/2022 Update: Began prepping area for re-encapsulation. 5/2021 Update: SW product received and approved for use. 4/2021 Update: New SW sealer arrives onsite under going QC process. 3/2021 Update: PR submitted and Sherwin-Williams product ordered. 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.	Incomplete

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
1953	1/13/2012	0900	C-337	La-22	4850	3/2024 Update: Flagging and barricade replaced. 2/2024 Update: Flagging and barricade replaced. 3/2023 Update: Additonal PCB Spill signs and PCB Caution signs added to barricade. 12/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
2019	3/6/2019	1211	C-333	C-11	2241	5/2021 Update: Sampling results received for 2S sampling event. Results show floor areas are <10 ug/100 cm2. Signage and flagging reduced to area just around the filter frame. 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 usuable. 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 cm2. 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: Additonal measurements requested by GIS Specialist in order to create sampling grid. 8/2019 Update: Flagging requires straightening due to wind 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

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
2038	5/7/2023	1700	C-333	Qa-11	718	2/28/2025 Update: Sampling of spill area B completed. 12/9/2024 Update: Sampling map received from GIS specialists. 11/19/2024 Update: Sampling map request sent to GIS specialists. 9/19/2024 Update: PCB Program Manager and Building Supervisor walk down the transformer/substation per work planners request to update LOTO work package before finalization. 3/21/2024 Update: Work Package for sampling of substation completed. 3/12/2024 Update: PCB Spill Area walkdown with PCB Crew, PCB FLM, Facility Manager, and Utility Operations Manager. Facility Manager enters work request into SOMAX system for Work Planners to begin work package process. 2/21/2024 Update: Data returned showing results as < 10 ppm. Spill area signage and flagging reduced to area around transformer itself. 1/4/2024 Update: 1S, 2S, and 3S sampling of spill area completed. 7/6/2023 Update: Sampling request submitted to SMO. 5/9/2023 Update: PCB crew returned to spill site at approximately 0745. Dripping in the area had stopped. The crew began cleaning PCB Spill site 2037. The PCB crew returns to spill area 2038 at approximately 1220. The PCB crew begins cleanup by removing wet absorbent pads, socks, and drying the area. Area on the floor is double washed with solvent PowerCleaner 5000 followed by a rinse of Formula 409 as a precaution. Area is covered with plastic and absorbent pads. 5/8/2023 Update: PCB crew arrived at spill area at approximately 0730. The area had previously had Caution barricade tape placed around spill area; PCB spill site signs and caution signs were applied to caution tape. After assessing the area the crew began picking up wet absorbent pads and putting down duct tape to designate spill area. Several drips were observed at this time. The crew paused in order to discuss what could be done about the dripping. During crew discussions the water began leaking at a greater rate from the cell floor. Water leaking from cell floor was observed dripping from PVC collection trough. The water was then observed dripping from PVC vent duct collection trough and onto transformer 36A1 and the concrete floor. The crew placed more absorbent pads on the floor, exited the area, and notified facility/project management of the issue. Project management had round sock absorbents delivered to the area. Upon arrival the PCB crew placed absorbent socks around area to prevent spread. Crew exited area to allow dripping to stop. Crew returned to area at approximately 1230 and area was still dripping. 5/7/2023 Update: Notified via email of spill at 1812.	Incomplete

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
2042	3/6/2024	1315	C-333	Lb-36	414	11/6/2024 Update: PCB Spill Assessment Report from WE received. Data shows site was cleaned to <10 ug/100cm2. Repairs to the PVC vent duct troughing system are still required. 10/24/2024 Update: OREIS Report received for PCB wipe sampling data. 9/9/2024 Update: Sampling completed. 8/7/2024 Update: Submit sampling request to Sample Management Office. 6/6/2024 Update: Received new sampling map from GIS Specialist as sampling map needed to be updated. 4/9/2024 Update: Receive sampling map from GIS specialist. 4/4/2024 Update: PCB spill map submitted to GIS Specialist in order to produce a sampling map. 3/6/2024 Update: PCB Program Manager notified by project personnel of potential PCB spill. PCB Program Manager, PCB FLM, and PCB crew respond to area to discover 2 spots of potential PCB oil on ground. Area is posted with PC B Spill signs, flagging, and PCB Caution Signs. The area is double washed and rinsed the areas per CP3-WM-0034 using solvent SoyGold 1000 followed by a rinse of rinse of Formula 409, as necessary to remove rsidue on cleaned surfaces. PSS and Waste Compliance Manager notified.	Incomplete
2044	5/15/2024	0929	C-335	G-25	344	11/6/2024 Update: OREIS Report received for PCB wipe sampling data. Receive PCB Spill Assessment Report from WE. Data shows results >10 ug/100cm2. Area to be encapsulated. 10/31/2024 Update: Repairs made to PVC vent duct troughing system. 8/28/2024 Update: Sampling completed. 8/7/2024 Update: Submit sampling request to Sample Management Office. 7/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/9/2024 Update: PCB spill map submitted to GIS Specialist in order to produce a sampling map. 5/15/2024 Update: PCB crew finds a connection in the PVC vent duct troughing that appears to be dripping. Area taped off is 2' x 2'. Area posted with PCB Spill Signs,flagging, and Caution signs. The area is double washed using solvent SoyGold 155 followed by a double rinse of rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS and Waste Compliance Manager notified.	Incomplete

