COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND
ENVIRONMENTAL PROTECTION CABINET
FILE NOS. DWM-31434-042 (includes DWM-00062, DWM-02162 and DWM-02163) DAQ-31740-030 and DOW-26141-042

NATURAL RESOURCES AND
ENVIRONMENTAL PROTECTION CABINET

PETITIONER

VS. **AGREED ORDER**

UNITED STATES DEPARTMENT OF ENERGY RESPONDENT

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I. STATEMENT OF FACTS

1. The Natural Resources and Environmental Protection Cabinet (hereinafter the "Cabinet") is charged with the statutory duty of enforcing the statutes and administrative regulations of the Commonwealth of Kentucky relating to waste management as provided for under Kentucky Revised Statutes (KRS) Chapter 224 and the regulations promulgated thereunder.

2. The Respondent is the United States Department of Energy (hereinafter "DOE"). DOE is the owner of the Paducah Gaseous Diffusion Plant (hereinafter "PGDP"), a uranium enrichment facility, located near Paducah, Kentucky in McCracken County. PGDP is a "facility" as that term is defined in 401 KAR 32:005, Section 1(93); 401 KAR 34:005, Section 1(93); and 401 KAR 38:005, Section 1(93).

3. DOE is registered as a large-quantity hazardous-waste generator with EPA ID No. KY8 890 008 982.

4. DOE is a "person" as that term is defined by KRS 224.01-010(17); 401 KAR 32:005, Section 1(203); 401 KAR 34:005, Section 1(203); and 401 KAR 38:005, Section 1(203); 401 KAR 50:010 Section 1(98); and 401 KAR 63:001 Section 1(88).

5. DOE is an "owner or operator" as that term is defined by 401 KAR 50:010, Section 1(94) and 401 KAR 63:001 Section 1(84).

6. PGDP was an "affected facility" as that term is defined by 401 KAR 63:010, Section 2(1).

7. DOE was operating "air pollution control equipment" as that term is defined by 401 KAR 50:010, Section 1(5) at PGDP.

8. In 1981, DOE was issued a solid waste disposal permit for the C-746-S facility. DOE operated the facility until 1995, when it was closed.

9. In the early 1980s, DOE was issued a solid waste disposal permit for the C-746-T facility. DOE operated the facility until 1992, when it was closed.

10. On July 16, 1991, the Cabinet issued a Hazardous Waste Permit for the PGDP for the operation of treatment and storage units and post-closure care for a disposal unit and for conducting corrective action at all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at the facility.

11. On September 10, 1995, the Secretary of the Cabinet entered a final Agreed Order to resolve DOE's violation of KRS 224.46-520 and 401 KAR 37:050 with respect to mixed waste. The Agreed Order incorporated an approved Site Treatment Plan (STP) which outlined schedules for the treatment of mixed waste stored in violation of KRS 224.46-520 and 401 KAR 37:050.

12. In 1996, DOE was issued a solid waste disposal permit for the C-746-U facility. DOE is currently operating this contained landfill.

13. On April 1, 1998, the Cabinet issued a Kentucky Pollution Discharge Elimination System (KPDES) permit to DOE.

14. In 1998, DOE, the Cabinet and U.S. Environmental Protection Agency (USEPA) entered into a Federal Facility Agreement (FFA) pursuant to 42 U.S.C.A Section 9620 that directs the comprehensive remediation of the PGDP.

15. In August 2003, DOE and the Commonwealth entered into a Letter of Intent (LOI), as set forth in Attachment A to this Agreed Order. The terms of the LOI, are incorporated into this section of the Agreed Order as if fully set forth herein.

A. ALLEGED LISTED HAZARDOUS WASTE VIOLATIONS

16. On May 3, 2002, DOE notified the Cabinet that certain drums of solid waste disposed of in Phases one (1) and two (2) of the C-746-U landfill may contain listed hazardous wastes (F001, F002, U228). Since that date, DOE has not placed any additional waste in those phases of the landfill.

17. On July 9, 2002, DOE notified the Cabinet that certain wastes disposed of in the C-746-S and C-746-T landfills may have been listed hazardous wastes (F001, F002, U228).

18. On November 13, 2002, the Cabinet issued Notices of Violation to DOE associated with the alleged disposal of listed hazardous waste in the C-746-S, C-746-T and C-746-U solid waste landfills. The following statutes and regulations were alleged as being violated: KRS 224.46-520(2) and 401 KAR 32:010(2); KRS 224.46-520(1) and

401 KAR 38:010(4); 401 KAR 47:040 3(3); 401 KAR 48:090, section 5. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to this matter.

19. On January 24, 2003, DOE notified the Cabinet that "an unknown, but potentially significant portion" of approximately 33,000 containers of waste currently being managed as low-level radioactive waste and/or Toxic Substances Control Act (hereinafter "TSCA") waste at the facility may contain listed hazardous wastes (F001, U228 and possibly F002). The potential listed wastes originated from trichloroethene (TCE) and 1,1,1-trichloroethane (TCA) from historic operations at PGDP. DOE's notice also set forth an analysis and proposal of appropriate site-specific health-based levels for TCE and TCA in waste for the Cabinet's approval. The Cabinet will review and approve health-based levels which will be used to make "contained-in" determinations for various investigation and remediation waste streams at the PGDP.

20. DOE categorized the 33,000 containers of waste currently being managed as low-level radioactive waste and/or TSCA waste into high, medium, and low probability of containing suspect listed hazardous waste.

21. DOE completed a review of the 33,000 containers of waste, consisting of an iterative process knowledge and data review procedure. This review has determined that the containers identified in Attachment B to this Agreed Order are suspected to contain listed hazardous waste. These suspect wastes were identified because they (a) originated from areas known to be contaminated with TCE listed hazardous waste; (b) came from areas that were likely to have been contaminated with TCE listed hazardous

waste; or (c) were derived from handling any of the wastes described in subsection (a) or (b) of this paragraph.

22. The containers listed in Attachment B consist of containers of environmental media and debris. The containers of environmental media store soils, drill cuttings, sediments, groundwater, purge/well development water, and sample residuals. The debris containers store personal protective equipment (PPE), plastic, materials related to a monitoring well abandonment (grout, concrete, well casing and riser pipe), and other miscellaneous materials. Attachment B to this Agreed Order identifies which containers hold environmental media and which containers contain environmental debris.

23. All of the containers identified in Attachment B, currently are stored in areas that DOE has previously identified as SWMUs in its Part B Hazardous Waste Permit application. Attachment C sets forth a list of the SWMUs where such containers are stored.

24. Although the Cabinet has not yet issued a notice of violation with respect to DOE's January 24, 2003 submission, the Cabinet believes that there are statutory and regulatory violations and potential violations of KRS 224.46-510 and 401 KAR 32:010 (requirement to make a hazardous waste determination), KRS 224.46-520 and 401 KAR 38:010 (unpermitted storage of hazardous waste), 401 KAR 32:030 (pre-transport requirements), 401 KAR Chapter 37 (land disposal restrictions), 401 KAR 34:010-34:070 and 34:180, other provisions of KRS 224 Subchapter 46, other provisions of 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit with respect to these containers.

25. On or about April 9, 2003, DOE notified the Cabinet that it has transported containers of suspect listed hazardous wastes to certain off-site locations, as

non-hazardous waste. Although the Cabinet has not yet issued a notice of violation with respect to DOE's April 9, 2003, submission, the Cabinet believes that there are statutory and regulatory violations and potential violations of KRS 224.46-510 and 401 KAR 32:010 (requirement to make a hazardous waste determination), 401 KAR 32:030 (pre-transport requirements), other provisions of KRS 224 Subchapter 46, other provisions of 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit. The Cabinet also believes that such violations and potential violations also would exist if other incidents of transport of suspect listed waste (F001, F002, U228) containers to off-site locations are discovered.

B. ALLEGED DOE MATERIAL STORAGE AREA VIOLATIONS

26. The United States Enrichment Corporation ("USEC") has, since July 1, 1993, leased, and operated portions of the PGDP, subject to the lease provisions between DOE and USEC.

27. On or about December 31, 1996, the lease with USEC was modified deleting certain areas from those previously leased by USEC. DOE refers to the areas deleted from the USEC lease as DOE Material Storage Areas (DMSAs). As of December 7, 2000, DOE has identified approximately one hundred sixty (160) DMSAs.

28. On or about April 4, 2000, pursuant to 42 U.S.C.A. Section 6907, the USEPA issued a request for information to DOE with respect to the DMSAs.

29. On or about May 17, 2000, DOE submitted a response to EPA's request for information. Beginning on June 12, 2000, the Cabinet conducted a series of inspections of the DMSAs.

30. On September 5, 2000, the Cabinet issued a Notice of Violation (NOV) to DOE. The Cabinet alleged that DOE violated KRS 224.46-510 and 401 KAR 32:010 by failing to conduct a waste determination for wastes generated at the facility and managed in the DMSAs; violated Part IV. B. of the Hazardous Waste Permit and 401 KAR 34:060 by failing to notify the Cabinet of newly discovered SWMUs and AOCs; and violated KRS 224.46-520; 401KAR 38:010; 401 KAR 32:030, Section 5; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the C-400-04 DMSA. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

31. On December 4, 2000, DOE submitted a Characterization/Remediation Plan for the DMSAs. The Cabinet reviewed the plan and provided comments.

32. On April 16, 2001, DOE submitted a revised DMSA Characterization/Remediation Plan.

33. Although the Cabinet had not approved the Plan, the Cabinet informed DOE that it would place no restriction on DOE's performance of characterization activities prior to approval of the Plan.

34. On July 31, 2001, the Cabinet issued a NOV to DOE alleging violations of KRS 224.46-520; 401 KAR 38:010; 401 KAR 32:030, Section 5; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the C-331-10 DMSA. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

35. On October 9, 2001, the Cabinet issued a NOV to DOE alleging violations of KRS 224.46-520; 401 KAR 38:010; 401 KAR 32:030, Section 5; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the C-335-05, C-331-15 and C-333-31 DMSAs. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

36. On January 18, 2002, the Cabinet issued a NOV to DOE. The Cabinet alleged that DOE violated KRS 224.46-510 and 401 KAR 32:010 by failing to conduct a waste determination for wastes generated at the facility and managed in SWMUs 206 (C-753-A), 464 (C-746-A) and 159 (C-746-H3 pad), and violated KRS 224.46-520; 401 KAR 38:010, Section 4; 401 KAR 32:030, Section 5; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the following Solid Waste Management Units: 206 (C-753-A), 159 (C-746-H3 pad), 214 (DMSA OS-3), 216 (DMSA OS-5), 220 (DMSA OS-9), 222 (DMSA OS-11), 223 (DMSA OS-12), 249 (DMSA C-331-15), 287 (DMSA C-333-31), 351 (DMSA C-400-05), 354 (DMSA C-409-01), 355 (DMSA C-409-02) and 464 (C-746-A). The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

37. On or about February 28, 2002, the Cabinet issued a NOV to DOE. The Cabinet alleged that DOE violated KRS 224.46-510 and 401 KAR 32:010 by failing to conduct a waste determination for wastes generated at the facility and managed in SWMUs 248 (DMSA C-331-14), 287 (DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02), and violated KRS 224.46-520; 401KAR 38:010, Section 4; 401

KAR 32:030, Section 5; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the following SWMUs: 248 (DMSA C-331-14), 287 (DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02). The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

38. On or about March 11, 2002, the Cabinet issued a NOV to DOE. The Cabinet alleged that DOE violated KRS 224.46-510 and 401 KAR 32:010 by failing to conduct a waste determination for wastes generated at the facility and managed in SWMUs 287 (DMSA C-333-31), and 355 (DMSA C-409-02), and violated KRS 224.46-520; 401 KAR 38:010, Section 4; 401 KAR 32:030, Section 5; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the following SWMUs: 287 (DMSA C-333-31), and 355 (DMSA C-409-02). The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

39. On or about November 6, 2002, the Cabinet issued a NOV to DOE. The Cabinet alleged that DOE violated KRS 224.46-510 and 401 KAR 32:010 by failing to conduct a waste determination for wastes generated at the facility and managed in SWMUs 287 (DMSA C-333-31), 351 (DMSA C-400-05), 219 (DMSA OS-8), 277 (DMSA C-333-21), 276 (DMSA 333-20), 240 (DMSA C-331-06), 239 (DMSA 331-05), 231 (DMSA C-310-02), 250 (DMSA C-331-16) and 464 (C-746-A West End Smelter), and violated KRS 224.46-520; 401 KAR Chapter 32; 401 KAR Chapter 34; 401 KAR 38:010, Section 4; 401 KAR 32:030, Section 5; 401 KAR 38:030, Section 1; and Part II of the permit with respect to hazardous and/or mixed wastes stored in the following Solid

Waste Management Units: 287 (DMSA C-333-31), 351 (DMSA C-400-05), 219 (DMSA OS-8), 277 (DMSA C-333-21), 276 (DMSA C-333-20), 240 (DMSA C-331-06), 239 (DMSA C-331-05), 231 (DMSA C-310-02), 250 (DMSA C-331-16) and 464 (C-746-A West End Smelter). The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

40. As DOE has continued to characterize the DMSAs, the Cabinet alleges that additional violations of KRS 224 Subchapter 46 and 401 KAR Chapters 30-40 have been discovered. Further, as DOE continues to characterize the DMSAs, the Cabinet believes that additional violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit will be discovered in the DMSAs.

C. OTHER ALLEGED HAZARDOUS WASTE VIOLATIONS

41. On September 28, 1999, the Cabinet issued a NOV to DOE alleging violations of certain conditions of DOE's Hazardous Waste Permit (failure to report planned changes in SWMU 194). DOE completed the required remedial measures on or about October 1, 1999. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to this matter.

42. On January 14, 2000, the Cabinet issued a NOV to DOE alleging violation of DOE's Hazardous Waste Permit (failure to maintain systems of treatment and control and failure to take reasonable steps to minimize releases on the northern boundary of SWMUs 12, 14, and 15). DOE completed the required remedial measures on or about

March 21, 2000. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

43. On May 23, 2000, the Cabinet issued a NOV to DOE alleging violation for failing to analyze and sample groundwater from the C-404 landfill for all parameters required pursuant to the conditions of DOE's Hazardous Waste Permit. DOE completed the required remedial measures on or about July 7, 2000.

44. On August 8, 2000, the Cabinet issued a NOV alleging a violation of 401 KAR 34:180, Section 8 in the C-752-A storage facility. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to this matter.

45. On or about December 2001, through March 2002, DOE conducted sampling in Sections 1 and 2 of the North/South Diversion Ditch (SWMU No. 59) without notifying the Cabinet of the work in this SWMU. Although the Cabinet has not issued a Notice of Violation with respect to this failure, the Cabinet believes that DOE violated Condition III.E.10 of its Hazardous Waste Permit and that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and other provisions of DOE's Hazardous Waste Permit may have occurred with respect to this matter.

46. Beginning on May 6, 2002, the Cabinet conducted a series of inspections of DOE's hazardous waste facility.

47. On November 4, 2002, the Cabinet issued a NOV to DOE for various alleged violations of Kentucky's hazardous waste regulations observed during the May 2002 inspections. The following violations were alleged: 401 KAR 32:040, sections 1 and 2; 401 KAR 34:020, section 7; 401 KAR 37:010, section 7; 401 KAR 34:050, section 6; 401 KAR 32:030, section 5(1)(b); and 401 KAR 35:180, section 5. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to these matters.

48. On or about January 3, 2003, DOE began the C-415 waste sorting project. During the waste sorting, DOE discovered the presence of hazardous waste in some of the containers. Although the Cabinet has not issued a NOV, the Cabinet believes that there are statutory and regulatory violations and potential violations of KRS 224.46-510 and 401 KAR 32:010 (failure to make a waste determination); KRS 224.46-520 and 401 KAR 38:010 (unpermitted storage of hazardous waste); 401 KAR 32:030 (pre-transport requirements); 401 KAR Chapter 37 (land disposal restrictions); and 401 KAR 34:010-070 and 34:180; other provisions of KRS 224 Subchapter 46, other provisions of 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit with respect to this matter.

49. On or about March 5, 2003, DOE began the sorting and repackaging of 280 m^3 of PCB/Radioactive waste currently located at the C-753-A building. During the waste sorting and repackaging, DOE discovered the presence of hazardous waste in some of the containers. Although the Cabinet has not issued a NOV, the Cabinet believes that there are statutory and regulatory violations and potential violations of KRS 224.46-510 and 401 KAR 32:010 (failure to make a waste determination); KRS 224.46-520 and 401

KAR 38:010 (unpermitted storage of hazardous waste); 401 KAR 32:030 (pre-transport requirements); 401 KAR Chapter 37 (land disposal restrictions); 401 KAR 34:010-070 and 34:180; other provisions of KRS 224 Subchapter 46, other provisions of 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit with respect to this matter.

50. On or about February 28, 2003, DOE notified the Cabinet that it had failed to conduct the annual external inspection of storage tanks at C-733 for fiscal year 2002. Although the Cabinet has not issued a NOV with respect to this notification, the Cabinet believes that DOE violated or potentially violated 401 KAR 34:190, KRS 224 Subchapter 46, other provisions of 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit by failing to conduct this inspection.

51. On or about February 28, 2003, DOE notified the Cabinet that it had exceeded the ninety (90) day accumulation time for hazardous waste at the T-746-S-01 accumulation area by one (1) day. Although the Cabinet has not issued a NOV with respect to this notification, the Cabinet believes that DOE violated 401 KAR 32:030. The Cabinet also believes that other violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to this matter.

52. On March 4, 2003, the Cabinet notified DOE of the need to comply with Condition IV.B.3 (notification of new SWMUs) of its Hazardous Waste Permit with respect to the leachate transfer pipeline from the C-404 sump to the North/South Diversion Ditch. Although the Cabinet has not issued a NOV with respect to this issue, the Cabinet believes that DOE violated or potentially violated its Hazardous Waste

Permit, KRS 224 Subchapter 46, and 401 KAR Chapters 30-40 with respect to this matter.

53. On August 25, 2003, the Cabinet was notified that excavation in SWMU 84 had occurred without prior notice to the Cabinet. The event occurred when approved excavation work in SWMU 526 (to repair a water line) extended beyond that SWMU into SWMU 84. Although the Cabinet has not issued a NOV with respect to this failure, the Cabinet believes that DOE violated or potentially violated its Hazardous Waste Permit, KRS 224 Subchapter 46, and 401 KAR Chapters 30-40 with respect to this matter.

54. On or about July 30, 2001, the Cabinet issued a NOV to DOE alleging that DOE had failed to provide an abandonment and replacement workplan for C-404 landfill monitoring well MW-87. The Cabinet believes that violations and potential violations of KRS 224 Subchapter 46, 401 KAR Chapters 30-40, and DOE's Hazardous Waste Permit may have occurred with respect to this matter.

D. ALLEGED AIR QUALITY VIOLATIONS

55. The Cabinet conducted inspections at PGDP on August 7, 1997 and July 13, 2000.

56. On or about July 24, 2000, the Cabinet issued a NOV with an accompanying Inspection Report to DOE for allegedly violating KRS 224; 401 KAR 63:010 (for DOE's alleged failure to prevent particulate matter from becoming airborne); and 401 KAR 50:055, Section 2(5) (for DOE's alleged failure to maintain and operate air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions). An inspection on August 3, 2000, revealed that DOE had subsequently taken reasonable precautions to prevent the alleged fugitive

emissions reported in the July 13, 2000, Inspection Report. The Cabinet also believes that other violations and potential violations of KRS Subchapter 20, 401 KAR Chapters 50-63, and the applicable air permit may have occurred with respect to this matter.

57. During September 2003, the Cabinet conducted an in-office file review to determine DOE's compliance with the alleged requirement to submit an Annual Compliance Certification. The file review indicated that DOE allegedly has failed to submit a required Annual Compliance Certification for 2002. On September 11, 2003, the Cabinet issued a NOV alleging a violation of 401 KAR 52:020, Section 21. The Cabinet also believes that other violations and potential violations of KRS Subchapter 20, 401 KAR Chapters 50-63, and the applicable air permit may have occurred with respect to this matter.

58. On September 4, 2003, the Cabinet issued a letter to DOE alleging that a Site Inspection had found that certain recommended actions specified by the Kentucky Division Air Quality for the 6 Phase Project had not been met. Although the Cabinet has not issued a NOV with respect to this matter, the Cabinet also believes that violations and potential violations of KRS Subchapter 20, 401 KAR Chapters 50-63, and the applicable air permit may have occurred with respect to this matter.

E. ALLEGED WATER QUALITY VIOLATIONS

59. On or about March 17, 2003, the Cabinet issued a NOV to DOE for an alleged violation of 401 KAR 5:065 1(1) with respect to Outfall 001. The Cabinet also believes that other violations and potential violations of KRS Subchapter 70, 401 KAR Chapter 5, and the applicable water permit may have occurred with respect to this matter.

60. On March 20, 2003, DOE submitted a Toxicity Reduction Evaluation Plan in response to the NOV.

61. On or about November 23, 1999, the Cabinet issued a NOV to DOE for alleged permit violations of Whole Effluent Toxicity Limits at Outfall 001. The Cabinet also believes that other violations and potential violations of KRS Subchapter 70, 401 KAR Chapter 5, and the applicable water permit may have occurred with respect to this matter.

62. On or about February 28, 2001, the Cabinet issued a NOV to DOE for alleged failure to submit a Discharge Monitoring Report (DMR) for Outfall 017-X. The Cabinet believes that violations and potential violations of KRS Subchapter 70, 401 KAR Chapter 5, and the applicable water permit may have occurred with respect to this matter.

NOW THEREFORE, in the interest of settling all civil claims and controversies with respect to the above-referenced violations and potential violations addressed herein, the parties hereby consent to the entry of this Agreed Order and agree as follows:

II. REMEDIAL MEASURES

A. CONTAINED IN DETERMINATIONS AT THE PGDP

63. In the event that DOE intends to obtain a contained-in determination for environmental media or a determination that debris is no longer contaminated with listed hazardous waste, DOE and the Cabinet shall follow the protocols outlined in Attachment D. The specific requirements for characterization and sampling to support contained-in determinations will be approved by the Cabinet on a project-specific basis, consistent with Attachment D. The site-specific health-based levels for determining whether

contaminated media/debris still contains or is no longer contaminated with listed hazardous waste (TCE and 1,1,1 TCA) are as follows: TCE-39.2 ppm for solids and 1,1,1 TCA-2080 ppm for solids. The site-specific health-based levels for determining whether contaminated groundwater destined for on-site treatment and discharge through KPDES permitted outfalls (e.g., groundwater resulting from well-purging, well development, and well sampling) still contains listed hazardous waste (TCE and 1,1,1 TCA) are as follows: .081 ppm TCE. Groundwater that meets the health-based level for TCE shall also be deemed to no longer contain 1,1,1 TCA.

64. Solids that are determined to be below the levels set forth in paragraph 63 and that are not characteristically hazardous but that cannot be disposed in the C-746-U landfill shall be deemed to no longer contain or to no longer be contaminated with listed hazardous waste (F001, F002, U228) and may be managed in accordance with applicable low-level waste and TSCA requirements until dispositioned to an appropriate off-site facility. The Cabinet agrees to consult with DOE and the State where the off-site facility is located to reach agreement on the appropriate health-based standard for making contained-in determinations for wastes that are to be shipped to such facility. In making contained-in determinations pursuant to paragraph 63, the Cabinet is not making any determination regarding the nature or characteristic of the suspect listed waste at any time prior to the date of the contained-in determination.

B. CHARACTERIZATION OF DMSAs

65. As of the date of entry of this Agreed Order by the Secretary, the Cabinet has approved the Characterization/Sampling and Analysis Plan for the waste stored in the approximately one hundred sixty (160) DMSAs, as set forth in Attachment E.

66. DOE shall complete the enforceable requirements of the Characterization/Sampling and Analysis Plan as set forth in Attachment E according to the following schedule:

A. All Priority A DMSAs by **September 30, 2004.**

B. All Priority B DMSAs by **September 30, 2006.**

C. All Priority C DMSAs by **September 30, 2009.**

D. The C-400-05 DMSA by **September 30, 2004.**

The Priority A, Priority B, and Priority C DMSAs are identified in Attachment F. If any of the containers identified in Attachment B are located in Priority C DMSAs, DOE shall comply with the requirements of the Container Sampling and Analysis Plan, Attachment G with respect to such containers by September 30, 2007.

67. Within sixty (60) days of receipt of final validated data for entry into the OREIS database for each DMSA, DOE shall submit a characterization report (following the format of the model characterization report in Attachment H which outlines the work completed pursuant to the approved Characterization/Sampling and Analysis Plan. For purposes of this Agreed Order "final validated data" means data that has gone through validation/evaluation including independent evaluation of laboratory adherence to analytical method requirements; data quality checks; integration and evaluation of all information associated with a data result; evaluation of data authenticity, data integrity, data usability, outliers, and other precision, accuracy, representativeness, completeness, and comparability parameters. The Cabinet will review DOE's characterization report and either approve the report or issue a written Notice of Deficiency delineating the specific deficiencies and the changes that DOE needs to make to correct the identified

deficiencies. DOE shall respond to the deficiencies and resubmit the report within thirty (30) days of receipt of written notice from the Cabinet. The Cabinet will review the revised report and either approve the revised report or issue a second Notice of Deficiency. Upon receipt of the second Notice of Deficiency, DOE shall comply with the requirements in Paragraphs 118-126.

68. On an annual basis until January 1, 2010, DOE shall submit revisions to its Part A Hazardous Waste Permit to include identification of additional DMSAs identified as storing (for a period of time exceeding the limits set forth in 401 KAR 32:030) characteristic hazardous waste or listed hazardous waste in excess of contained-in levels without a permit during characterization of DMSAs. This paragraph shall not apply to waste identified as newly generated waste during implementation of the DMSA Characterization/Sampling and Analysis Plan. For the purposes of this Agreed Order, newly generated waste shall include fluids drained from equipment located in inside DMSAs.

69. On an annual basis until January 1, 2010, DOE shall submit revised SWMU Assessment Reports as required in its Hazardous Waste Permit for each of the DMSAs where DOE has identified newly discovered characteristic or listed waste above contained-in levels that has been stored without a permit in excess of the time limits set forth in 401 KAR 32:030.

70. Within twenty (20) days of receipt of final validated data for entry into the OREIS database, where such final data establishes the presence of any newly discovered characteristic hazardous waste or listed hazardous waste in excess of contained-in levels being stored in a DMSA in excess of the time limits set forth in 401 KAR 32:030 without

a hazardous waste permit, DOE shall properly label such wastes per 401 KAR 32:030 and 401 KAR 34:180 and move the wastes to RCRA compliant storage areas (e.g., permitted storage, Satellite Accumulation Areas) and provide notification to the Cabinet identifying the type of waste, the DMSA it had been stored in, and the date the hazardous or mixed waste was moved to RCRA compliant storage, and, where appropriate, the anticipated permitted storage location to which such waste will be sent. This notification shall supercede the 24 hour additional generator notification requirement outlined in the Cabinet's August 29, 2001 letter.

71. Based on final validated data that has been received for entry into the OREIS database, DOE shall include all newly discovered mixed waste in the annual update for the STP in accordance with the September 10, 1997 Agreed Order (File No. DWM-30039-042).

C. CHARACTERIZATION OF CONTAINERS THAT MAY CONTAIN LISTED HAZARDOUS WASTE

72. Within thirty (30) days of the entry of this Agreed Order by the Secretary, DOE shall begin implementation of the Container Management Plan set forth in Attachment I. Within one hundred twenty (120) days of the entry of this Agreed Order by the Secretary, DOE shall manage the containers identified in Attachment B that are being stored in unpermitted storage units in accordance with the Container Management Plan set forth in Attachment B. The requirements of this paragraph shall terminate with respect to (a) any container that holds hazardous waste, once the container has been moved to RCRA compliant storage (e.g., permitted storage, Satellite Accumulation Areas) or (b) any container that has been characterized pursuant to the Container

Sampling and Analysis Plan and determined to no longer contain hazardous waste or contaminated debris.

73. DOE shall implement the Container Sampling and Analysis Plan set forth in Attachment G of this Agreed Order for the containers listed in Attachment B of this Agreed Order. The containers identified in Attachment B as being "previously characterized" have been sufficiently characterized for purposes of making a contained-in determination, and no further characterization or sampling for those containers is required under this Agreed Order. Based on the review of the characterization data, the Cabinet hereby grants DOE's January 24, 2003 contained-in request that the wastes in the containers no longer contain listed hazardous waste. In making this determination, the Cabinet makes no determination regarding the nature or characteristics of the wastes in the containers at any time prior to January 24, 2003. Based on this determination, the wastes in the containers and the containers themselves do not require management as hazardous wastes, and no further action is required under this Agreed Order for the containers.

74. DOE shall complete implementation of the Container Sampling and Analysis Plan, set forth in Attachment G by September 30, 2007. During implementation of the Container Sampling and Analysis Plan, DOE may request a revision of the sampling protocols. The Cabinet will review DOE's requested revision and either approve the revision or issue a Notice of Deficiencies identifying the specific deficiencies and include an explanation of the Cabinet's position. DOE shall respond to the deficiencies and resubmit the sampling protocol within thirty (30) days of receipt of written notice from the Cabinet. The Cabinet will review the revised protocol and either approve the revised protocol or issue a second Notice of Deficiencies. Upon receipt of

the second Notice of Deficiencies, DOE may either invoke the consultation process of this Agreed Order, revise the protocol as requested by the Cabinet, or withdraw the proposed revision.

75. Within sixty (60) days of receipt of final validated data for entry into the OREIS database for each distinct storage area designated in Attachment J, DOE shall submit its contained-in determination and all supporting analytical data to the Cabinet. The Cabinet will review DOE's determination and supporting analytical data and provide DOE with notification of any concerns the Cabinet has within thirty (30) days. The site-specific health-based levels for determining whether contaminated media/debris still contains or is no longer contaminated with hazardous waste are as follows: TCE-39.2 ppm for solids; and 1,1,1 TCA-2080 ppm for solids. The site-specific health-based levels for determining whether contaminated groundwater destined for on-site treatment and discharge through KPDES permitted outfalls (e.g., groundwater resulting from well-purging, well development, and well sampling) still contains listed hazardous waste (TCE and 1,1,1 TCA) are as follows: .081 ppm TCE. Groundwater that meets the health-based level for TCE shall also be deemed to no longer contain 1,1,1 TCA.

76. Solids that are determined to be below the levels set forth in paragraph 75 and that are not characteristically hazardous but that cannot be disposed in the C-746-U landfill shall be deemed to no longer contain or to no longer be contaminated with listed hazardous waste (F001, F002, U228) and may be managed in accordance with applicable low-level waste and TSCA requirements until dispositioned to an appropriate off-site facility. The Cabinet agrees to consult with DOE and the State where the off-site facility is located to reach agreement on the appropriate health-based

standard for making contained-in determinations for wastes that are to be shipped to such facility.

77. Environmental media and debris addressed pursuant to the site-wide contained-in protocol set forth in Attachment D, and established to contain concentrations of TCE and TCA below the health-based contained-in levels set forth therein, shall be deemed not to contain or not to be contaminated with listed hazardous wastes. Containers holding contaminated media/debris that no longer contain or are not contaminated with a listed hazardous waste (and are not otherwise hazardous by characteristic) do not need to be managed as hazardous waste. No further actions shall be required for such waste containers under this Agreed Order. Determinations under this paragraph shall be based upon the results from the Container Sampling and Analysis Plan. In making contained-in determinations pursuant to paragraphs 75-77, the Cabinet is not making any determination regarding the nature or characteristic of the suspect listed waste at any time prior to the date of the contained-in determination.

78. On an annual basis until January 1, 2008, DOE shall submit revisions to its Part A Hazardous Waste Permit to include identification of additional non-DMSA SWMUs storing characteristic hazardous waste or listed hazardous waste in excess of contained-in levels without a permit during characterization of non-DMSA SWMUs. For all the containers in a given SWMU, where DOE has identified newly discovered characteristic hazardous wastes or listed hazardous wastes above contained-in levels, DOE shall prepare and submit a revised SWMU Assessment Report in accordance with condition IV.B.3 of its Hazardous Waste Permit on an annual basis until January 1, 2008. This paragraph shall not apply to newly generated waste.

79. Within twenty (20) days of receipt of final validated data for entry into the OREIS database for the waste in individual containers, DOE shall, in accordance with 401 KAR 32:030 and 401 KAR 34:180, properly label all hazardous waste or mixed waste identified and move the wastes to available RCRA compliant storage areas (e.g., permitted storage, Satellite Accumulation Areas).

80. For each SWMU, within twenty (20) days of DOE's receipt of final validated data for entry into the OREIS database from the Container Sampling and Analysis Plan, DOE shall notify the Cabinet of the type of any hazardous waste discovered, the SWMU it had been stored in, the date the hazardous or mixed waste was moved to available RCRA compliant storage areas (e.g., permitted storage, Satellite Accumulation Areas), and, where appropriate, the permitted storage unit to which it was, or is anticipated to be, moved.

81. In the annual update for the STP, DOE shall include all newly discovered mixed waste identified during the implementation of the Container Sampling and Analysis Plan for the previous year in accordance with the terms and conditions of the September 10, 1997, Agreed Order and approved STP for mixed waste.

82. Based on the Cabinet's review of DOE's screening process referred to in Paragraph 21, the balance of the approximately 33,000 containers referenced in paragraph 19 of this Agreed Order (generated prior to February 5, 2002) and not listed in Attachment B of this Agreed Order do not require any further characterization for F001, F002, and/or U228 listed wastes. No further action will be required for these containers under this Agreed Order. This determination is based on the Cabinet's review of DOE's screening process, a site visit by Cabinet personnel to conduct a record review of

information pertaining to the screening process, and discussions with site personnel involved in conducting the screening process. The Cabinet reserves the right to require additional characterization of the containers based on additional information.

D. CLOSURE REQUIREMENTS FOR UNPERMITTED HAZARDOUS WASTE STORAGE UNITS

1. Closure, Post-Closure, and Corrective Action for Groundwater for All Units

83. For DMSA and non-DMSA SWMUs requiring closure under this Agreed Order, DOE has the option to (a) conduct final closure, (b) conduct partial closure (excluding subsurface soils and groundwater), with final closure (including subsurface soils and groundwater) to be deferred to response actions selected and implemented under the FFA, or (c) solely for inside units, defer any closure activity to response activities to be selected and implemented under the FFA.

84. If any activities for final closure for a unit are deferred to response actions selected and implemented under the FFA, any necessary post-closure or groundwater corrective action for such unit shall also be deferred to response actions selected and implemented under the FFA. Pursuant to CERCLA Section 121 (e)(1), modification of DOE's Part B Hazardous Waste Permit to include closure, post-closure care or groundwater corrective action requirements is not required for closure, post-closure and groundwater corrective action deferred to the FFA under this Agreed Order. DOE will submit appropriate permit documentation for units not deferred to the FFA.

85. Corrective action for groundwater shall not be required for any unit under this Agreed Order that is, or may be deemed in the future to be, a hazardous waste management unit, including DMSAs, non-DMSAs, and the C-746-U, -S, and -T landfills, unless substantial evidence affirmatively establishes that a contaminant of concern in groundwater is a result of a release of hazardous waste or hazardous constituents from that unit. Corrective action for groundwater so linked to a unit shall be deferred to response actions to be selected and implemented under the FFA. The groundwater remediation decision process will consider Alternative Contaminant Levels, alternative points of compliance, natural attenuation, cost-effectiveness (as required by CERCLA) and technical practicability.

86. For all inside and outside units being deferred to response actions selected and implemented under the FFA, the closure, post-closure and groundwater protection standards will be considered, and selected (or waived) as appropriate, as Applicable, Relevant and Appropriate Requirements (ARARs) in accordance with the Comprehensive Environmental Compensation and Liability Act (CERCLA) and FFA processes and standards. Such units will be treated as SWMUs under the FFA. The CERCLA requirements, including the CERCLA nine criteria for selecting remedial actions (as well as ARARs), will guide selection of a response action for such units. Schedules for selecting and implementing a response action for all such units will be established by FFA procedures. For the purposes of making ARARs determinations under the FFA, the Cabinet agrees that its groundwater corrective action requirements should not be considered to be ARARs for the purposes of making groundwater remediation decisions for a unit unless there is substantial evidence that affirmatively

establishes that a contaminant of concern in the groundwater is a result of a release of a hazardous waste or hazardous constituent from such unit. For purposes of making ARARs determinations under the FFA, the Cabinet agrees that its closure/post-closure requirements should only be considered to be ARARs for such a unit where hazardous waste is discovered which has been stored in excess of the time frames established in the KAR, and, with respect to potentially listed hazardous waste, where the contained-in levels in Attachment D have been exceeded

87. Unless otherwise specifically provided in this Agreed Order, for all units addressed under this Agreed Order, including DMSAs, non-DMSAs, and the C-746-U, -S, and –T landfills: (a) closure and post-closure requirements shall only apply for units where hazardous waste is discovered which has been stored in excess of the time frames established in the KAR, and, with respect to potentially listed hazardous waste, where the contained-in levels in Attachment D have been exceeded; and (b) groundwater corrective action requirements shall not apply unless substantial evidence affirmatively establishes that a contaminant of concern in groundwater is a result of a release of a hazardous waste or a hazardous constituent from the unit in question.

88. For all units addressed under this Agreed Order, including DMSAs, non-DMSAs, and the C-746-U, -S, and -T landfills, closure and post-closure requirements of this Agreed Order (including the final ("clean") closure and partial-closure standards referenced below), shall not apply to contamination within or from a unit unless the contamination is a result of a release of hazardous waste from such unit.

2. DMSAs and Non-DMSA SWMUs

89. Within one-hundred twenty (120) days of completion of characterization of a DMSA or non-DMSA SWMU and receipt of final validated data for entry into the OREIS database, where the data or process knowledge demonstrates that characteristic hazardous waste or listed hazardous waste in excess of contained-in levels has been stored in unpermitted areas, DOE shall either submit a closure plan for the DMSA or non-DMSA SWMU identified as an unpermitted hazardous waste storage unit at PGDP, or if the unit is an inside DMSA or inside non-DMSA SWMU, submit a notification to the Cabinet that closure will be deferred to response actions selected and implemented under the FFA pursuant to paragraphs 83-88 Closure plans for final closure shall comply with 401 KAR 34:070. Within ninety (90) days of entry of this Agreed Order, DOE may withdraw previously submitted closure plans and resubmit them consistent with the provisions of this paragraph.

90. The closure plan may propose final and/or partial closure of the units. Final closure ("clean closure") requires removal or decontamination of hazardous waste and hazardous constituents from the unit, including subsurface soils and groundwater without use of institutional or engineering controls. It is the Cabinet's position that the final closure ("clean closure") standard equates to an excess cancer risk of 1x10(-6) and a hazard index of 1. If DOE elects to meet the Cabinet's asserted final closure standard using engineering or institutional controls, the unit will be subject to post-closure requirements of 401 KAR 34:070. Partial closure requires removal or decontamination of hazardous waste and hazardous constituents from the unit to achieve the partial closure standard, which equates to an excess cancer risk of 1 x 10 (–4) and a hazard index of 3,

exclusive of groundwater and subsurface soils (for purposes of this Agreed Order subsurface soils mean soils one foot or more below the surface), using the appropriate exposure assumptions contained in "Methods for Conduction Risk Assessments and Risk Evaluations at the Paducah Gaseous Diffusion Plant (DOE/OR/07-1506-December 2000)." DOE shall attempt to meet the partial closure standard for outside units by the physical removal or decontamination of the hazardous waste and hazardous constituents rather than controlling exposure by institutional or engineering controls. Provided, however, that for outside units, DOE shall not be required to remove subsurface soils to achieve the 1 x 10 (-4) and hazard index of 3 standard. Where DOE has removed the surface soils (i.e., one foot of soil) and such removal is not sufficient to achieve the 1 x 10 (-4) and hazard index of 3 standard without institutional or engineering controls, DOE may implement such institutional or engineering controls as are necessary to achieve the 1 x 10 (-4) and hazard index of 3 standard. The partial closure plan shall discuss which type(s) of institutional or engineering controls would be utilized if necessary to achieve the 1 x 10 -4 and hazard index of 3 standard and shall also discuss how any such controls would be maintained. For inside units, DOE shall meet the partial closure standard by either the physical removal and/or decontamination of the hazardous waste and hazardous constituents. The closure plan shall either provide that closure (either final or partial) must be completed within one hundred and eighty (180) days of approval of the closure plan or propose another time for completion for the Cabinet's approval.

91. If DOE elects to conduct partial closure activities, the closure plan shall describe that final closure of the units, including groundwater and subsurface soils, will be deferred to response actions taken under the FFA. Upon deferral, final closure, and

any necessary post-closure and groundwater corrective action will be addressed pursuant to paragraphs 83-88 of this Agreed Order.

92. The Cabinet will review DOE's closure plan within forty-five (45) days of receipt and either approve the closure plan or issue a Notice of Deficiency identifying the specific deficiencies and include an explanation of the Cabinet's position. DOE shall respond to the deficiencies and resubmit the plan(s) within thirty (30) days of receipt of written notice from the Cabinet. The Cabinet will review the revised plan within thirty (30) days of receipt and either approve the revised plan or issue a second Notice of Deficiency. Upon receipt of the second Notice of Deficiency, DOE shall comply with the provisions of Paragraphs 118-126.

