Department of Energy

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

December 1, 2025

Mr. David Ruckstuhl
Director of Contracts and Procurements
Four Rivers Nuclear Partnership, LLC
5511 Hobbs Road
Kevil, Kentucky 42053

PPPO-02-10035622-26

Dear Mr. Ruckstuhl:

DE-EM0004895: APPROVAL OF DELIVERABLE NO. 11, URANIUM ENRICHMENT TOXIC SUBSTANCES CONTROL ACT QUARTERLY REPORT, JULY 1 THROUGH SEPTEMBER 30, 2025, FRNP-RPT-0403

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, July 1 through September 30, 2025*, FRNP-RPT-0403," (FRNP-26-9818), dated November 20, 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, July 1 through September 30, 2025*, FRNP-RPT-0403, 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
Date: 2025.12.01 12:21:06 -05'00'

Jennifer A. Stokes
Contracting Officer
Portsmouth/Paducah Project Office

cc:
abigail.parish@pppo.gov, PPPO
april.ladd@pppo.gov, PPPO
carrie.maxie@pad.pppo.gov, FRNP
david.ruckstuhl@pad.pppo.gov, FRNP
dennis.greene@pad.pppo.gov, FRNP
frnpcorrespondence@pad.pppo.gov
jennifer.stokes@pppo.gov, PPPO
joel.bradburne@pppo.gov, PPPO
mona.dockery@pad.pppo.gov, FRNP
myrna.redfield@pad.pppo.gov, FRNP
pad.rmc@pad.pppo.gov
reinhard.knerr@pppo.gov, PPPO
ryan.callihan@pppo.gov, PPPO
tammy.stapleton@pad.pppo.gov, FRNP
william.wessel@pppo.gov, PPPO

FRNP-RPT-0403

Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, July 1 through September 30, 2025

FOUR RIVERS NUCLEAR PARTNERSHIP, LLC

CLEARED FOR PUBLIC RELEASE

FRNP-RPT-0403

Uranium Enrichment Toxic Substances Control Act Quarterly Report for the Paducah Gaseous Diffusion Plant, Paducah, Kentucky, July 1 through September 30, 2025

Date Issued—November 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

CLEARED FOR PUBLIC RELEASE

CONTENTS

ACRONYMS

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

1. INTRODUCTION

The Toxic Substances Control Act (TSCA) Compliance Agreement (CA) was signed by the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) on February 20, 1992, modified in 1997, and modified again on May 30, 2017. The original TSCA CA required quarterly reports summarizing progress toward completing polychlorinated biphenyl (PCB)-related compliance measures. These measures included troughing, air sampling, process lubrication oil removal, spill cleanup, and disposal. As of March 30, 1994, the troughing interim measure was completed. Ongoing inspections of ventilation duct and troughing systems are performed to identify leaks or spills requiring additional troughing or trough maintenance. Subsequent to the May 30, 2017, modification, only PCB spill cleanup progress is required to be reported on a quarterly basis. The quarterly reports will be maintained at the DOE Site Office and 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 July 1, 2025, through September 30, 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

Ongoing.

2.1.3 Activity this Quarter

2.1.3.1 Gasket spills

The following is a summary of PCB gasket spill activities (including spill site numbers) for the third quarter of calendar year (CY) 2025.

- Number of PCB gasket spill sites awaiting closure as of June 30, 2025—16
  - — 1941, 1952, 1953, 2019, 2038, 2042, 2044, 2048, 2053, 2054, 2055, 2056, 2057, 2058, 2059, and 2060
- Number of new PCB gasket spill sites identified during reporting period—0
- Number of PCB gasket spill sites closed during reporting period—9
  - — 2042, 2044, 2048, 2053, 2054, 2055, 2057, 2058, and 2059
- Number of PCB gasket spill sites awaiting closure as of September 30, 2025—7
  - — 1941, 1952, 1953, 2019, 2038, 2056, and 2060
- Number of new PCB gasket spill sites closed as a historic spill—0

A quarterly breakdown of PCB gasket spill information can be found in Figure 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 Attachment 1 of the 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

The following is a summary of PCB non-gasket spill activities (including spill site numbers) for the third quarter of CY 2025.