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
2048	7/25/2024	1000	C-337	S-36	273	11/6/2024 Update: PCB Spill Assessment Report received from WE. Data shows spill area B is >10 ug/100cm2. Area B to be encapsulated. 10/24/2024 Update: OREIS Report received for PCB wipe sampling data. 9/10/2024 Update: Sampling completed. 8/26/2024 Update: Submit sampling request to Sample Management Office. 8/14/2024 Update: PCB spill map submitted to GIS Specialist in order to produce a sampling map. 7/25/2024 Update: PCB crew discovers two areas of staining below the PVC vent duct troughing piping. PSS, FM , WM Compliance Manager, and PCB FLS are notified. Area A taped off for the spill are approximately 10 ft 4 inches by 13.5 inches. Area B taped off for the spill are approximately 16 ft by 12 inches. Area posted with PCB Spill Signs,flagging, and Caution signs. The areas are double washed using solvent SoyGold 155 followed by a double rinse of rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS and Waste Compliance Manager notified.	Incomplete
2053	1/7/2025	1200	C-337	Cb-4	107	1/7/2025 Update: Two areas of oil found below PVC vent duct troughing piping. PSS, FM , WM Compliance Manager, and PCB Program Manager are notified. Area A of the spill is approximately 18 inches by 21 inches. Area B of the spill is approximately 16 inches by 12 inches. Spill area posted with PCB Spill Signs,flagging, and Caution signs. The areas is double washed using solvent SoyGold 155 followed by a double rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete
2054	1/8/2025	1250	C-337	Ea-32	106	1/7/2025 Update: Areas of staining found below PVC vent duct troughing piping. PSS, FM , WM Compliance Manager, and PCB Program Manager are notified. The spill area is approximately 16 inches by 12 inches. Spill area posted with PCB Spill Signs,flagging, and Caution signs. The areas is double washed using solvent SoyGold 155 followed by a double rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete
2055	1/8/2025	1310	C-337	Ca-28	106	1/8/2025 Update: Staining found below PVC vent duct troughing piping. PSS, FM , WM Compliance Manager, and PCB Program Manager are notified. The spill area is approximately 24 inches by 10 inches. Spill area posted with PCB Spill Signs,flagging, and Caution signs. The areas is double washed using solvent SoyGold 155 followed by a double rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete

Table 1. Open Gasket Spill Report (Continued)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
2056	1/16/2025	0819	C-337	S-24	98	1/16/2025 Update: PCB crew discovers five areas of staining below the PVC vent duct troughing piping. PSS, FM , WM Compliance Manager, and PCB Program Manager are notified. Area A taped off for the spill area approximately 12 inches by 12 inches. Area B taped off for the spill area approximately 17 ft by 18 inches. Area C taped off for the spill are approximately 17 ft by 12 inches. Area taped off for the spill are approximately 17 ft by 12 inches. Area E taped off for the spill are approximately 17 ft by 16 inches. Area posted with PCB Spill Signs,flagging, and Caution signs. The areas are double washed using solvent SoyGold 155 followed by a double rinse of rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete
2057	1/16/2025	0819	C-337	T-24	98	1/16/2025 Update: PCB crew discovers area of staining below the PVC vent duct troughing piping. PSS, FM , WM Compliance Manager, and PCB Program Manager are notified. Area taped off for the spill is approximately 24 inches by 36 inches. Area posted with PCB Spill Signs,flagging, and Caution signs. The areas is double washed using solvent SoyGold 155 followed by a double rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete
2058	3/12/2025	0826	C-333	Wb-47	43	3/12/2025 Update: PCB crew discovers drips on floor below PVC vent duct troughing. PSS, FM, WM Compliance Manager and PCB Program Manager notified. Area taped off for the spill is approximately 12 inches by 12 inches. Area posted with PCB Spill Signs,flagging, and Caution signs. The areas is double washed using solvent SoyGold 155 followed by a double rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete
2059	3/12/2025	0832	C-333	X-47	43	3/12/2025 Update: PCB crew discovers drips on floor below PVC vent duct troughing. PSS, FM, WM Compliance Manager and PCB Program Manager notified. Area taped off for the spill is approximately 12 inches by 12 inches. Area posted with PCB Spill Signs,flagging, and Caution signs. The areas is double washed using solvent SoyGold 155 followed by a double rinse of Formula 409, per CP3-WM-0034, as necessary to remove residue from surfaces. PSS, FM, Waste Compliance Manager notified of completed cleanup.	Incomplete