93. DOE shall follow the requirements set out in paragraphs 94-100 for final closure and paragraphs 101-108 for partial closure activities.

a. FINAL CLOSURE

94. Within sixty (60) days of closure of each unpermitted hazardous waste storage unit according to the approved closure plan for final closure, DOE shall submit a final closure report which demonstrates whether closure was accomplished in accordance with the requirements of the plan.

95. The Cabinet will review DOE's closure report within thirty (30) days of receipt for each unpermitted hazardous waste storage unit and either approve the closure report or issue a Notice of Deficiency identifying the specific deficiencies and include an explanation of the Cabinet's position. DOE shall respond to the deficiencies and resubmit the report within thirty (30) days of receipt of written notice from the Cabinet.

The Cabinet will review the revised report within thirty (30) days of receipt and either approve the revised report or issue a second Notice of Deficiency. Upon receipt of the second Notice of Deficiency, DOE shall comply with the provisions of Paragraphs 118-126.

96. If the closure report fails to demonstrate closure in accordance with 401 KAR 34:070, DOE may (a) implement additional closure activities by submitting a supplemental closure plan and report which shall be reviewed and implemented in accordance with the provisions of paragraphs 92-93; or (b) pursue partial closure for the unit (in accordance with paragraphs 89-93); or (c) if the unit is an inside unit, defer the final closure to response actions under the FFA (in accordance with paragraphs 83-88). DOE shall either invoke the consultation process set forth in paragraphs 118-126 or notify the Cabinet within thirty (30) days of receipt of notice that it has failed to meet the final closure standard of which option DOE intends to pursue, and thirty (30) days thereafter shall submit the appropriate plan/notice for the option it has chosen to pursue.

97. If DOE is unable to demonstrate closure by removal or decontamination of hazardous waste and hazardous constituents from the unpermitted hazardous waste storage unit in accordance with 401 KAR 34:070 (i.e., "clean close"), and DOE fails to either invoke the consultation process set forth in paragraphs 118-126 or notify the Cabinet that it intends to pursue the options in paragraph 96 above, the Cabinet will notify DOE that DOE must submit an amended closure plan for closure of the unit in accordance with 401 KAR 34:230, and a post-closure plan for conducting post-closure care in accordance with KRS 224.46-520 and 401 KAR 34:070.

98. Within ninety (90) days of receipt of written notification specified in paragraph 97, DOE shall submit an amended closure and post-closure plan for closure of the unpermitted hazardous waste storage unit pursuant to 401 KAR 34:070 and 401 KAR 34:230. The Cabinet will review DOE's amended closure/post-closure plan within thirty (30) days of receipt and either approve the amended closure/post-closure plan or issue a Notice of Deficiency identifying the specific deficiencies and include an explanation of the Cabinet's position. DOE shall respond to the deficiencies and resubmit the plan within thirty (30) days of receipt of written notice from the Cabinet. The Cabinet will review the amended plan within thirty (30) days of receipt and either approve the amended plan or issue a second Notice of Deficiency. Upon receipt of the second Notice of Deficiency, DOE shall comply with the provisions of Paragraphs 118-126.

99. Within fifteen (15) days of notice of approval of the closure/post-closure plan, DOE shall begin implementation of the closure/post closure plan and complete closure according to the approved schedule contained therein. Upon completion of closure activities, DOE shall conduct post-closure care for the unit pursuant to the approved post-closure care plan.

100. Pursuant to CERCLA Section 121(e)(1), modification of DOE's Part B Hazardous Waste Permit to include post-closure care procedures for the unpermitted hazardous waste storage unit is not required for units deferred to the FFA. However, with respect to such units, DOE must comply with all the substantive requirements of KRS 224.46-520 and 401 KAR 34:070, sections 8-11 that are determined to be ARARs (and are not waived) as discussed in paragraph 86. DOE will submit appropriate permit documentation for units not deferred to the FFA.

b. PARTIAL CLOSURE

101. Within sixty (60) days of partial closure of each unpermitted hazardous waste storage unit, DOE shall submit a partial closure report which demonstrates whether partial closure was accomplished in accordance with the requirements of the plan and the partial closure standard outlined in paragraph 90.

102. The Cabinet will review DOE's partial closure report for each unpermitted hazardous waste storage unit within thirty (30) days of receipt and either approve the partial closure report or issue a Notice of Deficiency identifying the specific deficiencies and include an explanation of the Cabinet's position. DOE shall respond to the deficiencies and resubmit the report within thirty (30) days of receipt of written notice from the Cabinet. The Cabinet will review the revised report within thirty (30) days of receipt and either approve the revised report or issue a second Notice of Deficiency. Upon receipt of the second Notice of Deficiency, DOE shall comply with the provisions of Paragraphs 118-126.

103. If the partial closure report fails to demonstrate closure in accordance with the plan and partial closure standard, DOE may (a) implement additional partial closure activities by submitting a supplemental partial closure plan and report which shall be reviewed and implemented in accordance with the provisions of paragraphs 92-93; or (b) submit a final closure plan which shall be reviewed and implemented in accordance with the provisions of paragraphs 92-93; or (c) if the unit is an inside unit, defer the final closure to response actions under the FFA (in accordance with paragraphs 83-88). DOE shall either invoke the consultation process set forth in paragraphs 118-126 or notify the

Cabinet within thirty (30) days of receipt of notice that it has failed to meet the partial closure standard of which option DOE intends to pursue, and thirty (30) days thereafter shall submit the appropriate plan/notice for the option DOE has chosen to pursue.

104. If DOE is unable to demonstrate partial closure by meeting the partial closure standard referenced herein, and DOE fails to either invoke the consultation process set forth in paragraphs 118-126 or notify the Cabinet that it intends to pursue the options in paragraph 103 above, the Cabinet will notify DOE that it must proceed to post-closure.

105. Within thirty (30) days of receipt of written notification specified in paragraph 104, DOE shall submit a revised closure and post-closure plan for closure of the unpermitted hazardous waste storage unit pursuant to 401 KAR 34:070 and 401 KAR 34:230. The Cabinet will review DOE's revised closure/post-closure plan within thirty (30) days of receipt and either approve the revised closure/post-closure plan or issue a Notice of Deficiency identifying the specific deficiencies and include an explanation of the Cabinet's position. DOE shall respond to the deficiencies and resubmit the plan within thirty (30) days of receipt of written notice from the Cabinet. The Cabinet will review the revised plan within thirty (30) days of receipt and either approve the revised plan or issue a second Notice of Deficiency. Upon receipt of the second Notice of Deficiency, DOE shall comply with the provisions of Paragraphs 118-126.

106. Within fifteen (15) days of notice of approval of the closure/post-closure plan, DOE shall begin implementation of the closure/post closure plan according to the approved schedule contained therein.

107. Pursuant to CERCLA Section 121(e)(1), modification of DOE's Part B Hazardous Waste Permit to include post-closure care procedures for the unpermitted hazardous waste storage unit is not required for units deferred to the FFA. However, with respect to such units, DOE must comply with all the substantive requirements of KRS 224.46-520 and 401 KAR 34:070, sections 8-11 that are determined to be ARARs (and are not waived) as discussed in paragraph 86. DOE will submit appropriate permit documentation for units not deferred to the FFA.

108. If the Cabinet approves DOE's partial closure report, then final closure/post-closure will be deferred to response actions selected and implemented under the FFA in accordance with paragraphs 83-88.

E. CONTAINED-IN DETERMINATION FOR THE C-746-U SOLID WASTE LANDFILL

109. On February 21, 2003, the Cabinet approved a Sampling and Analysis Plan for the suspect hazardous waste disposed in Phases 1 and 2 of the C-746-U landfill designed to allow DOE to make a hazardous waste determination with respect to the suspect waste placed in the C-746-U landfill.

110. DOE implemented the approved Sampling and Analysis Plan in accordance with the schedule contained therein. In addition to DOE's sampling, the Cabinet took split samples in order to verify DOE's sampling data.

111. On July 23, 2003, DOE submitted a request for a contained-in determination to the Division of Waste Management for review. The Cabinet has reviewed DOE's data, as well as the data from the split samples, to determine whether the contaminated media

in the landfill still contains listed hazardous waste. For the purposes of this Agreed Order, the site-specific health-based levels for determining whether the contaminated media in the landfill still contains hazardous waste are as follows: TCE-39.2 ppm and 1,1,1 TCA-2,080 ppm for solids.

112. Based on the review of the sampling data, the Cabinet hereby grants DOE's July 23, 2003, contained-in request that the identified suspect contaminated media no longer contains listed hazardous waste. In making this determination, the Cabinet makes no determination regarding the nature or characteristics of the suspect waste placed in the C-746-U landfill at any time prior to July 23, 2003. Based on this determination, the wastes do not require management as hazardous wastes and the C-746-U landfill does not require closure, post-closure or corrective action under the Cabinet's hazardous waste management program and no further action is required under this Agreed Order for the C-746-U-Landfill. DOE may resume disposal of solid waste in the C-746-U landfill in accordance with its solid waste disposal permit.

F. CLOSURE/POST-CLOSURE OF THE C-746-S AND C-746-T SOLID WASTE LANDFILLS

113. The Cabinet agrees that the C-746-S solid waste landfill shall be addressed by any necessary response actions selected and implemented under the FFA for the Groundwater and Burial Grounds Operable Units in lieu of any otherwise required hazardous waste closure/post-closure or regulated unit corrective action requirements of KRS 224 subchapter 60 and the regulations promulgated pursuant thereto. Further, the Cabinet agrees that within 10 days of finalization of any CERCLA decision document selecting a response action that addresses potential releases from the C-746-S solid waste

landfill to groundwater, that the Cabinet will modify DOE's existing C-746-S solid waste permit to reflect that any necessary groundwater corrective action will be addressed by the response actions selected and implemented under the FFA. The Cabinet also agrees that, for the purposes of making ARARs determinations under the FFA, the Cabinet's groundwater corrective action requirements shall only be considered to be ARARs for the purposes of making groundwater remediation decisions for the C-746-S landfill where there is substantial evidence that affirmatively establishes that a contaminant of concern in the groundwater is a result of a release of a hazardous waste or hazardous constituent from the C-746-S landfill. The Cabinet further agrees that, for purposes of making ARARs determinations under the FFA, the Cabinet's closure/post-closure requirements shall only be considered to be ARARs where hazardous waste is discovered which has been stored in excess of the time frames established in the KAR, and, with respect to potentially listed hazardous waste, where the contained-in levels in Attachment D have been exceeded.

114. No later than September 30, 2003, DOE shall submit a site investigation scoping plan for the C-746-S and C-746-T landfills to the Cabinet and EPA designed to evaluate whether the landfills are sources of groundwater contamination. The scope of the site evaluation includes a field investigation to determine whether the landfills are a source of the TCE groundwater contamination in the area or whether the groundwater contamination in the groundwater at the C-746-S and C-746-T landfills is migrating from upgradient source areas. The field investigation will include the installation of approximately 10 subsurface borings to collect groundwater samples from both upgradient and downgradient locations.

115. Based on the Cabinet's review of DOE's recently developed information (described in Attachment K), the Cabinet has determined that it cannot conclude that F001, F002, or U228 listed waste (TCE, 1,1,1, TCA) was disposed in the C-746-T-landfill. Based on this determination, the C-746-T landfill does not require management as a hazardous waste management unit and does not require closure, or post-closure, or corrective action under the Cabinet's hazardous waste management program and, except as provided in the preceding paragraph, no further action is required under this Agreed Order for the C-746-T landfill. This determination is based exclusively on DOE's recently developed information. The Cabinet is not precluded from making a different determination based on additional information consisting of credible analytical data or other substantial evidence affirmatively demonstrating that listed waste was actually disposed in the C-746-T landfill. Corrective action for groundwater shall not be required unless substantial evidence affirmatively establishes that a contaminant of concern in the groundwater is a result of a release of a hazardous waste or hazardous constituent from the C-746-T landfill.

G. DIVISION OF WATER REMEDIAL MEASURES

116. DOE shall comply with the provisions of the Toxicity Reduction Evaluation (TRE) Plan submitted on March 20, 2003, to determine the source(s) of the toxicity within two hundred seventy (270) days of entry of this Agreed Order. (a) Within ninety (90) days of determining the source(s) of the toxicity, DOE shall submit a revised TRE Plan for Cabinet review and approval that includes appropriate measures and an implementation schedule to meet the toxicity limits of its KPDES permit. (b) In the event

DOE is unable to determine the source(s) of the toxicity within two hundred seventy (270) days, DOE shall, within ninety (90) days, following the expiration of the two hundred seventy (270) day period, submit a revised TRE Plan for the Cabinet's review and approval that includes appropriate measures to address the toxicity (e.g., treatment approach, additional sampling to determine toxicity, etc.) and an implementation schedule to meet the toxicity limits of its KPDES permit. The timeframes set forth in this paragraph shall be subject to the extension provisions set forth in paragraphs 148-149.

117. The Cabinet agrees to apply the wastewater concentrations of 1ppm TCE and 25 ppm 1,1,1 TCA, as promulgated in 401 KAR Chapter 31:010, Section 3(1)(b)4. a. and b., to well purge water, well sampling water, and well development water that is generated by DOE during any sampling and investigation efforts associated with the PGDP facility, provided the water is destined for treatment at an onsite wastewater treatment facility and discharged through a PGDP KPDES permitted outfall. The Cabinet considers well purge water, well sampling water, and well development water that meet the above-stated concentrations and regulatory provisions to be excluded from the definition of hazardous waste.

III. CONSULTATION PROCESS

118. Except as otherwise specifically provided for in this Agreed Order, DOE may utilize the procedures outlined below either upon receipt of a Second Notice of Deficiencies issued by the Cabinet on a plan/report required by this Agreed Order or for any other dispute which arises concerning this Agreed Order, including attachments thereto.

119 DOE and the Cabinet shall first attempt to resolve expeditiously and informally all disputes at the project manager level. This informal consultation shall be limited to a period of ten (10) days from the occurrence of the event giving rise to the dispute.

120. In the event that any dispute is not resolved through informal means, within fifteen (15) days after the end of the informal consultation period, DOE shall give written notice to the Cabinet of its intent to invoke the formal consultation process. In the event DOE fails to submit the written notice required by this paragraph, DOE shall be deemed to have waived its right to the formal consultation process.

121. DOE's written notice of its intent to invoke the formal consultation process shall include a written statement of the issue in dispute, the relevant facts upon which the dispute is based, the factual data, analysis or opinion supporting its position, and supporting documentation on which DOE relies along with an explanation of what work is or will be affected by the dispute, including any impacts on compliance dates. The DOE project manager shall develop DOE's written notice of intent to invoke the formal consultation process in concert with the Cabinet's project manager and shall include with DOE's written notice any written positions and supporting documentation

provided to DOE by the Cabinet's project manager within the fifteen (15) day period. The Cabinet shall submit a written response to DOE within fifteen (15) days of receipt of DOE's notification. Within fifteen (15) days of DOE's receipt of the Cabinet's response to DOE, DOE's Manager of the Portsmouth/Paducah Project Office and the Cabinet's Director of the Division of Waste Management (Director) shall engage in meetings or conference calls.

122. Within ten (10) days of the meeting/conference call referenced in paragraph 121, the Director of the Division of Waste Management will notify DOE in writing of the Cabinet's determination of whether deficiencies still exist (if the dispute involves deficiencies in a plan/report) or otherwise issue a resolution of the dispute. If DOE disagrees with the Director's determination, DOE may, within ten (10) days of receipt of the Director's determination, request a consultation meeting with the Commissioner of the Department of Environmental Protection. If DOE requests a meeting/consultation, then the requested meeting/conference call shall take place within fifteen (15) days of the Cabinet's receipt of the request. Within ten (10) days of the meeting/conference call, the Commissioner will notify DOE in writing of the Cabinet's determination of whether deficiencies still exist or otherwise issue a final resolution of the dispute.

123. If the Cabinet determines that a deficiency still exists, DOE shall have thirty (30) days from receipt of the Cabinet's written determination to submit a revised plan/report to respond to the deficiencies or, if the dispute does not involve deficiencies in a plan/report, otherwise comply with the Cabinet's determination. The Cabinet will review the revised report/plan and issue its final determination to DOE. If the Cabinet

disapproves the plan/report, this shall constitute the Cabinet's determination that DOE has violated the Agreed Order and shall be deemed to be a final determination by the Cabinet. The Cabinet's disapproval of a plan/report or other final determination shall be subject to judicial or administrative review in accordance with applicable law. It is the Cabinet's position that DOE must exhaust its administrative remedies before the Cabinet prior to seeking judicial review of any final determinations by the Cabinet.

124. The pendency of any dispute under these procedures shall not affect DOE's responsibility for timely performance of the work required by this Agreed Order, except that the time period for completion of work affected by such dispute shall be extended for a period of time at least equaling the actual time taken to resolve any dispute in accordance with the procedures specified herein. All elements of the work required by this Agreed Order that are not affected by the dispute shall continue and be completed in accordance with the applicable schedule.

125. In any proceeding under this Section, the parties may by written agreement modify the procedures of paragraphs 118-124 above, including but not limited to an extension or shortening of the times therein or the waiver of any provision set forth in such paragraphs.

126. The Parties shall exhaust the Consultation Process (through the Cabinet's issuance of its final determination to DOE) prior to initiating administrative or judicial action with respect to any Second Notice of Deficiencies issued by the Cabinet on a plan/report required by this Agreed Order or for any other dispute which arises concerning this Agreed Order.

IV. BUDGET REQUIREMENTS

127. It is the Cabinet's position that it is DOE's obligation to obtain the funding necessary to comply with all the requirements in this Agreed Order.

128. It is DOE's position that any requirement for the payment or obligation of funds by DOE established by the terms of the Agreed Order is subject to the availability of appropriated funds, and that the Agreed Order shall not be interpreted to require the obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. Section 1341.

129. If appropriated funds are not available to fulfill DOE's obligations under the Agreed Order, DOE shall nevertheless make a good faith effort to comply with the requirements of this Agreed Order. If DOE's good faith efforts fail, DOE shall meet promptly with the Cabinet to discuss whether the parties can reach an accommodation on adjustments to deadlines that require the payment or obligation of such funds. If no agreement can be reached, then the Cabinet and DOE agree that the Cabinet may initiate an action to enforce any provision of the Agreed Order, and DOE may raise as a defense that its delay was caused by the unavailability of appropriated funds. The Cabinet disagrees that the lack of appropriations or funding is a valid defense. It is the Cabinet's position that the federal Anti-Deficiency Act, 31 U.S.C. Section 1341, does not apply to any obligation set forth under this Agreed Order. However, the Cabinet and DOE agree and stipulate that it is premature at this time to raise and adjudicate the existence of such a defense.

V. PENALTIES

130. DOE shall pay a civil penalty of one million dollars **($1,000,000)** in four installments of two hundred and fifty thousand dollars **($250,000.00).** The first installment is due and payable within thirty (30) days of entry of this Agreed Order by the Secretary. Subsequent payments are due and payable ninety (90) days, one hundred eighty (180) days, and two hundred seventy (270) days from the date the initial payment is due. Payment shall be made by cashier's check, certified check or money order made payable to the Kentucky State Treasurer and sent to the attention of Manager, Enforcement Branch, Division of Waste Management, 14 Reilly Road, Frankfort, Kentucky, 40601, or by electronic funds transfer.

131. DOE shall expend $200,000 on an environmental project(s). Such environmental project(s) must be mutually acceptable to both DOE and the Cabinet and shall not require amendment or modification to this Agreed Order to identify such project(s). Within ninety (90) days of entry of this Agreed Order, the parties will meet to identify the environmental project(s).

132. DOE may be assessed a stipulated penalty of up to five thousand dollars ($5,000.00) for the first week (or part thereof) and up to ten thousand dollars ($10,000.00) for each additional week (or part thereof) for failure to comply with any of the terms of this Agreed Order, including timely submission of any plans, or reports required by this Agreed Order and for failure to complete any requirement contained in an approved plan, or report. The stipulated penalties are in lieu of any other statutory penalty that may be assessed. Failure to pay stipulated penalties shall not be cause for the assessment of additional stipulated penalties.

133. If the Cabinet determines a stipulated penalty is due, the Cabinet will send DOE written notice, including the amount of the stipulated penalty. If DOE disagrees with the required payment or otherwise believes a request for payment is erroneous or contrary to law, it may invoke the consultation process set forth in paragraphs 118-126. If DOE invokes the consultation process set forth in Section III of this Agreed Order, no assessment of a stipulated penalty shall be final, and DOE shall have no obligation to pay until the conclusion of the consultation procedures, including any administrative or judicial review, related to the assessment of the stipulated penalty. DOE's invocation of the consultation process shall toll the obligation to pay the assessed penalty, but, shall not toll the accrual of stipulated penalties for such time as the alleged failure upon which the penalty was based continues. If the stipulated penalty is upheld on appeal, DOE shall submit the stipulated penalty amount within thirty (30) days of receipt of the final appellate decision.

VI. FORCE MAJEURE

134. A force majeure event is defined as an event arising from causes not reasonably foreseeable and beyond the control of DOE or their consultants or engineers or contractors, which could not be overcome by DOE's due diligence and which delays or prevents performance as required by this Agreed Order, or as any event which the parties mutually agree to be a force majeure event

135. Force majeure events do not include unanticipated or increased costs of performance, changed economic or financial circumstances, normal precipitation events,

or failure of a contractor to perform or failure of a supplier to deliver unless such failure is, itself, the result of force majeure.

136. DOE shall notify the Manager of the Enforcement Branch, Division of Waste Management by telephone (502-564-6716) within seventy-two (72) hours and in writing within ten (10) days business days after it becomes aware of events which it knows may constitute a force majeure. DOE's written notice shall provide an estimate of the anticipated length of delay, including any necessary period of time for demobilization and remobilization of contractors or equipment; a description of the cause of delay; a description of measures taken or to be taken by DOE to minimize delay, including a timetable for implementing these measures. Failure to comply with the notice provisions shall be grounds for the Cabinet to deny granting an extension of time to DOE. However, the Cabinet may in its sole discretion grant a request for extension for force majeure where DOE has failed to comply with the notice provisions.

137. If DOE successfully demonstrates to the Cabinet that the delay has been or will be caused by a force majeure event, the Cabinet will grant an extension of the time. In such cases, DOE will be granted a period of time at least equal to the length of delay.

138. All force majeure extensions shall be accomplished through a written amendment of this Agreed Order, unless the parties agree otherwise.

139. Any dispute arising over the application of the force majeure provisions of paragraphs 134-139 or the occurrence or impact of a force majeure event shall be subject to the consultation process described in paragraphs 118-126.

MISCELLANEOUS PROVISIONS

140. All submittals required of DOE by this Agreed Order shall be to the Manager, Enforcement Branch, Division of Waste Management, Department of Environmental Protection, 14 Reilly Road, Frankfort, Kentucky 40601. The Cabinet shall submit comments/notifications required by this Agreed Order to the DOE Paducah Site Manager, Post Office Box 1410, Paducah, Kentucky 42001-1410. Unless otherwise specified, any submittal or notice provided pursuant to this Agreed Order shall be sent by certified mail, return receipt requested, or similar method (including electronic transmission) which provides a written record of the sending and receiving date. Unless otherwise specified or requested, all routine correspondence other than a document or submittal may be sent as described above, or may be sent via regular mail or electronically transmitted to the above persons. Any party may change the individual designated to receive submittals and notifications required under this Agreed Order by providing written notice to the other party.

141. This Agreed Order addresses only those matters specifically set out or referred to above. The Cabinet enters into this Agreed Order, in part, based upon information supplied by DOE. Except as provided in this Agreed Order, nothing contained herein shall be construed to waive or limit any remedy or cause of action by the Cabinet based on statutes or regulations under its jurisdiction and DOE reserves its rights and defenses thereto. For matters not addressed in this Agreed Order, the Cabinet reserves its right at any time to issue administrative orders or to take any other action it deems necessary, including the right to order all necessary remedial measures, assess

penalties for violations or recover any response costs that may be incurred, and DOE reserves its rights and defenses thereto.

142. Except as otherwise provided herein, this Agreed Order shall not prevent the Cabinet from issuing, reissuing, renewing, modifying, revoking, suspending, denying, terminating, or reopening any permit to DOE, and DOE shall not use this Agreed Order as a defense to those permit actions.

143. The Cabinet agrees to allow the performance of the above-listed remedial measures, payment of civil penalties and implementation of environmental projects by DOE, to satisfy the obligations of DOE, its past or present officers, directors, officials, or employees to the Cabinet, with respect to the violations and potential violations addressed in this Agreed Order, including, (a) the notices of violation described above and attached hereto (Attachment L), (b) the not yet cited violations and potential violations referenced in paragraphs 16-62, (c) violations and potential violations of KRS 224 Subchapter 46 and 401 KAR Chapters 30-40 that have been discovered to date and that may be discovered through implementation of the Characterization/Sampling and Analysis Plan for the DMSAs, (d) violations and potential violations of KRS 224 Subchapter 46 and 401 KAR Chapters 30-40 that have been discovered to date and that may be discovered through implementation of the Container Sampling and Analysis Plan for the suspect listed hazardous waste containers referenced in Attachment B, and (e) all violations and potential violations alleged in NREPC v. DOE, file numbers DWM-31434-042 and DOW-26141-042, and DAQ-31740-30 . Except as otherwise provided herein, this Agreed Order shall stand in lieu of any administrative, legal, or other equitable actions that the Cabinet may bring against DOE, its past or present officers,

directors, officials, or employees, for the matters addressed herein. Nothing contained in this Agreed Order, including the Consultation Process, shall be construed to prevent the Cabinet from seeking administrative, legal or equitable relief to enforce the terms of this Agreed Order or from taking other administrative, legal or equitable action as deemed appropriate and necessary, including seeking penalties against DOE, for noncompliance with this Agreed Order. With respect to matters not addressed by this Agreed Order, nothing contained herein shall be construed to prevent the Cabinet from exercising its lawful authority to require DOE to perform additional activities at the facility, pursuant to KRS 224 and the regulations promulgated thereto, or other applicable law in the future and DOE reserves its defenses to such actions.

144. Consistent with the FFA, the Cabinet reserves its rights to maintain that the closure/post-closure/corrective action requirements in KRS 224 Subchapter 46 and 401 KAR Chapters 30-40 apply independently of the requirements in the FFA. DOE reserves its rights to maintain that the closure/post-closure/corrective action requirements in KRS 224 Subchapter 46 and 401 KAR Chapters 30-40 do not apply independently of the requirements in the FFA. Further, the Cabinet specifically reserves its rights to pursue administrative and/or judicial enforcement actions, including the right to order all necessary remedial measures, assess civil penalties for violations pursuant to KRS 224.99-010 and recover all incurred response costs as defined pursuant to KRS 224.01-400 against DOE's contractors (i.e. Martin Marietta Corporation, Lockheed Martin Corporation, Martin Marietta Energy Systems, Lockheed Martin Energy Systems and Bechtel Jacobs) for any violations relating to their operation of the PGDP, including the violations outlined in this Agreed Order. The Cabinet also specifically reserves its rights

to pursue administrative and/or judicial enforcement actions, including the right to order all necessary remedial measures, assess civil penalties for violations pursuant to KRS 224.99-010 and recover all incurred response costs as defined pursuant to KRS 224.01-400 against USEC, Inc. and its contractors Martin Marietta Utility Services and Lockheed Martin Utility Services for any violations relating to their activities at the PGDP, including the violations outlined in this Agreed Order. This Agreed Order is not intended, and nothing in this Agreed Order shall be construed, to release or limit the liability of any other person other than DOE, its past or present officers, directors, officials, or employees, for any violations of state or federal law, including the violations outlined in this Agreed Order.

145. DOE waives its rights to any hearing on the matters addressed herein, except where expressly provided for in this Agreed Order. DOE expressly reserves its right to administrative and judicial review of final determinations of the Cabinet relating to this Agreed Order in accordance with applicable law. It is the Cabinet's position that DOE must exhaust its administrative remedies before the Cabinet prior to seeking judicial review of any final determinations by the Cabinet. Failure by DOE to comply with the terms of this Agreed Order shall be grounds for the Cabinet to seek enforcement of this Agreed Order in accordance with applicable law and to pursue any other administrative or judicial action under KRS Chapter 224 that it deems appropriate and DOE reserves its rights and defenses thereto. Provided, however, that prior to seeking administrative or judicial review or seeking enforcement of this Agreed Order, the parties shall comply with paragraphs 118-126 (through the Cabinet's issuance of its final determination to DOE).

146. Each separate provision, condition or duty contained in this Agreed Order may be the basis for an enforcement action for a separate violation and penalty pursuant to KRS Chapter 224, upon the failure to comply with such provision, condition, or duty of this Agreed Order.

147. Except as otherwise provided herein, this Agreed Order or any of its provisions, conditions or dates contained herein may be amended, modified or deleted only upon a written request stating the reasons therefore, and by the approval and written Order of the Secretary or his designee. Any such amendment, modification, deletion, or extension shall not affect any other provision, condition or date within the Agreed Order unless specifically and expressly so provided by the written Order.

148. Upon receipt of a written request, the Cabinet will grant DOE an extension of time reasonably needed for DOE to complete its performance under the terms of this Agreed Order when good cause exists for the requested extension. Good cause exists in the following circumstances: (a) in the event of force majeure; (b) if a delay is caused by the Cabinet's failure to meet a requirement of this Agreed Order; (c) if a delay is caused by a good faith use of the Consultation Process of paragraphs 118-126; (d) a delay caused by the good faith initiation of administrative or judicial action; (e) a delay caused, or which is likely to be caused, by the grant of an extension in regard to another schedule; or (f) any other event or series of events mutually agreed to by DOE and the Cabinet as constituting good cause. Good cause does not exist if a delay is caused by DOE's failure to coordinate its activities with USEC. Such extension request must be made in writing (or made orally, followed within ten (10) days by a written request) and must be tendered prior to the time performance is due and include the length of extension sought, the good

cause for the extension, and any related deadline that would be affected if the extension was granted.

149. For extension requests, the following procedures shall apply: (a) Within twenty-one (21) days of receipt of a written request for an extension of a schedule, the Cabinet shall advise DOE in writing of the Cabinet's position on the request. If the Cabinet fails to respond to DOE's request within the twenty (21) day period, then, beginning on the 22nd day, DOE shall have a day for day extension until such time as the Cabinet either concurs with the extension request or issues a statement of nonconcurrence. If the Cabinet does not concur with the requested extension, it shall provide a written statement of nonconcurrence setting forth the basis for its position. (b) If the Cabinet concurs in the extension request, then the Cabinet shall extend the schedule accordingly. (c) If the Cabinet does not concur in the extension request, the schedule shall not be extended, except as otherwise provided in the consultation process set forth in Section III of this Agreed Order. (d) Within fifteen (15) days of receipt of a statement of the Cabinet's nonconcurrence with the requested extension, DOE may invoke the consultation process set forth in Section III. If DOE does not invoke the consultation process within fifteen (15) days of receipt of a statement of nonconcurrence, then DOE shall be deemed to have accepted the Cabinet's position and the existing schedule. (e) A timely and good faith request for an extension shall suspend any assessment of stipulated penalties or application for enforcement of the affected schedule until a decision is reached on whether the requested extension will be approved. (f) Following the grant of an extension, an assessment of stipulated penalties or an application for enforcement may be sought only to compel compliance with the schedule as most recently extended.

150. The Cabinet does not, by its consent to the entry of this Agreed Order, warrant or aver in any manner that DOE's complete compliance with this Agreed Order will necessarily result in compliance with the provisions of KRS Chapter 224 and the regulations promulgated pursuant thereto.

151 The provisions of this Agreed Order shall apply to and be binding upon DOE. The acts or omissions of its agents and employees shall not excuse DOE's performance of any provision of this Agreed Order. DOE shall give notice of this Agreed Order to any successors in interest prior to the transfer of ownership and/or operation of any part of the now existing facility and shall follow all statutory and regulatory requirements for such a transfer. After such a transfer, DOE shall notify the Cabinet that the required notice was given to any successor in interest prior to the transfer of ownership and/or operation. Regardless of whether or not any transfer takes place, DOE shall remain fully responsible for the performance of all Remedial Measures to the extent consistent with applicable law.

152 The Cabinet and the DOE acknowledge and agree that the terms and conditions of this Agreed Order are facility-specific and are designed specifically for the unique characteristics of this facility and the factual circumstances of this enforcement case. This Agreed Order is therefore expressly inapplicable to any other site or facility in the Commonwealth of Kentucky.

153. DOE enters into this Agreed Order, without admission of any alleged violation or issue of fact or law, in order to expeditiously resolve disputed matters and to avoid delays and costs associated with litigation. DOE reserves all rights and defenses to

administrative and judicial review of actions of the Cabinet taken pursuant to this Agreed Order.

154. This Agreed Order shall be of no force and effect unless and until it is entered by the Secretary of the Cabinet or his designee as evidenced by his signature thereon.

155. The Cabinet has determined that, with respect to violations and potential violations addressed herein, DOE, by entering into this Agreed Order, has either corrected or is in the process of correcting all alleged violations of laws, rules, or regulations pertaining to environmental protection to the satisfaction of the Commonwealth of Kentucky within the meaning of KRS 224.40-330(3).

156. The parties recognize the value of the C-746-U landfill to ongoing DOE operations, including its value as a disposal facility for cleanup wastes meeting the landfill's waste acceptance criteria (WAC) and derived from response/corrective actions undertaken pursuant to state and federal authorities. The parties will, consistent with applicable requirements, expedite final action on the pending permit modification requests to use the C-746-U landfill to dispose of cleanup wastes, scrap metal, and other materials meeting the C-746-U landfill permit requirements and WAC.

157. The universe of waste that may be accepted at the U-landfill will be determined by the U-landfill permit, as modified, and applicable laws and regulations, and will not be limited to the original information included in DOE's Notice of Intent to Apply, dated December 31, 1992.

158. The parties agree that all environmental sampling at the site will be in accordance with U.S. Environmental Protection Agency's sampling and analysis protocol set forth in SW-846, unless the parties agree otherwise in writing.

159. Nothing in this Agreed Order shall be construed as a waiver of or limitation on DOE's jurisdiction over source, by-product, or special nuclear materials under the Atomic Energy Act of 1954, as amended, 42 U.S.C. Section 2201, et seq.

160. Any submittal or written statement of dispute that, under the terms of this Agreed Order, would be due on a Saturday, Sunday, or holiday shall be due on the following business day.

AGREED TO BY:

Jessie Roberson
United States Department of Energy

9/30/03
Date

HAVE SEEN:

James F. Dickinson
James Dickinson, Hearing Officer

9/29/03
Date

FILE NOS. DWM-31434-042 (includes DWM-00062, DWM-02162, and DWM-02163) DAQ-31740-030 and DOW-26141-042

ORDER

Upon agreement of the parties and being otherwise sufficiently informed, the foregoing AGREED ORDER is hereby executed as a final Order of the Natural Resources and Environmental Protection Cabinet this the 29th day of September 2003,

NATURAL RESOURCES AND
ENVIRONMENTAL PROTECTION CABINET

HENRY C. LIST, SECRETARY

AND THIS AGREED ORDER, HAVING BEEN SIGNED BY BOTH PARTIES, IS ENTERED AS A FINAL ORDER ON THIS THE 2nd DAY OF October 2003.

NATURAL RESOURCES AND
ENVIRONMENTAL PROTECTION CABINET

HENRY C. LIST, SECRETARY

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of October, 2003, a true and accurate copy of the foregoing **AGREED ORDER** was mailed, postage pre-paid, to the following:

Rachel Blumenfeld
Office of Chief Counsel
Department of Energy
P. O. Box 2001
Oak Ridge, TN 37831

And Ray Miskelley
GC-51/Forrestal Building
1000 Independence Avenue, S.W.
Washington, D.C. 20565

and hand-delivered to:

Hon. Randall G. McDowell
Office of Legal Services
Fifth Floor, Capital Plaza Tower
Frankfort, Kentucky 40601

and by messenger mail to:

DWM Enforcement Branch

Sue Stivers
DOCKET COORDINATOR

Dist: HO
DOW
DAQ
Orlando
LTS
GDM

Attachment A

Letter of Intent between the Department of Energy and the Commonwealth of Kentucky

Purpose

This Letter of Intent documents the commitment by the Commonwealth of Kentucky and the U.S. Department of Energy (DOE) to promote accelerated cleanup at the Paducah Gaseous Diffusion Plant (PGDP), develop integrated planning and funding requests, meet commitments under the Paducah Federal Facility Agreement (FFA), and settle all identified outstanding enforcement and compliance issues through an Agreed Order(s).

- The parties agree to accelerate risk reduction and complete cleanup in accordance with agreed upon scope and enforceable deadlines for completion of operable units. This approach establishes a bias for action and continuous improvement, recognizes and describes post completion activities and commitments until the final closure of the Plant, and settles all identified outstanding enforcement and compliance issues.

- This Letter of Intent is intended to be an integrated agreement between the parties addressing major issues at the PGDP under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the FFA, the Resource Conservation and Recovery Act (RCRA), and other federal and state environmental laws and regulations.

Understanding

The following statements document the commitments and agreements between the parties:

1. The parties share a desire to move forward and fundamentally transform the project. The parties share a vision to accomplish the agreed-upon scope by a mutually acceptable date, with a goal to achieve accelerated completion. Additionally, accelerated cleanup will be accomplished in a manner that is safe, protective of human health and the environment, and compliant with applicable Kentucky and Federal environmental laws.

2. DOE and its contractors bear the greatest responsibility to transform their business practices to accelerate cleanup. DOE and its contractors agree to take all necessary steps to accelerate risk reduction and to apply as large a percentage as possible of the Paducah site's budget to accelerated cleanup as a continuing and ongoing process.

3. The parties will be accountable for meeting their commitments To this end, the parties agree that accelerated cleanup and meeting commitments are made more attainable with sufficient, stable, and predictable funding, good regulatory relationships, broad stakeholder support, and best management practices.

4. The parties agree to consider "risk reduction" as an important factor in setting priorities and cleanup strategies, and acknowledge a preference for cleanup strategies that reduce site-wide long-term stewardship requirements and costs, recognizing there are other factors that need to be considered including balancing risk to workers, the public, and the environment. In this regard, the parties agree to aggressively evaluate and implement where appropriate the targets of opportunity for accelerated risk reduction, including implementing a streamlined and focused decision process, as well as actions identified by the Top-to-Bottom Review. This includes the use of onsite disposal to maximize the use of resources available for cleanup.

5. The parties agree to focus resources on the following Operable Unit Strategic Initiatives, based on the assumptions described in Attachment 1 to this Letter of Intent:
   - D & D Operable Unit Strategic Initiative; completion date, 2017
   - Groundwater Operable Unit Strategic Initiative; completion date, 2010
   - Burial Grounds Operable Unit Strategic Initiative; completion date, 2019
   - Surface Water Operable Unit Strategic Initiative; completion date, 2017
   - Soils Operable Unit Strategic Initiative; completion date, 2015

6. The parties will enter into an Agreed Order(s) to settle all outstanding enforcement and compliance issues at the PGDP. The Agreed Order(s) will address outstanding compliance issues associated with F-listed waste, DOE Material Storage Areas (DMSAs), management of DUF6, and various other unresolved compliance issues at the site. The parties have set forth their agreement on the scope of the Agreed Order(s) and specific provisions that will be incorporated into such Order(s), in Attachment 2 to this Letter of Intent (hereinafter Attachment 2). The parties will execute the final Agreed Order(s) settling all outstanding enforcement and compliance issues at the site, by September 15, 2003.

7. The parties recognize the value of the U-landfill to ongoing DOE operations, including its value as a disposal facility for cleanup wastes meeting the landfill's waste acceptance criteria (WAC) and derived from response/corrective actions undertaken pursuant to state and federal authorities. The parties will expedite final action on the pending permit modification requests to use the U-landfill to dispose of cleanup wastes, scrap metal, and other materials meeting the U-landfill permit requirements and WAC.

8. The parties agree that the universe of waste that may be accepted at the U-landfill will be determined by the U-landfill permit, as modified, and applicable laws and regulations, and will not be limited to the original information included in DOE's Notice of Intent to Apply, dated December 31, 1992.

9. The parties recognize that CERCLA Section 121(e)(1) may be used to expedite fieldwork and minimize procedural delay in implementing CERCLA response actions. The parties agree to seek and evaluate opportunities for use of CERCLA Section 121(e)(1). The parties agree that the substantive provisions that would be included in the permit (or permit modification) to support any given response action will be incorporated into the appropriate decision document for such response action.

10. By September 15, 2003, the Agreed Order(s) referenced in paragraph 6 will provide that the sampling and analysis protocol for conducting all environmental sampling at the site will be in accordance with USEPA's sampling and analysis protocol set forth in SW-846.

11. By September 15, 2003, the Agreed Order(s) referenced in paragraph 6 will contain Kentucky approved site-wide procedures and health-based levels for "contained-in" determinations with respect to all environmental media at the site. Those levels and procedures shall be consistent with the levels and procedures referenced in Attachment 2, under the heading "F-listed Waste-Specific Requirements." The parties agree that requirements for characterization and sampling to support "contained-in" determinations will be approved by Kentucky on a project specific basis.