- Number of PCB non-gasket spill sites awaiting closure as of June 30, 2025—8
  - — 748, 785, 847, 850, 853, 857, 858, and 867
- Number of new PCB non-gasket spill sites identified during reporting period—0
- Number of PCB non-gasket spill sites closed during reporting period—3
  - — 850, 857, and 858
- Number of PCB non-gasket spill sites awaiting closure as of September 30, 2025—5
  - — 748, 785, 847, 853, and 867
- Number of new PCB non-gasket spill sites closed as a historic spill—0

A quarterly breakdown of PCB non-gasket spill information can be found in Figure 2.

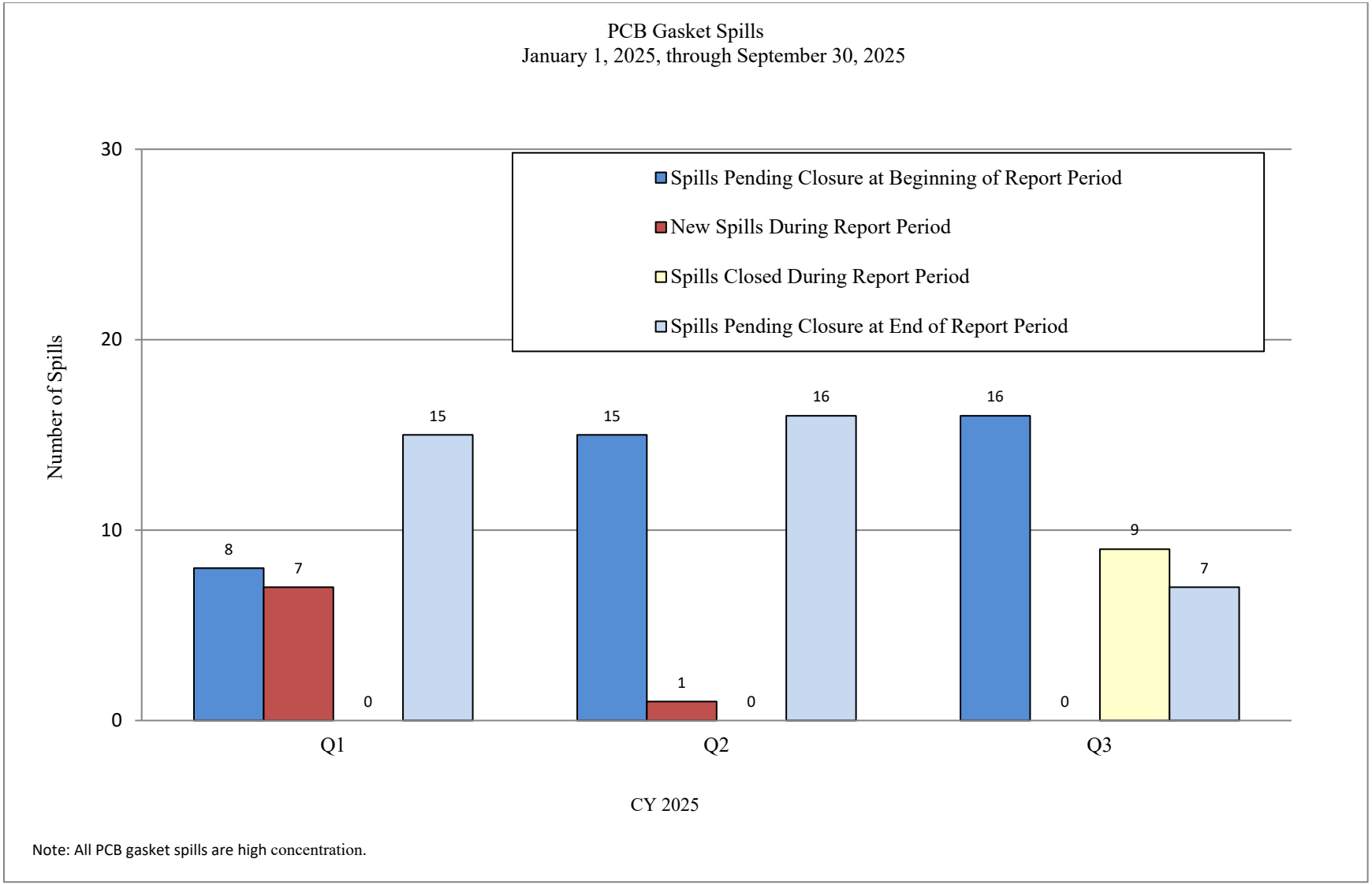

Figure 1. Quarterly Summary of PCB Gasket Spills

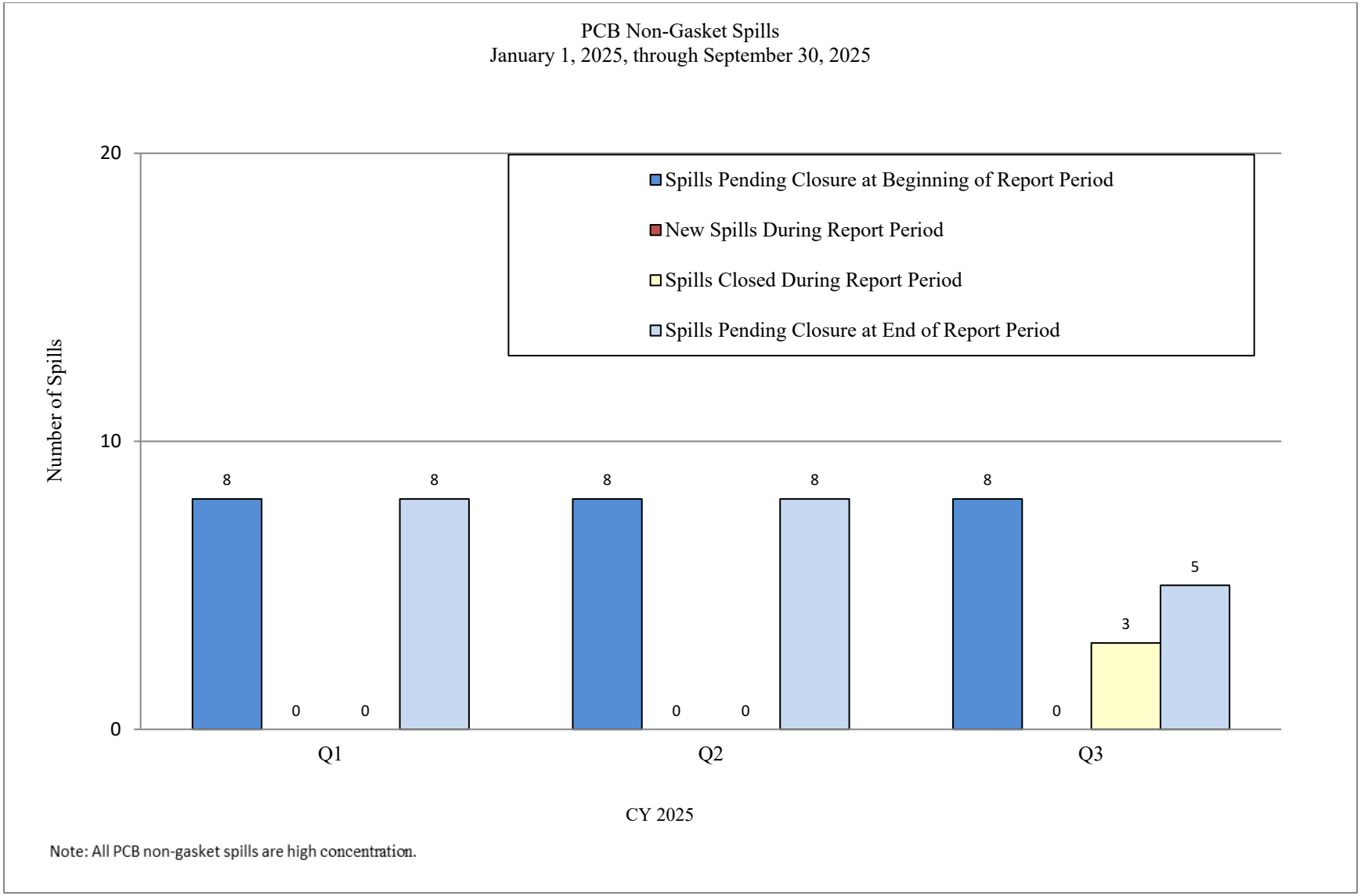

Figure 2. Quarterly Summary of PCB Non-Gasket Spills

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 Attachment 1 of the 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.