

REVISED
PRELIMINARY ASSESSMENT/SITE INSPECTION REPORT
AND SOLID WASTE MANAGEMENT UNIT (SWMU) ASSESSMENT REPORT

UNIT NUMBER: 206

UNIT NAME: C-753-A Toxic Substances Control Act (TSCA) Storage Building

DATE: 1/13/97
Revised 07/02/02
Revised 3/10/06

REGULATORY STATUS: SWMU

LOCATION: SWMU 206 is located inside the security fence south of C-746-B.

APPROXIMATE DIMENSION: 270 ft x 120 ft (32,400 ft²)

FUNCTION: This building is used for storage of polychlorinated biphenyls (PCB) waste materials and drained PCB equipment. In addition, low-level wastes and non-hazardous wastes could be stored in this building. Materials are stored in various types of containers such as 55-gallon drums, overpacks, and portable tanks. The building was designed as required by the TSCA regulations for PCB storage, which includes design and containment for spills and releases.

BRIEF HISTORY: Construction for this building was initiated in 1994. Construction was completed in the fall of 1995. Storage operations for TSCA regulated wastes began in 1995. Prior to construction, the area was not developed. In 2001, during a waste repackaging event, nonconforming items were discovered in 6 of 498 drums of TSCA regulated wastes. These items were characterized as Resource Conservation and Recovery Act (RCRA) materials and were placed into RCRA compliant storage. There were no spills or releases from the repackaging event. DOE reported finding these items to the Kentucky Division of

Waste Management (KDWM). On January 18, 2002, DOE received a Notice of Violation (NOV) from KDWM for the storage of non-conforming RCRA items (respirator canisters, a lead fuse, broken incandescent light bulbs, a can of dried Pistol Pete Solvent Cement, and a can of dried Rector Seal Cleaner Primer) in an unpermitted storage area. The area where the six drums were staged at the time of discovery will undergo a RCRA closure.

On May 3, 2005, DOE reported the identification of a drum of lab-packaged miscellaneous samples that contained four samples of F001 waste. The drum was re-labeled as hazardous waste and re-located to a compliant RCRA storage area.

Nine containers of C-404 leachate pit sludge were included in Appendix B of the Commonwealth of Kentucky Natural Resources and Environmental Protection Cabinet Agreed Order (File Nos. DWM-31434-042, DAQ-31740-30, and DOW-26141-042) (Agreed Order). These containers were identified as a portion of Population 36 in the Agreed Order, and were believed to primarily consist of environmental media, debris, or a mixture thereof. Consistent with the Agreed Order, these 9 containers were managed in accordance with the Container Management Plan in Attachment I of the Agreed Order.

Additionally, these containers were sampled in accordance with the Agreed Order. No trichloroethene (TCE) or 1,1,1-trichloroethane (TCA) were detected above laboratory detection limits. During discussions held with representatives from the Kentucky Department for Environmental Protection (KDEP) on January 13, 2005, the parties agreed that it was not necessary to apply the contained-in/contaminated-with procedures of the Agreed Order for certain Attachment B populations with no dateable levels of TCE or TCA, including the containers of the C-404 leachate pit sludge (see DOE correspondence dated April 14, 2005). KDEP had no objections to managing those waste populations as non-hazardous wastes. On June 16, 2005, consistent with the understanding reached with KDEP, BJC started managing the 9 containers as non-hazardous waste and discontinued management of the containers under the Agreed Order Container Management Plan. On July 28, 2005, in preparation for shipment of the leachate pit sludge and related waste for off-site disposal, BJC determined that the leachate pit sludge associated with these populations was subject to the derived-from rule and should be characterized as a RCRA-listed hazardous waste, with the

code F001. The period of noncompliance is between June 16, 2005, and July 28, 2005, at which point the waste was moved to RCRA compliance storage and managed as RCRA hazardous waste.

Once the revised waste determination was made and the containers were declared RCRA-listed hazardous waste, the C-404 leachate pit sludge, weighing approximately 6,000 pounds, was properly labeled and placed into permitted storage.

OPERATIONAL STATUS:

Active

DATES OPERATED:

1995 to present

SITE/PROCESS DESCRIPTION:

Waste Storage Building

WASTE DESCRIPTION:

PCB wastes generated from various locations on-site.

WASTE QUANTITY:

Building has a design capacity of 12,500 55-gallon drum equivalents (92,500 ft³)

SUMMARY OF ENVIRONMENTAL SAMPLING DATA:

This building was characterized prior to construction. No levels of PCBs or radionuclides were present in sufficient quantity to present a hazard to human health or the environment in the area where the building was constructed.

DESCRIPTION OF RELEASE AND MEDIA AFFECTED:

There have been no releases from the building. This building is operated in accordance with TSCA regulations. No spills have occurred of PCB materials in this building. There is an impervious concrete floor and curbing to prevent the release of any materials, if a spill should occur.

GROUNDWATER:

NA

SURFACE WATER:

NA

SOIL:

NA

ECOLOGY AFFECTED
(i.e., endangered/threatened species): None

DOCUMENTATION OF NO RELEASE: There have been no known spills or releases of materials from this facility to the environment.