12. The parties recognize that the agreement and cooperation of the USEPA is necessary to implement the approaches described in this Letter of Intent involving response actions under the FFA. The parties agree to seek USEPA's agreement and cooperation with respect to implementing all of these approaches, and modifying the FFA as necessary. If USEPA disagrees with one or more provisions of this Letter of Intent involving response actions under the FFA, any such provision(s) shall be considered null and void; however, the parties agree to carry out all other understandings and agreements set forth in any other provisions of this Letter of Intent.

13. By entering into this Letter of Intent and upon entry of an Agreed Order(s), the parties agree that DOE is in the process of correcting all alleged violations of laws, rules, or regulations

pertaining to environmental protection to the satisfaction of the Commonwealth of Kentucky within the meaning of KRS 224.40-330(3).

14. The parties will continue to meet regularly to ensure progress, solve problems, identify new initiatives, and to expedite and elevate issues so as to avoid undue delay. The parties also agree that the authority to make policy decisions and commitments resides with Senior Management.

15. DOE agrees that upon signature of the Letter of Intent, and upon entry of an Agreed Order(s), it will inform the appropriate budget committees of Congress in writing that the PGDP should be considered eligible for additional funding identified by Congress as contingent upon an Accelerated Cleanup Agreement.

16. Unless the parties agree otherwise in writing, this Letter of Intent will expire on October 1, 2003.

We the undersigned are committed to work together, to seek additional opportunities to accelerate and improve cleanup, and to find practical solutions that overcome barriers to success.

Paul E. Patton
Governor
Commonwealth of Kentucky

Jessie Hill Roberson
Assistant Secretary for
Environmental Management
U.S. Department of Energy

Attachments

ATTACHMENT 1
TO LETTER OF INTENT BETWEEN THE DEPARTMENT OF ENERGY AND THE COMMONWEALTH OF KENTUCKY

OPERABLE UNIT STRATEGIC INITIATIVES

D&D Operable Unit

The scope of this project includes D&D of the C-410 and C-340 Facilities as well as the other 15 inactive DOE facilities, assuming the use of CERCLA removal actions implemented in accordance with the Federal Facility Agreement. The D&D strategy includes implementation of a phased approach, sequenced as follows: 1) stabilization, removal, and disposition of the infrastructure at C-410 (e.g., process piping, equipment, stored material); 2) stabilization, removal, and disposition of the infrastructure at C-340; 3) demolition and disposition of the C-410 and C-340 structures to grade/building slab; and 4) D&D of the remaining 15 inactive DOE facilities will be scheduled as needed to balance resources. This strategy is intended to take advantage of maintaining a trained work-force during infrastructure removal as well as maximize opportunities for achieving cost-efficiencies and economies of scale through coordination of structure demolition at C-410 and C-340. The goal of this strategy is to accelerate this project, assuming a combination of both on- and off-site disposal options are available. The building slabs and any potential underlying contamination will be investigated and remediated as necessary as part of final D&D of the operating Gaseous Diffusion Plant once it ceases operation.

Groundwater Operable Unit

The scope of the groundwater operable unit is the identification, investigation, evaluation of risk and remedial alternatives, and selection and implementation of actions necessary to achieve protection of human health from exposure to groundwater contamination. The strategy includes a phased approach consisting of the following steps: 1) prevent human exposure, 2) reduce, control, or minimize groundwater source areas contributing to off-site contamination; and 3) evaluate and select long-term solutions for the off-site dissolved phase groundwater plumes for protection of human health and the environment. Early actions have already been implemented to prevent exposure and reduce further off-site migration of contaminant plumes including implementation of the water policy and construction and on-going operation of the northwest and northeast groundwater treatment systems. The current focus of the strategy has shifted to actions necessary to reduce, control, or minimize source areas with emphasis on accelerated early action at the C-400 area – the largest DNAPL source contributing to off-site contamination. The schedule for the C-400 early action is defined by the April 15 SMP Dispute Agreement, which requires submittal of a Proposed Plan (D1) to the regulators by January 30, 2004. Concurrent with the C-400 early action, additional investigation will be conducted to identify and evaluate the source area(s) contributing to the southwest plume, which has a sampling and analysis plan scheduled for submittal on October 30, 2003. The short-term goal is to accelerate completion of early actions at the major DNAPL sources areas [i.e., C-400, Southwest Plume Source(s)] contributing to off-site contamination by 2010, assuming successful deployment of the 6-Phase treatment technology. Subsequently, any remaining ground water contaminant sources and long-term solutions for off-

site dissolved phase ground water plumes will be evaluated and remedies implemented, as necessary, to complete actions under this Operable Unit.

Burial Grounds Operable Unit

The scope of this project includes a remedial investigation, baseline risk assessment, evaluation of remedial alternatives/feasibility study, remedy selection, and implementation of actions as necessary for protection of human health and the environment, for the following burial grounds: 1) C-749 (SWMU 2); 2) C-404 (SWMU 3); 3) C-747 (SWMU 4); C-746-F (SWMU 5); C-747-B (SWMU 6); C-747-A (SWMUs 7&30); and, SWMU 145, which includes both the residential/inert borrow area and old north-south ditch disposal trench. The strategy for this project includes a phased approach with the initial phase focused on: 1) acceleration of investigation and actions at burial grounds with potential sources that pose a current off-site groundwater risk; and, 2) implementation of mitigating actions necessary for protection of plant workers during the continued operation of the Gaseous Diffusion Plant. Investigation, risk evaluation, and potential implementation of removal/remedial actions for groundwater contamination located in the vicinity of the C-747 Burial Ground (SWMU4) is being proposed for acceleration by inclusion of that scope into the Southwest Plume/Sources Project, which has a sampling and analysis plan (D1) due by October 30, 2003. The proposed schedule for initiating the investigation for the remaining burial grounds is defined by the April 15 SMP Dispute Agreement, which requires submittal of a remedial investigation work plan (D1) to the regulators by June 30, 2005. The actual scope of the action and schedule for implementation/completion associated with the remaining burial grounds will be defined upon completion of the remedial investigation/feasibility study and documented in the record of decision and remedial action work plan. The goal of the proposed strategy is to accelerate completion of this project, based upon DOE's assumption of in-situ covers supplemented by a groundwater performance monitoring system. The second phase of the strategy, which will be implemented as part of D&D of the operating Gaseous Diffusion Plant, will include evaluation of the long-term effectiveness of the existing remedies, supplemented by additional actions as necessary to achieve protectiveness consistent with the future end-state objectives associated with post-plant shutdown conditions.

Surface Water Operable Unit

The scope of this project includes investigation, baseline risk assessment, evaluation of cleanup alternatives, remedy selection, and implementation of removal/remedial actions as necessary. The strategy includes a phased approach consisting of the following steps: 1) Prevent human exposure; 2) Prevent or minimize further off-site migration; 3) Reduce, control, or minimize surface water sources contributing to off-site contamination; and 4) Evaluate and select long-term solutions for off-site surface water contamination to protect human health and the environment. Off-site surface water areas have already undergone initial characterization as part of the CERCLA Administrative Consent Order and DOE's on-going environmental monitoring program. In addition, a series of early actions associated with the strategic objectives to prevent exposure, prevent/minimize further off-site migration, and reduce/control or minimize source releases have either been completed or are currently underway. Early actions include controls to prevent access to contaminated areas of Big and Little Bayou Creeks; fish advisories; actions to reduce off-site migration, including re-routing surface water discharges and installation of storm water basins at North South Diversion Ditch (NSDD) and Outfall Ditch 001; previous PCB hot spot removals associated with Waste Area Group 23, Outfall Ditch 011, and the C-333-A and C-

337-A vaporizers; removal of drum mountain; as well as on-going actions to remove approximately 54,000 tons of scrap metal and excavation/removal of source material associated with the NSDD (Sections 1 & 2). In conjunction with these early actions, additional investigation will be conducted as part of the Surface Water Phase I Assessment to identify hot spot areas associated with the internal plant ditches, outfalls, and Sections 3, 4, and 5 of the NSDD that may warrant early action, as well as an evaluation of whether additional sediment controls are necessary. In accordance with the April 15, 2003 SMP Dispute Agreement, a sampling and analysis plan (D1) is due to the regulators on April 30, 2004 . The goal of this strategy is to accelerate completion of any necessary actions associated with the internal ditches, storm sewers (not affecting plant operations), Outfalls, and Big and Little Bayou Creeks.

Soils Operable Unit

The scope of this project includes investigation, baseline risk assessment, evaluation of cleanup alternatives, remedy selection, and implementation of removal/remedial actions as necessary. The strategy includes a phased approach consisting of two initial removal actions implemented during plant operations and a final remedial action implemented as part of the final D&D of the Gaseous Diffusion Plant once it ceases operation. The first early removal action will be implemented immediately following completion of the scrap metal project and outside DMSAs, addressing the potentially contaminated underlying surface soils. The second removal action will focus on the identification and mitigation of additional soil hot spots associated with radionuclide and PCB contamination from the remaining plant areas that are accessible and not impacted by plant operations. The objective of these initial removal actions is to ensure protection of plant workers within industrial areas during the continued operation of the Gaseous Diffusion Plant. The goal of this strategy is to accelerate this project, assuming a target cleanup level of 10^{-4} risk for interim and removal actions conducted within industrial areas inside the security fence. The final remedial action will be implemented as part of the final D&D of the Gaseous Diffusion Plant once it ceases operation, focusing on achieving protectiveness of human health and the environment consistent with the future end-state objectives associated with post-plant shutdown conditions, as well as other contaminants of concern and areas that were not readily accessible during plant operations.

Comprehensive Site Operable Unit

The site cleanup strategy consists of a two-phased approach, including a series of actions implemented during plant operations and a second series of actions implemented after the plant ceases operations. The primary objective of the first phase, which includes actions associated with the five operable units, is intended to prevent both on-site and off-site human exposure, actions necessary to ensure safe environmental conditions for industrial workers during on-going plant operations, and actions that provide the greatest opportunity for risk reduction. The second phase of site cleanup will be implemented when the Plant ceases operation and will include D&D of the operating Gaseous Diffusion Plant, as well as other actions necessary for achieving protectiveness of human health and the environment consistent with the future end-state objectives associated with post-plant shutdown conditions. Six months prior to plant shutdown, the parties will initiate negotiations to reach agreement on enforceable completion dates for the second phase of site cleanup.

ATTACHMENT 2
TO LETTER OF INTENT BETWEEN THE DEPARTMENT OF ENERGY AND THE COMMONWEALTH OF KENTUCKY

SETTLEMENT PROVISIONS FOR AN AGREED ORDER(S)
RESOLVING ALL OUTSTANDING COMPLIANCE ISSUES AT THE SITE

Closure and post-closure activities for units where F-listed hazardous waste is or may be discovered (U, S, T, landfills, DMSAs, and other areas where the approximately 5,100 containers are stored) and for all DMSAs where hazardous waste is or may be discovered.

-Closure and post-closure only required for units where hazardous waste discovered and which has been stored in excess of the time frames established in the KAR; and closure/post- closure only required where contained-in levels (see below) exceeded.

-Inside units. Agreed Order will defer closure/post-closure directly to response actions to be selected and implemented under the FFA.

-Outside units. Agreed Order will establish an option for DOE to (1) conduct final closure in the near term (1 x 10(-6); HI 1) or (2) conduct partial closure (1 x 10(-4); HI 3), excluding groundwater and subsurface soils, and defer final closure/post-closure and groundwater and subsurface soils directly to response actions to be selected under the FFA.

-For all units. Corrective action for groundwater will not be required for any unit under the Agreed Order, unless substantial evidence affirmatively establishes that a COC in groundwater is a result of a release of hazardous waste or hazardous constituents from that unit. Corrective action for groundwater so linked to a unit will be deferred to response actions to be selected and implemented under the FFA. The Agreed Order will clarify the standard for "clean closure" for units where there is no substantial evidence establishing a release to groundwater. Such standard will not require cleanup to non-detect/background levels. Part B permits and post-closure permits will not be required in accordance with CERCLA 121(e)(1).

-For all units deferred to the FFA. Closure, post-closure, and groundwater protection standards will be considered, and selected (or waived) as appropriate, as ARARs in accordance with CERCLA and FFA processes and standards. Units will be treated as SWMUs under the FFA. The CERCLA requirements, including the CERCLA nine criteria for selecting remedial actions (as well as ARARs), will guide selection of a response action for the units. Schedules for selecting and implementing a response action for all units will be established by FFA procedures.

-The Parties agree that the groundwater remediation decision process will consider Alternative Contaminant Levels, alternative points of compliance, natural attenuation, cost-effectiveness (as required by CERCLA) and technical practicability. Kentucky agrees that entry of an Agreed Order(s) resolving hazardous waste violations will not preclude consideration of Alternative Contaminant Levels, alternative points of compliance, natural attenuation, cost-effectiveness (as required by CERCLA) and technical practicability with respect to groundwater remediation decisions.

F-listed Waste-Specific Requirements

-A Characterization Plan for the estimated 5,100 containers that may contain listed hazardous waste will be submitted, approved, and implemented pursuant to the Agreed Order. DOE is in the process of completing its screening of existing container information to determine the exact number of containers that may contain listed hazardous waste and thus require characterization. The final number of containers will be determined by September 15, 2003, will be subject to approval by Kentucky, and will be identified in an appendix to the Agreed Order. Compliance activities under the Agreed Order will include completion of characterization by September 30, 2007, but will not include treatment/disposal of the estimated 5,100 containers. Management requirements applicable to

containers during characterization activities will be risk-based. Any hazardous waste discovered above established contained-in levels in any of the estimated 5,100 containers through implementing the Characterization Plan will be removed to available permitted storage within 10 days of a hazardous waste determination.

-The Agreed Order will contain a definitive determination that no listed wastes exceeding established contained-in levels were disposed in the U-landfill, and accordingly, no closure, post-closure, or groundwater corrective action or remediation is required for the landfill under Subtitle C with respect to potential disposal of listed waste in the landfill. (Note: This position is based on recent sampling results from the U-landfill. DOE provided the sampling results to the Cabinet by letter dated July 23, 2003.)

-As part of the negotiations for an Agreed Order, Kentucky will consider recently developed information indicating that listed waste was not disposed in the T-landfill. The Agreed Order will not address closure/post-closure of the T-landfill as a hazardous waste unit, unless there is credible analytical data or other substantial evidence affirmatively demonstrating that listed waste was actually disposed in the landfill. DOE proposes that the Kentucky Consortium for Energy and Environment, whose principal partner is the University of Kentucky, conduct sampling of the landfill to validate DOE's information.

-As part of negotiations for an Agreed Order, the parties will address any closure/post-closure requirements that might apply to the S-landfill.

-Contained-in levels for groundwater destined for treatment and discharge at on-site KPDES permitted treatment units (e.g., groundwater resulting from well-purging, well development, and well sampling) and for solids will be established in the Agreed Order. The contained-in level for such groundwater will be a health-based level for TCE that is approved by Kentucky. The contained-in level for solids will be 39.2 ppm for TCE. These levels are consistent with levels currently being discussed with the Cabinet. Only waste exhibiting TCE in excess of the above referenced contained-in levels will trigger closure/post-closure requirements for the unit (excluding groundwater) containing such waste. A characterization protocol for solids, the above-referenced groundwater, media, and debris will be established and appended to the Agreed Order. The protocol will set forth general agreements on issues such as sampling frequency, the use of SW-846, and acceptable methods for applying contained-in levels to debris. Requirements for characterization and sampling to support "contained-in" determinations will be approved by Kentucky on a project specific basis.

DMSA-Specific Requirements

-Characterization Schedule for DMSAs. Priority A - September 30, 2004. Priority B- September 30, 2006, Priority C - September 30, 2009, C-400-05 - September 30, 2004.

-Permitted Storage. Any hazardous waste discovered in any of the DMSAs must be removed to available on-site permitted storage within 10 days of a hazardous waste determination.

Penalty

-Base Penalty amount will be $1,000,000 to be paid in installments, plus $200,000 for environmental projects.

-The stipulated penalty provisions of the Agreed Order will reflect a stipulated penalty of up to $5,000 for the first week (or part thereof) and up to $10,000 for each additional week (or part thereof). Stipulated penalties will be in lieu of statutory penalties. No stipulated penalties will be assessed for failure to pay stipulated penalties. The assessment of stipulated penalties will be subject to the consultation process of the Agreed Order. Stipulated penalties will not be payable until any appeals relevant to the assessment of the penalties have been completed.

Release

-Release will cover DOE for violations known to exist in the DOE Material Storage Areas and that have been or may be found in the DMSAs through the implementation of the Characterization Plan (exact language to be worked out in an Agreed Order). Release will include known violations associated with F-listed waste and those that have been or may be found through implementation of the F-listed waste Characterization Plan for the estimated 5,100 containers. DOE understands "release" to mean complete relief from further enforcement action by the Commonwealth, administrative (including permitting actions) and judicial, with respect to both the aforementioned alleged violations and the activities necessary to "come into compliance" (referred to in the Commonwealth's previous DMSA draft Agreed Order as "remedial measures"). The scope of the release will also include other identified alleged violations that are the subject of pending administrative complaints and any and all violations alleged in outstanding NOVs at the PGDP.

Miscellaneous Provisions

-Consultation. The consultation process in the Agreed Order will apply to any and all disputes that may arise under the Agreed Order. Final determinations arising from the consultation process will be subject to administrative and/or judicial review according to applicable law. A time frame for the state actions (e.g., final determinations) under the consultation process will be established. (DOE would like to explore with the state alternative and creative methods for expeditiously resolving technical disputes.)

-Extensions. The Agreed Order will require the approval of an extension request, when good cause exists for the requested extension. Denial of an extension request will be subject to the consultation process of the Agreed Order, and upon completion of the consultation process, administrative and/or judicial review. The Agreed Order will articulate what constitutes good cause.

-Force Majeure. Force Majeure provisions will allow for "consultation" for disagreements relating to implementation of the Force Majeure provisions and will not require notice of "anticipated" events which may cause a delay in compliance with the Agreed Order.

-Transfer. DOE's responsibility under the Agreed Order in event of a transfer of ownership and/or operation will be clarified, relevant to the scope of the Agreed Order, and consistent with limits on DOE's authority.

-Reservation. Agreed Order will not require DOE to acknowledge independent applicability of closure/post-closure/corrective action requirements under state law and the Agreed Order. The Commonwealth may reserve its arguments in this regard.

-Budget. Budget provisions will omit reference to E.O. 12088 and the pre-budget briefing/information requirements.

-Other provisions. Provisions of the Agreed Order will build on provisions of the Commonwealth's last F-listed waste proposal and agreements reached in F-listed waste negotiations. DOE assumes that the provisions of those previous proposals with which DOE has voiced its affirmative agreement will be incorporated into the Agreed Order. All other matters would need to be discussed and finally resolved.

Resolving Issues Associated with DUF6

-Resolution of this issue will be consistent with DUF6 agreements DOE has already entered into with Tennessee and Ohio, and will take into consideration site-specific circumstances and updated information and procedures.

36430-01		DISPLACED WATER/ABSORBENT	C-746-H3	Yes
CASX-15717		DISPOSED SOLID SAMPLES	C-746-H3	No
CAS-15711		DISPOSED SOLID SAMPLES	C-753-A	No
CAS-00805		DITCH SEDIMENTS	C-337	Yes
CAS-00815		DITCH SEDIMENTS	C-337	Yes
CAS-00847		DITCH SEDIMENTS	C-337	Yes
CAS-00855		DITCH SEDIMENTS	C-337	Yes
CAS-00858		DITCH SEDIMENTS	C-337	Yes
CAS-00859		DITCH SEDIMENTS	C-337	Yes
CAS-00860		DITCH SEDIMENTS	C-337	Yes
CAS-00870		DITCH SEDIMENTS	C-337	Yes
CAS-00871		DITCH SEDIMENTS	C-337	Yes
CAS-00872		DITCH SEDIMENTS	C-337	Yes
CAS-00881		DITCH SEDIMENTS	C-337	Yes
CAS-00882		DITCH SEDIMENTS	C-337	Yes
CAS-00884		DITCH SEDIMENTS	C-337	Yes
CAS-00885		DITCH SEDIMENTS	C-337	Yes
CAS-00886		DITCH SEDIMENTS	C-337	Yes
CAS-00901		DITCH SEDIMENTS	C-337	Yes
CAS-00902		DITCH SEDIMENTS	C-337	Yes
CAS-00904		DITCH SEDIMENTS	C-337	Yes
CAS-00906		DITCH SEDIMENTS	C-337	Yes
CAS-00907		DITCH SEDIMENTS	C-337	Yes
CAS-00914		DITCH SEDIMENTS	C-337	Yes
CAS-00915		DITCH SEDIMENTS	C-337	Yes
CAS-00918		DITCH SEDIMENTS	C-337	Yes
CAS-00974		DITCH SEDIMENTS	C-337	Yes
CAS-00981		DITCH SEDIMENTS	C-337	Yes
CAS-00982		DITCH SEDIMENTS	C-337	Yes
CAS-00983		DITCH SEDIMENTS	C-337	Yes
CAS-00984		DITCH SEDIMENTS	C-337	Yes
CAS-00985		DITCH SEDIMENTS	C-337	Yes
CAS-00986		DITCH SEDIMENTS	C-337	Yes
CAS-00987		DITCH SEDIMENTS	C-337	Yes
CAS-00988		DITCH SEDIMENTS	C-337	Yes
CAS-00993		DITCH SEDIMENTS	C-337	Yes
CAS-00996		DITCH SEDIMENTS	C-337	Yes
CAS-01001		DITCH SEDIMENTS	C-337	Yes
CAS-01002		DITCH SEDIMENTS	C-337	Yes
CAS-01003		DITCH SEDIMENTS	C-337	Yes
CAS-01009		DITCH SEDIMENTS	C-337	Yes
CAS-01010		DITCH SEDIMENTS	C-337	Yes
CAS-01011		DITCH SEDIMENTS	C-337	Yes
CAS-01012		DITCH SEDIMENTS	C-337	Yes
CAS-01017		DITCH SEDIMENTS	C-337	Yes
CAS-01018		DITCH SEDIMENTS	C-337	Yes
CAS-01019		DITCH SEDIMENTS	C-337	Yes
CAS-01020		DITCH SEDIMENTS	C-337	Yes
CAS-01021		DITCH SEDIMENTS	C-337	Yes
CAS-01022		DITCH SEDIMENTS	C-337	Yes
CAS-01023		DITCH SEDIMENTS	C-337	Yes
CAS-01024		DITCH SEDIMENTS	C-337	Yes
CAS-01025		DITCH SEDIMENTS	C-337	Yes
CAS-01026		DITCH SEDIMENTS	C-337	Yes
CAS-01027		DITCH SEDIMENTS	C-337	Yes

SI-0181		DECON TRAILER PPE	C-746-H3	No
SI-1300		DECON WATER	C-746-B	Yes
102431-01		DECON WATER	C-746-H3	Yes
45666-01		DECON WATER	C-746-H3	Yes
103806-01		DECON WATER	C-752-A	Yes
103813-01		DECON WATER	C-752-A	Yes
53754-01		DECON WATER	C-752-A	Yes
6954A		DECON WATER SLUDGE	C-746-A	No
49670-03A		DECON WATER SLUDGE	C-753-A	Yes
104315-01		DET. PCB LAB SAMPLES FROM AW-49	C-752-A	No
55415-01		DIESEL/WATER MIX	C-752-A	Yes
20415-02		DIRT	C-333	Yes
CAS-16592		DIRT	C-746-A	Yes
CAS-16593		DIRT	C-746-A	Yes
CASX-14616		DIRT	C-746-A	Yes
CASX-14617		DIRT	C-746-A	Yes
CASX-14618		DIRT	C-746-A	Yes
54608-01		DIRT	C-746-B	Yes
54608-02		DIRT	C-746-B	Yes
54608-03		DIRT	C-746-B	Yes
CAS-11193		DIRT	C-746-B	Yes
CAS-16586		DIRT	C-746-B	Yes
CAS-16587		DIRT	C-746-B	Yes
CAS-16588		DIRT	C-746-B	Yes
CAS-16589		DIRT	C-746-B	Yes
CAS-16590		DIRT	C-746-B	Yes
CAS-16594		DIRT	C-746-B	Yes
CAS-17342		DIRT	C-746-B	Yes
CAS-17343		DIRT	C-746-B	Yes
CAS-17344		DIRT	C-746-B	Yes
CAS-17345		DIRT	C-746-B	Yes
CAS-17346		DIRT	C-746-B	Yes
CAS-17347		DIRT	C-746-B	Yes
CAS-17348		DIRT	C-746-B	Yes
CAS-17349		DIRT	C-746-B	Yes
CAS-17350		DIRT	C-746-B	Yes
CAS-17351		DIRT	C-746-B	Yes
CAS-17352		DIRT	C-746-B	Yes
CAS-17353		DIRT	C-746-B	Yes
CAS-17354		DIRT	C-746-B	Yes
CAS-17355		DIRT	C-746-B	Yes
CAS-17356		DIRT	C-746-B	Yes
11064-002		DIRT	C-746-H3	Yes
13901-017		DIRT	C-746-H3	Yes
HC-0405		DIRT	C-746-H3	Yes
HC-0407		DIRT	C-746-H3	Yes
HC-0408		DIRT	C-746-H3	Yes
20415-01		DIRT	C-752-A	Yes
CAS-16591		DIRT	C-753-A	Yes
CAS-16595		DIRT	C-753-A	Yes
CAS-16596		DIRT	C-753-A	Yes
CAS-17311		DIRT	C-753-A	Yes
CAS-17312		DIRT	C-753-A	Yes
CAS-17314		DIRT	C-753-A	Yes
CAS-17336		DIRT	C-753-A	Yes

CAS-12863		CONCRETE & SOIL/TEMP PROJECT	C-337	Yes
CAS-12864		CONCRETE & SOIL/TEMP PROJECT	C-337	Yes
CAS-12866		CONCRETE & SOIL/TEMP PROJECT	C-337	Yes
CAS-12867		CONCRETE & SOIL/TEMP PROJECT	C-337	Yes
CAS-12845		CONCRETE & SOIL/TEMP PROJECT	C-753-A	Yes
CAS-12846		CONCRETE & SOIL/TEMP PROJECT	C-753-A	Yes
CAS-12847		CONCRETE & SOIL/TEMP PROJECT	C-753-A	Yes
34776-01		CONCRETE CHIPS	C-746-H3	No
34776-02		CONCRETE CHIPS	C-746-H3	No
06441-09		CONT. TRASH/PPE/PAPER/FLOORSWEEP	C-746-B	No
32531-01		CONTAMINATED WATER	C-746-B	Yes
44862-13		CUTTINGS	C-746-B	Yes
42713-01		CUTTINGS	C-752-A	Yes
42713-02		CUTTINGS	C-752-A	Yes
42713-03		CUTTINGS	C-752-A	Yes
42713-04		CUTTINGS	C-752-A	Yes
42713-05		CUTTINGS	C-752-A	Yes
42713-06		CUTTINGS	C-752-A	Yes
42713-07		CUTTINGS	C-752-A	Yes
42713-08		CUTTINGS	C-752-A	Yes
42713-09		CUTTINGS	C-752-A	Yes
42713-10		CUTTINGS	C-752-A	Yes
42713-11		CUTTINGS	C-752-A	Yes
42713-12		CUTTINGS	C-752-A	Yes
42713-13		CUTTINGS	C-752-A	Yes
42718-01		CUTTINGS	C-752-A	Yes
42718-02		CUTTINGS	C-752-A	Yes
42718-03		CUTTINGS	C-752-A	Yes
42718-04		CUTTINGS	C-752-A	Yes
42718-05		CUTTINGS	C-752-A	Yes
42718-06		CUTTINGS	C-752-A	Yes
42718-07		CUTTINGS	C-752-A	Yes
42718-08		CUTTINGS	C-752-A	Yes
42718-09		CUTTINGS	C-752-A	Yes
42718-10		CUTTINGS	C-752-A	Yes
42718-11		CUTTINGS	C-752-A	Yes
42718-12		CUTTINGS	C-752-A	Yes
42718-13		CUTTINGS	C-752-A	Yes
42718-14		CUTTINGS	C-752-A	Yes
42718-15		CUTTINGS	C-752-A	Yes
42718-16		CUTTINGS	C-752-A	Yes
42718-17		CUTTINGS	C-752-A	Yes
42719-01		CUTTINGS	C-752-A	Yes
42719-02		CUTTINGS	C-752-A	Yes
42719-03		CUTTINGS	C-752-A	Yes
42719-04		CUTTINGS	C-752-A	Yes
42719-05		CUTTINGS	C-752-A	Yes
42719-06		CUTTINGS	C-752-A	Yes
42719-07		CUTTINGS	C-752-A	Yes
42719-08		CUTTINGS	C-752-A	Yes
42719-09		CUTTINGS	C-752-A	Yes
42719-10		CUTTINGS	C-752-A	Yes
42719-11		CUTTINGS	C-752-A	Yes
42719-12		CUTTINGS	C-752-A	Yes
42719-13		CUTTINGS	C-752-A	Yes

32831-01		AUGER CUTTINGS	C-746-H3	Yes
32831-02		AUGER CUTTINGS	C-746-H3	Yes
32831-03		AUGER CUTTINGS	C-746-H3	Yes
32831-04		AUGER CUTTINGS	C-746-H3	Yes
32831-05		AUGER CUTTINGS	C-746-H3	Yes
32831-06		AUGER CUTTINGS	C-746-H3	Yes
32831-07		AUGER CUTTINGS	C-746-H3	Yes
32831-08		AUGER CUTTINGS	C-746-H3	Yes
32831-10		AUGER CUTTINGS	C-746-H3	Yes
32831-11		AUGER CUTTINGS	C-746-H3	Yes
32831-12		AUGER CUTTINGS	C-746-H3	Yes
32831-13		AUGER CUTTINGS	C-746-H3	Yes
32847-01		AUGER CUTTINGS	C-746-H3	Yes
32847-02		AUGER CUTTINGS	C-746-H3	Yes
32847-03		AUGER CUTTINGS	C-746-H3	Yes
32847-04		AUGER CUTTINGS	C-746-H3	Yes
32847-05		AUGER CUTTINGS	C-746-H3	Yes
32847-09		AUGER CUTTINGS	C-746-H3	Yes
36436-01		AUGER CUTTINGS	C-746-H3	Yes
36691-01		AUGER CUTTINGS	C-746-H3	Yes
36691-02		AUGER CUTTINGS	C-746-H3	Yes
36691-03		AUGER CUTTINGS	C-746-H3	Yes
36691-04		AUGER CUTTINGS	C-746-H3	Yes
36699-01		AUGER CUTTINGS	C-746-H3	Yes
36699-02		AUGER CUTTINGS	C-746-H3	Yes
36699-03		AUGER CUTTINGS	C-746-H3	Yes
36699-04		AUGER CUTTINGS	C-746-H3	Yes
36699-05		AUGER CUTTINGS	C-746-H3	Yes
36699-06		AUGER CUTTINGS	C-746-H3	Yes
36699-07		AUGER CUTTINGS	C-746-H3	Yes
36699-08		AUGER CUTTINGS	C-746-H3	Yes
36802-11		AUGER CUTTINGS	C-746-H3	Yes
44574-62		AUGER CUTTINGS	C-746-H3	Yes
44574-79		AUGER CUTTINGS	C-746-H3	Yes
46139-27		AUGER CUTTINGS	C-746-H3	Yes
46139-59		AUGER CUTTINGS	C-746-H3	Yes
46159-01		AUGER CUTTINGS	C-746-H3	Yes
46159-02		AUGER CUTTINGS	C-746-H3	Yes
31175-04		AUGER CUTTINGS	C-752-A	Yes
31198-12		AUGER CUTTINGS	C-752-A	Yes
32831-09		AUGER CUTTINGS	C-752-A	Yes
32847-10		AUGER CUTTINGS	C-752-A	Yes
36699-09		AUGER CUTTINGS	C-752-A	Yes
39096-07		AUGER CUTTINGS	C-752-A	Yes
44861-07		AUGER CUTTINGS	C-752-A	Yes
44862-10		AUGER CUTTINGS	C-752-A	Yes
SI-1337B		AUGER CUTTINGS	C-746-B	Yes
31102-02		AUGER CUTTINGS AND BENTONITE	C-746-H3	Yes
31153-01		AUGER CUTTINGS AND BENTONITE	C-746-H3	Yes
31102-01		AUGER CUTTINGS AND BENTONITE	C-752-A	Yes
51405-01		AUGER CUTTINGS TREATABILITY	C-746-Q	Yes
51396-01		AUGER CUTTINGS TREATABILITY STUDY	C-746-Q	Yes
51888-01		AUGER CUTTINGS/SODIUM ORTHOSILICATE	C-746-Q	Yes
51888-02		AUGER CUTTINGS/SODIUM ORTHOSILICATE	C-746-Q	Yes
SI-0249		BENTONITE	C-746-B	No

106101-38	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106101-39	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106101-40	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106101-41	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106101-42	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106176-01	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106176-06	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106176-07	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
105335-01	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-H3	Mixed media and debris
105335-02	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-H3	Mixed media and debris
105335-03	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-H3	Mixed media and debris
105335-18	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-H3	Mixed media and debris
105335-25	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-H3	Mixed media and debris
105335-04	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-05	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-06	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-07	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-08	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-09	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-10	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-11	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-12	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-13	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-14	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-15	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-16	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-17	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-19	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-20	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-21	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-22	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-23	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-24	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
105335-26	*	750 M3 REPACKAGING PROJECT. FROM PHASE 4	C-746-V	Mixed media and debris
CAS-16299		ABSORBENT PADS/PLASTIC	C-753-A	No
CASX-15619		ABSORBENT PADS/PPE/RAGS/PLASTIC	C-746-A	No
CAS-14329		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14330		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14331		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14332		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14333		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14334		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14335		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14336		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14337		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14338		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14339		ABSORBENT RAGS/PLASTIC/GRAVEL	C-746-A	Yes
CAS-14327		ABSORBENT RAGS/PLASTIC/GRAVEL	C-753-A	Yes
CAS-14328		ABSORBENT RAGS/PLASTIC/GRAVEL	C-753-A	Yes
SI-1402		AC	C-746-B	No
SI-1408		AC	C-746-B	No
SI-3331		AC, 00-40	C-746-B	No
SI-3337		AC, 00-40	C-746-B	No
SI-3359		AC, 00-40	C-746-B	No
SI-3322		AC, 00-40	C-746-H3	No

106078-31	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106078-32	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106078-33	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106078-34	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106078-35	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-11	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-12	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-13	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-14	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-15	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-16	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-17	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-18	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-19	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-25	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-26	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-28	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-29	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-30	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-31	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-32	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106079-33	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106093-01	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106093-02	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106093-03	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106093-04	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106093-19	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106093-20	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-15	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-16	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-17	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-18	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-21	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-22	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-27	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-28	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-29	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-30	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-31	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-32	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-33	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-34	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106098-35	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-01	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-02	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-03	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-05	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-07	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-08	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-09	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-10	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-11	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-12	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-13	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris
106100-14	*	750 M3 REPACKAGING PROJECT	C-746-V	Mixed media and debris

106100-20	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-21	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-22	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-23	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-24	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-25	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-26	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-29	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-30	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-31	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-32	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-33	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-34	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-35	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-36	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-37	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-38	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-39	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-40	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-41	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-42	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-43	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-44	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-45	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-46	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-47	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-48	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-49	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-50	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-51	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-52	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-53	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-54	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-55	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-56	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-57	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-58	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-59	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-60	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-61	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106100-62	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-15	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-16	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-17	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-18	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-19	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-20	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-21	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-22	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-23	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-24	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-25	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-26	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-27	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106101-37	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris

105275-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105337-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105337-03	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105337-04	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105338-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105338-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105339-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105342-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105343-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105343-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105344-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105346-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105346-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105346-03	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105346-04	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105346-05	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105347-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105347-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105347-03	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105347-04	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105348-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-03	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-04	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-05	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-06	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-07	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105349-08	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
105350-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106076-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106076-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-03	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-04	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-05	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-06	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-07	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-08	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-09	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106077-10	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-01	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-02	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-03	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-04	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-05	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-06	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-07	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-08	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-09	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-12	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-13	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-14	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris
106078-16	*	750 M3 REPACKAGING PROJECT	C-746-H3	Mixed media and debris

105114-35	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105114-36	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105114-37	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105114-38	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-01	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-02	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-03	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-04	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-05	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-06	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-07	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-08	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-09	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-10	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-11	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-12	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-13	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-14	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-15	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-16	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-17	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-18	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-19	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-20	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-21	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-22	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-23	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-24	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-25	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-26	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-27	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-28	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-29	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-30	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-31	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-32	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-33	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-34	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-35	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-36	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-37	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-38	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-39	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-40	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105327-41	*	500 M3 SOILS FORM C-617	C-746-V	Mixed media and debris
105252-01	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-02	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-03	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-04	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-05	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-06	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-07	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-08	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-09	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris
105252-10	*	500 M3 SOILS FROM DITCH 11	C-746-V	Mixed media and debris

105254-10	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-11	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-12	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-13	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-14	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-15	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-16	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-17	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-18	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-19	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-20	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-21	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-22	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-23	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-24	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-25	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-26	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-27	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-28	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-29	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-30	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-31	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-32	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-33	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-34	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-35	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-36	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-37	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-38	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-39	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-40	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-41	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-42	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-43	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-44	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-45	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-46	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-47	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-48	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-49	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-50	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-51	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-52	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-53	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-54	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-55	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-56	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-57	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-58	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-59	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-60	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-61	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-62	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-63	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris
105254-64	*	500 M3 REPACKAGING PROJECT SOURCE 617	C-746-V	Mixed media and debris

36430-01		DISPLACED WATER/ABSORBENT	C-746-H3	Yes
CASX-15717		DISPOSED SOLID SAMPLES	C-746-H3	No
CAS-15711		DISPOSED SOLID SAMPLES	C-753-A	No
CAS-00805		DITCH SEDIMENTS	C-337	Yes
CAS-00815		DITCH SEDIMENTS	C-337	Yes
CAS-00847		DITCH SEDIMENTS	C-337	Yes
CAS-00855		DITCH SEDIMENTS	C-337	Yes
CAS-00858		DITCH SEDIMENTS	C-337	Yes
CAS-00859		DITCH SEDIMENTS	C-337	Yes
CAS-00860		DITCH SEDIMENTS	C-337	Yes
CAS-00870		DITCH SEDIMENTS	C-337	Yes
CAS-00871		DITCH SEDIMENTS	C-337	Yes
CAS-00872		DITCH SEDIMENTS	C-337	Yes
CAS-00881		DITCH SEDIMENTS	C-337	Yes
CAS-00882		DITCH SEDIMENTS	C-337	Yes
CAS-00884		DITCH SEDIMENTS	C-337	Yes
CAS-00885		DITCH SEDIMENTS	C-337	Yes
CAS-00886		DITCH SEDIMENTS	C-337	Yes
CAS-00901		DITCH SEDIMENTS	C-337	Yes
CAS-00902		DITCH SEDIMENTS	C-337	Yes
CAS-00904		DITCH SEDIMENTS	C-337	Yes
CAS-00906		DITCH SEDIMENTS	C-337	Yes
CAS-00907		DITCH SEDIMENTS	C-337	Yes
CAS-00914		DITCH SEDIMENTS	C-337	Yes
CAS-00915		DITCH SEDIMENTS	C-337	Yes
CAS-00918		DITCH SEDIMENTS	C-337	Yes
CAS-00974		DITCH SEDIMENTS	C-337	Yes
CAS-00981		DITCH SEDIMENTS	C-337	Yes
CAS-00982		DITCH SEDIMENTS	C-337	Yes
CAS-00983		DITCH SEDIMENTS	C-337	Yes
CAS-00984		DITCH SEDIMENTS	C-337	Yes
CAS-00985		DITCH SEDIMENTS	C-337	Yes
CAS-00986		DITCH SEDIMENTS	C-337	Yes
CAS-00987		DITCH SEDIMENTS	C-337	Yes
CAS-00988		DITCH SEDIMENTS	C-337	Yes
CAS-00993		DITCH SEDIMENTS	C-337	Yes
CAS-00996		DITCH SEDIMENTS	C-337	Yes
CAS-01001		DITCH SEDIMENTS	C-337	Yes
CAS-01002		DITCH SEDIMENTS	C-337	Yes
CAS-01003		DITCH SEDIMENTS	C-337	Yes
CAS-01009		DITCH SEDIMENTS	C-337	Yes
CAS-01010		DITCH SEDIMENTS	C-337	Yes
CAS-01011		DITCH SEDIMENTS	C-337	Yes
CAS-01012		DITCH SEDIMENTS	C-337	Yes
CAS-01017		DITCH SEDIMENTS	C-337	Yes
CAS-01018		DITCH SEDIMENTS	C-337	Yes
CAS-01019		DITCH SEDIMENTS	C-337	Yes
CAS-01020		DITCH SEDIMENTS	C-337	Yes
CAS-01021		DITCH SEDIMENTS	C-337	Yes
CAS-01022		DITCH SEDIMENTS	C-337	Yes
CAS-01023		DITCH SEDIMENTS	C-337	Yes
CAS-01024		DITCH SEDIMENTS	C-337	Yes
CAS-01025		DITCH SEDIMENTS	C-337	Yes
CAS-01026		DITCH SEDIMENTS	C-337	Yes
CAS-01027		DITCH SEDIMENTS	C-337	Yes