Open Spills: 15

OPEN NON-GASKET SPILL REPORT

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
748	6/27/2004	1555	C-337	E-30	7598	5/1/2024 Update: Labels added to encapsulated area and layer of clear coat placed over labels. Re-encapsulation and labeling efforts completed. 4/17/2024 Update Second layer of encapsulation is completed. 4/15/2024 Update: Operators begin applying second layer(grey) of encapsulant. 4/4/2024 Update: Application of white layer of encapsulant is completed. 4/3/2024 Update: Operators continue applying white paint to the area. 4/2/2024 Update: Operators continue applying white paint to the area. 3/25/2024 Update: Operators begin applying first layer of white paint. 3/20/2024 Update: Operators enter spill area in order to sweep and wipe the area clean of any loose debris. 2/2024 Update: Performed more scraping to remove loose paint preparing for re-encapsulation. 1/2024 Update: Received paint supplies for encapsulation activities. 11/2023 Update: Continued cleaning and scraping the concrete area of the spill in preparation to encapsulate the floor and dike area. 7/2023 Update: Cleaned and scraped concrete of the spill area. 3/2023 Update: Additonal PCB Caution signs added to barricade. 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 encapuslation. 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	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						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.	
785	3/22/2006	1129	C-337	Ca-13	6965	3/2023 Update: Additonal PCB Spill signs and PCB Caution signs added to barricade. 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.	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
847	3/22/2011	0845	C-337	Nb-13	5139	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.	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
850	12/21/2011	0830	C-337	Lb-21	4865	1/2025 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 4/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2023 Update: Additonal PCB Spill signs and PCB Caution signs added to barricade. 8/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						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 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.	

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
853	3/21/2012	0853	C-337	M-13	4774	3/2023 Update: Replacement PCB Spill signs added to barricade. 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.	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
857	3/20/2015	2208	C-337	Jb-29	3680	9/24/2024 Update: Final layer of grey encapsulate added to floor. Encapsulation of concrete areas of the spill completed. 9/12/2024 Update: Area cleaned and scraped in preparation for encapsulation. 7/9/2024 Update: Placed pan above open vent duct above transformer and wipe down area of transformer that oil has been seen dripping from in the past. 6/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/1/2024 Update: Encapsulation labels placed on floor and clear coat layer applied. 4/16/2024 Update: Operators apply second layer(grey) of encapsulant. 3/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/25/2024 Update: Operators complete encapsulating area with first layer of white paint. 3/19/2024 Update: Operators entered spill area sweep and wipe area clean of any loose debris. 3/27/2024 Update: Work Order 24020488 added to system for bus tray of transformer 72P4A to be cleaned. Work Planner begins work package process. 2/22/2024 Update: Work Request added to SOMAX system to drain bus tray of transformer 72P6B. 10/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2023 Update: Additonal PCB Spill signs and PCB Caution signs added to barricade. 7/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						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 necessay. 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 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'	

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						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)

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
858	5/27/2015	1745	C-337	Lb-21	3612	1/2025 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 10/16/2024 Update: Second layer of encapsulant is completed. 9/30/2024 Update: First layer of white encpasulate added to the floor. 9/18/2024 Update: Cleaned and scraped area in preparation of encapsulation. 9/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. Flagging and barricades were replaced. 1/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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 occuring 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	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						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.	

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
867	1/10/2018	0925	C-337	G-29	2653	8/21/2024 Update: Completed both white and grey layers of encapsulation. 8/15/2024 Update: The area was cleaned and scraped in preparation for encapsulation. 7/2/2024 Update: WM Maintenance Mechanics and Operators remove the side panel and clean up residual oil inside of transformer bus tray. Then the bottom panel is removed to ensure oil has been completely cleaned out. Plastic and absorbent pads are placed on the concrete floor and the panels are left removed to observe for more drips. 6/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 4/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/27/2024 Update: Work Order 24020488 added to system for bus tray of transformer 72P6B to be cleaned. Work Planner begins work package process. 2/22/2024 Update: Work Request added to SOMAX system to drain bus tray of transformer 72P6B. 2/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2024 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 12/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. The transformer had visible liquid on it as well. That material was cleaned up as well. 11/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. The transformer had visible liquid on it as well. That material was cleaned up as well. 10/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 9/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2023 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 11/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 7/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 6/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 3/2022	Incomplete

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 2/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 1/2022 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 12/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 8/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 5/2021 Update: Material observed on absorbent pads. Absorbent pads cleaned up and replaced as necessary. 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	

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

REPORT	DATE	TIME	BUILDING	COLUMN	DAYS OPEN	COMMENTS	STATUS
						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. 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.	

Open Spills 8