IMPACT ON OR BY OTHER SWMU/AOC: SWMU 200 is south of this building.

PRG COMPARISON: NA

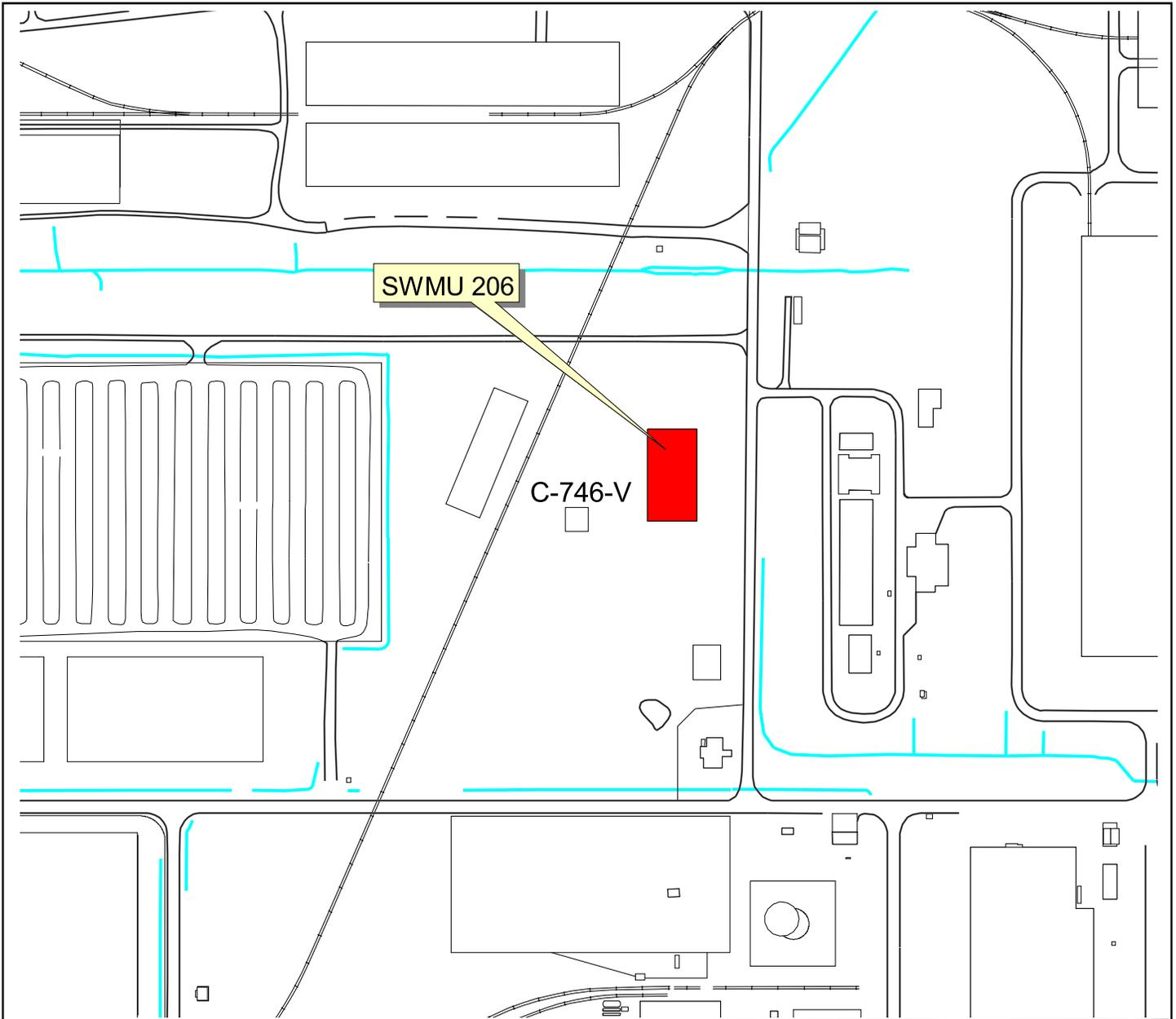
RFI NECESSARY: No. This building is newly constructed and designed to prevent releases into the environment. The building is subject to the appropriate TSCA regulations for decontamination when operations cease or there is a spill inside the facility. Then, a RFI would be necessary.

NOTE: Elements included in this outline shall be considered and incorporated, as appropriate, when developing the above referenced document.



February 2002

**C-753-A TSCA Storage Building
SWMU 206**



LEGEND:

- SWMU 206 Area
- Buildings

200 0 200 Feet



U.S. DEPARTMENT OF ENERGY

PADUCAH GASEOUS DIFFUSION PLANT



BECHTEL JACOBS COMPANY LLC
 MANAGED FOR THE US DEPARTMENT OF ENERGY UNDER
 US GOVERNMENT CONTRACT DE-AC-05-03OR22980
 Oak Ridge, Tennessee • Paducah, Kentucky • Portsmouth, Ohio

SWMU 206 C-753-A TSCA Storage Building