CAS-01028		DITCH SEDIMENTS	C-337	Yes
CAS-01029		DITCH SEDIMENTS	C-337	Yes
CAS-01030		DITCH SEDIMENTS	C-337	Yes
CAS-01031		DITCH SEDIMENTS	C-337	Yes
CAS-01032		DITCH SEDIMENTS	C-337	Yes
CAS-01062		DITCH SEDIMENTS	C-337	Yes
CAS-01093		DITCH SEDIMENTS	C-337	Yes
CAS-01094		DITCH SEDIMENTS	C-337	Yes
CAS-01095		DITCH SEDIMENTS	C-337	Yes
CAS-01096		DITCH SEDIMENTS	C-337	Yes
CAS-01118		DITCH SEDIMENTS	C-337	Yes
CAS-01139		DITCH SEDIMENTS	C-337	Yes
CAS-01145		DITCH SEDIMENTS	C-337	Yes
CAS-01146		DITCH SEDIMENTS	C-337	Yes
CAS-01147		DITCH SEDIMENTS	C-337	Yes
CAS-01148		DITCH SEDIMENTS	C-337	Yes
CAS-01149		DITCH SEDIMENTS	C-337	Yes
CAS-01153		DITCH SEDIMENTS	C-337	Yes
CAS-01154		DITCH SEDIMENTS	C-337	Yes
CAS-01155		DITCH SEDIMENTS	C-337	Yes
CAS-01156		DITCH SEDIMENTS	C-337	Yes
CAS-01165		DITCH SEDIMENTS	C-337	Yes
CAS-01166		DITCH SEDIMENTS	C-337	Yes
CAS-01167		DITCH SEDIMENTS	C-337	Yes
CAS-01211		DITCH SEDIMENTS	C-337	Yes
CAS-01225		DITCH SEDIMENTS	C-337	Yes
CAS-01226		DITCH SEDIMENTS	C-337	Yes
CAS-01228		DITCH SEDIMENTS	C-337	Yes
CAS-01229		DITCH SEDIMENTS	C-337	Yes
CAS-01230		DITCH SEDIMENTS	C-337	Yes
CAS-01231		DITCH SEDIMENTS	C-337	Yes
CAS-01232		DITCH SEDIMENTS	C-337	Yes
CAS-01234		DITCH SEDIMENTS	C-337	Yes
CAS-01237		DITCH SEDIMENTS	C-337	Yes
CAS-01238		DITCH SEDIMENTS	C-337	Yes
CAS-01239		DITCH SEDIMENTS	C-337	Yes
CAS-01245		DITCH SEDIMENTS	C-337	Yes
CAS-01257		DITCH SEDIMENTS	C-337	Yes
CAS-01259		DITCH SEDIMENTS	C-337	Yes
CAS-01260		DITCH SEDIMENTS	C-337	Yes
CAS-01283		DITCH SEDIMENTS	C-337	Yes
CAS-01298		DITCH SEDIMENTS	C-337	Yes
CAS-01343		DITCH SEDIMENTS	C-337	Yes
CAS-01396		DITCH SEDIMENTS	C-337	Yes
CAS-01425		DITCH SEDIMENTS	C-337	Yes
CAS-01451		DITCH SEDIMENTS	C-337	Yes
CAS-01465		DITCH SEDIMENTS	C-337	Yes
CAS-01466		DITCH SEDIMENTS	C-337	Yes
CAS-01468		DITCH SEDIMENTS	C-337	Yes
CAS-01473		DITCH SEDIMENTS	C-337	Yes
CAS-01474		DITCH SEDIMENTS	C-337	Yes
CAS-01475		DITCH SEDIMENTS	C-337	Yes
CAS-01476		DITCH SEDIMENTS	C-337	Yes
CAS-01509		DITCH SEDIMENTS	C-337	Yes
CAS-01524		DITCH SEDIMENTS	C-337	Yes

CAS-01553		DITCH SEDIMENTS	C-337	Yes
CAS-01561		DITCH SEDIMENTS	C-337	Yes
CAS-01582		DITCH SEDIMENTS	C-337	Yes
CAS-01615		DITCH SEDIMENTS	C-337	Yes
CAS-01618		DITCH SEDIMENTS	C-337	Yes
CAS-01674		DITCH SEDIMENTS	C-337	Yes
CAS-01770		DITCH SEDIMENTS	C-337	Yes
CAS-01785		DITCH SEDIMENTS	C-337	Yes
CAS-01856		DITCH SEDIMENTS	C-337	Yes
CAS-01901		DITCH SEDIMENTS	C-337	Yes
CAS-01955		DITCH SEDIMENTS	C-337	Yes
CAS-01976		DITCH SEDIMENTS	C-337	Yes
CAS-01994		DITCH SEDIMENTS	C-337	Yes
CAS-02105		DITCH SEDIMENTS	C-337	Yes
CAS-00806		DITCH SEDIMENTS	C-752-A	Yes
CAS-00807		DITCH SEDIMENTS	C-746-B	Yes
CAS-00808		DITCH SEDIMENTS	C-746-B	Yes
CAS-00809		DITCH SEDIMENTS	C-746-B	Yes
CAS-00810		DITCH SEDIMENTS	C-746-B	Yes
CAS-00811		DITCH SEDIMENTS	C-746-B	Yes
CAS-00812		DITCH SEDIMENTS	C-746-B	Yes
CAS-00813		DITCH SEDIMENTS	C-746-B	Yes
CAS-00814		DITCH SEDIMENTS	C-746-B	Yes
CAS-00816		DITCH SEDIMENTS	C-746-B	Yes
CAS-00817		DITCH SEDIMENTS	C-746-B	Yes
CAS-00818		DITCH SEDIMENTS	C-746-B	Yes
CAS-00819		DITCH SEDIMENTS	C-746-B	Yes
CAS-00821		DITCH SEDIMENTS	C-746-B	Yes
CAS-00822		DITCH SEDIMENTS	C-746-B	Yes
CAS-00823		DITCH SEDIMENTS	C-746-B	Yes
CAS-00824		DITCH SEDIMENTS	C-746-B	Yes
CAS-00825		DITCH SEDIMENTS	C-746-B	Yes
CAS-00826		DITCH SEDIMENTS	C-746-B	Yes
CAS-00827		DITCH SEDIMENTS	C-746-B	Yes
CAS-00828		DITCH SEDIMENTS	C-746-B	Yes
CAS-00829		DITCH SEDIMENTS	C-746-B	Yes
CAS-00830		DITCH SEDIMENTS	C-746-B	Yes
CAS-00831		DITCH SEDIMENTS	C-746-B	Yes
CAS-00833		DITCH SEDIMENTS	C-746-B	Yes
CAS-00834		DITCH SEDIMENTS	C-746-B	Yes
CAS-00835		DITCH SEDIMENTS	C-746-B	Yes
CAS-00836		DITCH SEDIMENTS	C-746-B	Yes
CAS-00837		DITCH SEDIMENTS	C-746-B	Yes
CAS-00838		DITCH SEDIMENTS	C-746-B	Yes
CAS-00839		DITCH SEDIMENTS	C-746-B	Yes
CAS-00840		DITCH SEDIMENTS	C-746-B	Yes
CAS-00841		DITCH SEDIMENTS	C-746-B	Yes
CAS-00842		DITCH SEDIMENTS	C-746-B	Yes
CAS-00843		DITCH SEDIMENTS	C-746-B	Yes
CAS-00846		DITCH SEDIMENTS	C-746-B	Yes
CAS-00848		DITCH SEDIMENTS	C-746-B	Yes
CAS-00849		DITCH SEDIMENTS	C-746-B	Yes
CAS-00850		DITCH SEDIMENTS	C-746-B	Yes
CAS-00851		DITCH SEDIMENTS	C-746-B	Yes
CAS-00852		DITCH SEDIMENTS	C-746-B	Yes

CAS-00853		DITCH SEDIMENTS	C-746-B	Yes
CAS-00854		DITCH SEDIMENTS	C-746-B	Yes
CAS-00856		DITCH SEDIMENTS	C-746-B	Yes
CAS-00861		DITCH SEDIMENTS	C-746-B	Yes
CAS-00862		DITCH SEDIMENTS	C-746-B	Yes
CAS-00863		DITCH SEDIMENTS	C-746-B	Yes
CAS-00864		DITCH SEDIMENTS	C-746-B	Yes
CAS-00865		DITCH SEDIMENTS	C-746-B	Yes
CAS-00867		DITCH SEDIMENTS	C-746-B	Yes
CAS-00868		DITCH SEDIMENTS	C-746-B	Yes
CAS-00869		DITCH SEDIMENTS	C-746-B	Yes
CAS-00873		DITCH SEDIMENTS	C-746-B	Yes
CAS-00875		DITCH SEDIMENTS	C-746-B	Yes
CAS-00878		DITCH SEDIMENTS	C-746-B	Yes
CAS-00879		DITCH SEDIMENTS	C-746-B	Yes
CAS-00880		DITCH SEDIMENTS	C-746-B	Yes
CAS-00883		DITCH SEDIMENTS	C-746-B	Yes
CAS-00887		DITCH SEDIMENTS	C-746-B	Yes
CAS-00888		DITCH SEDIMENTS	C-746-B	Yes
CAS-00889		DITCH SEDIMENTS	C-746-B	Yes
CAS-00890		DITCH SEDIMENTS	C-746-B	Yes
CAS-00891		DITCH SEDIMENTS	C-746-B	Yes
CAS-00892		DITCH SEDIMENTS	C-746-B	Yes
CAS-00895		DITCH SEDIMENTS	C-746-B	Yes
CAS-00897		DITCH SEDIMENTS	C-746-B	Yes
CAS-00898		DITCH SEDIMENTS	C-746-B	Yes
CAS-00899		DITCH SEDIMENTS	C-746-B	Yes
CAS-00900		DITCH SEDIMENTS	C-746-B	Yes
CAS-00903		DITCH SEDIMENTS	C-746-B	Yes
CAS-00905		DITCH SEDIMENTS	C-746-B	Yes
CAS-00909		DITCH SEDIMENTS	C-746-B	Yes
CAS-00911		DITCH SEDIMENTS	C-746-B	Yes
CAS-00912		DITCH SEDIMENTS	C-746-B	Yes
CAS-00913		DITCH SEDIMENTS	C-746-B	Yes
CAS-00917		DITCH SEDIMENTS	C-746-B	Yes
CAS-00919		DITCH SEDIMENTS	C-746-B	Yes
CAS-00920		DITCH SEDIMENTS	C-746-B	Yes
CAS-00921		DITCH SEDIMENTS	C-746-B	Yes
CAS-00923		DITCH SEDIMENTS	C-746-B	Yes
CAS-00924		DITCH SEDIMENTS	C-746-B	Yes
CAS-00925		DITCH SEDIMENTS	C-746-B	Yes
CAS-00926		DITCH SEDIMENTS	C-746-B	Yes
CAS-00927		DITCH SEDIMENTS	C-746-B	Yes
CAS-00928		DITCH SEDIMENTS	C-746-B	Yes
CAS-00929		DITCH SEDIMENTS	C-746-B	Yes
CAS-00930		DITCH SEDIMENTS	C-746-B	Yes
CAS-00931		DITCH SEDIMENTS	C-746-B	Yes
CAS-00932		DITCH SEDIMENTS	C-746-B	Yes
CAS-00933		DITCH SEDIMENTS	C-746-B	Yes
CAS-00934		DITCH SEDIMENTS	C-746-B	Yes
CAS-00935		DITCH SEDIMENTS	C-746-B	Yes
CAS-00936		DITCH SEDIMENTS	C-746-B	Yes
CAS-00937		DITCH SEDIMENTS	C-746-B	Yes
CAS-00938		DITCH SEDIMENTS	C-746-B	Yes
CAS-00939		DITCH SEDIMENTS	C-746-B	Yes

CAS-00940		DITCH SEDIMENTS	C-746-B	Yes
CAS-00941		DITCH SEDIMENTS	C-746-B	Yes
CAS-00942		DITCH SEDIMENTS	C-746-B	Yes
CAS-00943		DITCH SEDIMENTS	C-746-B	Yes
CAS-00944		DITCH SEDIMENTS	C-746-B	Yes
CAS-00945		DITCH SEDIMENTS	C-746-B	Yes
CAS-00946		DITCH SEDIMENTS	C-746-B	Yes
CAS-00947		DITCH SEDIMENTS	C-746-B	Yes
CAS-00949		DITCH SEDIMENTS	C-746-B	Yes
CAS-00950		DITCH SEDIMENTS	C-746-B	Yes
CAS-00951		DITCH SEDIMENTS	C-746-B	Yes
CAS-00952		DITCH SEDIMENTS	C-746-B	Yes
CAS-00953		DITCH SEDIMENTS	C-746-B	Yes
CAS-00954		DITCH SEDIMENTS	C-746-B	Yes
CAS-00955		DITCH SEDIMENTS	C-746-B	Yes
CAS-00956		DITCH SEDIMENTS	C-746-B	Yes
CAS-00957		DITCH SEDIMENTS	C-746-B	Yes
CAS-00958		DITCH SEDIMENTS	C-746-B	Yes
CAS-00960		DITCH SEDIMENTS	C-746-B	Yes
CAS-00961		DITCH SEDIMENTS	C-746-B	Yes
CAS-00963		DITCH SEDIMENTS	C-746-B	Yes
CAS-00964		DITCH SEDIMENTS	C-746-B	Yes
CAS-00965		DITCH SEDIMENTS	C-746-B	Yes
CAS-00966		DITCH SEDIMENTS	C-746-B	Yes
CAS-00968		DITCH SEDIMENTS	C-746-B	Yes
CAS-00969		DITCH SEDIMENTS	C-746-B	Yes
CAS-00971		DITCH SEDIMENTS	C-746-B	Yes
CAS-00972		DITCH SEDIMENTS	C-746-B	Yes
CAS-00973		DITCH SEDIMENTS	C-746-B	Yes
CAS-00975		DITCH SEDIMENTS	C-746-B	Yes
CAS-00976		DITCH SEDIMENTS	C-746-B	Yes
CAS-00978		DITCH SEDIMENTS	C-746-B	Yes
CAS-00979		DITCH SEDIMENTS	C-746-B	Yes
CAS-00989		DITCH SEDIMENTS	C-746-B	Yes
CAS-00990		DITCH SEDIMENTS	C-746-B	Yes
CAS-00991		DITCH SEDIMENTS	C-746-B	Yes
CAS-00992		DITCH SEDIMENTS	C-746-B	Yes
CAS-00995		DITCH SEDIMENTS	C-746-B	Yes
CAS-00997		DITCH SEDIMENTS	C-746-B	Yes
CAS-00998		DITCH SEDIMENTS	C-746-B	Yes
CAS-01000		DITCH SEDIMENTS	C-746-B	Yes
CAS-01004		DITCH SEDIMENTS	C-746-B	Yes
CAS-01005		DITCH SEDIMENTS	C-746-B	Yes
CAS-01007		DITCH SEDIMENTS	C-746-B	Yes
CAS-01008		DITCH SEDIMENTS	C-746-B	Yes
CAS-01013		DITCH SEDIMENTS	C-746-B	Yes
CAS-01014		DITCH SEDIMENTS	C-746-B	Yes
CAS-01015		DITCH SEDIMENTS	C-746-B	Yes
CAS-01016		DITCH SEDIMENTS	C-746-B	Yes
CAS-01033		DITCH SEDIMENTS	C-746-B	Yes
CAS-01034		DITCH SEDIMENTS	C-746-B	Yes
CAS-01035		DITCH SEDIMENTS	C-746-B	Yes
CAS-01037		DITCH SEDIMENTS	C-746-B	Yes
CAS-01038		DITCH SEDIMENTS	C-746-B	Yes
CAS-01039		DITCH SEDIMENTS	C-746-B	Yes

CAS-01040		DITCH SEDIMENTS	C-746-B	Yes
CAS-01041		DITCH SEDIMENTS	C-746-B	Yes
CAS-01042		DITCH SEDIMENTS	C-746-B	Yes
CAS-01043		DITCH SEDIMENTS	C-746-B	Yes
CAS-01045		DITCH SEDIMENTS	C-746-B	Yes
CAS-01046		DITCH SEDIMENTS	C-746-B	Yes
CAS-01047		DITCH SEDIMENTS	C-746-B	Yes
CAS-01050		DITCH SEDIMENTS	C-746-B	Yes
CAS-01051		DITCH SEDIMENTS	C-746-B	Yes
CAS-01052		DITCH SEDIMENTS	C-746-B	Yes
CAS-01054		DITCH SEDIMENTS	C-746-B	Yes
CAS-01057		DITCH SEDIMENTS	C-746-B	Yes
CAS-01058		DITCH SEDIMENTS	C-746-B	Yes
CAS-01059		DITCH SEDIMENTS	C-746-B	Yes
CAS-01060		DITCH SEDIMENTS	C-746-B	Yes
CAS-01061		DITCH SEDIMENTS	C-746-B	Yes
CAS-01063		DITCH SEDIMENTS	C-746-B	Yes
CAS-01064		DITCH SEDIMENTS	C-746-B	Yes
CAS-01065		DITCH SEDIMENTS	C-746-B	Yes
CAS-01066		DITCH SEDIMENTS	C-746-B	Yes
CAS-01067		DITCH SEDIMENTS	C-746-B	Yes
CAS-01068		DITCH SEDIMENTS	C-746-B	Yes
CAS-01069		DITCH SEDIMENTS	C-746-B	Yes
CAS-01070		DITCH SEDIMENTS	C-746-B	Yes
CAS-01071		DITCH SEDIMENTS	C-746-B	Yes
CAS-01072		DITCH SEDIMENTS	C-746-B	Yes
CAS-01074		DITCH SEDIMENTS	C-746-B	Yes
CAS-01076		DITCH SEDIMENTS	C-746-B	Yes
CAS-01077		DITCH SEDIMENTS	C-746-B	Yes
CAS-01079		DITCH SEDIMENTS	C-746-B	Yes
CAS-01080		DITCH SEDIMENTS	C-746-B	Yes
CAS-01081		DITCH SEDIMENTS	C-746-B	Yes
CAS-01082		DITCH SEDIMENTS	C-746-B	Yes
CAS-01083		DITCH SEDIMENTS	C-746-B	Yes
CAS-01084		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01086		DITCH SEDIMENTS	C-746-B	Yes
CAS-01088		DITCH SEDIMENTS	C-746-B	Yes
CAS-01090		DITCH SEDIMENTS	C-746-B	Yes
CAS-01091		DITCH SEDIMENTS	C-746-B	Yes
CAS-01097		DITCH SEDIMENTS	C-746-B	Yes
CAS-01099		DITCH SEDIMENTS	C-746-B	Yes
CAS-01100		DITCH SEDIMENTS	C-746-B	Yes
CAS-01101		DITCH SEDIMENTS	C-746-B	Yes
CAS-01102		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01105		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01110		DITCH SEDIMENTS	C-746-B	Yes
CAS-01111		DITCH SEDIMENTS	C-746-B	Yes
CAS-01112		DITCH SEDIMENTS	C-746-B	Yes
CAS-01113		DITCH SEDIMENTS	C-746-B	Yes

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CAS-01117		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01120		DITCH SEDIMENTS	C-746-B	Yes
CAS-01121		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01123		DITCH SEDIMENTS	C-746-B	Yes
CAS-01124		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01126		DITCH SEDIMENTS	C-746-B	Yes
CAS-01127		DITCH SEDIMENTS	C-746-B	Yes
CAS-01128		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01135		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01137		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01140		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01209		DITCH SEDIMENTS	C-746-B	Yes
CAS-01212		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01215		DITCH SEDIMENTS	C-746-B	Yes
CAS-01216		DITCH SEDIMENTS	C-746-B	Yes
CAS-01217		DITCH SEDIMENTS	C-746-B	Yes
CAS-01218		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01220		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01224		DITCH SEDIMENTS	C-746-B	Yes
CAS-01233		DITCH SEDIMENTS	C-752-A	Yes
CAS-01235		DITCH SEDIMENTS	C-746-B	Yes
CAS-01241		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01264		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01267		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01280		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01296		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01299		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01301		DITCH SEDIMENTS	C-746-B	Yes
CAS-01302		DITCH SEDIMENTS	C-746-B	Yes
CAS-01303		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01311		DITCH SEDIMENTS	C-746-B	Yes
CAS-01312		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01314		DITCH SEDIMENTS	C-746-B	Yes
CAS-01315		DITCH SEDIMENTS	C-746-B	Yes
CAS-01316		DITCH SEDIMENTS	C-746-B	Yes
CAS-01317		DITCH SEDIMENTS	C-746-B	Yes
CAS-01318		DITCH SEDIMENTS	C-746-B	Yes
CAS-01319		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01325		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01341		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01350		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01357		DITCH SEDIMENTS	C-746-B	Yes
CAS-01358		DITCH SEDIMENTS	C-752-A	Yes
CAS-01360		DITCH SEDIMENTS	C-746-B	Yes
CAS-01361		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01364		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01387		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01401		DITCH SEDIMENTS	C-746-B	Yes
CAS-01402		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01411		DITCH SEDIMENTS	C-746-B	Yes
CAS-01412		DITCH SEDIMENTS	C-746-B	Yes
CAS-01413		DITCH SEDIMENTS	C-746-B	Yes
CAS-01414		DITCH SEDIMENTS	C-746-B	Yes
CAS-01415		DITCH SEDIMENTS	C-746-B	Yes
CAS-01416		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01418		DITCH SEDIMENTS	C-746-B	Yes
CAS-01419		DITCH SEDIMENTS	C-746-B	Yes
CAS-01420		DITCH SEDIMENTS	C-746-B	Yes
CAS-01421		DITCH SEDIMENTS	C-746-B	Yes
CAS-01423		DITCH SEDIMENTS	C-746-B	Yes
CAS-01424		DITCH SEDIMENTS	C-746-B	Yes
CAS-01426		DITCH SEDIMENTS	C-746-B	Yes
CAS-01427		DITCH SEDIMENTS	C-746-B	Yes
CAS-01428		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01431		DITCH SEDIMENTS	C-746-B	Yes
CAS-01432		DITCH SEDIMENTS	C-746-B	Yes
CAS-01433		DITCH SEDIMENTS	C-746-B	Yes
CAS-01434		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01436		DITCH SEDIMENTS	C-746-B	Yes
CAS-01437		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01439		DITCH SEDIMENTS	C-746-B	Yes
CAS-01440		DITCH SEDIMENTS	C-746-B	Yes
CAS-01441		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01445		DITCH SEDIMENTS	C-746-B	Yes
CAS-01447		DITCH SEDIMENTS	C-746-B	Yes
CAS-01448		DITCH SEDIMENTS	C-746-B	Yes
CAS-01449		DITCH SEDIMENTS	C-746-B	Yes
CAS-01450		DITCH SEDIMENTS	C-746-B	Yes
CAS-01452		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01455		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01459		DITCH SEDIMENTS	C-746-B	Yes
CAS-01460		DITCH SEDIMENTS	C-746-B	Yes
CAS-01461		DITCH SEDIMENTS	C-746-B	Yes
CAS-01462		DITCH SEDIMENTS	C-746-B	Yes
CAS-01464		DITCH SEDIMENTS	C-746-B	Yes
CAS-01470		DITCH SEDIMENTS	C-746-B	Yes

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CAS-01472		DITCH SEDIMENTS	C-746-B	Yes
CAS-01477		DITCH SEDIMENTS	C-746-B	Yes
CAS-01478		DITCH SEDIMENTS	C-746-B	Yes
CAS-01479		DITCH SEDIMENTS	C-746-B	Yes
CAS-01480		DITCH SEDIMENTS	C-746-B	Yes
CAS-01481		DITCH SEDIMENTS	C-746-B	Yes
CAS-01482		DITCH SEDIMENTS	C-746-B	Yes
CAS-01483		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01487		DITCH SEDIMENTS	C-746-B	Yes
CAS-01488		DITCH SEDIMENTS	C-746-B	Yes
CAS-01489		DITCH SEDIMENTS	C-746-B	Yes
CAS-01490		DITCH SEDIMENTS	C-746-B	Yes
CAS-01491		DITCH SEDIMENTS	C-746-B	Yes
CAS-01492		DITCH SEDIMENTS	C-746-B	Yes
CAS-01493		DITCH SEDIMENTS	C-746-B	Yes
CAS-01494		DITCH SEDIMENTS	C-746-B	Yes
CAS-01495		DITCH SEDIMENTS	C-746-B	Yes
CAS-01496		DITCH SEDIMENTS	C-746-B	Yes
CAS-01497		DITCH SEDIMENTS	C-746-B	Yes
CAS-01498		DITCH SEDIMENTS	C-746-B	Yes
CAS-01499		DITCH SEDIMENTS	C-746-B	Yes
CAS-01500		DITCH SEDIMENTS	C-746-B	Yes
CAS-01501		DITCH SEDIMENTS	C-746-B	Yes
CAS-01502		DITCH SEDIMENTS	C-746-B	Yes
CAS-01503		DITCH SEDIMENTS	C-746-B	Yes
CAS-01504		DITCH SEDIMENTS	C-746-B	Yes
CAS-01505		DITCH SEDIMENTS	C-746-B	Yes
CAS-01506		DITCH SEDIMENTS	C-746-B	Yes
CAS-01507		DITCH SEDIMENTS	C-746-B	Yes
CAS-01508		DITCH SEDIMENTS	C-746-B	Yes
CAS-01510		DITCH SEDIMENTS	C-746-B	Yes
CAS-01512		DITCH SEDIMENTS	C-746-B	Yes
CAS-01513		DITCH SEDIMENTS	C-746-B	Yes
CAS-01514		DITCH SEDIMENTS	C-746-B	Yes
CAS-01515		DITCH SEDIMENTS	C-746-B	Yes
CAS-01516		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01519		DITCH SEDIMENTS	C-746-B	Yes
CAS-01520		DITCH SEDIMENTS	C-746-B	Yes
CAS-01521		DITCH SEDIMENTS	C-746-B	Yes
CAS-01522		DITCH SEDIMENTS	C-746-B	Yes
CAS-01523		DITCH SEDIMENTS	C-746-B	Yes
CAS-01525		DITCH SEDIMENTS	C-746-B	Yes
CAS-01526		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01528		DITCH SEDIMENTS	C-746-B	Yes
CAS-01529		DITCH SEDIMENTS	C-746-B	Yes
CAS-01530		DITCH SEDIMENTS	C-746-B	Yes
CAS-01532		DITCH SEDIMENTS	C-746-B	Yes
CAS-01533		DITCH SEDIMENTS	C-746-B	Yes

CAS-01534		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01536		DITCH SEDIMENTS	C-746-B	Yes
CAS-01537		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01540		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01560		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01564		DITCH SEDIMENTS	C-746-B	Yes
CAS-01565		DITCH SEDIMENTS	C-746-B	Yes
CAS-01566		DITCH SEDIMENTS	C-746-B	Yes
CAS-01568		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01570		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01595		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01600		DITCH SEDIMENTS	C-746-B	Yes
CAS-01601		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01612		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01666		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01668		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01670		DITCH SEDIMENTS	C-746-B	Yes
CAS-01672		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01680		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01712		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01714		DITCH SEDIMENTS	C-746-B	Yes
CAS-01716		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01719		DITCH SEDIMENTS	C-746-B	Yes

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CAS-01723		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01737		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01768		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01787		DITCH SEDIMENTS	C-746-B	Yes
CAS-01788		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01790		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01792		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01795		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01798		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01803		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01810		DITCH SEDIMENTS	C-746-B	Yes
CAS-01811		DITCH SEDIMENTS	C-746-B	Yes
CAS-01812		DITCH SEDIMENTS	C-746-B	Yes
CAS-01813		DITCH SEDIMENTS	C-746-B	Yes
CAS-01814		DITCH SEDIMENTS	C-746-B	Yes
CAS-01815		DITCH SEDIMENTS	C-746-B	Yes
CAS-01816		DITCH SEDIMENTS	C-746-B	Yes
CAS-01817		DITCH SEDIMENTS	C-746-B	Yes
CAS-01818		DITCH SEDIMENTS	C-746-B	Yes
CAS-01819		DITCH SEDIMENTS	C-746-B	Yes
CAS-01820		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01827		DITCH SEDIMENTS	C-746-B	Yes
CAS-01828		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01831		DITCH SEDIMENTS	C-746-B	Yes
CAS-01832		DITCH SEDIMENTS	C-746-B	Yes
CAS-01834		DITCH SEDIMENTS	C-746-B	Yes
CAS-01835		DITCH SEDIMENTS	C-746-B	Yes
CAS-01836		DITCH SEDIMENTS	C-746-B	Yes
CAS-01837		DITCH SEDIMENTS	C-752-A	Yes
CAS-01838		DITCH SEDIMENTS	C-746-B	Yes

CAS-01839		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01841		DITCH SEDIMENTS	C-746-B	Yes
CAS-01842		DITCH SEDIMENTS	C-746-B	Yes
CAS-01843		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01845		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01848		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01851		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01878		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01884		DITCH SEDIMENTS	C-746-B	Yes
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CAS-01894		DITCH SEDIMENTS	C-746-B	Yes
CAS-01895		DITCH SEDIMENTS	C-746-B	Yes
CAS-01896		DITCH SEDIMENTS	C-746-B	Yes

CAS-01897		DITCH SEDIMENTS	C-746-B	Yes
CAS-01898		DITCH SEDIMENTS	C-746-B	Yes
CAS-01899		DITCH SEDIMENTS	C-746-B	Yes
CAS-01900		DITCH SEDIMENTS	C-746-B	Yes
CAS-01902		DITCH SEDIMENTS	C-746-B	Yes
CAS-01903		DITCH SEDIMENTS	C-746-B	Yes
CAS-01904		DITCH SEDIMENTS	C-746-B	Yes
CAS-01905		DITCH SEDIMENTS	C-746-B	Yes
CAS-01906		DITCH SEDIMENTS	C-746-B	Yes
CAS-01907		DITCH SEDIMENTS	C-746-B	Yes
CAS-01908		DITCH SEDIMENTS	C-746-B	Yes
CAS-01909		DITCH SEDIMENTS	C-746-B	Yes
CAS-01910		DITCH SEDIMENTS	C-746-B	Yes
CAS-01911		DITCH SEDIMENTS	C-746-B	Yes
CAS-01912		DITCH SEDIMENTS	C-746-B	Yes
CAS-01913		DITCH SEDIMENTS	C-746-B	Yes
CAS-01914		DITCH SEDIMENTS	C-746-B	Yes
CAS-01915		DITCH SEDIMENTS	C-746-B	Yes
CAS-01916		DITCH SEDIMENTS	C-746-B	Yes
CAS-01917		DITCH SEDIMENTS	C-746-B	Yes
CAS-01918		DITCH SEDIMENTS	C-746-B	Yes
CAS-01919		DITCH SEDIMENTS	C-746-B	Yes
CAS-01920		DITCH SEDIMENTS	C-746-B	Yes
CAS-01921		DITCH SEDIMENTS	C-746-B	Yes
CAS-01922		DITCH SEDIMENTS	C-746-B	Yes
CAS-01923		DITCH SEDIMENTS	C-746-B	Yes
CAS-01924		DITCH SEDIMENTS	C-746-B	Yes
CAS-01926		DITCH SEDIMENTS	C-746-B	Yes
CAS-01927		DITCH SEDIMENTS	C-746-B	Yes
CAS-01928		DITCH SEDIMENTS	C-746-B	Yes
CAS-01929		DITCH SEDIMENTS	C-746-B	Yes
CAS-01930		DITCH SEDIMENTS	C-746-B	Yes
CAS-01931		DITCH SEDIMENTS	C-746-B	Yes
CAS-01932		DITCH SEDIMENTS	C-746-B	Yes
CAS-01933		DITCH SEDIMENTS	C-746-B	Yes
CAS-01934		DITCH SEDIMENTS	C-746-B	Yes
CAS-01935		DITCH SEDIMENTS	C-746-B	Yes
CAS-01936		DITCH SEDIMENTS	C-746-B	Yes
CAS-01937		DITCH SEDIMENTS	C-746-B	Yes
CAS-01938		DITCH SEDIMENTS	C-746-B	Yes
CAS-01939		DITCH SEDIMENTS	C-746-B	Yes
CAS-01940		DITCH SEDIMENTS	C-746-B	Yes
CAS-01941		DITCH SEDIMENTS	C-746-B	Yes
CAS-01942		DITCH SEDIMENTS	C-746-B	Yes
CAS-01943		DITCH SEDIMENTS	C-746-B	Yes
CAS-01944		DITCH SEDIMENTS	C-746-B	Yes
CAS-01945		DITCH SEDIMENTS	C-746-B	Yes
CAS-01946		DITCH SEDIMENTS	C-746-B	Yes
CAS-01947		DITCH SEDIMENTS	C-746-B	Yes
CAS-01948		DITCH SEDIMENTS	C-746-B	Yes
CAS-01949		DITCH SEDIMENTS	C-746-B	Yes
CAS-01950		DITCH SEDIMENTS	C-746-B	Yes
CAS-01951		DITCH SEDIMENTS	C-746-B	Yes
CAS-01952		DITCH SEDIMENTS	C-746-B	Yes
CAS-01953		DITCH SEDIMENTS	C-746-B	Yes

CAS-01954		DITCH SEDIMENTS	C-746-B	Yes
CAS-01956		DITCH SEDIMENTS	C-746-B	Yes
CAS-01957		DITCH SEDIMENTS	C-746-B	Yes
CAS-01958		DITCH SEDIMENTS	C-746-B	Yes
CAS-01959		DITCH SEDIMENTS	C-746-B	Yes
CAS-01960		DITCH SEDIMENTS	C-746-B	Yes
CAS-01961		DITCH SEDIMENTS	C-746-B	Yes
CAS-01962		DITCH SEDIMENTS	C-746-B	Yes
CAS-01963		DITCH SEDIMENTS	C-746-B	Yes
CAS-01964		DITCH SEDIMENTS	C-746-B	Yes
CAS-01965		DITCH SEDIMENTS	C-746-B	Yes
CAS-01966		DITCH SEDIMENTS	C-746-B	Yes
CAS-01968		DITCH SEDIMENTS	C-746-B	Yes
CAS-01969		DITCH SEDIMENTS	C-746-B	Yes
CAS-01970		DITCH SEDIMENTS	C-746-B	Yes
CAS-01971		DITCH SEDIMENTS	C-746-B	Yes
CAS-01972		DITCH SEDIMENTS	C-746-B	Yes
CAS-01973		DITCH SEDIMENTS	C-746-B	Yes
CAS-01974		DITCH SEDIMENTS	C-746-B	Yes
CAS-01977		DITCH SEDIMENTS	C-746-B	Yes
CAS-01978		DITCH SEDIMENTS	C-746-B	Yes
CAS-01979		DITCH SEDIMENTS	C-746-B	Yes
CAS-01980		DITCH SEDIMENTS	C-746-B	Yes
CAS-01981		DITCH SEDIMENTS	C-746-B	Yes
CAS-01982		DITCH SEDIMENTS	C-746-B	Yes
CAS-01983		DITCH SEDIMENTS	C-746-B	Yes
CAS-01984		DITCH SEDIMENTS	C-746-B	Yes
CAS-01985		DITCH SEDIMENTS	C-746-B	Yes
CAS-01986		DITCH SEDIMENTS	C-746-B	Yes
CAS-01987		DITCH SEDIMENTS	C-746-B	Yes
CAS-01988		DITCH SEDIMENTS	C-746-B	Yes
CAS-01989		DITCH SEDIMENTS	C-746-B	Yes
CAS-01990		DITCH SEDIMENTS	C-746-B	Yes
CAS-01991		DITCH SEDIMENTS	C-746-B	Yes
CAS-01992		DITCH SEDIMENTS	C-746-B	Yes
CAS-01993		DITCH SEDIMENTS	C-746-B	Yes
CAS-01995		DITCH SEDIMENTS	C-746-B	Yes
CAS-01996		DITCH SEDIMENTS	C-746-B	Yes
CAS-01997		DITCH SEDIMENTS	C-746-B	Yes
CAS-01998		DITCH SEDIMENTS	C-746-B	Yes
CAS-01999		DITCH SEDIMENTS	C-746-B	Yes
CAS-02001		DITCH SEDIMENTS	C-746-B	Yes
CAS-02002		DITCH SEDIMENTS	C-746-B	Yes
CAS-02003		DITCH SEDIMENTS	C-746-B	Yes
CAS-02004		DITCH SEDIMENTS	C-746-B	Yes
CAS-02005		DITCH SEDIMENTS	C-746-B	Yes
CAS-02006		DITCH SEDIMENTS	C-746-B	Yes
CAS-02007		DITCH SEDIMENTS	C-746-B	Yes
CAS-02008		DITCH SEDIMENTS	C-746-B	Yes
CAS-02009		DITCH SEDIMENTS	C-746-B	Yes
CAS-02010		DITCH SEDIMENTS	C-746-B	Yes
CAS-02011		DITCH SEDIMENTS	C-746-B	Yes
CAS-02012		DITCH SEDIMENTS	C-746-B	Yes
CAS-02013		DITCH SEDIMENTS	C-746-B	Yes
CAS-02014		DITCH SEDIMENTS	C-746-B	Yes

CAS-02015		DITCH SEDIMENTS	C-746-B	Yes
CAS-02017		DITCH SEDIMENTS	C-746-B	Yes
CAS-02018		DITCH SEDIMENTS	C-746-B	Yes
CAS-02019		DITCH SEDIMENTS	C-746-B	Yes
CAS-02020		DITCH SEDIMENTS	C-746-B	Yes
CAS-02021		DITCH SEDIMENTS	C-746-B	Yes
CAS-02022		DITCH SEDIMENTS	C-746-B	Yes
CAS-02023		DITCH SEDIMENTS	C-746-B	Yes
CAS-02024		DITCH SEDIMENTS	C-746-B	Yes
CAS-02026		DITCH SEDIMENTS	C-746-B	Yes
CAS-02027		DITCH SEDIMENTS	C-746-B	Yes
CAS-02028		DITCH SEDIMENTS	C-746-B	Yes
CAS-02029		DITCH SEDIMENTS	C-746-B	Yes
CAS-02030		DITCH SEDIMENTS	C-746-B	Yes
CAS-02031		DITCH SEDIMENTS	C-746-B	Yes
CAS-02032		DITCH SEDIMENTS	C-746-B	Yes
CAS-02033		DITCH SEDIMENTS	C-746-B	Yes
CAS-02034		DITCH SEDIMENTS	C-746-B	Yes
CAS-02035		DITCH SEDIMENTS	C-746-B	Yes
CAS-02036		DITCH SEDIMENTS	C-746-B	Yes
CAS-02038		DITCH SEDIMENTS	C-746-B	Yes
CAS-02039		DITCH SEDIMENTS	C-746-B	Yes
CAS-02040		DITCH SEDIMENTS	C-746-B	Yes
CAS-02041		DITCH SEDIMENTS	C-746-B	Yes
CAS-02042		DITCH SEDIMENTS	C-746-B	Yes
CAS-02043		DITCH SEDIMENTS	C-746-B	Yes
CAS-02044		DITCH SEDIMENTS	C-746-B	Yes
CAS-02045		DITCH SEDIMENTS	C-746-B	Yes
CAS-02046		DITCH SEDIMENTS	C-746-B	Yes
CAS-02048		DITCH SEDIMENTS	C-746-B	Yes
CAS-02049		DITCH SEDIMENTS	C-746-B	Yes
CAS-02050		DITCH SEDIMENTS	C-746-B	Yes
CAS-02051		DITCH SEDIMENTS	C-746-B	Yes
CAS-02052		DITCH SEDIMENTS	C-746-B	Yes
CAS-02053		DITCH SEDIMENTS	C-746-B	Yes
CAS-02054		DITCH SEDIMENTS	C-746-B	Yes
CAS-02055		DITCH SEDIMENTS	C-746-B	Yes
CAS-02056		DITCH SEDIMENTS	C-746-B	Yes
CAS-02057		DITCH SEDIMENTS	C-746-B	Yes
CAS-02058		DITCH SEDIMENTS	C-746-B	Yes
CAS-02059		DITCH SEDIMENTS	C-746-B	Yes
CAS-02060		DITCH SEDIMENTS	C-746-B	Yes
CAS-02061		DITCH SEDIMENTS	C-746-B	Yes
CAS-02062		DITCH SEDIMENTS	C-746-B	Yes
CAS-02063		DITCH SEDIMENTS	C-746-B	Yes
CAS-02064		DITCH SEDIMENTS	C-746-B	Yes
CAS-02065		DITCH SEDIMENTS	C-746-B	Yes
CAS-02066		DITCH SEDIMENTS	C-746-B	Yes
CAS-02067		DITCH SEDIMENTS	C-746-B	Yes
CAS-02068		DITCH SEDIMENTS	C-746-B	Yes
CAS-02069		DITCH SEDIMENTS	C-746-B	Yes
CAS-02070		DITCH SEDIMENTS	C-746-B	Yes
CAS-02071		DITCH SEDIMENTS	C-746-B	Yes
CAS-02072		DITCH SEDIMENTS	C-746-B	Yes
CAS-02073		DITCH SEDIMENTS	C-752-A	Yes

CAS-02074		DITCH SEDIMENTS	C-746-B	Yes
CAS-02075		DITCH SEDIMENTS	C-746-B	Yes
CAS-02076		DITCH SEDIMENTS	C-746-B	Yes
CAS-02077		DITCH SEDIMENTS	C-746-B	Yes
CAS-02078		DITCH SEDIMENTS	C-746-B	Yes
CAS-02079		DITCH SEDIMENTS	C-746-B	Yes
CAS-02080		DITCH SEDIMENTS	C-746-B	Yes
CAS-02081		DITCH SEDIMENTS	C-746-B	Yes
CAS-02082		DITCH SEDIMENTS	C-746-B	Yes
CAS-02083		DITCH SEDIMENTS	C-746-B	Yes
CAS-02084		DITCH SEDIMENTS	C-746-B	Yes
CAS-02085		DITCH SEDIMENTS	C-746-B	Yes
CAS-02086		DITCH SEDIMENTS	C-746-B	Yes
CAS-02087		DITCH SEDIMENTS	C-746-B	Yes
CAS-02088		DITCH SEDIMENTS	C-746-B	Yes
CAS-02089		DITCH SEDIMENTS	C-746-B	Yes
CAS-02090		DITCH SEDIMENTS	C-746-B	Yes
CAS-02091		DITCH SEDIMENTS	C-746-B	Yes
CAS-02092		DITCH SEDIMENTS	C-746-B	Yes
CAS-02093		DITCH SEDIMENTS	C-746-B	Yes
CAS-02094		DITCH SEDIMENTS	C-746-B	Yes
CAS-02095		DITCH SEDIMENTS	C-746-B	Yes
CAS-02096		DITCH SEDIMENTS	C-746-B	Yes
CAS-02097		DITCH SEDIMENTS	C-746-B	Yes
CAS-02098		DITCH SEDIMENTS	C-746-B	Yes
CAS-02099		DITCH SEDIMENTS	C-746-B	Yes
CAS-02100		DITCH SEDIMENTS	C-746-B	Yes
CAS-02101		DITCH SEDIMENTS	C-746-B	Yes
CAS-02102		DITCH SEDIMENTS	C-746-B	Yes
CAS-02103		DITCH SEDIMENTS	C-746-B	Yes
CAS-02104		DITCH SEDIMENTS	C-746-B	Yes
CAS-02106		DITCH SEDIMENTS	C-746-B	Yes
CAS-02107		DITCH SEDIMENTS	C-746-B	Yes
CAS-02108		DITCH SEDIMENTS	C-746-B	Yes
CAS-02109		DITCH SEDIMENTS	C-746-B	Yes
CAS-02110		DITCH SEDIMENTS	C-746-B	Yes
CAS-02111		DITCH SEDIMENTS	C-746-B	Yes
CAS-02112		DITCH SEDIMENTS	C-746-B	Yes
CAS-00820		DITCH SEDIMENTS	C-753-A	Yes
CAS-00832		DITCH SEDIMENTS	C-753-A	Yes
CAS-00844		DITCH SEDIMENTS	C-753-A	Yes
CAS-00845		DITCH SEDIMENTS	C-753-A	Yes
CAS-00857		DITCH SEDIMENTS	C-753-A	Yes
CAS-00866		DITCH SEDIMENTS	C-753-A	Yes
CAS-00874		DITCH SEDIMENTS	C-753-A	Yes
CAS-00876		DITCH SEDIMENTS	C-753-A	Yes
CAS-00877		DITCH SEDIMENTS	C-753-A	Yes
CAS-00893		DITCH SEDIMENTS	C-753-A	Yes
CAS-00894		DITCH SEDIMENTS	C-753-A	Yes
CAS-00896		DITCH SEDIMENTS	C-753-A	Yes
CAS-00908		DITCH SEDIMENTS	C-753-A	Yes
CAS-00910		DITCH SEDIMENTS	C-753-A	Yes
CAS-00916		DITCH SEDIMENTS	C-753-A	Yes
CAS-00922		DITCH SEDIMENTS	C-753-A	Yes
CAS-00948		DITCH SEDIMENTS	C-753-A	Yes

CAS-00959		DITCH SEDIMENTS	C-753-A	Yes
CAS-00962		DITCH SEDIMENTS	C-753-A	Yes
CAS-00967		DITCH SEDIMENTS	C-753-A	Yes
CAS-00970		DITCH SEDIMENTS	C-753-A	Yes
CAS-00977		DITCH SEDIMENTS	C-753-A	Yes
CAS-00980		DITCH SEDIMENTS	C-753-A	Yes
CAS-00994		DITCH SEDIMENTS	C-753-A	Yes
CAS-00999		DITCH SEDIMENTS	C-753-A	Yes
CAS-01006		DITCH SEDIMENTS	C-753-A	Yes
CAS-01036		DITCH SEDIMENTS	C-753-A	Yes
CAS-01044		DITCH SEDIMENTS	C-753-A	Yes
CAS-01048		DITCH SEDIMENTS	C-753-A	Yes
CAS-01049		DITCH SEDIMENTS	C-753-A	Yes
CAS-01053		DITCH SEDIMENTS	C-753-A	Yes
CAS-01055		DITCH SEDIMENTS	C-753-A	Yes
CAS-01056		DITCH SEDIMENTS	C-753-A	Yes
CAS-01073		DITCH SEDIMENTS	C-753-A	Yes
CAS-01075		DITCH SEDIMENTS	C-753-A	Yes
CAS-01078		DITCH SEDIMENTS	C-753-A	Yes
CAS-01087		DITCH SEDIMENTS	C-753-A	Yes
CAS-01089		DITCH SEDIMENTS	C-753-A	Yes
CAS-01092		DITCH SEDIMENTS	C-753-A	Yes
CAS-01098		DITCH SEDIMENTS	C-753-A	Yes
CAS-01106		DITCH SEDIMENTS	C-753-A	Yes
CAS-01129		DITCH SEDIMENTS	C-753-A	Yes
CAS-01143		DITCH SEDIMENTS	C-753-A	Yes
CAS-01150		DITCH SEDIMENTS	C-753-A	Yes
CAS-01157		DITCH SEDIMENTS	C-753-A	Yes
CAS-01158		DITCH SEDIMENTS	C-753-A	Yes
CAS-01161		DITCH SEDIMENTS	C-753-A	Yes
CAS-01164		DITCH SEDIMENTS	C-753-A	Yes
CAS-01169		DITCH SEDIMENTS	C-753-A	Yes
CAS-01174		DITCH SEDIMENTS	C-753-A	Yes
CAS-01177		DITCH SEDIMENTS	C-753-A	Yes
CAS-01179		DITCH SEDIMENTS	C-753-A	Yes
CAS-01180		DITCH SEDIMENTS	C-753-A	Yes
CAS-01184		DITCH SEDIMENTS	C-753-A	Yes
CAS-01185		DITCH SEDIMENTS	C-753-A	Yes
CAS-01189		DITCH SEDIMENTS	C-753-A	Yes
CAS-01192		DITCH SEDIMENTS	C-753-A	Yes
CAS-01194		DITCH SEDIMENTS	C-753-A	Yes
CAS-01196		DITCH SEDIMENTS	C-753-A	Yes
CAS-01197		DITCH SEDIMENTS	C-753-A	Yes
CAS-01206		DITCH SEDIMENTS	C-753-A	Yes
CAS-01210		DITCH SEDIMENTS	C-753-A	Yes
CAS-01213		DITCH SEDIMENTS	C-753-A	Yes
CAS-01227		DITCH SEDIMENTS	C-753-A	Yes
CAS-01236		DITCH SEDIMENTS	C-753-A	Yes
CAS-01240		DITCH SEDIMENTS	C-753-A	Yes
CAS-01248		DITCH SEDIMENTS	C-753-A	Yes
CAS-01258		DITCH SEDIMENTS	C-753-A	Yes
CAS-01268		DITCH SEDIMENTS	C-753-A	Yes
CAS-01275		DITCH SEDIMENTS	C-753-A	Yes
CAS-01287		DITCH SEDIMENTS	C-753-A	Yes
CAS-01324		DITCH SEDIMENTS	C-753-A	Yes

CAS-01330		DITCH SEDIMENTS	C-753-A	Yes
CAS-01335		DITCH SEDIMENTS	C-753-A	Yes
CAS-01359		DITCH SEDIMENTS	C-753-A	Yes
CAS-01363		DITCH SEDIMENTS	C-753-A	Yes
CAS-01371		DITCH SEDIMENTS	C-753-A	Yes
CAS-01384		DITCH SEDIMENTS	C-753-A	Yes
CAS-01422		DITCH SEDIMENTS	C-753-A	Yes
CAS-01446		DITCH SEDIMENTS	C-753-A	Yes
CAS-01458		DITCH SEDIMENTS	C-753-A	Yes
CAS-01463		DITCH SEDIMENTS	C-753-A	Yes
CAS-01467		DITCH SEDIMENTS	C-753-A	Yes
CAS-01469		DITCH SEDIMENTS	C-753-A	Yes
CAS-01511		DITCH SEDIMENTS	C-753-A	Yes
CAS-01531		DITCH SEDIMENTS	C-753-A	Yes
CAS-01544		DITCH SEDIMENTS	C-753-A	Yes
CAS-01557		DITCH SEDIMENTS	C-753-A	Yes
CAS-01558		DITCH SEDIMENTS	C-753-A	Yes
CAS-01559		DITCH SEDIMENTS	C-753-A	Yes
CAS-01567		DITCH SEDIMENTS	C-753-A	Yes
CAS-01620		DITCH SEDIMENTS	C-753-A	Yes
CAS-01622		DITCH SEDIMENTS	C-753-A	Yes
CAS-01633		DITCH SEDIMENTS	C-753-A	Yes
CAS-01650		DITCH SEDIMENTS	C-753-A	Yes
CAS-01659		DITCH SEDIMENTS	C-753-A	Yes
CAS-01671		DITCH SEDIMENTS	C-753-A	Yes
CAS-01684		DITCH SEDIMENTS	C-753-A	Yes
CAS-01686		DITCH SEDIMENTS	C-753-A	Yes
CAS-01687		DITCH SEDIMENTS	C-753-A	Yes
CAS-01715		DITCH SEDIMENTS	C-753-A	Yes
CAS-01735		DITCH SEDIMENTS	C-753-A	Yes
CAS-01741		DITCH SEDIMENTS	C-753-A	Yes
CAS-01745		DITCH SEDIMENTS	C-753-A	Yes
CAS-01796		DITCH SEDIMENTS	C-753-A	Yes
CAS-01822		DITCH SEDIMENTS	C-753-A	Yes
CAS-01824		DITCH SEDIMENTS	C-753-A	Yes
CAS-01833		DITCH SEDIMENTS	C-753-A	Yes
CAS-01859		DITCH SEDIMENTS	C-753-A	Yes
CAS-01863		DITCH SEDIMENTS	C-753-A	Yes
CAS-01925		DITCH SEDIMENTS	C-753-A	Yes
CAS-01967		DITCH SEDIMENTS	C-753-A	Yes
CAS-01975		DITCH SEDIMENTS	C-753-A	Yes
CAS-02000		DITCH SEDIMENTS	C-753-A	Yes
CAS-02016		DITCH SEDIMENTS	C-753-A	Yes
CAS-02025		DITCH SEDIMENTS	C-753-A	Yes
CAS-02037		DITCH SEDIMENTS	C-753-A	Yes
CAS-02047		DITCH SEDIMENTS	C-753-A	Yes
22821-008		DRILL CUTTINGS	C-746-B	Yes
SI-0271		DRILL CUTTINGS	C-746-B	Yes
46101-01		DRILL CUTTINGS	C-746-H3	Yes
103188-01		SITE IN	C-752-A	Yes
103188-02		SITE IN	C-752-A	Yes
103188-03		SITE IN	C-752-A	Yes
103188-04		SITE IN	C-752-A	Yes
103188-05		SITE IN	C-752-A	Yes
103185-01		OPERATIONS AT	C-752-A	Yes

103185-02		OPERATIONS AT	C-752-A	Yes
103185-03		OPERATIONS AT	C-752-A	Yes
103185-04		OPERATIONS AT	C-752-A	Yes
103171-03		OPERATIONS -BO	C-752-A	Yes
103171-04		OPERATIONS -BO	C-752-A	Yes
22821-004		DRILL FLUID	C-746-B	Yes
SI-0111		DRILL FLUID	C-746-B	Yes
SI-0112		DRILL FLUID	C-746-B	Yes
SI-0113		DRILL FLUID	C-746-B	Yes
SI-0119		DRILL FLUID	C-746-B	Yes
SI-0346		DRILL FLUID	C-746-B	Yes
SI-1148		DRILL FLUID	C-746-B	Yes
22816-007		DRILL FLUID	C-746-H3	Yes
22821-005		DRILL FLUID	C-746-H3	Yes
22821-006		DRILL FLUID	C-746-H3	Yes
SI-0117		DRILL FLUID	C-746-H3	Yes
22575-013		DRILL FLUID & CUTTINGS	C-746-B	Yes
22601-010		DRILL FLUID & CUTTINGS	C-746-B	Yes
22601-012		DRILL FLUID & CUTTINGS	C-746-B	Yes
22601-026		DRILL FLUID & CUTTINGS	C-746-B	Yes
22601-027		DRILL FLUID & CUTTINGS	C-746-B	Yes
22601-028		DRILL FLUID & CUTTINGS	C-746-B	Yes
22604-019		DRILL FLUID & CUTTINGS	C-746-B	Yes
22604-148		DRILL FLUID & CUTTINGS	C-746-B	Yes
22608-040		DRILL FLUID & CUTTINGS	C-746-B	Yes
22609-016		DRILL FLUID & CUTTINGS	C-746-B	Yes
22609-044		DRILL FLUID & CUTTINGS	C-746-B	Yes
22610-017		DRILL FLUID & CUTTINGS	C-746-B	Yes
22610-018		DRILL FLUID & CUTTINGS	C-746-B	Yes
22610-049		DRILL FLUID & CUTTINGS	C-746-B	Yes
22611-015		DRILL FLUID & CUTTINGS	C-746-B	Yes
22611-043		DRILL FLUID & CUTTINGS	C-746-B	Yes
22613-001		DRILL FLUID & CUTTINGS	C-746-B	Yes
22613-007		DRILL FLUID & CUTTINGS	C-746-B	Yes
SI-0435		DRILL FLUID (DRILL MUD?)	C-746-B	Yes
SI-0439		DRILL FLUID (DRILL MUD?)	C-746-B	Yes
SI-0720		DRILL FLUID, DRILL MUD	C-746-B	Yes
SI-1202		DRILL FLUID, GROUT	C-746-B	Yes
22812-003		DRILL MUD	C-746-B	Yes
22816-002B		DRILL MUD	C-746-B	Yes
22816-008		DRILL MUD	C-746-B	Yes
22816-009		DRILL MUD	C-746-B	Yes
22816-010		DRILL MUD	C-746-B	Yes
22821-001		DRILL MUD	C-746-B	Yes
22821-002		DRILL MUD	C-746-B	Yes
22821-003		DRILL MUD	C-746-B	Yes
22821-007		DRILL MUD	C-746-B	Yes
SI-0098		DRILL MUD	C-746-B	Yes
SI-0103		DRILL MUD	C-746-B	Yes
SI-0114		DRILL MUD	C-746-B	Yes
SI-0115		DRILL MUD	C-746-B	Yes
SI-0116		DRILL MUD	C-746-B	Yes
SI-0118		DRILL MUD	C-746-B	Yes
SI-0130		DRILL MUD	C-746-B	Yes
SI-0133		DRILL MUD	C-746-B	Yes

SI-0137		DRILL MUD	C-746-B	Yes
SI-0140		DRILL MUD	C-746-B	Yes
SI-0153		DRILL MUD	C-746-B	Yes
SI-0157		DRILL MUD	C-746-B	Yes
SI-0167		DRILL MUD	C-746-B	Yes
SI-0184		DRILL MUD	C-746-B	Yes
SI-0217		DRILL MUD	C-746-B	Yes
SI-0224		DRILL MUD	C-746-B	Yes
SI-0240		DRILL MUD	C-746-B	Yes
SI-0243		DRILL MUD	C-746-B	Yes
SI-0254		DRILL MUD	C-746-B	Yes
SI-0258		DRILL MUD	C-746-B	Yes
SI-0269		DRILL MUD	C-746-B	Yes
SI-0273		DRILL MUD	C-746-B	Yes
SI-0327		DRILL MUD	C-746-B	Yes
SI-0338		DRILL MUD	C-746-B	Yes
SI-0357		DRILL MUD	C-746-B	Yes
SI-0371		DRILL MUD	C-746-B	Yes
SI-0373		DRILL MUD	C-746-B	Yes
SI-0374		DRILL MUD	C-746-B	Yes
SI-0378		DRILL MUD	C-746-B	Yes
SI-0381		DRILL MUD	C-746-B	Yes
SI-0453		DRILL MUD	C-746-B	Yes
SI-0482		DRILL MUD	C-746-B	Yes
SI-0583		DRILL MUD	C-746-B	Yes
SI-0584		DRILL MUD	C-746-B	Yes
SI-0608		DRILL MUD	C-746-B	Yes
SI-0620		DRILL MUD	C-746-B	Yes
SI-0647		DRILL MUD	C-746-B	Yes
SI-0649		DRILL MUD	C-746-B	Yes
SI-0711		DRILL MUD	C-746-B	Yes
SI-0728		DRILL MUD	C-746-B	Yes
SI-0731		DRILL MUD	C-746-B	Yes
SI-0863		DRILL MUD	C-746-B	Yes
SI-0907		DRILL MUD	C-746-B	Yes
SI-1004		DRILL MUD	C-746-B	Yes
SI-1147		DRILL MUD	C-746-B	Yes
RC-11320		DRILL MUD	C-746-H3	Yes
SI-0231		DRILL MUD	C-746-H3	Yes
SI-0232		DRILL MUD	C-746-H3	Yes
SI-0319		DRILL MUD	C-746-H3	Yes
SI-0375		DRILL MUD	C-746-H3	Yes
SI-0659		DRILL MUD	C-746-H3	Yes
SI-0925		DRILL MUD	C-746-H3	Yes
22816-002		DRILL MUD	C-746-B	Yes
SI-0079		DRILL MUD	C-746-B	Yes
SI-0110		DRILL MUD	C-746-B	Yes
SI-0131		DRILL MUD	C-746-B	Yes
SI-0186		DRILL MUD	C-746-B	Yes
SI-0212		DRILL MUD	C-746-B	Yes
SI-0317		DRILL MUD	C-746-B	Yes
SI-0320		DRILL MUD	C-746-B	Yes
SI-0321		DRILL MUD	C-746-B	Yes
SI-0325		DRILL MUD	C-746-B	Yes
SI-0347		DRILL MUD	C-746-B	Yes

SI-0379		DRILL MUD	C-746-B	Yes
SI-0395		DRILL MUD	C-746-B	Yes
SI-0401		DRILL MUD	C-746-B	Yes
SI-0404		DRILL MUD	C-746-B	Yes
SI-0858		DRILL MUD	C-746-B	Yes
SI-1043		DRILL MUD (BENTONITE SLURRY)	C-746-Q	Yes
SI-0230		DRILL MUD (PPE?)	C-746-B	Yes
SI-0165		DRILL MUD, WATER	C-746-B	Yes
SI-0592		DRILL MUD, WATER	C-746-B	Yes
SI-1431		DRILL MUD, WATER	C-746-H3	Yes
SI-0154		DRILL MUD/GROUT	C-746-Q	Yes
SI-0291		DRILL MUD/GROUT	C-746-Q	Yes
SI-0343		DRILL MUD/GROUT	C-746-Q	Yes
SI-0531		DRILL MUD/GROUT	C-746-Q	Yes
SI-0535		DRILL MUD/GROUT	C-746-Q	Yes
SI-0644		DRILL MUD/GROUT	C-746-Q	Yes
SI-0906		DRILL MUD/GROUT	C-746-Q	Yes
SI-1082		DRILL MUD/GROUT	C-746-Q	Yes
SI-1084		DRILL MUD/GROUT	C-746-Q	Yes
SI-1095		DRILL MUD/GROUT	C-746-B	Yes
SI-0149		DRILL MUD/GROUT	C-746-B	Yes
SI-1014		DRILL MUD/GROUT	C-746-B	Yes
08994-09		DRILL TAILINGS	C-746-B	Yes
08994-11		DRILL TAILINGS	C-746-H3	Yes
04200-01		DRILL TAILINGS	C-752-A	Yes
04200-02		DRILL TAILINGS	C-752-A	Yes
04200-03		DRILL TAILINGS	C-752-A	Yes
04200-04		DRILL TAILINGS	C-752-A	Yes
22812-002		DRILL WATER	C-746-B	Yes
53778-01		DRILLING GROUT	C-752-A	No
13943-02		DRUM SOIL (WET FROM TEST)	C-746-H3	Yes
13943-01		DRUM SOIL (WET FROM TEST)	C-746-V	Yes
51493-01		EMPTY GLASS/PLASTIC/BOTTLES	C-746-A	No
51493-02		EMPTY GLASS/PLASTIC/BOTTLES	C-746-A	No
53834-01		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
53834-02		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
53834-03		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
53834-04		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
53834-05		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
53834-06		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
53834-07		EPOXY RESIN FROM CEMENT PAD	C-746-A	No
17649-01		ER DRILLINGS	C-746-V	Yes
CAS-11401		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11402		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11403		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11404		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11405		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11406		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11407		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11408		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11409		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11410		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11411		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11412		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11413		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-11414		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11415		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11416		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11417		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11418		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11419		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11420		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11421		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11422		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11423		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11424		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11425		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11426		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11427		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11428		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11429		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11430		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11431		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11432		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11433		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11434		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11435		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11436		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11437		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11438		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11439		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11440		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11441		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11442		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11443		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11444		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11445		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11446		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11447		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11448		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11449		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11450		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11451		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11452		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11453		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11454		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11455		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11456		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11457		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11458		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11459		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11460		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11461		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11462		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11463		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11464		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11465		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11466		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11467		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11468		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-11469		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11470		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11471		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11472		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11473		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11474		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11475		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11476		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11477		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11478		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11479		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11480		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11481		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11482		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11483		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11484		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11485		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11486		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11487		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11488		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11489		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11490		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11491		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11492		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11493		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11494		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11495		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11496		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11497		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11498		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11499		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11500		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11501		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11502		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11503		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11504		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11505		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11506		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11507		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11508		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11509		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11510		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11511		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11512		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11513		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11514		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11515		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11516		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11518		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11519		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11520		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11521		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11522		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11523		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-11524		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11525		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11526		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11527		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11528		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11529		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11530		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11531		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11532		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11533		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11534		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11535		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11536		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11537		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11538		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11539		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11540		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11541		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11542		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11544		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11545		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11546		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11547		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11548		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11549		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11550		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11551		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11552		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11553		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11554		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11555		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11556		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11557		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11558		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11559		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11560		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11561		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11562		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11565		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11566		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11567		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11568		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11569		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11570		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11571		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11572		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11573		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11577		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11578		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11579		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-11580		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11581		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11582		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11583		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11584		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11613		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11614		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11615		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11616		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11617		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11618		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11619		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11620		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11621		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11622		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11623		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11624		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11625		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11626		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11627		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11628		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11629		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11630		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11631		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11632		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11633		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11634		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11635		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11636		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11637		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11638		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11639		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11640		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11641		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11642		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11643		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11644		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11645		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11646		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11647		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11648		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11649		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11650		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11651		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11652		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11653		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11654		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11655		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11656		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11657		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11658		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11659		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11660		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11661		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11662		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-11663		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11664		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11665		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11666		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11667		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11668		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11669		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11670		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11672		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11673		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11674		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11675		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11676		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11677		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11678		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11679		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11680		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11681		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11682		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11683		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11684		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11685		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11686		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11687		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11688		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11690		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11691		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11692		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11694		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11695		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11696		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11697		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11698		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11699		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11707		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11972		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11973		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-11990		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11991		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11992		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11993		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11994		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12001		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12002		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12003		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12004		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12005		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12008		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12009		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12014		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12017		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12018		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12019		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12020		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12021		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12029		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12032		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12033		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12034		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12035		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-12036		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12040		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12043		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12046		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12052		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12053		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12055		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
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CAS-12368		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12369		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes

CAS-12370		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12371		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12372		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12373		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12374		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12375		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12376		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12377		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12378		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12379		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12380		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12381		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12382		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12383		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12384		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12385		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12386		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12387		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12388		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12389		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12390		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12391		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-12392		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15314		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15315		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15316		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15317		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15318		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15319		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15320		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-15321		EXCAVATED SOIL/AUTOSAMPLER	C-337	Yes
CAS-11543		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11585		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11586		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11587		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11588		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11589		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11590		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11591		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11592		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11593		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11594		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11595		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11596		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11597		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11598		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11599		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11600		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11601		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11602		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11603		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11604		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11605		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11606		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11607		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes

CAS-11608		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11609		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11610		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11611		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11612		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11724		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11869		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11870		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11871		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11872		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11873		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11874		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11875		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11876		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11877		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11878		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11879		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11880		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11881		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11882		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11883		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11884		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11885		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11886		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11887		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11888		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11889		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11890		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11891		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11892		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11893		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11894		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11895		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11896		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11897		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11898		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11899		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11900		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11901		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11902		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11903		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-11904		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12135		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12136		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12137		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12139		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12140		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12141		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12142		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12143		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12144		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12145		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12146		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12147		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12148		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes

CAS-12149		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12150		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12198		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12199		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12200		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12201		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12256		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12257		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12258		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12259		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12260		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12261		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12262		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12263		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12264		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12265		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12266		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12267		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12268		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12269		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12270		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12271		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12272		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12273		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12274		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12275		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12276		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12277		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12278		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12279		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12296		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12297		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12298		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12299		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12353		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12354		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12355		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12356		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12357		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12358		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12359		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12360		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12361		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CAS-12367		EXCAVATED SOIL/AUTOSAMPLER	C-753-A	Yes
CASX-17358		EXCAVATION DIRT	C-746-B	Yes
CASX-17359		EXCAVATION DIRT	C-746-B	Yes
CASX-17360		EXCAVATION DIRT	C-746-B	Yes
CASX-17361		EXCAVATION DIRT	C-746-B	Yes
CASX-17362		EXCAVATION DIRT	C-746-B	Yes
CASX-17357		EXCAVATION DIRT	C-746-H3	Yes
104653-01		FILTER BAGS/WOOD/RUBBER/PLASTIC/METAL	C-752-A	No
58457-01		FILTER CAKE	C-752-A	No
53182-01		FILTER CAKE FROM FILTER PRESS	C-752-A	No
104676-01		FILTERS FROM WASTE WATER TREATMENT	C-752-A	No
11115-01		FILTERS/RUGS/FLOOR MATS/PLASTIC/METAL	C-333	No

11115-02		FILTERS/RUGS/FLOOR MATS/PLASTIC/METAL	C-333	No
06441-06		FLOORSWEEP/RAGS/WOOD/LEATHER GLOVES	C-746-B	No
CAS-14961		FLUME SLUDGE	C-753-A	Yes
CAS-14962		FLUME SLUDGE	C-753-A	Yes
CAS-14963		FLUME SLUDGE	C-753-A	Yes
CAS-14964		FLUME SLUDGE	C-753-A	Yes
CAS-14965		FLUME SLUDGE	C-753-A	Yes
CASX-18117		FLUME SLUDGE--10 INCHES WATER	C-746-A	Yes
59808-02		GABION FABRIC FROM N/S DITCH	C-746-B	No
SI-2175		GASKETS; SOIL HAY	C-746-B	Yes
44824-01		GEOTEXTILE/PLASTIC	C-746-B	No
44824-02		GEOTEXTILE/PLASTIC	C-746-B	No
44824-03		GEOTEXTILE/PLASTIC	C-746-B	No
44824-04		GEOTEXTILE/PLASTIC	C-746-B	No
44824-05		GEOTEXTILE/PLASTIC	C-746-B	No
44825-01		GEOTEXTILE/PLASTIC	C-746-B	No
44825-02		GEOTEXTILE/PLASTIC	C-746-B	No
44825-03		GEOTEXTILE/PLASTIC	C-746-B	No
44825-04		GEOTEXTILE/PLASTIC	C-746-B	No
44825-05		GEOTEXTILE/PLASTIC	C-746-B	No
44825-06		GEOTEXTILE/PLASTIC	C-746-B	No
44825-07		GEOTEXTILE/PLASTIC	C-746-B	No
44825-08		GEOTEXTILE/PLASTIC	C-746-B	No
53199-01		GLASS	C-746-H3	No
6229		GLASS AND PLASTIC BOTTLES	C-752-A	No
36823-01		GLASS BOTTLES	C-746-H3	No
07249-01		GLASS JARS/SAMPLES/FILTERS/ALKALI SLUDGE	C-746-B	No
CAS-10909		GLASS, PAPER & PLASTIC	C-753-A	No
CAS-10911		GLASS, PAPER, & PLASTIC	C-753-A	No
CAS-10910		GLASS, PAPER, PLASTIC	C-753-A	No
CAS-12517		GLASS, PLASTICS, PAPER, SAMPLES	C-753-A	No
53185-01		GLASS/BOTTLEWARE	C-746-H3	No
CAS-14064		GLASS/PAPER/PLASTIC	C-337	No
CAS-14277		GLASS/PAPER/PLASTIC	C-337	No
13848-01		GLASS/TYVEK/PAPER/GLOVES	C-746-V	No
13848-02		GLASS/TYVEK/PAPER/GLOVES	C-746-V	No
22808-001		GLOVES	C-746-B	Yes
22808-002		GLOVES	C-746-H3	Yes
CASX-15478		GLOVES, RAGS, PANS, PADS, PLASTI	C-746-A	No
18429-02		GLOVES/FILTERS/RAGS/PADS/SWEEPINGS/DIRT	C-333	Yes
44937-01		GLOVES/KIMWIPES/RAGS/PAPER/DEBRIS	C-746-Q	No
51819-02		GLOVES/PLASTIC/PPE	C-746-V	No
CAS-16294		GRAVEL	C-752-A	Yes
CAS-16295		GRAVEL	C-753-A	Yes
CAS-16296		GRAVEL	C-753-A	Yes
CAS-16298		GRAVEL	C-753-A	Yes
CAS-16301		GRAVEL	C-753-A	Yes
CAS-16302		GRAVEL	C-753-A	Yes
CAS-14686		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14733		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14734		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14735		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14736		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14737		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14738		GRAVEL/DEBRIS	C-753-A	Yes

CAS-14739		GRAVEL/DEBRIS	C-753-A	Yes
CAS-14740		GRAVEL/DEBRIS	C-753-A	Yes
CASX-17363		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17364		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17365		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17366		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17367		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17368		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17369		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17370		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17371		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17372		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17373		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17374		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17375		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17376		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17377		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17378		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17379		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17380		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17381		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17382		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17383		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17384		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17385		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17386		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17387		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17388		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17389		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17390		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17391		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17392		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17393		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CASX-17394		GRAVEL/SOIL DEBRIS	C-746-B	Yes
CAS-15236		GRAVEL/TYVEKS/PLASTIC	C-746-B	Yes
CAS-15394		GRAVEL/UNDERLAYMENT	C-753-A	Yes
CAS-17520		GROUNDING VAULT SLUDGE	C-746-A	No
CASX-18015		GROUNDING VAULT SLUDGE	C-752-A	No
SI-0663		GROUT	C-746-B	No
SI-1350		GROUT	C-746-B	No
SI-1352		GROUT	C-746-B	No
SI-0107		GROUT	C-746-B	No
SI-0580		GROUT	C-746-B	No
SI-0630		GROUT	C-746-B	No
SI-1351		GROUT	C-746-B	No
SI-0013		GROUT, WATER	C-746-Q	Yes
SI-0525		HOSES, TUBING	C-746-B	No
44937-02		HOSES/PADS/GLOVES/KIMWIPES	C-746-Q	No
13374-01		HYPALON	C-746-B	No
13374-02		HYPALON	C-746-B	No
13374-03		HYPALON	C-746-B	No
43841-01		HYPALON	C-746-V	No
52737-01		HYPALON	C-752-A	No
52737-02		HYPALON	C-752-A	No
CAS-16001		HYPALON	C-753-A	No

53222-01		HYPALON/PPE/LAB WASTE	C-753-A	No
CASX-18116		HYPALON/RAGS/GRASS FROM OUTFALL	C-746-B	Yes
103180-01		26 & 27	C-752-A	Yes
103626-01		INVESTIGATIONS	C-752-A	Yes
103153-03		IDW SOIL FROM BORING 4-24	C-752-A	Yes
103153-04		IDW SOIL FROM BORING 4-24	C-752-A	Yes
103181-03		IDW SOIL FROM WAG 3, SWMU 4	C-752-A	Yes
103181-04		IDW SOIL FROM WAG 3, SWMU 4	C-752-A	Yes
103181-05		IDW SOIL FROM WAG 3, SWMU 4	C-752-A	Yes
101586-01		LAB AQUEOUS WASTE	C-746-B	Yes
51322-03		LAB PACK LIQUID SAMPLES &	C-746-B	Yes
52752-01		LAB PACK SOIL TREATABILITY SAMPL	C-746-B	Yes
104316-01		LAB PACKED SAMPLES	C-752-A	No
52777-01		LAB RESIDUALS	C-746-V	No
52777-02		LAB RESIDUALS	C-746-V	No
52777-03		LAB RESIDUALS	C-746-V	No
52777-04		LAB RESIDUALS	C-746-V	No
38167-01		LAB RESIDUALS (VARIOUS ER PROJECTS)	C-746-H3	Yes
38167-02		LAB RESIDUALS (VARIOUS ER PROJECTS)	C-746-H3	Yes
38167-03		LAB RESIDUALS (VARIOUS ER PROJECTS)	C-746-H3	Yes
104307-01		LAB SAMPLES	C-752-A	No
102590-01		LAB SAMPLING WASTE	C-746-A	No
102587-01		LAB SAMPLING WASTE	C-746-Q	No
102587-02		LAB SAMPLING WASTE	C-746-Q	No
101584-01		LAB SOLIDS	C-746-A	No
SI-2086		LAB WASTE	C-746-H3	No
SI-2088		LAB WASTE	C-746-H3	No
SI-3098		LAB WASTE	C-746-H3	No
SI-3099		LAB WASTE	C-746-H3	No
SI-3520		LAB WASTE	C-746-H3	No
CAS-15850		LAB WASTE	C-753-A	No
CAS-16679		LAB WASTE	C-753-A	No
SI-2085		LAB WASTE	C-746-H3	Yes
CAS-09734		LAB WASTE - BOTTLES AND WIPES	C-746-B	No
CAS-11233		LAB WASTE - GLOVES,TYVEKS,PAPER	C-753-A	No
CAS-11234		LAB WASTE - GLOVES,TYVEKS,PAPER	C-753-A	No
CAS-11236		LAB WASTE - GLOVES,TYVEKS,PAPER	C-753-A	No
55704-01		LAB WASTE PCB/LOW LEVEL SOLIDS	C-746-A	No
CAS-10140		LAB WASTE/PAPER/PLASTIC	C-746-B	No
CASX-18008		LAB WASTE-SOLID SAMPLES	C-746-H3	No
HC-1710		LEACHATE LIQUID/SOLID RESIDUE	C-746-H3	Yes
HC-1711		LEACHATE LIQUID/SOLID RESIDUE	C-746-H3	Yes
HC-1712		LEACHATE LIQUID/SOLID RESIDUE	C-746-H3	Yes
CAS-03703		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03704		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03705		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03706		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03707		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03708		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03709		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03710		LEACHATE PIT SLUDGE	C-753-A	Yes
CAS-03711		LEACHATE PIT SLUDGE	C-753-A	Yes
50226-01		LEACHATE SAMPLES FROM CONCRETE	C-746-H3	Yes
CASX-18078		LIFT STATION SUMP SEDIMENT	C-746-A	Yes
CASX-18079		LIFT STATION SUMP SEDIMENT	C-746-A	Yes

CASX-18080		LIFT STATION SUMP SEDIMENT	C-746-A	Yes
37185-01		LIFTSTATION SLUDGE	C-746-B	Yes
37185-02		LIFTSTATION SLUDGE	C-746-B	Yes
37185-03		LIFTSTATION SLUDGE	C-746-B	Yes
104778-01		LIME	C-752-A	No
CASX-15491		LIMESTONE ROCK	C-746-B	Yes
29261-01		LIQUID SLUDGE/LIQUID RESIN	C-746-B	No
46281-01		CUT UP	C-746-H3	Yes
102755		MEGA WAG	C-752-C	No
102868		MEGA WAG	C-752-C	No
103630		MEGA WAG	C-752-C	No
102194		MEGA WAG	C-752-C	Yes
102643		MEGA WAG	C-752-C	Yes
102647		MEGA WAG	C-752-C	Yes
102759		MEGA WAG	C-752-C	Yes
102870		MEGA WAG	C-752-C	Yes
102905		MEGA WAG	C-752-C	Yes
103033		MEGA WAG	C-752-C	Yes
103173		MEGA WAG	C-752-C	Yes
103174		MEGA WAG	C-752-C	Yes
103175		MEGA WAG	C-752-C	Yes
103183		MEGA WAG	C-752-C	Yes
103192		MEGA WAG	C-752-C	Yes
12528-01		MISC PAPER/PLASTIC/ION EXCHANGE RESINS	C-333	No
CAS-08487		MISC. SOILD PCB/U-CONTAMINATED	C-746-B	No
62161-01		MISC. SOLID SAMPLES	C-746-H3	No
44962-45		MUD	C-746-A	No
SI-0095		MUD	C-746-B	Yes
SI-0104		MUD	C-746-B	Yes
SI-0141		MUD	C-746-B	Yes
SI-0143		MUD	C-746-B	Yes
SI-0218?		MUD	C-746-B	Yes
SI-0318		MUD	C-746-B	Yes
SI-0598		MUD	C-746-B	Yes
SI-0632		MUD	C-746-B	Yes
SI-0743		MUD	C-746-B	Yes
SI-0754		MUD	C-746-B	Yes
SI-0802		MUD	C-746-B	Yes
44962-13		MUD	C-746-H3	No
44962-15		MUD	C-746-H3	No
44962-16		MUD	C-746-H3	No
44962-17		MUD	C-746-H3	No
44962-20		MUD	C-746-H3	No
44962-21		MUD	C-746-H3	No
44962-22		MUD	C-746-H3	No
44962-23		MUD	C-746-H3	No
44962-47		MUD	C-746-H3	No
44962-64		MUD	C-746-H3	No
44962-68		MUD	C-746-H3	No
44962-69		MUD	C-746-H3	No
44962-81		MUD	C-746-H3	No
44962-83		MUD	C-746-H3	No
44962-84		MUD	C-746-H3	No
44962-86		MUD	C-746-H3	No
44962-90		MUD	C-746-H3	No

44965-01		MUD	C-746-H3	No
44965-02		MUD	C-746-H3	No
44965-03		MUD	C-746-H3	No
44965-04		MUD	C-746-H3	No
44965-05		MUD	C-746-H3	No
44965-06		MUD	C-746-H3	No
44965-07		MUD	C-746-H3	No
44965-08		MUD	C-746-H3	No
44965-09		MUD	C-746-H3	No
44965-10		MUD	C-746-H3	No
SI-0358		MUD	C-746-H3	Yes
SI-0423		MUD	C-746-H3	Yes
35594-01		MUD - SLUDGE	C-746-H3	Yes
35594-06		MUD - SLUDGE	C-746-H3	Yes
35594-07		MUD - SLUDGE	C-746-H3	Yes
35594-03		MUD - SLUDGE	C-746-V	Yes
35594-04		MUD - SLUDGE	C-746-V	Yes
35594-05		MUD - SLUDGE	C-746-V	Yes
35594-08		MUD - SLUDGE	C-746-V	Yes
35594-09		MUD - SLUDGE	C-746-V	Yes
35594-11		MUD - SLUDGE	C-746-V	Yes
SI-0087		MUD (SOIL)	C-746-H3	Yes
33244-01		MUD FROM LIFT STATION SUMP	C-752-A	Yes
SI-0744		MUD FROM SUMP CLEANOUT	C-746-B	Yes
SI-0753		MUD FROM SUMP CLEANOUT	C-746-B	Yes
SI-0626		MUD/PLASTIC	C-746-B	Yes
SI-0627		MUD/PLASTIC	C-746-B	Yes
SI-0521		MUD/RADSORB	C-746-H3	Yes
SI-0613		MUD/ROPE/GLOVES	C-746-B	Yes
SI-0534		MUD; PLASTIC	C-752-A	Yes
SI-0738		MUDDY PLASTIC	C-746-B	Yes
59778-01		N/A	C-746-V	N/A
61947-01		NONINCINERABLE SAMPLING DEBRIS	C-753-A	No
62572-01		NONINCINERABLE SAMPLING DEBRIS	C-753-A	No
62136-01		NONINCINERABLE SOLID SAMPLES	C-746-A	No
61899-01		NONINCINERABLE SOLID SAMPLES	C-753-A	No
SI-0499		OFS SOIL (LAB RESIDUALS)	C-746-B	Yes
SI-1206		OFS SOLID, SOIL, LAB RESIDUAL	C-746-B	Yes
SI-0071		OFS SOLIDS (LAB RESIDUALS)	C-746-B	Yes
105109-01		OIL & WATER FROM UST 17	C-752-A	Yes
15498-01		OIL CONTAMINATED PLASTIC/GRAVEL	C-746-V	Yes
51897-01		OIL CONTAMINATED SOIL FROM UST RELEASE	C-752-A	Yes
51897-02		OIL CONTAMINATED SOIL FROM UST RELEASE	C-752-A	Yes
51897-03		OIL CONTAMINATED SOIL FROM UST RELEASE	C-752-A	Yes
CAS-14729		OIL HOSE/RAGS/GLOVES-SPILL CLNUP	C-753-A	No
48169-01		OIL LADDEN SOIL	C-746-H3	Yes
48169-02		OIL LADDEN SOIL	C-746-H3	Yes
48169-03		OIL LADDEN SOIL	C-746-H3	Yes
48169-04		OIL LADDEN SOIL	C-746-H3	Yes
48169-05		OIL LADDEN SOIL	C-746-H3	Yes
48169-06		OIL LADDEN SOIL	C-746-H3	Yes
48169-07		OIL LADDEN SOIL	C-746-H3	Yes
48169-08		OIL LADDEN SOIL	C-746-H3	Yes
48169-09		OIL LADDEN SOIL	C-746-H3	Yes
48169-10		OIL LADDEN SOIL	C-746-H3	Yes

53184-01		OIL SOAKED RAGS/ABSORBENT PADS	C-746-H3	No
101469-01		OILY RAGS, GLOVES, ABSORBENTS	C-753-A	No
101468-01		OILY RAGS,GLOVES,ETC	C-753-A	No
CASX-16131		OILY RAGS,GLOVES,PADS,ABSORBANTS	C-746-A	No
CASX-16132		OILY RAGS,GLOVES,PADS,ABSORBANTS	C-746-A	No
CASX-15758		OILY RAGS/FILTERS/GLOVES	C-746-A	No
6903		OILY RAGS/GLOVES/ABSORBENTS	C-746-A	No
CASX-15751		OILY RAGS/GLOVES/FILTERS	C-746-A	No
CASX-15759		OILY RAGS/GLOVES/FILTERS	C-746-A	No
CASX-16610		OILY RAGS/GLOVES/FILTERS/ABSORB	C-746-A	No
35125-01		OILY RAGS/GLOVES/PIGS/ABSORBENTS	C-753-A	No
CAS-18094		OILY RAGS/PPE/PIGS/ABSORBENTS	C-746-B	No
CASX-15741		OILY RAGS-GLOVES/ABSORBENTS	C-746-A	No
CASX-15742		OILY RAGS-GLOVES-ABSORBENTS	C-746-A	No
CASX-15744		OILY RAGS-GLOVES-ABSORBENTS	C-746-A	No
CASX-15745		OILY RAGS-GLOVES-ABSORBENTS	C-746-A	No
CASX-16338		OILY ROCKS	C-746-A	Yes
46011-01		OUTFALL 010 SUMP SLUDGE	C-746-Q	Yes
46011-02		OUTFALL 010 SUMP SLUDGE	C-746-Q	Yes
48162-01		OUTFALL 011 FLUME SLUDGE/DEBRIS	C-746-A	Yes
14889-01		OUTFALL SLUDGE	C-333	Yes
51329-01		OUTFALL SLUDGE	C-746-B	Yes
37184-01		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-02		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-03		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-04		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-05		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-06		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-07		OUTFALL SUMP SLUDGE	C-746-B	Yes
37184-08		OUTFALL SUMP SLUDGE	C-746-B	Yes
SI-2038		PAD SUMP CO #1	C-746-A	No
SI-2039		PAD SUMP CO #1	C-746-A	No
SI-2040		PAD SUMP CO #1	C-746-A	No
SI-2041		PAD SUMP CO #1	C-746-A	No
SI-2020		PAD SUMP CO #2	C-746-A	No
SI-2021		PAD SUMP CO #2	C-746-A	No
SI-2022		PAD SUMP CO #2	C-746-A	No
SI-2044		PAD SUMP CO #3	C-746-A	No
SI-2045		PAD SUMP CO #3	C-746-A	No
SI-2046		PAD SUMP CO #3	C-746-A	No
SI-2047		PAD SUMP CO #3	C-746-A	No
SI-2058		PAD SUMP CO #3	C-746-A	No
SI-2059		PAD SUMP CO #3	C-746-A	No
SI-2060		PAD SUMP CO #5	C-746-A	Yes
SI-3001		PAD SUMP CO #5	C-746-A	Yes
SI-3002		PAD SUMP CO #5	C-746-A	Yes
SI-2061		PAD SUMP CO #5	C-746-M	Yes
SI-2066		PAD SUMP CO #5	C-746-M	Yes
SI-2067		PAD SUMP CO #5	C-746-M	Yes
SI-3000		PAD SUMP CO #5	C-746-Q	Yes
SI-3003		PAD SUMP CO #6	C-746-A	Yes
SI-3031		PAD SUMP CO #6	C-746-A	Yes
SI-3032		PAD SUMP CO #6	C-746-A	Yes
SI-3033		PAD SUMP CO #6	C-746-A	Yes
SI-3034		PAD SUMP CO #6	C-746-A	Yes

SI-3035		PAD SUMP CO #6	C-746-A	Yes
SI-3036		PAD SUMP CO #6	C-746-A	Yes
SI-3045		PAD SUMP CO #6	C-746-A	Yes
SI-3083		PAD SUMP CO #7	C-746-Q	Yes
SI-3085		PAD SUMP CO #7	C-746-Q	Yes
SI-3086		PAD SUMP CO #7	C-746-M	Yes
SI-3087		PAD SUMP CO #7	C-746-Q	Yes
SI-3082		PAD SUMP CO #7	C-746-H3	Yes
SI-3084		PAD SUMP CO #7	C-746-H3	Yes
SI-3088		PAD SUMP CO #7	C-746-H3	Yes
SI-3534		PAD SUMP CO #9	C-746-A	Yes
SI-3535		PAD SUMP CO #9	C-746-A	Yes
SI-3536		PAD SUMP CO #9	C-746-A	Yes
SI-3537		PAD SUMP CO #9	C-746-A	Yes
SI-3538		PAD SUMP CO #9	C-746-A	Yes
SI-3539		PAD SUMP CO #9	C-746-A	Yes
CASX-15458		PADS, PANS, PLASTIC, RAGS	C-746-H3	No
CAS-14453		PADS/PIGS/RUBBER/PLASTIC	C-753-A	No
CAS-15404		PADS/PLASTIC (SPILL PCB-291)	C-753-A	No
101454-01		PADS/PLASTIC/PPE	C-746-A	No
103203-01		PAPER & PLASTIC	C-746-A	No
CAS-09731		PAPER & PLASTIC	C-746-B	No
CAS-11312		PAPER & PLASTIC	C-753-A	No
32827-01		PAPER TOWELS	C-746-H3	No
CAS-12514		PAPER, PLASTIC	C-753-A	No
CAS-16032		PAPER, PLASTIC	C-753-A	No
CAS-12516		PAPER, PLASTIC, GLASS	C-753-A	No
13681-01		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-02		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-03		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-04		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-05		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-06		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-07		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-08		PAPER/CARDBOARD/PLASTIC	C-333	No
13681-09		PAPER/CARDBOARD/PLASTIC	C-333	No
CAS-14452		PAPER/MISC SAMPLES/PLASTIC/GLASS	C-337	No
45312-01		PAPER/PLASTIC	C-753-A	No
CAS-12637		PAPER/PLASTIC	C-753-A	No
20292-01		PAPER/PLASTIC/DIRT	C-333	Yes
45246-01		PAPER/PLASTIC/DIRT/GLASS/RUBBER	C-753-A	Yes
20309-01		PAPER/PLASTIC/DIRT/ROPE/TAPE	C-333	Yes
20309-03		PAPER/PLASTIC/DIRT/ROPE/TAPE	C-333	Yes
20309-05		PAPER/PLASTIC/DIRT/ROPE/TAPE	C-333	Yes
20309-06		PAPER/PLASTIC/DIRT/ROPE/TAPE	C-333	Yes
20309-08		PAPER/PLASTIC/DIRT/ROPE/TAPE	C-333	Yes
102591-01		PAPER/PLASTIC/ETC	C-746-A	No
CAS-14065		PAPER/PLASTIC/GLASS	C-337	No
CAS-14273		PAPER/PLASTIC/GLASS	C-337	No
CAS-14724		PAPER/PLASTIC/GLASS	C-337	No
CAS-15060		PAPER/PLASTIC/GLASS	C-337	No
CAS-15074		PAPER/PLASTIC/GLASS	C-337	No
CAS-12635		PAPER/PLASTIC/GLASS	C-753-A	No
CAS-15421		PAPER/PLASTIC/GLASS	C-753-A	No
CAS-15486		PAPER/PLASTIC/GLASS	C-753-A	No

CAS-15584		PAPER/PLASTIC/GLASS	C-753-A	No
CAS-15615		PAPER/PLASTIC/GLASS	C-753-A	No
47630-01		PAPER/PLASTIC/GLASS VIALS/SOIL	C-753-A	Yes
CAS-14399		PAPER/PLASTIC/GLASS/MISC	C-337	No
CAS-14723		PAPER/PLASTIC/GLASS/SAMPLE WASTE	C-337	No
CAS-17532		PAPER/PLASTIC/GLASS/SOIL	C-337	Yes
47641-01		PAPER/PLASTIC/GLASS/SOIL	C-746-A	Yes
45234-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
45243-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
47606-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
47607-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
47629-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
47647-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
47703-01		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
CAS-17024		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
CAS-18085		PAPER/PLASTIC/GLASS/SOIL	C-753-A	Yes
CAS-12891		PAPER/PLASTIC/GLASS/SOIL SAMPLES	C-337	Yes
47619-01		PAPER/PLASTIC/GLASS/SOIL SAMPLES	C-753-A	Yes
47627-01		PAPER/PLASTIC/GLASS/SOIL/SOLID	C-753-A	Yes
CAS-12636		PAPER/PLASTIC/GLASS/SOILS	C-753-A	Yes
20306-01		PAPER/PLASTIC/GLOVES/ROPE/TAPE/DIRT	C-333	Yes
20306-03		PAPER/PLASTIC/GLOVES/ROPE/TAPE/DIRT	C-333	Yes
20306-04		PAPER/PLASTIC/GLOVES/ROPE/TAPE/DIRT	C-333	Yes
47643-01		PAPER/PLASTIC/GRASS/SOIL/RUBBER	C-746-A	Yes
07244-01		PAPER/PLASTIC/GREEN SALT	C-746-B	No
06441-02		PAPER/PLASTIC/METAL/GLASS	C-746-B	No
12502-01		PAPER/PLASTIC/PPE/PADS	C-746-B	No
06441-11		PAPER/PLASTIC/RAGS/METAL/FLOORSWEEP	C-746-B	No
34938-14		PAPER/PLASTIC/ROPE/CARDBOARD/DIRT	C-333	Yes
20209-02		PAPER/PLASTIC/ROPE/DIRT	C-333	Yes
45244-01		PAPER/PLASTIC/SOIL/GLASS	C-753-A	Yes
CAS-15061		PAPER/PLASTIC/TRASH	C-337	No
CAS-14580		PAPER/PLASTIC/TRASH/GLASS	C-337	No
04587-03		PAPER/RAGS/PLASTIC/GLASSWARE	C-746-Q	No
SI-0094		PAPER; PLASTIC	C-746-B	No
CAS-09732		PCB & U SAMPLES IN GLASS JARS	C-746-B	No
102051-01		PCB FLUSH WATER	C-752-A	Yes
CAS-17315		PCB PAPER/PPE/GLASS	C-753-A	No
CAS-17125		PCB SOLID SAMPLES	C-753-A	No
CAS-17408		PCB/RAD SOLID SAMPLES	C-753-A	No
CAS-16498		PCB/URANIUM/PAPER, PLASTIC	C-753-A	No
CAS-10052		PEA GRAVEL (PADS/PLAS/CLEAN UP)	C-746-B	Yes
CAS-14249		PEA GRAVEL/UNDERLAYMENT	C-753-A	Yes
37955-01		PETROLEUM ABSORBENT PADS	C-746-H3	No
37955-02		PETROLEUM ABSORBENT PADS	C-746-H3	No
46158-01		PETROLEUM PADS	C-746-H3	No
SI-2951		PH AC	C-746-A	No
106189-01		PHASE 1 SI SOILS	C-746-B	Yes
106190-01		PHASE 1 SI SOILS	C-746-B	Yes
106191-01		PHASE 1 SI SOILS	C-746-B	Yes
106192-01		PHASE 1 SI SOILS	C-746-B	Yes
106193-01		PHASE 1 SI SOILS	C-746-B	Yes
106194-01		PHASE 1 SI SOILS	C-746-B	Yes
106195-01		PHASE 1 SI SOILS	C-746-B	Yes
104511		Piezometer Abandonment	C-752-C	Yes

51816-01		PIGMATS/PPE/PLASTIC/KIMWIPES	C-746-Q	No
10962-001		PLASTIC	C-746-B	No
44819-02		PLASTIC	C-746-B	No
44820-03		PLASTIC	C-746-B	No
44829-01		PLASTIC	C-746-B	No
49617-01		PLASTIC	C-746-B	No
49620-01		PLASTIC	C-746-B	No
49621-01		PLASTIC	C-746-B	No
49621-02		PLASTIC	C-746-B	No
SI-0287		PLASTIC	C-746-B	No
SI-0391		PLASTIC	C-746-B	No
SI-0393		PLASTIC	C-746-B	No
31007-001		PLASTIC	C-746-H3	No
31007-002		PLASTIC	C-746-H3	No
31007-003		PLASTIC	C-746-H3	No
31178-08		PLASTIC	C-746-H3	No
31178-09		PLASTIC	C-746-H3	No
31178-11		PLASTIC	C-746-H3	No
36401-02		PLASTIC	C-746-H3	No
36431-01		PLASTIC	C-746-H3	No
36431-02		PLASTIC	C-746-H3	No
44561-01		PLASTIC	C-746-H3	No
44561-02		PLASTIC	C-746-H3	No
44561-03		PLASTIC	C-746-H3	No
44561-04		PLASTIC	C-746-H3	No
44561-05		PLASTIC	C-746-H3	No
44561-06		PLASTIC	C-746-H3	No
44561-07		PLASTIC	C-746-H3	No
44561-08		PLASTIC	C-746-H3	No
44561-09		PLASTIC	C-746-H3	No
44561-11		PLASTIC	C-746-H3	No
44561-12		PLASTIC	C-746-H3	No
44561-13		PLASTIC	C-746-H3	No
44561-14		PLASTIC	C-746-H3	No
44855-01		PLASTIC	C-746-H3	No
44855-02		PLASTIC	C-746-H3	No
44855-03		PLASTIC	C-746-H3	No
44855-04		PLASTIC	C-746-H3	No
44855-05		PLASTIC	C-746-H3	No
44855-06		PLASTIC	C-746-H3	No
44855-07		PLASTIC	C-746-H3	No
44855-08		PLASTIC	C-746-H3	No
44855-09		PLASTIC	C-746-H3	No
44855-10		PLASTIC	C-746-H3	No
44855-11		PLASTIC	C-746-H3	No
44855-12		PLASTIC	C-746-H3	No
44855-13		PLASTIC	C-746-H3	No
44855-14		PLASTIC	C-746-H3	No
44855-15		PLASTIC	C-746-H3	No
44855-16		PLASTIC	C-746-H3	No
46145-01		PLASTIC	C-746-H3	No
46145-02		PLASTIC	C-746-H3	No
46145-03		PLASTIC	C-746-H3	No
46145-04		PLASTIC	C-746-H3	No
46145-05		PLASTIC	C-746-H3	No

46145-06		PLASTIC	C-746-H3	No
46145-07		PLASTIC	C-746-H3	No
46145-08		PLASTIC	C-746-H3	No
46160-01		PLASTIC	C-746-H3	No
46160-02		PLASTIC	C-746-H3	No
53129-01		PLASTIC	C-752-A	No
36432-02		PLASTIC GROUND COVER	C-746-H3	No
SI-1424		PLASTIC HOSE	C-746-B	No
SI-1457		PLASTIC HOSE	C-746-B	No
SI-1475		PLASTIC HOSE	C-746-B	No
SI-1471		PLASTIC HOSE	C-746-B	No
CAS-14068		PLASTIC LINERS/PADS/ROCKS	C-746-A	Yes
38042-01		PLASTIC LININGS	C-746-H3	No
38042-02		PLASTIC LININGS	C-746-H3	No
38042-03		PLASTIC LININGS	C-746-H3	No
38042-04		PLASTIC LININGS	C-746-H3	No
38042-05		PLASTIC LININGS	C-746-H3	No
38042-06		PLASTIC LININGS	C-746-H3	No
38042-07		PLASTIC LININGS	C-746-H3	No
38042-08		PLASTIC LININGS	C-746-H3	No
101103-01		PLASTIC SHEETING	C-752-A	No
101103-02		PLASTIC SHEETING	C-752-A	No
102509-01		PLASTIC SHEETING	C-752-A	No
102509-02		PLASTIC SHEETING	C-752-A	No
46953-01		PLASTIC SHEETING	C-752-A	No
46953-02		PLASTIC SHEETING	C-752-A	No
58453-01		PLASTIC SHEETING	C-752-A	No
22813-001		PLASTIC SHEETS	C-746-H3	No
22818-001		PLASTIC SHEETS	C-746-H3	No
SI-0707		PLASTIC TUBING/RADSORB	C-746-H3	No
SI-1124		PLASTIC TUBING/RADSORB	C-746-H3	No
22605-001		PLASTIC, GLOVES	C-746-H3	No
22605-002		PLASTIC, GLOVES	C-746-H3	No
32482-01		PLASTIC, PAPER, CLOTH	C-333	No
32482-02		PLASTIC, PAPER, CLOTH	C-333	No
32482-03		PLASTIC, PAPER, CLOTH	C-333	No
35931-01		PLASTIC, PLASTIC TUBING, LATEX GLOVES, PPE	C-746-H3	No
46260-02		PLASTIC/DEBRIS FROM NICKEL STRP	C-746-Q	No
24577-01		PLASTIC/DIRT/GRASS	C-333	Yes
CAS-12638		PLASTIC/GLASS/SOIL SAMPLES	C-753-A	Yes
20490-01		PLASTIC/GRAVEL	C-746-Q	Yes
20490-02		PLASTIC/GRAVEL	C-746-Q	Yes
CAS-18050		PLASTIC/MASLIN	C-746-A	No
CAS-14855		PLASTIC/METAL/GRAVEL	C-337	Yes
CAS-15396		PLASTIC/PADS (SPILL PCB-291)	C-753-A	No
CAS-15413		PLASTIC/PADS (SPILL PCB-291)	C-753-A	No
SI-1476		PLASTIC/PAINT CANS	C-746-B	No
102354-01		PLASTIC/PAPER	C-746-Q	No
102354-02		PLASTIC/PAPER	C-746-Q	No
102354-03		PLASTIC/PAPER	C-746-Q	No
102354-04		PLASTIC/PAPER	C-746-Q	No
102354-05		PLASTIC/PAPER	C-746-Q	No
51378-01		PLASTIC/PAPER	C-746-V	No
51378-02		PLASTIC/PAPER	C-746-V	No
49614-01		PLASTIC/PPE	C-746-B	No

SI-1456		PLASTIC/PPE	C-746-B	No
42706-01		PLASTIC/PPE	C-752-A	No
42706-02		PLASTIC/PPE	C-752-A	No
42706-03		PLASTIC/PPE	C-752-A	No
42706-04		PLASTIC/PPE	C-752-A	No
42706-05		PLASTIC/PPE	C-752-A	No
42706-06		PLASTIC/PPE	C-752-A	No
42706-07		PLASTIC/PPE	C-752-A	No
42706-08		PLASTIC/PPE	C-752-A	No
42706-09		PLASTIC/PPE	C-752-A	No
42706-10		PLASTIC/PPE	C-752-A	No
42706-12		PLASTIC/PPE	C-752-A	No
42706-13		PLASTIC/PPE	C-752-A	No
42706-14		PLASTIC/PPE	C-752-A	No
42706-15		PLASTIC/PPE	C-752-A	No
42706-16		PLASTIC/PPE	C-752-A	No
42706-17		PLASTIC/PPE	C-752-A	No
42706-18		PLASTIC/PPE	C-752-A	No
31225-01		PLASTIC/SAND/GRAVEL	C-746-H3	Yes
31225-02		PLASTIC/SAND/GRAVEL	C-746-H3	Yes
31225-03		PLASTIC/SAND/GRAVEL	C-746-H3	Yes
31225-04		PLASTIC/SAND/GRAVEL	C-746-H3	Yes
103805-01		PLASTING SHEETING	C-752-A	No
103805-02		PLASTING SHEETING	C-752-A	No
103805-03		PLASTING SHEETING	C-752-A	No
103805-04		PLASTING SHEETING	C-752-A	No
103805-05		PLASTING SHEETING	C-752-A	No
22811-001		PORTLAND CEMENT & WATER	C-746-M	Yes
22822-001		PORTLAND CEMENT & WATER	C-746-M	Yes
22817-001		PORTLAND CEMENT AND WATER	C-746-Q	Yes
29291-01		POSSIBLY METAL, WOOD, PAPER, PLASTIC	C-746-H3	No
29291-02		POSSIBLY METAL, WOOD, PAPER, PLASTIC	C-746-H3	No
29291-03		POSSIBLY METAL, WOOD, PAPER, PLASTIC	C-746-H3	No
29291-04		POSSIBLY METAL, WOOD, PAPER, PLASTIC	C-746-H3	No
29291-05		POSSIBLY METAL, WOOD, PAPER, PLASTIC	C-746-H3	No
29291-06		POSSIBLY METAL, WOOD, PAPER, PLASTIC	C-746-H3	No
HC-0367		POTASSIUM DICHROMATE FILTER CAKE	C-746-A	No
CASX-14890		PPE	C-746-A	No
48161-01		PPE	C-746-A	No
08998-01		PPE	C-746-B	No
08998-02		PPE	C-746-B	No
10960-001		PPE	C-746-B	No
10960-002		PPE	C-746-B	No
10961-001		PPE	C-746-B	No
10962-002		PPE	C-746-B	No
10962-004		PPE	C-746-B	No
10962-005		PPE	C-746-B	No
13901-023		PPE	C-746-B	No
13901-024		PPE	C-746-B	No
13901-026		PPE	C-746-B	No
13901-027		PPE	C-746-B	No
13901-029		PPE	C-746-B	No
13901-033		PPE	C-746-B	No
13901-034		PPE	C-746-B	No
13901-036		PPE	C-746-B	No

44805-01		PPE	C-746-B	No
44806-01		PPE	C-746-B	No
44807-01		PPE	C-746-B	No
44807-02		PPE	C-746-B	No
44807-03		PPE	C-746-B	No
44807-04		PPE	C-746-B	No
44807-05		PPE	C-746-B	No
44807-06		PPE	C-746-B	No
44810-01		PPE	C-746-B	No
44810-02		PPE	C-746-B	No
44810-03		PPE	C-746-B	No
44810-04		PPE	C-746-B	No
44810-05		PPE	C-746-B	No
44811-01		PPE	C-746-B	No
44811-02		PPE	C-746-B	No
44811-03		PPE	C-746-B	No
44812-01		PPE	C-746-B	No
44812-02		PPE	C-746-B	No
44812-03		PPE	C-746-B	No
44822-01		PPE	C-746-B	No
44822-02		PPE	C-746-B	No
44822-03		PPE	C-746-B	No
44822-04		PPE	C-746-B	No
44826-01		PPE	C-746-B	No
44826-02		PPE	C-746-B	No
44826-03		PPE	C-746-B	No
44826-04		PPE	C-746-B	No
44833-01		PPE	C-746-B	No
48755-01		PPE	C-746-B	No
49623-01		PPE	C-746-B	No
49624-01		PPE	C-746-B	No
49624-02		PPE	C-746-B	No
49624-03		PPE	C-746-B	No
53378-01		PPE	C-746-B	No
53378-02		PPE	C-746-B	No
SI-0002		PPE	C-746-B	No
SI-0018		PPE	C-746-B	No
SI-0020		PPE	C-746-B	No
SI-0038		PPE	C-746-B	No
SI-0040		PPE	C-746-B	No
SI-0044		PPE	C-746-B	No
SI-0051		PPE	C-746-B	No
SI-0069		PPE	C-746-B	No
SI-0078		PPE	C-746-B	No
SI-0082		PPE	C-746-B	No
SI-0127		PPE	C-746-B	No
SI-0128		PPE	C-746-B	No
SI-0155		PPE	C-746-B	No
SI-0178		PPE	C-746-B	No
SI-0209		PPE	C-746-B	No
SI-0210		PPE	C-746-B	No
SI-0250		PPE	C-746-B	No
SI-0293		PPE	C-746-B	No
SI-0333		PPE	C-746-B	No
SI-0334		PPE	C-746-B	No

SI-0344		PPE	C-746-B	No
SI-0356		PPE	C-746-B	No
SI-0460		PPE	C-746-B	No
SI-0494		PPE	C-746-B	No
SI-0502		PPE	C-746-B	No
SI-0511		PPE	C-746-B	No
SI-0521B		PPE	C-746-B	No
SI-0523		PPE	C-746-B	No
SI-0565		PPE	C-746-B	No
SI-0572		PPE	C-746-B	No
SI-0574		PPE	C-746-B	No
SI-0575		PPE	C-746-B	No
SI-0603		PPE	C-746-B	No
SI-0631		PPE	C-746-B	No
SI-0648		PPE	C-746-B	No
SI-0651		PPE	C-746-B	No
SI-0665		PPE	C-746-B	No
SI-0739		PPE	C-746-B	No
SI-0751		PPE	C-746-B	No
SI-0758		PPE	C-746-B	No
SI-0781		PPE	C-746-B	No
SI-0896		PPE	C-746-B	No
SI-0913		PPE	C-746-B	No
SI-0922		PPE	C-746-B	No
SI-0924		PPE	C-746-B	No
SI-0929		PPE	C-746-B	No
SI-0935		PPE	C-746-B	No
SI-0952		PPE	C-746-B	No
SI-0953		PPE	C-746-B	No
SI-0978		PPE	C-746-B	No
SI-0985		PPE	C-746-B	No
SI-1005		PPE	C-746-B	No
SI-1019		PPE	C-746-B	No
SI-1050		PPE	C-746-B	No
SI-1053		PPE	C-746-B	No
SI-1074		PPE	C-746-B	No
SI-1076		PPE	C-746-B	No
SI-1089		PPE	C-746-B	No
SI-1090		PPE	C-746-B	No
SI-1091		PPE	C-746-B	No
SI-1093		PPE	C-746-B	No
SI-1102		PPE	C-746-B	No
SI-1103		PPE	C-746-B	No
SI-1120		PPE	C-746-B	No
SI-1141		PPE	C-746-B	No
SI-1303		PPE	C-746-B	No
SI-1432		PPE	C-746-B	No
SI-1448		PPE	C-746-B	No
13901-018		PPE	C-746-H3	No
13901-019		PPE	C-746-H3	No
13901-020		PPE	C-746-H3	No
13901-021		PPE	C-746-H3	No
13901-022		PPE	C-746-H3	No
13901-025		PPE	C-746-H3	No
13901-028		PPE	C-746-H3	No

13901-032		PPE	C-746-H3	No
13901-035		PPE	C-746-H3	No
13901-046		PPE	C-746-H3	No
13901-047		PPE	C-746-H3	No
13901-049		PPE	C-746-H3	No
31105-01		PPE	C-746-H3	No
31124-01		PPE	C-746-H3	No
31124-02		PPE	C-746-H3	No
31124-03		PPE	C-746-H3	No
31154-01		PPE	C-746-H3	No
31176-01		PPE	C-746-H3	No
31176-02		PPE	C-746-H3	No
31176-03		PPE	C-746-H3	No
31186-01		PPE	C-746-H3	No
31191-01		PPE	C-746-H3	No
31191-02		PPE	C-746-H3	No
31199-01		PPE	C-746-H3	No
31214-01		PPE	C-746-H3	No
31214-02		PPE	C-746-H3	No
32826-01		PPE	C-746-H3	No
32832-01		PPE	C-746-H3	No
35962-01		PPE	C-746-H3	No
36407-01		PPE	C-746-H3	No
36408-01		PPE	C-746-H3	No
36413-01		PPE	C-746-H3	No
36413-02		PPE	C-746-H3	No
36449-01		PPE	C-746-H3	No
36824-01		PPE	C-746-H3	No
37941-01		PPE	C-746-H3	No
39100-01		PPE	C-746-H3	No
39100-02		PPE	C-746-H3	No
44551-01		PPE	C-746-H3	No
46102-01		PPE	C-746-H3	No
46105-01		PPE	C-746-H3	No
49669-01		PPE	C-746-H3	No
53181-01		PPE	C-746-H3	No
SI-0558		PPE	C-746-H3	No
SI-0782		PPE	C-746-H3	No
SI-1439		PPE	C-746-H3	No
46877-01		PPE	C-746-H3	No
49651-01		PPE	C-746-H3	No
49651-02		PPE	C-746-H3	No
49651-03		PPE	C-746-H3	No
46376-01		PPE	C-746-V	No
101102-01		PPE	C-752-A	No
46958-01		PPE	C-752-A	No
53781-01		PPE	C-752-A	No
58458-01		PPE	C-752-A	No
58502-01		PPE	C-752-A	No
58511-01		PPE	C-752-A	No
CAS-16155		PPE	C-753-A	No
SI-0099		PPE	C-746-B	No
SI-0138		PPE	C-746-B	No
SI-0146		PPE	C-746-B	No
SI-0163		PPE	C-746-B	No

SI-0198		PPE	C-746-B	No
SI-0204		PPE	C-746-B	No
SI-0214		PPE	C-746-B	No
SI-0263		PPE	C-746-B	No
SI-0298		PPE	C-746-B	No
SI-0323		PPE	C-746-B	No
SI-0359		PPE	C-746-B	No
SI-0397		PPE	C-746-B	No
SI-0425		PPE	C-746-B	No
SI-0765		PPE	C-746-B	No
SI-0780		PPE	C-746-B	No
SI-0795		PPE	C-746-B	No
SI-0838		PPE	C-746-B	No
SI-0847		PPE	C-746-B	No
SI-0860		PPE	C-746-B	No
SI-0872		PPE	C-746-B	No
SI-0912		PPE	C-746-B	No
SI-0983		PPE	C-746-B	No
SI-1010		PPE	C-746-B	No
SI-1023		PPE	C-746-B	No
SI-1062		PPE	C-746-B	No
SI-1138		PPE	C-746-B	No
SI-1205		PPE	C-746-B	No
SI-1434		PPE	C-746-B	No
13901-030		PPE	C-746-H3	Yes
36416-02		PPE & DIRTY PLASTIC	C-746-H3	No
36417-01		PPE & DIRTY PLASTIC	C-746-H3	No
36412-01		PPE & RADSORB	C-746-H3	No
SI-1433		PPE (HOSES) - WELL DEVELOPMENT	C-746-B	No
10962-006		PPE ?	C-746-B	No
59808-01		PPE FROM N/S DITCH	C-746-B	No
CAS-14792		PPE FROM SPILL CLEAN UP	C-753-A	No
SI-0725		PPE*	C-746-B	No
SI-0486		PPE*	C-746-B	No
SI-0709		PPE*	C-746-B	No
SI-0741		PPE*	C-746-B	No
SI-3543		PPE, PLASTIC	C-746-H3	No
CAS-17106		PPE, GLOVES, HOSE	C-753-A	No
101230-01		PPE, LAB TRASH, GLOVES	C-746-A	No
101230-02		PPE, LAB TRASH, GLOVES	C-746-A	No
101230-03		PPE, LAB TRASH, GLOVES	C-746-A	No
101230-04		PPE, LAB TRASH, GLOVES	C-746-A	No
CAS-14689		PPE, PADS, BUCKETS, PLASTIC	C-753-A	No
CASX-15476		PPE, PIGS, PADS, RAGS, PLASTIC	C-746-H3	No
10962-011		PPE, PLASTIC	C-746-B	No
CASX-15456		PPE, PLASTIC, PADS, PANS, RAGS	C-746-A	No
102542-01		PPE, PLASTIC, PADS,TEFLON BEAKER	C-746-Q	No
105108-01		PPE, PLASTSTIC FROM UST 17 PROJECT	C-752-A	No
10962-008		PPE, TUBING	C-746-B	No
47334-01		PPE/ASBORBENT PADS	C-746-V	No
10960-003		PPE/CDM OUTFALL STUDY	C-746-B	No
10960-004		PPE/CDM OUTFALL STUDY	C-746-B	No
62524-01		PPE/EMPTY BOTTLES/PAPER/PLASTIC	C-746-Q	No
CASX-17514		PPE/FILTERS	C-746-A	No
51815-01		PPE/GLOVES/KIMWIPES/	C-746-V	No

51819-01		PPE/GLOVES/PIGS/DEBRIS	C-746-V	No
CAS-15451		PPE/GRAVEL/CLEANUP DEBRIS	C-753-A	No
CAS-15452		PPE/GRAVEL/CLEANUP DEBRIS	C-753-A	No
CAS-15389		PPE/HOSES/ABSORBENTS FROM TRANSF	C-753-A	No
CAS-16585		PPE/HYPALON/RAGS	C-753-A	No
62035-01		PPE/KIMWIPES	C-746-A	No
32251-01		PPE/KIMWIPES/GLASS	C-746-Q	No
54317-01		PPE/KIMWIPES/SAMPLE RESIDUE	C-746-Q	No
101702-01		PPE/KIMWIPES/SAMPLE RESIDUE/pH STRIPS/	C-746-A	No
101702-02		PPE/KIMWIPES/SAMPLE RESIDUE/pH STRIPS/	C-746-A	No
101702-03		PPE/KIMWIPES/SAMPLE RESIDUE/pH STRIPS/	C-746-A	No
62584-01		PPE/MASLIN	C-746-Q	No
62584-02		PPE/MASLIN	C-746-Q	No
62584-03		PPE/MASLIN	C-746-Q	No
102376-01		PPE/MASLIN/PLASTIC/MAG FLUORIDE PELLETS	C-746-Q	No
102376-02		PPE/MASLIN/PLASTIC/MAG FLUORIDE PELLETS	C-746-Q	No
102376-03		PPE/MASLIN/PLASTIC/MAG FLUORIDE PELLETS	C-746-Q	No
102376-04		PPE/MASLIN/PLASTIC/MAG FLUORIDE PELLETS	C-746-Q	No
CAS-15397		PPE/PADS (SPILL PCB-291)	C-753-A	No
53758-01		PPE/PADS/PLASTIC SHEETING	C-752-A	No
CAS-14026		PPE/PADS/PLASTIC/SHOES/ROCKS	C-753-A	Yes
CASX-15728		PPE/PALLETS	C-746-H3	No
CASX-15729		PPE/PALLETS	C-746-H3	No
101577-01		PPE/PAPER	C-746-A	No
101577-02		PPE/PAPER	C-746-A	No
101577-03		PPE/PAPER	C-746-A	No
54292-01		PPE/PAPER/GLASS/SAMPLES	C-746-A	No
45863-01		PPE/PAPER/GLOVES/PLASTIC/PIG MATS/WIPES	C-746-Q	No
62508-01		PPE/PAPER/PLASTIC	C-746-A	No
101287-01		PPE/PAPER/PLASTIC/ABSORBENT PADS/MASSLIN	C-746-Q	No
32492-01		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-02		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-03		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-04		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-05		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-06		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-07		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-08		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-09		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-10		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-11		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-12		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-13		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-14		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-15		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-16		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-17		PPE/PAPER/PLASTIC/TAPE	C-333	No
32492-18		PPE/PAPER/PLASTIC/TAPE	C-333	No
54312-01		PPE/PAPER/SAMPLE RESIDUALS	C-746-A	No
62049-01		PPE/PAPER/SAMPLE RESIDUALS	C-746-A	No
62030-01		PPE/PAPER/SAMPLE RESIDUE	C-746-A	No
54297-01		PPE/PAPER/SAMPLE RESIDUE	C-746-B	No
62044-01		PPE/PAPER/SAMPLE RESIDUE	C-746-B	No
54300-01		PPE/PAPER/SAMPLE RESIDUES	C-746-A	No
54290-01		PPE/PAPER/SAMPLES	C-746-A	No

54295-01		PPE/PAPER/SAMPLES	C-746-A	No
101313-01		PPE/PIGS/PADS/ETC.	C-746-Q	No
101313-02		PPE/PIGS/PADS/ETC.	C-746-Q	No
101313-03		PPE/PIGS/PADS/ETC.	C-746-Q	No
10962-003		PPE/PLASTIC	C-746-B	No
44831-01		PPE/PLASTIC	C-746-B	No
44831-02		PPE/PLASTIC	C-746-B	No
44831-03		PPE/PLASTIC	C-746-B	No
44831-04		PPE/PLASTIC	C-746-B	No
49610-07		PPE/PLASTIC	C-746-B	No
49610-08		PPE/PLASTIC	C-746-B	No
49610-09		PPE/PLASTIC	C-746-B	No
SI-0007		PPE/PLASTIC	C-746-B	No
SI-0008		PPE/PLASTIC	C-746-B	No
SI-0043		PPE/PLASTIC	C-746-B	No
SI-0124		PPE/PLASTIC	C-746-B	No
SI-0129		PPE/PLASTIC	C-746-B	No
SI-0484		PPE/PLASTIC	C-746-B	No
SI-0503		PPE/PLASTIC	C-746-B	No
SI-0624		PPE/PLASTIC	C-746-B	No
SI-0638		PPE/PLASTIC	C-746-B	No
SI-0723		PPE/PLASTIC	C-746-B	No
SI-0796		PPE/PLASTIC	C-746-B	No
SI-1070		PPE/PLASTIC	C-746-B	No
SI-1320		PPE/PLASTIC	C-746-B	No
SI-1334		PPE/PLASTIC	C-746-B	No
SI-1339		PPE/PLASTIC	C-746-B	No
SI-1340		PPE/PLASTIC	C-746-B	No
SI-1365		PPE/PLASTIC	C-746-B	No
SI-1389		PPE/PLASTIC	C-746-B	No
SI-1406		PPE/PLASTIC	C-746-B	No
SI-1416		PPE/PLASTIC	C-746-B	No
SI-1423		PPE/PLASTIC	C-746-B	No
SI-1425		PPE/PLASTIC	C-746-B	No
SI-1430		PPE/PLASTIC	C-746-B	No
SI-1441		PPE/PLASTIC	C-746-B	No
SI-1444		PPE/PLASTIC	C-746-B	No
SI-1445		PPE/PLASTIC	C-746-B	No
SI-1453		PPE/PLASTIC	C-746-B	No
SI-1454		PPE/PLASTIC	C-746-B	No
SI-1455		PPE/PLASTIC	C-746-B	No
W-2557		PPE/PLASTIC	C-746-B	No
W-2559		PPE/PLASTIC	C-746-B	No
53109-01		PPE/PLASTIC	C-746-V	No
101112-01		PPE/PLASTIC	C-752-A	No
101112-02		PPE/PLASTIC	C-752-A	No
22023-04		PPE/PLASTIC	C-752-A	No
CAS-15604		PPE/PLASTIC	C-753-A	No
CAS-15605		PPE/PLASTIC	C-753-A	No
CAS-17041		PPE/PLASTIC	C-753-A	No
SI-0076		PPE/PLASTIC	C-746-B	No
SI-0239		PPE/PLASTIC	C-746-B	No
SI-1384		PPE/PLASTIC	C-746-B	No
SI-1395		PPE/PLASTIC	C-746-B	No
CAS-14899		PPE/PLASTIC	C-753-A	Yes

103155-03		PPE/PLASTIC BAGS/GLOVES ETC.	C-752-A	No
102471-01		PPE/PLASTIC FROM DRUM #4318	C-746-Q	No
53728-01		PPE/PLASTIC LINERS	C-752-A	No
102848-03		PPE/PLASTIC SHEETING	C-752-A	No
102848-04		PPE/PLASTIC SHEETING	C-752-A	No
102848-06		PPE/PLASTIC SHEETING	C-752-A	No
103627-01		PPE/PLASTIC SHEETING	C-752-A	No
103172-01		OPERATIO	C-752-A	No
103172-02		OPERATIO	C-752-A	No
103172-03		OPERATIO	C-752-A	No
103172-04		OPERATIO	C-752-A	No
103172-05		OPERATIO	C-752-A	No
103189-01		OPERATIO	C-752-A	No
103189-02		OPERATIO	C-752-A	No
103189-03		OPERATIO	C-752-A	No
103189-04		OPERATIO	C-752-A	No
103189-05		OPERATIO	C-752-A	No
103189-06		OPERATIO	C-752-A	No
103154-01		DRILLING AND	C-752-A	No
103154-02		DRILLING AND	C-752-A	No
103182-01		DRILLING OPER	C-752-A	No
103182-02		DRILLING OPER	C-752-A	No
103182-03		DRILLING OPER	C-752-A	No
103182-04		DRILLING OPER	C-752-A	No
103182-05		DRILLING OPER	C-752-A	No
103182-06		DRILLING OPER	C-752-A	No
102912-01		PPE/PLASTIC SHEETING/PVC TUBING	C-752-A	No
SI-0005		PPE/PLASTIC*	C-746-B	No
SI-0625		PPE/PLASTIC*	C-746-B	No
SI-0641		PPE/PLASTIC*	C-746-B	No
CAS-15391		PPE/PLASTIC/ABSORBENTS	C-753-A	No
62510-01		PPE/PLASTIC/BOTTLES/PADS/PLASTIC	C-746-Q	No
100727-01		PPE/PLASTIC/COTTEN LINERS/GLOVES/PAPER	C-746-Q	No
62584-04		PPE/PLASTIC/MASLIN	C-746-Q	No
SI-0028		PPE/PLASTIC/PAPER	C-746-B	No
52734-01		PPE/PLASTIC/PAPER WIPES	C-752-A	No
52734-02		PPE/PLASTIC/PAPER WIPES	C-752-A	No
52734-03		PPE/PLASTIC/PAPER WIPES	C-752-A	No
52734-04		PPE/PLASTIC/PAPER WIPES	C-752-A	No
52734-05		PPE/PLASTIC/PAPER WIPES	C-752-A	No
102010-01		PPE/PLASTIC/PAPER/PADS	C-746-Q	No
102923-05		PPE/PLASTIC/PVC TUBING USED AT SOIL BORING 4	C-752-A	Yes
102923-06		PPE/PLASTIC/PVC TUBING USED AT SOIL BORING 4	C-752-A	Yes
CAS-18026		PPE/PLASTIC/RUBBER SHOESCUFFS	C-746-B	No
CASX-17485		PPE/RAGS	C-746-B	No
CASX-17486		PPE/RAGS	C-746-B	No
CAS-15929		PPE/RAGS/GLOVES	C-753-A	No
CASX-17513		PPE/RAGS/GLOVES/ABSORBENTS	C-746-A	No
46742-01		PPE/RAGS/KIMWIPES	C-746-Q	No
CAS-16921		PPE/RAGS/MASLIN/LINERS	C-753-A	No
CAS-17040		PPE/RAGS/PLASTIC	C-753-A	No
CAS-14882		PPE/ROCKS/ABSORBENT	C-753-A	Yes
CAS-14883		PPE/ROCKS/ABSORBENT	C-753-A	Yes
51498-01		PPE/SAMPLE RESIDUALS	C-746-A	No
54307-01		PPE/SAMPLE RESIDUALS	C-746-A	No

62032-01		PPE/SAMPLE RESIDUE	C-746-A	No
62037-01		PPE/SAMPLE RESIDUE	C-746-A	No
62046-01		PPE/SAMPLE RESIDUE	C-746-B	No
62042-01		PPE/SAMPLE RESIDUE/KIMWIPES	C-746-B	No
54313-01		PPE/SAMPLE RESIDUE/PAPER	C-746-A	No
49630-01		PPE/SAMPLING EQUIPMENT	C-746-H3	No
CAS-17122		PPE/SPILL CLEANUP	C-753-A	No
51322-01		PPE/TOWELS/PANS	C-746-B	No
NULL-2		PPE/TUBING	C-746-B	No
32247-01		PPE/TYVEKS/GLOVES	C-746-V	No
54288-01		PPE/WIPES/RESIDUE	C-746-A	No
SI-2734		PPE; G PLASTIC	C-746-B	No
SI-3526		PPE; PLASTIC	C-746-A	No
SI-0080		PPE; PLASTIC	C-746-B	No
SI-0540		PPE; PLASTIC	C-746-B	No
SI-2034		PPE; PLASTIC	C-746-B	No
SI-2521		PPE; PLASTIC	C-746-H3	No
SI-2817		PPE; PLASTIC	C-746-H3	No
SI-0416B		PPE?	C-746-B	No
SI-1025		PPE?	C-746-B	No
SI-0602		PPE\PLASTIC\PVC TUBING	C-746-B	No
04315-06		PRECIPITATE SLUDGE	C-746-Q	No
04315-07		PRECIPITATE SLUDGE	C-746-Q	No
04315-08		PRECIPITATE SLUDGE	C-746-Q	No
04315-21		PRECIPITATE SLUDGE	C-746-Q	No
04315-22		PRECIPITATE SLUDGE	C-746-Q	No
04315-23		PRECIPITATE SLUDGE	C-746-Q	No
04315-24		PRECIPITATE SLUDGE	C-746-Q	No
04315-25		PRECIPITATE SLUDGE	C-746-Q	No
04315-37		PRECIPITATE SLUDGE	C-746-Q	No
04315-38		PRECIPITATE SLUDGE	C-746-Q	No
04315-39		PRECIPITATE SLUDGE	C-746-Q	No
04315-40		PRECIPITATE SLUDGE	C-746-Q	No
46377-01		PROTECTIVE EQUIPMENT	C-746-V	No
46377-02		PROTECTIVE EQUIPMENT	C-746-V	No
46377-03		PROTECTIVE EQUIPMENT	C-746-V	No
103785		PTZ	C-752-C	No
103787		PTZ	C-752-C	Yes
104402		PTZ	C-752-C	Yes
104499		PTZ	C-752-C	Yes
104506		PTZ	C-752-C	Yes
104508		PTZ	C-752-C	Yes
36071-01		PURGE WATER, RADSORB	C-746-H3	Yes
102912-02		PVC 1 IN. TUBING	C-752-A	No
53780-01		PVC PIPE/STAINLESS STEELE PIPE/PLASTIC	C-746-H3	No
102510-01		RAD PPE	C-752-A	No
103802-01		RAD PPE	C-752-A	No
103802-02		RAD PPE	C-752-A	No
103802-03		RAD PPE	C-752-A	No
103809-01		RAD PPE	C-752-A	No
103809-02		RAD PPE	C-752-A	No
103809-03		RAD PPE	C-752-A	No
103809-04		RAD PPE	C-752-A	No
103809-05		RAD PPE	C-752-A	No
103809-06		RAD PPE	C-752-A	No

103811-01		RAD PPE AND PLASTIC	C-752-A	No
103811-02		RAD PPE AND PLASTIC	C-752-A	No
103807-01		RAD PPE AND PLASTIC TUBING	C-752-A	No
103812-01		RAD PPE, PAPER, PLASTIC	C-752-A	No
103812-02		RAD PPE, PAPER, PLASTIC	C-752-A	No
CASX-15420		RAGS, PIGS, PADS, PANS, PLASTIC	C-746-H3	No
104936-01		RAGS, WIRE BRUSES AND PPE	C-746-A	No
CAS-17519		RAGS/GLOVES	C-753-A	No
CASX-15494		RAGS/GLOVES/ABSORBENTS	C-746-B	No
CASX-15737		RAGS/GLOVES/ABSORBENTS/SMALL CAP	C-746-A	No
CAS-14728		RAGS/PADS/GLOVES	C-746-A	No
22883-01		RAGS/PLASTIC/PAPER	C-333	No
CASX-15489		RAGS/PLASTIC/PPE/DIRT	C-746-A	No
102415-01		RECEIVER ASH / URANIUM PRECIPITATE	C-746-Q	No
11059-05		RED GRAVEL/WATER	C-746-A	Yes
11059-01		RED GRAVEL/WATER	C-746-V	Yes
11059-02		RED GRAVEL/WATER	C-746-V	Yes
11059-03		RED GRAVEL/WATER	C-746-V	Yes
11059-04		RED GRAVEL/WATER	C-746-V	Yes
11059-06		RED GRAVEL/WATER	C-746-V	Yes
11059-07		RED GRAVEL/WATER	C-746-V	Yes
11059-08		RED GRAVEL/WATER	C-746-V	Yes
33778-01		ROAD DEBRIS	C-746-H3	Yes
33778-02		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-03		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-04		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-05		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-06		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-07		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-08		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-09		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-10		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-11		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-12		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-13		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-14		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-15		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-16		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-17		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-18		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-19		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-20		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-21		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-22		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-23		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-24		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
33778-25		ROAD DEBRIS (SEE LOG SHEET)	C-746-H3	Yes
CAS-14016		ROCK	C-746-A	Yes
CAS-14017		ROCK	C-746-A	Yes
09464-01		ROCK	C-752-A	Yes
CAS-14898		ROCK AND SOIL	C-753-A	Yes
CAS-14900		ROCK AND SOIL	C-753-A	Yes
CAS-14901		ROCK AND SOIL	C-753-A	Yes
CAS-14902		ROCK AND SOIL	C-753-A	Yes
CAS-14903		ROCK AND SOIL	C-753-A	Yes

CAS-14904		ROCK AND SOIL	C-753-A	Yes
CAS-14905		ROCK AND SOIL	C-753-A	Yes
CAS-14906		ROCK AND SOIL	C-753-A	Yes
CAS-14907		ROCK AND SOIL	C-753-A	Yes
CAS-14908		ROCK AND SOIL	C-753-A	Yes
CAS-14909		ROCK AND SOIL	C-753-A	Yes
CAS-14910		ROCK AND SOIL	C-753-A	Yes
CAS-14911		ROCK AND SOIL	C-753-A	Yes
CAS-14912		ROCK AND SOIL	C-753-A	Yes
CAS-14913		ROCK AND SOIL	C-753-A	Yes
04738-04		ROCK/DIRT	C-746-H3	Yes
04738-09		ROCK/DIRT	C-746-H3	Yes
48788-01		ROCK/GRAVEL/RUST	C-746-H3	Yes
CASX-15460		ROCKS	C-746-A	Yes
CASX-15461		ROCKS	C-746-A	Yes
CASX-15462		ROCKS	C-746-A	Yes
CASX-15459		ROCKS	C-746-B	Yes
CAS-15398		ROCKS (SPILL PCB-291	C-753-A	Yes
CAS-15399		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15400		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15401		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15405		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15406		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15407		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15408		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15409		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15410		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15411		ROCKS (SPILL PCB-291)	C-753-A	Yes
CAS-15412		ROCKS (SPILL PCB-291)	C-753-A	Yes
CASX-14794		ROCKS FROM SPILL CLEANUP	C-746-B	Yes
CASX-15071		ROCKS, GLOVES, RAGS	C-746-A	Yes
CAS-15403		ROCKS/DIRT (SPILL PCB-291)	C-753-A	Yes
CASX-15073		ROCKS/GLOVES	C-746-A	Yes
CASX-15072		ROCKS/PPE	C-746-A	Yes
CAS-17449		RUBBER BOOTS/GLOVES	C-746-B	No
06441-15		RUBBER GASKETS/OILY SLUDGE/OILY RAGS	C-333	No
06441-13		RUBBER GASKETS/PAPER/PLASTIC/PADS/RAGS	C-746-B	No
CAS-06377		SAMPLE BOTTLES	C-746-B	No
CAS-16788		SAMPLE BOTTLES/TAPE/KIMWIPES	C-753-A	No
103205-01		SAMPLE RESIDUALS	C-753-A	No
CAS-10907		SAMPLE WASTE PAPER,PLSTIC DEBRIS	C-746-B	No
CAS-10939		SAMPLE WASTE PAPER,PLSTIC DEBRIS	C-746-B	No
CAS-09733		SAMPLES IN BOTTLES	C-746-B	No
61943-01		SAMPLING DEBRIS	C-746-H3	No
62530-01		SAMPLING DEBRIS	C-746-H3	No
101423-01		SAMPLING DEBRIS	C-746-Q	No
CAS-11313		SAMPLING DEBRIS	C-753-A	No
62509-01		SAMPLING DEBRIS: GLASS COLIWASAS	C-753-A	No
CAS-17658		SAMPLING DEBRIS: PPE/PAPER	C-753-A	No
CAS-17661		SAMPLING DEBRIS:PPE/PAPER/GLASS	C-753-A	No
36498-01		SAMPLING SURVEY	C-746-B	No
CAS-12844		SAMPLING WASTE-PAPER/PLSTC/GLASS	C-753-A	No
CAS-14051		SAND/GRAVEL	C-753-A	Yes
CAS-14052		SAND/GRAVEL	C-753-A	Yes
CAS-14053		SAND/GRAVEL	C-753-A	Yes

CAS-16000		SAND/ZORBALL/PPE	C-753-A	No
CASX-17484		SANDBAGS/HYPALON	C-746-B	Yes
35889-05		SARANEX/GLOVES/TAPE	C-746-H3	No
35889-01		SARANEX/GLOVES/TAPE	C-746-V	No
35889-02		SARANEX/GLOVES/TAPE	C-746-V	No
35889-03		SARANEX/GLOVES/TAPE	C-746-V	No
35889-04		SARANEX/GLOVES/TAPE	C-746-V	No
CAS-16300		SARANEX/RAGS/GLOVES	C-753-A	No
102021-01		SARANEX/TYVEK/NEOPRENE/VINYL/PLASTIC	C-746-Q	No
SI-3015		SB HA	C-752-A	Yes
CAS-17310		SEMI-SOLID SLUDGE/DIRT	C-753-A	Yes
CAS-15395		SERENEX/GLOVES/RAGS/TRASH	C-753-A	No
CASX-17499		SLUDGE	C-746-B	Yes
37995-01		SLUDGE	C-746-V	Yes
37995-02		SLUDGE	C-746-V	Yes
37995-03		SLUDGE	C-746-V	Yes
37995-04		SLUDGE	C-746-V	Yes
37995-05		SLUDGE	C-746-V	Yes
37995-06		SLUDGE	C-746-V	Yes
37995-07		SLUDGE	C-746-V	Yes
101686-01A		SLUDGE FROM 101686-01	C-752-A	No
103201-01A		SLUDGE FROM 103201-01	C-752-A	No
37183-01		SLUDGE FROM LIFT STATION	C-746-B	Yes
37183-02		SLUDGE FROM LIFT STATION	C-746-B	Yes
46012-01		SLUDGE FROM OUTFALL 002 SUMP	C-746-A	Yes
46012-02		SLUDGE FROM OUTFALL 002 SUMP	C-746-A	Yes
46879-01A		SLUDGE OF DECON WATER	C-746-B	Yes
CALX-1177A		SLUDGE OF WASTE WATER	C-746-B	Yes
35521-01A		SLUDGE OF WATER	C-746-B	Yes
35521-03A		SLUDGE OF WATER	C-746-B	Yes
47676-01		SLUDGE TANK CLEANOUT	C-752-A	No
47676-02		SLUDGE TANK CLEANOUT	C-752-A	No
47676-03		SLUDGE TANK CLEANOUT	C-752-A	No
47676-04		SLUDGE TANK CLEANOUT	C-752-A	No
CAS-14349		SLUDGE/PLASTIC/ZORBALL	C-753-A	No
53377-01		SLUDGE-011 LIFT STATION	C-746-B	Yes
53377-02		SLUDGE-011 LIFT STATION	C-746-B	Yes
53377-03		SLUDGE-011 LIFT STATION	C-746-B	Yes
53379-01		SLUDGE-012 FLUME	C-746-Q	Yes
22615-007		SOIL	C-746-A	Yes
22615-010		SOIL	C-746-A	Yes
22615-012		SOIL	C-746-A	Yes
22615-022		SOIL	C-746-A	Yes
44779-01		SOIL	C-746-A	Yes
44827-01		SOIL	C-746-A	Yes
44827-13		SOIL	C-746-A	Yes
46258-01		SOIL	C-746-A	Yes
49612-01		SOIL	C-746-A	Yes
49612-02		SOIL	C-746-A	Yes
49616-01		SOIL	C-746-A	Yes
49616-02		SOIL	C-746-A	Yes
49616-03		SOIL	C-746-A	Yes
49616-04		SOIL	C-746-A	Yes
49616-05		SOIL	C-746-A	Yes
49616-06		SOIL	C-746-A	Yes

05140-03		SOIL	C-746-B	Yes
05140-04		SOIL	C-746-B	Yes
22805-001		SOIL	C-746-B	Yes
44778-10		SOIL	C-746-B	Yes
44813-02		SOIL	C-746-B	Yes
45674-49		SOIL	C-746-B	Yes
46880-01		SOIL	C-746-B	Yes
49608-06		SOIL	C-746-B	Yes
49613-22		SOIL	C-746-B	Yes
49619-05		SOIL	C-746-B	Yes
SI-0017		SOIL	C-746-B	Yes
SI-0065		SOIL	C-746-B	Yes
SI-0077		SOIL	C-746-B	Yes
SI-0086		SOIL	C-746-B	Yes
SI-0102		SOIL	C-746-B	Yes
SI-0125		SOIL	C-746-B	Yes
SI-0162		SOIL	C-746-B	Yes
SI-0168		SOIL	C-746-B	Yes
SI-0189		SOIL	C-746-B	Yes
SI-0190		SOIL	C-746-B	Yes
SI-0195		SOIL	C-746-B	Yes
SI-0208		SOIL	C-746-B	Yes
SI-0213		SOIL	C-746-B	Yes
SI-0219		SOIL	C-746-B	Yes
SI-0223		SOIL	C-746-B	Yes
SI-0242		SOIL	C-746-B	Yes
SI-0248		SOIL	C-746-B	Yes
SI-0256		SOIL	C-746-B	Yes
SI-0274		SOIL	C-746-B	Yes
SI-0276		SOIL	C-746-B	Yes
SI-0290		SOIL	C-746-B	Yes
SI-0336		SOIL	C-746-B	Yes
SI-0349		SOIL	C-746-B	Yes
SI-0368		SOIL	C-746-B	Yes
SI-0384		SOIL	C-746-B	Yes
SI-0385		SOIL	C-746-B	Yes
SI-0389		SOIL	C-746-B	Yes
SI-0399		SOIL	C-746-B	Yes
SI-0403		SOIL	C-746-B	Yes
SI-0406		SOIL	C-746-B	Yes
SI-0408		SOIL	C-746-B	Yes
SI-0409		SOIL	C-746-B	Yes
SI-0414		SOIL	C-746-B	Yes
SI-0418		SOIL	C-746-B	Yes
SI-0419		SOIL	C-746-B	Yes
SI-0420		SOIL	C-746-B	Yes
SI-0421		SOIL	C-746-B	Yes
SI-0424		SOIL	C-746-B	Yes
SI-0432		SOIL	C-746-B	Yes
SI-0433		SOIL	C-746-B	Yes
SI-0437		SOIL	C-746-B	Yes
SI-0441		SOIL	C-746-B	Yes
SI-0444		SOIL	C-746-B	Yes
SI-0449		SOIL	C-746-B	Yes
SI-0464		SOIL	C-746-B	Yes

SI-0501		SOIL	C-746-B	Yes
SI-0539		SOIL	C-746-B	Yes
SI-0541		SOIL	C-746-B	Yes
SI-0573		SOIL	C-746-B	Yes
SI-0599		SOIL	C-746-B	Yes
SI-0600		SOIL	C-746-B	Yes
SI-0604		SOIL	C-746-B	Yes
SI-0606		SOIL	C-746-B	Yes
SI-0662		SOIL	C-746-B	Yes
SI-0712		SOIL	C-746-B	Yes
SI-0851		SOIL	C-746-B	Yes
SI-0897		SOIL	C-746-B	Yes
SI-0898		SOIL	C-746-B	Yes
SI-0899		SOIL	C-746-B	Yes
SI-0902		SOIL	C-746-B	Yes
SI-0933		SOIL	C-746-B	Yes
SI-0934		SOIL	C-746-B	Yes
SI-0963B		SOIL	C-746-B	Yes
SI-0992		SOIL	C-746-B	Yes
SI-0993		SOIL	C-746-B	Yes
SI-1008		SOIL	C-746-B	Yes
SI-1011		SOIL	C-746-B	Yes
SI-1012		SOIL	C-746-B	Yes
SI-1015		SOIL	C-746-B	Yes
SI-1018		SOIL	C-746-B	Yes
SI-1021		SOIL	C-746-B	Yes
SI-1029		SOIL	C-746-B	Yes
SI-1056		SOIL	C-746-B	Yes
SI-1088		SOIL	C-746-B	Yes
SI-1201		SOIL	C-746-B	Yes
W-1942		SOIL	C-746-B	Yes
05140-01		SOIL	C-746-H3	Yes
05140-02		SOIL	C-746-H3	Yes
05148-01		SOIL	C-746-H3	Yes
05148-02		SOIL	C-746-H3	Yes
101177-01		SOIL	C-746-H3	Yes
22615-020		SOIL	C-746-H3	Yes
22615-021		SOIL	C-746-H3	Yes
33829-001		SOIL	C-746-H3	Yes
42231-14		SOIL	C-746-H3	Yes
45349-01		SOIL	C-746-H3	Yes
45349-02		SOIL	C-746-H3	Yes
49666-01		SOIL	C-746-H3	Yes
SI-0057		SOIL	C-746-H3	Yes
SI-0058		SOIL	C-746-H3	Yes
SI-0415		SOIL	C-746-H3	Yes
SI-0927		SOIL	C-746-H3	Yes
SI-0949		SOIL	C-746-H3	Yes
SI-0982		SOIL	C-746-H3	Yes
45667-01		SOIL	C-752-A	Yes
45667-02		SOIL	C-752-A	Yes
45667-03		SOIL	C-752-A	Yes
45667-04		SOIL	C-752-A	Yes
45667-05		SOIL	C-752-A	Yes
45667-06		SOIL	C-752-A	Yes

45667-07		SOIL	C-752-A	Yes
45667-08		SOIL	C-752-A	Yes
45667-09		SOIL	C-752-A	Yes
45667-10		SOIL	C-752-A	Yes
45667-11		SOIL	C-752-A	Yes
45667-12		SOIL	C-752-A	Yes
45674-01		SOIL	C-752-A	Yes
45674-02		SOIL	C-752-A	Yes
45674-03		SOIL	C-752-A	Yes
45674-04		SOIL	C-752-A	Yes
45674-05		SOIL	C-752-A	Yes
45674-06		SOIL	C-752-A	Yes
45674-07		SOIL	C-752-A	Yes
45674-08		SOIL	C-752-A	Yes
45674-09		SOIL	C-752-A	Yes
45674-10		SOIL	C-752-A	Yes
45674-11		SOIL	C-752-A	Yes
45674-12		SOIL	C-752-A	Yes
45674-13		SOIL	C-752-A	Yes
45674-14		SOIL	C-752-A	Yes
45674-15		SOIL	C-752-A	Yes
45674-16		SOIL	C-752-A	Yes
45674-17		SOIL	C-752-A	Yes
45674-18		SOIL	C-752-A	Yes
45674-19		SOIL	C-752-A	Yes
45674-20		SOIL	C-752-A	Yes
45674-21		SOIL	C-752-A	Yes
45674-22		SOIL	C-752-A	Yes
45674-23		SOIL	C-752-A	Yes
45674-24		SOIL	C-752-A	Yes
45674-25		SOIL	C-752-A	Yes
45674-26		SOIL	C-752-A	Yes
45674-27		SOIL	C-752-A	Yes
45674-28		SOIL	C-752-A	Yes
45674-29		SOIL	C-752-A	Yes
45674-30		SOIL	C-752-A	Yes
45674-31		SOIL	C-752-A	Yes
45674-32		SOIL	C-752-A	Yes
45674-33		SOIL	C-752-A	Yes
45674-34		SOIL	C-752-A	Yes
45674-35		SOIL	C-752-A	Yes
45674-36		SOIL	C-752-A	Yes
45674-37		SOIL	C-752-A	Yes
45674-38		SOIL	C-752-A	Yes
45674-39		SOIL	C-752-A	Yes
45674-40		SOIL	C-752-A	Yes
45674-41		SOIL	C-752-A	Yes
45674-42		SOIL	C-752-A	Yes
45674-43		SOIL	C-752-A	Yes
45674-44		SOIL	C-752-A	Yes
45674-45		SOIL	C-752-A	Yes
45674-46		SOIL	C-752-A	Yes
45674-47		SOIL	C-752-A	Yes
45674-48		SOIL	C-752-A	Yes
45674-50		SOIL	C-752-A	Yes

45674-51		SOIL	C-752-A	Yes
45674-52		SOIL	C-752-A	Yes
45674-53		SOIL	C-752-A	Yes
45674-54		SOIL	C-752-A	Yes
45674-55		SOIL	C-752-A	Yes
45674-56		SOIL	C-752-A	Yes
46110-01		SOIL	C-752-A	Yes
53727-01		SOIL	C-752-A	Yes
SI-0047		SOIL	C-746-B	Yes
SI-0164		SOIL	C-746-B	Yes
SI-0192		SOIL	C-746-B	Yes
SI-0193		SOIL	C-746-B	Yes
SI-0260		SOIL	C-746-B	Yes
SI-0280		SOIL	C-746-B	Yes
SI-0281		SOIL	C-746-B	Yes
SI-0299?		SOIL	C-746-B	Yes
SI-0380		SOIL	C-746-B	Yes
SI-0431		SOIL	C-746-B	Yes
SI-0434		SOIL	C-746-B	Yes
SI-0442		SOIL	C-746-B	Yes
SI-0443		SOIL	C-746-B	Yes
SI-0750		SOIL	C-746-B	Yes
SI-0766		SOIL	C-746-B	Yes
SI-0767		SOIL	C-746-B	Yes
SI-0768		SOIL	C-746-B	Yes
SI-0773		SOIL	C-746-B	Yes
SI-0775		SOIL	C-746-B	Yes
SI-0799		SOIL	C-746-B	Yes
SI-0821		SOIL	C-746-B	Yes
SI-0916		SOIL	C-746-B	Yes
SI-0932		SOIL	C-746-B	Yes
SI-0960		SOIL	C-746-B	Yes
SI-1006		SOIL	C-746-B	Yes
103808-01		SOIL & EXCAVATION DEBRIS	C-752-A	Yes
103808-02		SOIL & EXCAVATION DEBRIS	C-752-A	Yes
SI-1020		SOIL & GROUT	C-746-B	Yes
CAS-10916		SOIL & SEDIMENT SAMPLES	C-753-A	Yes
SI-0267		SOIL (DRILL SOLIDS)	C-746-B	Yes
SI-0278		SOIL (DRILL)	C-746-B	Yes
45344-01		SOIL (LAB RESIDUALS)	C-746-A	Yes
45344-02		SOIL (LAB RESIDUALS)	C-746-A	Yes
45344-03		SOIL (LAB RESIDUALS)	C-746-A	Yes
SI-1027		SOIL ?	C-746-B	Yes
05139-04		SOIL AC	C-746-A	Yes
22784-06		SOIL AC	C-746-A	Yes
22832-01		SOIL AC	C-746-A	Yes
22873-03		SOIL AC	C-746-A	Yes
22798-05		SOIL AC	C-746-B	Yes
SI-0526		SOIL AC	C-746-B	Yes
SI-0772		SOIL AC	C-746-B	Yes
SI-0895		SOIL AC	C-746-B	Yes
SI-0901		SOIL AC	C-746-B	Yes
SI-1007		SOIL AC	C-746-B	Yes
SI-1022		SOIL AC	C-746-B	Yes
SI-1024		SOIL AC	C-746-B	Yes

SI-1349		SOIL AC	C-746-B	Yes
SI-1413		SOIL AC	C-746-B	Yes
SI-1418		SOIL AC	C-746-B	Yes
22566-004		SOIL AC	C-746-H3	Yes
22806-001		SOIL AC	C-746-H3	Yes
22810-001		SOIL AC	C-746-H3	Yes
22810-002		SOIL AC	C-746-H3	Yes
22810-003		SOIL AC	C-746-H3	Yes
22810-004		SOIL AC	C-746-H3	Yes
22815-004		SOIL AC	C-746-H3	Yes
22819-001		SOIL AC	C-746-H3	Yes
SI-0920		SOIL AC	C-746-H3	Yes
SI-0426		SOIL AC	C-746-B	Yes
SI-0797		SOIL AC	C-746-B	Yes
SI-0822		SOIL AC	C-746-B	Yes
SI-0894		SOIL AC	C-746-B	Yes
SI-1412		SOIL AC	C-746-B	Yes
SI-1415		SOIL AC	C-746-B	Yes
SI-0820		SOIL AC (COMPOSITE)	C-746-B	Yes
22604-048		SOIL AC, DRILL FLUID	C-746-A	Yes
22604-049		SOIL AC, DRILL FLUID	C-746-A	Yes
22604-054		SOIL AC, DRILL FLUID	C-746-A	Yes
22604-074		SOIL AC, DRILL FLUID	C-746-A	Yes
22604-102		SOIL AC, DRILL FLUID	C-746-A	Yes
22604-144		SOIL AC, DRILL FLUID	C-746-A	Yes
22606-002		SOIL AC, DRILL FLUID	C-746-A	Yes
22609-006		SOIL AC, DRILL FLUID	C-746-A	Yes
22601-009		SOIL AC, DRILL FLUID	C-746-B	Yes
22601-011		SOIL AC, DRILL FLUID	C-746-B	Yes
22604-043		SOIL AC, DRILL FLUID	C-746-B	Yes
22604-122		SOIL AC, DRILL FLUID	C-746-B	Yes
22604-136		SOIL AC, DRILL FLUID	C-746-B	Yes
22611-006		SOIL AC, DRILL FLUID	C-746-B	Yes
22611-007		SOIL AC, DRILL FLUID	C-746-B	Yes
22601-022		SOIL AC, DRILL FLUID	C-746-H3	Yes
22601-023		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-025		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-036		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-039		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-064		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-079		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-080		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-095		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-118		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-134		SOIL AC, DRILL FLUID	C-746-H3	Yes
22604-146		SOIL AC, DRILL FLUID	C-746-H3	Yes
22606-008		SOIL AC, DRILL FLUID	C-746-H3	Yes
22606-012		SOIL AC, DRILL FLUID	C-746-H3	Yes
22606-019		SOIL AC, DRILL FLUID	C-746-H3	Yes
22606-021		SOIL AC, DRILL FLUID	C-746-H3	Yes
22608-002		SOIL AC, DRILL FLUID	C-746-H3	Yes
22608-012		SOIL AC, DRILL FLUID	C-746-H3	Yes
22608-014		SOIL AC, DRILL FLUID	C-746-H3	Yes
22608-015		SOIL AC, DRILL FLUID	C-746-H3	Yes
22608-032		SOIL AC, DRILL FLUID	C-746-H3	Yes

22608-042		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-007		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-015		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-024		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-025		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-030		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-033		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-035		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-038		SOIL AC, DRILL FLUID	C-746-H3	Yes
22609-040		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-006		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-008		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-024		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-026		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-031		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-032		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-039		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-044		SOIL AC, DRILL FLUID	C-746-H3	Yes
22610-047		SOIL AC, DRILL FLUID	C-746-H3	Yes
22611-001		SOIL AC, DRILL FLUID	C-746-H3	Yes
22611-002		SOIL AC, DRILL FLUID	C-746-H3	Yes
22611-003		SOIL AC, DRILL FLUID	C-746-H3	Yes
22611-004		SOIL AC, DRILL FLUID	C-746-H3	Yes
22611-019		SOIL AC, DRILL FLUID	C-746-H3	Yes
22601-025		SOIL AC,DF	C-746-H3	Yes
22608-029		SOIL AC; DF	C-746-H3	Yes
22608-033		SOIL AC; DF	C-746-H3	Yes
55760-01		SOIL AND ABSORBENT	C-746-B	Yes
53153-01		SOIL AND GRAVEL	C-746-H3	Yes
53153-02		SOIL AND GRAVEL	C-746-H3	Yes
53153-03		SOIL AND GRAVEL	C-746-H3	Yes
53153-04		SOIL AND GRAVEL	C-746-H3	Yes
53153-05		SOIL AND GRAVEL	C-746-H3	Yes
53153-06		SOIL AND GRAVEL	C-746-H3	Yes
53153-07		SOIL AND GRAVEL	C-746-H3	Yes
53153-08		SOIL AND GRAVEL	C-746-H3	Yes
32235-01		SOIL AND SEDIMENT SAMPLES	C-746-V	Yes
SI-1391		SOIL AND WATER	C-746-B	Yes
08997-02		SOIL AUGER CUTTINGS	C-746-B	Yes
SI-1335		SOIL AUGER CUTTINGS	C-746-B	Yes
22604-023		SOIL AUGER CUTTINGS , DRILL FLUID	C-746-B	Yes
22608-017		SOIL AUGER CUTTINGS , DRILL FLUID	C-746-B	Yes
22604-005		SOIL AUGER CUTTINGS, DRILL FLUID	C-746-B	Yes
22608-039		SOIL AUGER CUTTINGS, DRILL FLUID	C-746-B	Yes
22608-041		SOIL AUGER CUTTINGS, DRILL FLUID	C-746-B	Yes
22609-017		SOIL AUGER CUTTINGS, DRILL FLUID	C-746-B	Yes
SI-0480		SOIL CUTTING	C-746-B	Yes
SI-0481		SOIL CUTTING	C-746-B	Yes
SI-0652		SOIL CUTTING	C-746-B	Yes
SI-0655		SOIL CUTTING	C-746-B	Yes
SI-0656		SOIL CUTTING	C-746-B	Yes
57327-01		SOIL CUTTING	C-752-A	Yes
34822-01		SOIL CUTTINGS	C-746-A	Yes
34822-02		SOIL CUTTINGS	C-746-A	Yes
34822-03		SOIL CUTTINGS	C-746-A	Yes

37965-02		SOIL CUTTINGS	C-746-A	Yes
37965-05		SOIL CUTTINGS	C-746-A	Yes
38038-01		SOIL CUTTINGS	C-746-A	Yes
38038-08		SOIL CUTTINGS	C-746-A	Yes
42641-08		SOIL CUTTINGS	C-746-A	Yes
38038-04		SOIL CUTTINGS	C-746-B	Yes
38038-05		SOIL CUTTINGS	C-746-B	Yes
SI-0479		SOIL CUTTINGS	C-746-B	Yes
SI-0589		SOIL CUTTINGS	C-746-B	Yes
SI-0963		SOIL CUTTINGS	C-746-B	Yes
33788-01		SOIL CUTTINGS	C-746-H3	Yes
33788-02		SOIL CUTTINGS	C-746-H3	Yes
33788-03		SOIL CUTTINGS	C-746-H3	Yes
33788-04		SOIL CUTTINGS	C-746-H3	Yes
33789-01		SOIL CUTTINGS	C-746-H3	Yes
33789-02		SOIL CUTTINGS	C-746-H3	Yes
33789-03		SOIL CUTTINGS	C-746-H3	Yes
33789-04		SOIL CUTTINGS	C-746-H3	Yes
33790-01		SOIL CUTTINGS	C-746-H3	Yes
33790-02		SOIL CUTTINGS	C-746-H3	Yes
33790-03		SOIL CUTTINGS	C-746-H3	Yes
33790-04		SOIL CUTTINGS	C-746-H3	Yes
33790-05		SOIL CUTTINGS	C-746-H3	Yes
33790-06		SOIL CUTTINGS	C-746-H3	Yes
33790-07		SOIL CUTTINGS	C-746-H3	Yes
33790-08		SOIL CUTTINGS	C-746-H3	Yes
33799-01		SOIL CUTTINGS	C-746-H3	Yes
33799-02		SOIL CUTTINGS	C-746-H3	Yes
33799-03		SOIL CUTTINGS	C-746-H3	Yes
33799-04		SOIL CUTTINGS	C-746-H3	Yes
33799-05		SOIL CUTTINGS	C-746-H3	Yes
34815-09		SOIL CUTTINGS	C-746-H3	Yes
34815-10		SOIL CUTTINGS	C-746-H3	Yes
34815-11		SOIL CUTTINGS	C-746-H3	Yes
38038-02		SOIL CUTTINGS	C-746-H3	Yes
38038-07		SOIL CUTTINGS	C-746-H3	Yes
38038-09		SOIL CUTTINGS	C-746-H3	Yes
38038-11		SOIL CUTTINGS	C-746-H3	Yes
38038-12		SOIL CUTTINGS	C-746-H3	Yes
43157-01		SOIL CUTTINGS	C-746-H3	Yes
43157-02		SOIL CUTTINGS	C-746-H3	Yes
43157-03		SOIL CUTTINGS	C-746-H3	Yes
43157-04		SOIL CUTTINGS	C-746-H3	Yes
43157-05		SOIL CUTTINGS	C-746-H3	Yes
43157-06		SOIL CUTTINGS	C-746-H3	Yes
43158-01		SOIL CUTTINGS	C-746-H3	Yes
43158-02		SOIL CUTTINGS	C-746-H3	Yes
43158-03		SOIL CUTTINGS	C-746-H3	Yes
43158-04		SOIL CUTTINGS	C-746-H3	Yes
49652-01		SOIL CUTTINGS	C-746-H3	Yes
49652-02		SOIL CUTTINGS	C-746-H3	Yes
49652-03		SOIL CUTTINGS	C-746-H3	Yes
49652-04		SOIL CUTTINGS	C-746-H3	Yes
SI-0590		SOIL CUTTINGS/DM?	C-746-B	Yes
CASX-18040		SOIL FOR PCB TREATABILITY STUDY	C-746-B	Yes

7445		SOIL FROM 7445, 6085, 7446	C-746-A	Yes
101113-01		SOIL SAMPLE RESIDUE	C-752-A	Yes
102526-01		SOIL SAMPLES	C-746-B	Yes
49668-01		SOIL SAMPLES	C-746-B	Yes
54229-01		SOIL SAMPLES WAG23	C-753-A	Yes
SI-1341		SOIL, AC	C-746-B	Yes
SI-1342		SOIL, AC	C-746-B	Yes
SI-1410		SOIL, AC	C-746-B	Yes
SI-1417		SOIL, AC	C-746-B	Yes
SI-1419		SOIL, AC	C-746-B	Yes
SI-1436		SOIL, AC	C-746-B	Yes
SI-1437		SOIL, AUGER CUTTINGS	C-746-B	Yes
SI-1336		SOIL, AUGER CUTTINGS	C-746-B	Yes
SI-1337		SOIL, AUGER CUTTINGS	C-746-B	Yes
SI-1338		SOIL, AUGER CUTTINGS	C-746-B	Yes
22608-019		SOIL, AUGER CUTTINGS, DRILL FLUID	C-746-B	Yes
55538-01		SOIL/CONCRETE/SLUDGE	C-746-H3	Yes
SI-0440		SOIL/DM	C-746-B	Yes
SI-1017		SOIL/GROUT	C-746-B	Yes
47602-01		SOIL/PAPER/PLASTIC/GLASS	C-753-A	Yes
46278-08		SOIL/PLASTIC	C-746-A	Yes
SI-0042		SOIL/PLASTIC	C-746-B	Yes
SI-0430		SOIL/PLASTIC	C-746-B	Yes
46278-01		SOIL/PLASTIC	C-746-H3	Yes
46278-02		SOIL/PLASTIC	C-746-H3	Yes
46278-05		SOIL/PLASTIC	C-746-H3	Yes
46278-06		SOIL/PLASTIC	C-746-H3	Yes
46278-07		SOIL/PLASTIC	C-746-H3	Yes
47604-01		SOIL/PLATIC/GLASS/PAPER	C-753-A	Yes
CAS-14683		SOIL/SEDIMENT SAMPLES	C-753-A	Yes
SI-0994		SOIL/WATER	C-746-B	Yes
SI-1409		SOIL/WATER	C-746-B	Yes
33829-004		SOILS	C-746-H3	Yes
SI-0261		SOILS	C-746-B	Yes
3649		SOLID DEBRIS	C-746-A	No
3650		SOLID DEBRIS	C-746-A	No
61901-01		SOLID DEBRIS	C-746-Q	No
CAS-17668		SOLID LAB SAMPLES	C-753-A	No
103229-01		SOLID LAB WASTE	C-753-A	No
103235-01		SOLID LAB WASTE	C-753-A	No
CAS-16544		SOLID LAB WASTE/GLOVES/PLASTIC	C-337	No
CAS-16545		SOLID LAB WASTE/PAPER/PLASTIC	C-337	No
CAS-15710		SOLID PCB & NICKEL STRIPPER SMPL	C-753-A	No
35195-01		SOLID PCB WASTE PPE/PADS	C-753-A	No
62140-01		SOLID SAMPLES	C-746-H3	No
62144-01		SOLID SAMPLES	C-746-H3	No
CASX-17660		SOLID SAMPLES	C-746-V	No
45984-01		SOLID SAMPLES	C-753-A	No
45984-02		SOLID SAMPLES	C-753-A	No
56697-01		SOLID SAMPLES	C-753-A	No
62132-01		SOLID SAMPLES	C-753-A	No
62135-01		SOLID SAMPLES	C-753-A	No
CAS-17670		SOLID SAMPLES	C-753-A	No
62141-01		SOLID SAMPLES	C-746-H3	Yes
62141-02		SOLID SAMPLES	C-746-H3	Yes

62147-01		SOLID SAMPLES (VORTEC 97-06)	C-746-A	Yes
61893-01		SOLID SAMPLES/GLASS	C-753-A	No
55534-01		SOLID SAMPLES-INCINERABLE	C-746-A	No
56725-01		SOLID SAMPLES-INCINERABLE	C-746-A	No
CASX-16502		SOLID WASTE - OILY ROCKS	C-746-B	Yes
36491-01		SOLID WASTE SAMPLE CONTAINERS	C-746-H3	No
6594		SOLID WASTE/OILY RAGS/GLOVES	C-746-V	No
SI-2083		SOLID/OFF/HIGH	C-746-H3	Yes
SI-2084		SOLID/OFF/LOW	C-746-H3	Yes
SI-2087		SOLID/OH/LOW	C-746-B	Yes
100256-01		SPENT RESIN	C-746-H3	No
58452-01		SPENT RESIN	C-746-H3	No
58452-02		SPENT RESIN	C-746-H3	No
58452-03		SPENT RESIN	C-746-H3	No
58452-04		SPENT RESIN	C-746-H3	No
58452-05		SPENT RESIN	C-746-H3	No
58452-06		SPENT RESIN	C-746-H3	No
58452-07		SPENT RESIN	C-746-H3	No
58452-08		SPENT RESIN	C-746-H3	No
58452-09		SPENT RESIN	C-746-H3	No
58452-10		SPENT RESIN	C-746-H3	No
58455-01		SPENT RESIN	C-746-H3	No
58461-01		SPENT RESIN	C-746-H3	No
58462-01		SPENT RESIN	C-746-H3	No
CASX-15526		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15527		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15528		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15529		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15530		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15531		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15532		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15533		SPILL CLEANUP - DIRT/GRAVEL	C-746-A	Yes
CASX-15534		SPILL CLEANUP - DIRT/GRAVEL	C-752-A	Yes
CASX-15525		SPILL CLEANUP - PPE/RAGS/DIRT	C-746-B	Yes
29696-01		OIL/GRAVE	C-746-H3	No
51972-01		SPILL CLEAN-UP MATERIAL	C-746-A	No
SI-2072		SUMP CLEAN OUT #4	C-746-H3	Yes
SI-2073		SUMP CLEAN OUT #4	C-746-H3	Yes
SI-2074		SUMP CLEAN OUT #4	C-746-H3	Yes
SI-2075		SUMP CLEAN OUT #4	C-746-H3	Yes
38057-01		SUMP CLEANOUT	C-746-H3	Yes
38057-02		SUMP CLEANOUT	C-746-H3	Yes
38057-03		SUMP CLEANOUT	C-746-H3	Yes
38057-04		SUMP CLEANOUT	C-746-H3	Yes
38057-05		SUMP CLEANOUT	C-746-H3	Yes
38057-06		SUMP CLEANOUT	C-746-H3	Yes
31200-08		SUMP CLEAN-OUT	C-746-H3	Yes
31200-07		SUMP CLEAN-OUT	C-752-A	Yes
SI-3524		SUMP CO #8, MPA	C-746-A	Yes
SI-3528		SUMP CO #8, MPA	C-746-A	Yes
SI-3529		SUMP CO #8, MPA	C-746-A	Yes
SI-3531		SUMP CO #8, MPA	C-746-A	Yes
SI-3530		SUMP CO #8, MPA	C-746-H3	Yes
W-1234		SUMP MUD	C-746-B	Yes
W-3607		SUMP MUD	C-746-B	Yes

W-3619		SUMP MUD	C-746-B	Yes
48727-01		SUMP MUD	C-746-H3	Yes
48727-02		SUMP MUD	C-746-H3	Yes
48727-03		SUMP MUD	C-746-H3	Yes
48727-04		SUMP MUD	C-746-H3	Yes
CAS-12865		SUMP SEDIMENT	C-337	Yes
CASX-17489		SUMP SLUDGE	C-746-A	Yes
CASX-17487		SUMP SLUDGE	C-746-B	Yes
CASX-17488		SUMP SLUDGE	C-746-B	Yes
46122-01		SUMP SLUDGE	C-746-H3	Yes
CASX-17492		SUMP SLUDGE FROM LIFT STATION	C-746-B	Yes
CASX-17493		SUMP SLUDGE FROM LIFT STATION	C-746-B	Yes
CASX-17494		SUMP SLUDGE FROM LIFT STATION	C-746-B	Yes
CASX-17495		SUMP SLUDGE FROM LIFT STATION	C-746-B	Yes
CASX-17496		SUMP SLUDGE FROM LIFT STATION	C-746-B	Yes
104781-01		SUSPECT LIME	C-752-A	No
54076-01		TANK CLEANOUT SLUDGE	C-746-H3	No
55638-01		TANK SEDIMENT	C-746-H3	No
55638-02		TANK SEDIMENT	C-746-H3	No
55638-03		TANK SEDIMENT	C-746-H3	No
55638-04		TANK SEDIMENT	C-746-H3	No
55638-05		TANK SEDIMENT	C-746-H3	No
55638-06		TANK SEDIMENT	C-746-H3	No
55638-07		TANK SEDIMENT	C-746-H3	No
55638-08		TANK SEDIMENT	C-746-H3	No
55638-09		TANK SEDIMENT	C-746-H3	No
55638-10		TANK SEDIMENT	C-746-H3	No
55638-11		TANK SEDIMENT	C-746-H3	No
55638-12		TANK SEDIMENT	C-746-H3	No
55638-13		TANK SEDIMENT	C-746-H3	No
55638-14		TANK SEDIMENT	C-746-H3	No
55638-15		TANK SEDIMENT	C-746-H3	No
55638-16		TANK SEDIMENT	C-746-H3	No
55638-17		TANK SEDIMENT	C-746-H3	No
55638-18		TANK SEDIMENT	C-746-H3	No
55638-19		TANK SEDIMENT	C-746-H3	No
54077-01		TANK SLUDGE	C-752-A	No
54077-02		TANK SLUDGE	C-752-A	No
54077-03		TANK SLUDGE	C-752-A	No
54077-04		TANK SLUDGE	C-752-A	No
54077-05		TANK SLUDGE	C-752-A	No
54077-06		TANK SLUDGE	C-752-A	No
54077-07		TANK SLUDGE	C-752-A	No
13685-01		TAPE/PLASTIC/PAPER/GLOVES	C-333	No
CAS-18006		TCLP SAMPLE	C-753-A	No
CAS-17550		TCLP SAMPLE BOTTLES	C-753-A	No
CAS-15971		TOOLS/HOSES/PPE	C-746-B	No
SI-2009		TR, AL BOTTLES	C-746-A	No
SI-3512		TRACK HOE BUCKET DECON	C-746-H3	Yes
41774-01		TRANSITE PIECES/DIRT/PLASTIC	C-746-V	Yes
41774-02		TRANSITE PIECES/DIRT/PLASTIC	C-746-V	Yes
41774-03		TRANSITE PIECES/DIRT/PLASTIC	C-746-V	Yes
41774-04		TRANSITE PIECES/DIRT/PLASTIC	C-746-V	Yes
CAS-12727		TRASH - PPE	C-753-A	No
CAS-12728		TRASH - PPE/RAGS	C-753-A	No

CAS-09790		TRASH/PLASTIC	C-746-B	No
CAS-09791		TRASH/PLASTIC	C-746-B	No
CAS-09793		TRASH/PLASTIC	C-746-B	No
CAS-09794		TRASH/PLASTIC	C-746-B	No
CAS-09796		TRASH/PLASTIC	C-746-B	No
CAS-09797		TRASH/PLASTIC	C-746-B	No
52753-02		TREATABILITY SOIL SAMPLES	C-746-B	Yes
52753-03		TREATABILITY SOIL SAMPLES	C-746-B	Yes
SI-1152		TUBING	C-746-B	No
W-3531		TUBING	C-746-H3	No
SI-1143		TUBING	C-746-B	No
SI-0537		TUBING/PPE	C-746-B	No
CAS-12610		TYVEK GLOVES/GLASS/PAPER/PLASTIC	C-337	No
CAS-12611		TYVEK GLOVES/GLASS/PAPER/PLASTIC	C-337	No
CAS-17450		TYVEK SUITS/GLOVES/TAPE	C-752-A	No
CAS-17451		TYVEK SUITS/GLOVES/TAPE	C-746-B	No
CAS-17452		TYVEK SUITS/GLOVES/TAPE	C-746-B	No
CAS-12950		TYVEK SUITS/SHOE COVERS/GLOVES	C-753-A	Yes
17640-01		TYVEK/GLASS/GLOVES/PAPER/PLASTIC	C-746-Q	No
17640-02		TYVEK/GLASS/GLOVES/PAPER/PLASTIC	C-746-V	No
CASX-14846		TYVEK/GLASS/PAPER/PLASTIC	C-746-H3	No
13844-01		TYVEK/PAPER/PLASTIC/RAGS	C-333	No
46260-01		TYVEK/RAGS/SYRANEX/CARDBOARD/OTHER	C-746-Q	No
102012-01		TYVEK/SARANEX/NEOPRENE/VINYL/PADS/PLASTI	C-746-B	No
101198-01		TYVEK/SARANEX/NEOPRENE/VINYL/PLASTIC	C-746-Q	No
51407-01		TYVEK/WIPES/GLOVES/TAPE	C-746-Q	No
36379-01		TYVEKS/RAGS/COLIWASAS	C-746-V	No
102671-01		U CONTAMINATED METAL FROM C-720 SUMP PIT	C-752-A	No
CAS-14037		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14038		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14039		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14040		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14041		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14042		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14043		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14044		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14045		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14046		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14047		UNDERLAYMENT AND ROCKS	C-746-A	Yes
CAS-14048		UNDERLAYMENT AND ROCKS	C-746-A	Yes
23513-02		UNKNOWN	C-746-B	Yes
CAS-16630		URANIUM CONTAM SOLID LAB	C-753-A	No
09469-01		URANIUM CONTAMINATED PRECIPITATE	C-746-Q	No
09469-02		URANIUM CONTAMINATED PRECIPITATE	C-746-Q	No
09469-03		URANIUM CONTAMINATED PRECIPITATE	C-746-Q	No
09469-05		URANIUM CONTAMINATED PRECIPITATE	C-746-Q	No
09469-07		URANIUM CONTAMINATED PRECIPITATE	C-746-Q	No
09469-08		URANIUM CONTAMINATED PRECIPITATE	C-746-Q	No
04876-01		URANIUM PRECIPITATE	C-746-Q	No
04876-02		URANIUM PRECIPITATE	C-746-Q	No
04876-03		URANIUM PRECIPITATE	C-746-Q	No
04876-04		URANIUM PRECIPITATE	C-746-Q	No
04888-01		URANIUM PRECIPITATE	C-746-Q	No
04888-02		URANIUM PRECIPITATE	C-746-Q	No
04888-03		URANIUM PRECIPITATE	C-746-Q	No

04888-04		URANIUM PRECIPITATE	C-746-Q	No
04888-05		URANIUM PRECIPITATE	C-746-Q	No
04888-06		URANIUM PRECIPITATE	C-746-Q	No
04888-21		URANIUM PRECIPITATE	C-746-Q	No
04888-22		URANIUM PRECIPITATE	C-746-Q	No
04888-23		URANIUM PRECIPITATE	C-746-Q	No
04888-24		URANIUM PRECIPITATE	C-746-Q	No
04888-31		URANIUM PRECIPITATE	C-746-Q	No
04888-32		URANIUM PRECIPITATE	C-746-Q	No
04895-12		URANIUM PRECIPITATE	C-746-Q	No
04895-13		URANIUM PRECIPITATE	C-746-Q	No
04895-14		URANIUM PRECIPITATE	C-746-Q	No
04895-15		URANIUM PRECIPITATE	C-746-Q	No
04895-16		URANIUM PRECIPITATE	C-746-Q	No
04895-17		URANIUM PRECIPITATE	C-746-Q	No
04895-22		URANIUM PRECIPITATE	C-746-Q	No
04895-23		URANIUM PRECIPITATE	C-746-Q	No
04895-24		URANIUM PRECIPITATE	C-746-Q	No
04912-01		URANIUM PRECIPITATE	C-746-Q	No
04912-02		URANIUM PRECIPITATE	C-746-Q	No
04912-03		URANIUM PRECIPITATE	C-746-Q	No
04912-04		URANIUM PRECIPITATE	C-746-Q	No
04912-05		URANIUM PRECIPITATE	C-746-Q	No
04912-06		URANIUM PRECIPITATE	C-746-Q	No
04912-07		URANIUM PRECIPITATE	C-746-Q	No
04912-09		URANIUM PRECIPITATE	C-746-Q	No
04912-10		URANIUM PRECIPITATE	C-746-Q	No
04912-11		URANIUM PRECIPITATE	C-746-Q	No
04912-12		URANIUM PRECIPITATE	C-746-Q	No
04912-13		URANIUM PRECIPITATE	C-746-Q	No
04912-20		URANIUM PRECIPITATE	C-746-Q	No
04912-25		URANIUM PRECIPITATE	C-746-Q	No
04912-28		URANIUM PRECIPITATE	C-746-Q	No
04912-31		URANIUM PRECIPITATE	C-746-Q	No
04912-33		URANIUM PRECIPITATE	C-746-Q	No
04912-34		URANIUM PRECIPITATE	C-746-Q	No
04912-35		URANIUM PRECIPITATE	C-746-Q	No
04912-36		URANIUM PRECIPITATE	C-746-Q	No
04912-39		URANIUM PRECIPITATE	C-746-Q	No
04912-40		URANIUM PRECIPITATE	C-746-Q	No
04912-41		URANIUM PRECIPITATE	C-746-Q	No
04912-45		URANIUM PRECIPITATE	C-746-Q	No
04912-46		URANIUM PRECIPITATE	C-746-Q	No
04912-47		URANIUM PRECIPITATE	C-746-Q	No
04912-48		URANIUM PRECIPITATE	C-746-Q	No
06427-01		URANIUM PRECIPITATE	C-746-Q	No
06427-02		URANIUM PRECIPITATE	C-746-Q	No
06427-03		URANIUM PRECIPITATE	C-746-Q	No
06427-04		URANIUM PRECIPITATE	C-746-Q	No
06427-05		URANIUM PRECIPITATE	C-746-Q	No
06427-06		URANIUM PRECIPITATE	C-746-Q	No
06427-07		URANIUM PRECIPITATE	C-746-Q	No
06427-08		URANIUM PRECIPITATE	C-746-Q	No
06427-09		URANIUM PRECIPITATE	C-746-Q	No
06427-10		URANIUM PRECIPITATE	C-746-Q	No

06427-11		URANIUM PRECIPITATE	C-746-Q	No
06427-12		URANIUM PRECIPITATE	C-746-Q	No
06427-13		URANIUM PRECIPITATE	C-746-Q	No
06430-01		URANIUM PRECIPITATE	C-746-Q	No
06430-02		URANIUM PRECIPITATE	C-746-Q	No
06430-03		URANIUM PRECIPITATE	C-746-Q	No
06430-04		URANIUM PRECIPITATE	C-746-Q	No
06430-05		URANIUM PRECIPITATE	C-746-Q	No
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14701-32		URANIUM PRECIPITATE	C-746-Q	No
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14702-02		URANIUM PRECIPITATE	C-746-Q	No
14702-03		URANIUM PRECIPITATE	C-746-Q	No
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14702-13		URANIUM PRECIPITATE	C-746-Q	No
14702-14		URANIUM PRECIPITATE	C-746-Q	No
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14702-30		URANIUM PRECIPITATE	C-746-Q	No
14702-31		URANIUM PRECIPITATE	C-746-Q	No
14702-32		URANIUM PRECIPITATE	C-746-Q	No
14703-01		URANIUM PRECIPITATE	C-746-Q	No
14703-02		URANIUM PRECIPITATE	C-746-Q	No
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14987-01		URANIUM PRECIPITATE	C-746-Q	No
14987-02		URANIUM PRECIPITATE	C-746-Q	No
34935-01		URANIUM PRECIPITATE	C-746-Q	No
34935-02		URANIUM PRECIPITATE	C-746-Q	No
48799-01		URANIUM PRECIPITATE	C-746-Q	No
6996		URANIUM PRECIPITATE	C-746-Q	No
6997		URANIUM PRECIPITATE	C-746-Q	No
6998		URANIUM PRECIPITATE	C-746-Q	No
7111		URANIUM PRECIPITATE	C-746-Q	No
7112		URANIUM PRECIPITATE	C-746-Q	No
7451		URANIUM PRECIPITATE	C-746-Q	No
7452		URANIUM PRECIPITATE	C-746-Q	No
7586		URANIUM PRECIPITATE	C-746-Q	No
HC-0458		URANIUM PRECIPITATE	C-746-Q	No
HC-0459		URANIUM PRECIPITATE	C-746-Q	No
HC-0460		URANIUM PRECIPITATE	C-746-Q	No
HC-0461		URANIUM PRECIPITATE	C-746-Q	No
HC-0462		URANIUM PRECIPITATE	C-746-Q	No
HC-0463		URANIUM PRECIPITATE	C-746-Q	No
HC-0464		URANIUM PRECIPITATE	C-746-Q	No
HC-1020		URANIUM PRECIPITATE	C-746-Q	No
HC-1021		URANIUM PRECIPITATE	C-746-Q	No

HC-1022		URANIUM PRECIPITATE	C-746-Q	No
HC-1023		URANIUM PRECIPITATE	C-746-Q	No
HC-1024		URANIUM PRECIPITATE	C-746-Q	No
HC-1025		URANIUM PRECIPITATE	C-746-Q	No
HC-1026		URANIUM PRECIPITATE	C-746-Q	No
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HC-1036		URANIUM PRECIPITATE	C-746-Q	No
HC-1037		URANIUM PRECIPITATE	C-746-Q	No
HC-1038		URANIUM PRECIPITATE	C-746-Q	No
HC-1137		URANIUM PRECIPITATE	C-746-Q	No
HC-1138		URANIUM PRECIPITATE	C-746-Q	No
HC-1139		URANIUM PRECIPITATE	C-746-Q	No
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HC-1141		URANIUM PRECIPITATE	C-746-Q	No
HC-1142		URANIUM PRECIPITATE	C-746-Q	No
HC-1182		URANIUM PRECIPITATE	C-746-Q	No
HC-1183		URANIUM PRECIPITATE	C-746-Q	No
HC-1184		URANIUM PRECIPITATE	C-746-Q	No
HC-1185		URANIUM PRECIPITATE	C-746-Q	No
09469-04		URANIUM PRECIPITATE	C-746-Q	No
09469-06		URANIUM PRECIPITATE	C-746-Q	No
HC-1029		URANIUM PRECIPITATE	C-746-A	No
SI-0450B		VERMICULITE	C-746-B	No
17619-01		WASTE SOLID SAMPLES	C-333	No
17620-01		WASTE SOLID SAMPLES	C-333	No
7229		WASTE SOLID SAMPLES	C-746-A	No
7230		WASTE SOLID SAMPLES	C-746-A	No
7231		WASTE SOLID SAMPLES	C-746-A	No
7232		WASTE SOLID SAMPLES	C-746-A	No
36496-01		WASTE SOLID SAMPLES	C-746-B	No
36496-02		WASTE SOLID SAMPLES	C-746-B	No
CAS-15840		WASTE SOLID SAMPLES	C-753-A	No
CAS-15914		WASTE SOLID SAMPLES	C-753-A	No
CAS-16584		WASTE SOLID SAMPLES	C-753-A	No
CAS-17018		WASTE SOLID SAMPLES	C-753-A	No
CAS-17407		WASTE SOLID SAMPLES	C-753-A	No
CAS-18023		WASTE SOLID SAMPLES	C-753-A	No
CAS-16462		WASTE SOLID SAMPLES	C-753-A	Yes
CAS-16503		WASTE SOLID SAMPLES	C-753-A	Yes
CAS-16597		WASTE SOLID SAMPLES IN CONTAINER	C-753-A	Yes
14010-01		WASTE WATER	C-746-B	Yes
32103-01		WASTE WATER	C-746-H3	Yes
05980-02		WATER	C-333	Yes
09595-02		WATER	C-333	Yes
09595-03		WATER	C-333	Yes
09595-04		WATER	C-333	Yes
57492-01		WATER	C-746-A	Yes
57492-02		WATER	C-746-A	Yes

05980-01		WATER	C-746-B	Yes
09595-01		WATER	C-746-B	Yes
14001-01		WATER	C-746-B	Yes
14007-01		WATER	C-746-B	Yes
14007-02		WATER	C-746-B	Yes
14008-01		WATER	C-746-B	Yes
14025-01		WATER	C-746-B	Yes
14039-01		WATER	C-746-B	Yes
14039-02		WATER	C-746-B	Yes
23112-01		WATER	C-746-B	Yes
23834-01		WATER	C-746-B	Yes
24269-01		WATER	C-746-B	Yes
105282-01		WATER / PETROLEUM FROM UST 18	C-752-A	Yes
105282-02		WATER / PETROLEUM FROM UST 18	C-752-A	Yes
105282-03		WATER / PETROLEUM FROM UST 18	C-752-A	Yes
105282-04		WATER / PETROLEUM FROM UST 18	C-752-A	Yes
105282-05		WATER / PETROLEUM FROM UST 18	C-752-A	Yes
105282-06		WATER / PETROLEUM FROM UST 18	C-752-A	Yes
105107-01		WATER FROM UST 17	C-752-A	Yes
101055-01		WATER WITH HYDRAULIC FLUID	C-752-A	Yes
101055-02		WATER WITH HYDRAULIC FLUID	C-752-A	Yes
101055-03		WATER WITH HYDRAULIC FLUID	C-752-A	Yes
101217-01		WATER/HYDRAULIC FLUID	C-752-A	Yes
CAS-14615		WATER/MUD/RADZORB,NO FREE LIQUID	C-746-A	Yes
SI-3095		WATER/OFF/LOW	C-746-H3	Yes
SI-3097		WATER/OFF/LOW	C-746-H3	Yes
SI-3503		WATER/OFF/LOW	C-746-H3	Yes
SI-3070		WATER/ON/LOW	C-746-H3	Yes
SI-3096		WATER/ON/LOW	C-746-H3	Yes
CAL-1174A		WATER/ROCKS/GRAVEL	C-746-A	Yes
SI-0661		WATER; GROUT OR DRILL MUD?	C-746-Q	Yes
31192-04		WELL DISPLACEMENT WATER/GROUT/RADSORB	C-746-H3	Yes
36425-01		WELL SEDIAMENT WATER (RADSORB)	C-746-H3	Yes
36409-01		(RADSORB)	C-746-H3	Yes
100261-01		WIPES, GLOVES, PPE	C-752-A	No
53130-01		WOD SCRAP	C-752-A	No
W-3598		WOOD	C-746-H3	No
CASX-18027		YEARLY SOIL SEDIMENT SAMPLES	C-746-B	Yes
06441-03		N/A	C-746-B	No
06441-04		N/A	C-746-B	No
06441-07		N/A	C-746-B	No
06441-08		N/A	C-746-Q	No
06441-10		N/A	C-746-B	No
06441-12		N/A	C-746-B	No
06441-17		N/A	C-746-B	No
06441-19		N/A	C-746-B	No
06441-20		N/A	C-746-B	No
06441-21		N/A	C-746-B	No
06441-22		N/A	C-746-B	No
06441-24		N/A	C-746-B	No
04763-01		N/A	C-333	Yes
04763-02		N/A	C-333	Yes
04763-03		N/A	C-333	Yes
04763-04		N/A	C-333	Yes
04763-05		N/A	C-333	Yes

04763-07		N/A	C-333	Yes
04763-08		N/A	C-333	Yes
04763-09		N/A	C-333	Yes
04763-10		N/A	C-333	Yes
04763-13		N/A	C-333	Yes
04763-15		N/A	C-333	Yes
04763-16		N/A	C-333	Yes
04763-17		N/A	C-333	Yes
04763-18		N/A	C-333	Yes
04763-19		N/A	C-333	Yes
04763-20		N/A	C-333	Yes
04763-21		N/A	C-333	Yes
04763-22		N/A	C-333	Yes
04763-23		N/A	C-333	Yes
04763-24		N/A	C-333	Yes
04763-25		N/A	C-333	Yes
04763-26		N/A	C-333	Yes
04763-27		N/A	C-333	Yes
04763-28		N/A	C-333	Yes
04763-29		N/A	C-333	Yes
04763-30		N/A	C-333	Yes
16390-02		N/A	C-746-H3	Yes
16390-03		N/A	C-746-H3	Yes
16390-04		N/A	C-746-H3	Yes
16390-05		N/A	C-746-H3	Yes
16390-06		N/A	C-746-H3	Yes
13902-237		N/A	C-746-H3	Yes
13902-238		N/A	C-746-H3	Yes
13902-239		N/A	C-746-H3	Yes
13902-240		N/A	C-746-H3	Yes
13902-305		N/A	C-746-H3	Yes
13902-306		N/A	C-746-H3	Yes
13902-307		N/A	C-746-H3	Yes
13902-308		N/A	C-746-H3	Yes
13904-08		N/A	C-746-H3	Yes
13906-237		N/A	C-746-H3	Yes
13906-238		N/A	C-746-H3	Yes
13906-239		N/A	C-746-H3	Yes
16390-01		N/A	C-746-V	Yes
13905-107		N/A	C-746-V	Yes
13905-134		N/A	C-746-V	Yes
13905-141		N/A	C-746-V	Yes
13905-142		N/A	C-746-V	Yes
13905-145		N/A	C-746-V	Yes
13905-146		N/A	C-746-V	Yes
13905-155		N/A	C-746-A	Yes
13905-244		N/A	C-746-V	Yes
13905-252		N/A	C-746-V	Yes
13905-261		N/A	C-746-V	Yes
13905-262		N/A	C-746-V	Yes
13905-321		N/A	C-746-V	Yes
13905-324		N/A	C-746-V	Yes
13905-325		N/A	C-746-V	Yes
13905-328		N/A	C-746-V	Yes
13905-358		N/A	C-746-V	Yes

13905-361		N/A	C-746-V	Yes
13905-45		N/A	C-746-V	Yes
13905-46		N/A	C-746-V	Yes
13905-47		N/A	C-746-V	Yes
13905-48		N/A	C-746-V	Yes
13905-79		N/A	C-746-V	Yes
13905-861		N/A	C-746-V	Yes
13906-234		N/A	C-746-V	Yes
13906-257		N/A	C-746-V	Yes
13906-338		N/A	C-746-V	Yes
13906-343		N/A	C-746-V	Yes
13906-607		N/A	C-746-V	Yes
13906-625		N/A	C-746-V	Yes
13904-06		N/A	C-752-A	Yes
103178		MEGA WAG	C-752-C	Yes
51821-01		DECON WATER FROM AUGER SAMPLING	C-746-B	Yes
51390-01		URANIUM PRECIPITATE	C-746-Q	No
51425-01		URANIUM PRECIPITATE	C-746-B	No
36488-01		URANIUM PRECIPITATE	C-746-Q	No
04876-09		URANIUM PRECIPITATE	C-746-Q	No
04879-07		URANIUM PRECIPITATE	C-753-A	No
04879-02		URANIUM PRECIPITATE	C-753-A	No
04876-08		URANIUM PRECIPITATE	C-746-Q	No
04876-06		URANIUM PRECIPITATE	C-746-Q	No
04879-04		URANIUM PRECIPITATE	C-753-A	No
04879-03		URANIUM PRECIPITATE	C-753-A	No
04879-01		URANIUM PRECIPITATE	C-753-A	No
04876-07		URANIUM PRECIPITATE	C-746-Q	No
04876-05		URANIUM PRECIPITATE	C-746-Q	No
04879-05		URANIUM PRECIPITATE	C-753-A	No
04879-08		URANIUM PRECIPITATE	C-753-A	No
04879-06		URANIUM PRECIPITATE	C-753-A	No
13091-42		URANIUM PRECIP	C-746-Q	No

*Previously Characterized
Note: if Envr Media column indcates "no" then contains debris

Attachment C

Suspect F and U listed Container Storage Locations

Location	SWMU #
C-746-Q	46A
C-752-A	207
C-746-H3	159
C-746-B	39
C-746-B outside	471
C-746-A	144
C-746-V	470
C-753-A	206
DMSA-333-29	285
DMSA-333-24	280
DMSA-333-35	289
DMSA-333-02	257
DMSA-333-34	288
DMSA-333-14	269
DMSA-333-13	268
DMSA-333-03	237
DMSA-333-15	270
DMSA-333-06	261
DMSA-333-25	281
DMSA-333-12	267
DMSA-333-05	260
DMSA-337-40	343
DMSA-337-19	326
DMSA-337-21	328
DMSA-337-30	333
DMSA-337-13	320
DMSA-337-05	312
DMSA-337-12	319
DMSA-337-18	325
DMSA-337-07	314
DMSA-337-17	324
DMSA-337-09	316
DMSA-337-04	311
DMSA-337-08	315
DMSA-337-15	322
C-746-M	34
C-752-C Decon Pad	419

HEALTH-BASED CONTAINED-IN LEVELS AND CHARACTERIZATION PROTOCOL FOR MEDIA AND MEDIA-RELATED WASTES GENERATED AT THE PADUCAH GASEOUS DIFFUSION PLANT

1. BACKGROUND

Because an environmental medium (e.g., soils, surface water, or groundwater) in and of itself is not defined as a solid waste, a release of a listed waste to an environmental medium does not make the medium a hazardous waste per the Mixture or Derived-From Rules. Consequently, EPA developed what is referred to as the "Contained-In" Policy to address environmental media.

In general, the "Contained-In" Policy states that when environmental media are generated and actively managed as wastes and the media have been contaminated with a listed waste, they must be managed as a hazardous waste until they are determined to no longer contain the listed waste. The process to determine if the waste no longer contains a listed waste is called a "contained-in" determination. When conducting a "contained-in" determination, the generator compares the concentrations of the listed hazardous constituents in the environmental media to regulator-approved, health-based standards. If the listed hazardous constituent levels are below the approved health-based levels and the media do not exhibit a hazardous characteristic, the media are deemed to no longer contain a hazardous waste. When the concentrations of the listed constituents are above the health-based levels, then the media must be managed as RCRA-hazardous waste unless treated below the approved health-based levels.

This characterization protocol includes the following:

- Identification of the site-specific health-based levels for use in RCRA-listed waste determinations for newly generated wastes at PGDP; and,

- An outline for a systematic approach to evaluate, characterize, and implement the site-specific health based levels for listed hazardous waste determinations at PGDP.

2. HEALTH-BASED LEVELS

This section identifies the health-based levels for TCE and 1,1,1-TCA that will be used when making contained-in determinations at PGDP. The health-based levels are established at either 10^{-6} risk level for carcinogens or a hazard index (HI) of 1 for systemic toxicants. The values for solids were derived following the protocols presented in App. B of the approved Human Health Risk Methods Document (DOE/OR/07-1506&D2, December 2000) and using site-specific exposure information. The risk assessment assumptions for soils are provided in Appendix A. Based upon site-specific scenarios, for solids, the health-based contaminant concentration level corresponding to either a 10^{-6} risk or a hazard index (HI) of 1, is 39.2 parts per million (ppm) for TCE and is 2,080 ppm for 1,1,1-TCA. Note that 1,1,1-TCA does not have a cancer risk-based screening level derived because a cancer toxicity value for this compound is not available. Therefore the proposed health based standard was calculated using the hazard index.

The site-specific health-based levels for determining whether contaminated media/debris still contains or is no longer contaminated with listed hazardous waste (TCE and 1,1,1 TCA), are as follows: TCE-39.2 ppm for solids and 1,1,1 TCA-2080 ppm for solids. These levels are presented in Table 1. The site-specific health-based levels for determining whether contaminated groundwater destined for on-site treatment and discharge through a KPDES permitted outfall (e.g., groundwater resulting from well-purging, well development, and well sampling) still contains listed hazardous waste (TCE and 1,1,1-TCA are as follows: 0.081 ppm TTCE. Groundwater that meets the health-based level for TCE shall also be deemed to no longer contain 1,1,1 TCA.

Solids that are determined to be below the levels set forth in Table 1 and that are not characteristically hazardous but that cannot be disposed in the C-746-U landfill shall be deemed to no longer contain or to

no longer be contaminated with listed hazardous waste (F001, F002, U228) and may be managed in accordance with applicable low-level waste and TSCA requirements until dispositioned to an appropriate off-site facility. The cabinet agrees to consult with DOE and the State where the off-site facility is located to reach agreement on the appropriate health-based standard for making contained-in determinations for wastes that are to be shipped to such facility. In making contained-in determinations pursuant to this document, the Cabinet is not making any determination regarding the nature or characteristic of the suspect listed waste at any time prior to the date of the contained-in determination.

Table 1
Proposed Contained-In Concentrations

Contaminant	Solids	Groundwater
TCE	39.2 ppm	Surface Water Standard
1,1,1–TCA	2,080 ppm	N/A

DOE may develop additional project and waste-specific health-based levels for KDEP review and approval on a case-by-case basis to address media that may be managed differently than the standard waste management practices represented by these exposure scenarios.

DOE will apply these health-based standards to the following media wastestreams at the PGDP.

Solids	Aqueous Liquids
Soils	Groundwater, including purge/well
Drill cuttings/sample residuals	development water/sample residuals water
Sediment	

For the purposes of this paper, related waste is defined as wastes that are mixed with or derived from environmental media containing a listed waste (e.g., have come into contact with such environmental media). Examples of related waste include personnel protective equipment (PPE), sampling equipment, drilling fluids, and decontamination water. Also, related waste streams can be derived from the storage, treatment or disposal of environmental media that contains a listed waste. Related waste may also be referred to as secondary wastes.

Related waste streams consist of the following:

- Debris such as PPE, sampling equipment, and other materials that have been contaminated with environmental media that contains a listed waste;
- Drilling fluids and decontamination water;
- Landfill leachate;
- Wastewaters;
- Wastewater treatment media (filters, activated carbon, etc.); and,
- Wastewater treatment sludges.

Generally, related waste stream determinations will be consistent with determinations for the corresponding primary waste streams. If the primary waste stream is determined not to exceed the health-based standards, any related waste streams will be deemed not to be derived from or mixed with listed hazardous waste. However, the contained-in standards for solids, as presented in Table 1, will be applied to all debris waste streams generated as a result of site activities involving contaminated media. For example, PPE and sampling debris generated during the sampling of a monitoring well with TCE

groundwater concentration less than 39.2 ppm would not require management as a listed TCE hazardous waste.

The contained-in standards will be applied against the contaminant concentration in the media (primary wastestream) based upon process knowledge, in-situ data, or characterization data collected after generation.

For the groundwater at PGDP, the contained-in standard will be applied at the well extraction head based on the most current characterization data. Actual sampling data will be reviewed to ensure that the groundwater is handled appropriately at the point of generation.

Media and related wastes that are below the contained-in standards and do not exhibit a hazardous characteristic will be considered not to "contain" or to be derived from or mixed with a listed waste and will be managed as non-hazardous waste, subject to applicable Land Disposal Restrictions (LDRs), as discussed in Section 3.3.

3. IMPLEMENTATION

A variety of waste streams already generated at the PGDP, and to be generated at the PGDP are potentially RCRA hazardous waste as a result of contamination of an environmental media by a listed hazardous waste. As described above, DOE will use the health-based levels in Table 1 to determine if these waste streams contain listed wastes and are subject to hazardous waste management requirements.

3.1 SAMPLING AND ANALYSIS PLAN

When DOE desires to pursue a contained-in determination for a particular waste stream, for those which require additional characterization, DOE will prepare a Sampling and Analysis Plan (SAP) to collect data to support the request for a contained-in determination. The SAP will be submitted to the Cabinet for review and approval. Review and comments on SAPs and other documents being developed for a CERCLA Response Action conducted under the Federal Facility Agreement (FFA) will follow the review process specified in the FFA. For those SAPs not developed in association with an FFA scope of work, the Cabinet, within thirty (30) days of receipt of a SAP, will review DOE's SAP and either approve the SAP or issue comments. DOE will respond to comments and resubmit the plan within thirty (30) days of receipt of the Cabinet's written comments. The Cabinet will review the response to comments and the resubmitted SAP and either approve the resubmitted plan or issue additional comments within (30) days of receipt of DOE's response to comments and resubmitted plan. If the Cabinet issues any additional comments, DOE may invoke the consultation provisions of the Agreed Order.

The sampling and analysis plans for conducting sampling of environmental media and related wastes will be developed in accordance with the United States Environmental Protection Agency's (USEPA) sampling and analysis protocol as defined in SW-846, 3rd edition, or the most recently EPA approved edition.

The sampling approach for a given population of material will be tailored to the population matrix, the size of the population, and its location, either ex-situ (e.g., container) or in-situ (e.g., ditch). PPE, plastic and other debris that cannot be directly associated with a specific population of environmental media will be evaluated to determine the possibility of contamination with TCE. Since the PPE, plastic and other debris have the potential to have heterogeneous contamination within a container, the sampling protocol will be designed to be matrix-specific, and may include composite sampling, grid sampling, or other methodologies consistent with the guidance outlined in SW-846, 3rd edition, or the most recently approved EPA edition. The specific sampling approach will be detailed in the SAP and submitted to the Cabinet for review and approval.

3.2 APPLICATION OF ANALYTICAL RESULTS

DOE will determine if additional samples will be required to ensure proper and adequate characterization in accordance with SW-846 Chapter 9. Additional sampling may be required if the variance in the sample results are of such a magnitude that the calculation specified in SW-846 shows that an insufficient number of samples were collected to make a decision with the desired degree of confidence. Additional sampling may also be required if the Quality Control samples show unacceptable results (e.g., the blanks show sampling or laboratory contamination, the Relative Percent Difference between duplicate sample results exceeds the acceptable range as specified in SW-846, etc.) If additional samples are required, DOE will conduct additional sampling in accordance with the approved SAP or, if necessary, submit a revised SAP providing for the additional sampling to the Cabinet for review and approval.

DOE will review the assessed data and compare the analytical results to the health based levels as set forth herein and the Agreed Order to determine if the media "contains" a listed waste. If the analytical data indicates that the listed constituents were detected below the applicable health-based levels, the media and any associated debris would be determined not to "contain" listed waste and would not be subject to RCRA management requirements provided that it does not exhibit any hazardous characteristics. If the listed constituent concentrations are above the health-based levels, DOE will identify the wastes as listed hazardous waste requiring RCRA management, or submit a revised SAP to the Cabinet that proposes sampling each container in order to make a hazardous waste determination for each container on an individual basis, or as otherwise agreed to by the Cabinet.

Within twenty (20) days of receipt of final validated data for entry into the OREIS database, DOE shall submit its contained-in determination and all supporting analytical data to the Cabinet. The Cabinet will review DOE's determination and supporting analytical data and provide DOE with notification of any concerns the Cabinet has within thirty (30) days.

3.3 APPLICATION OF LAND DISPOSAL RESTRICTIONS

In accordance with KDEP and EPA regulations, all RCRA hazardous waste must meet the land disposal restrictions (LDRs) for the contaminants of concern prior to being land disposed. The LDRs also apply to media and debris that "contain" or are determined to "no longer contain" a RCRA regulated waste. The LDR Universal Treatment Standards (UTS) for TCE and TCA are presented in Table 2.

Table 2

Contaminant	Nonwastewaters	Wastewaters
TCE	6 ppm	0.054 ppm
1,1,1–TCA	6 ppm	0.054 ppm

For soils and debris, DOE will review the assessed data to determine if the media contains a hazardous waste above contained-in-levels. Soil and debris that do not constitute hazardous waste at generation may be disposed of in a subtitle D landfill. Soil and debris that are determined to no longer contain listed hazardous waste and that are not characteristically hazardous must meet LDR treatment standards prior to disposal in a subtitle D landfill. Soil and debris determined to contain a hazardous waste above contained-in levels must be treated to the LDR standards prior to land disposal. Soil and debris that contain a listed hazardous waste above contained-in levels and which have been subsequently treated to meet the contained-in levels and meet the LDR standards may be disposed of in a subtitle D landfill. DOE may apply the LDR treatment standards for contaminated soils promulgated by EPA on May 26, 1998, upon receiving a variance from Kentucky's promulgated LDRs.

At PGDP, the groundwater will be treated at a wastewater treatment unit and ultimately discharged through a KPDES outfall, in which case the LDR standards do not apply at the point source discharge. [401 KAR 31:010 Section 4(1)(b) and 40 CFR 261.4(a)(2)].

Appendix A

RISK ASSUMPTIONS AND CALCULATIONS

Industrial use no action direct contact risk-based values for the PGDP for trichloroethene (TCE) and 1,1,1-trichloroethane (1,1,1-TCA) in soil were calculated as part of the work performed for the Human Health Risk Methods Document (DOE/OR/07-1506&D2, December 2000). In the Methods Document, these no action values are defined as the values below which no action is needed to address contamination in order to be protective of human health. These no action values were calculated using default exposure assumptions and dose equations for ingestion of contaminated soil, inhalation of particulates and vapors emitted by contaminated soil, and dermal contact with contaminated soil. The dose equations are presented in Tables D-29, D-31, and D-33 in Appendix D of the Methods Document. The exposure assumptions used in these equations are presented in Table B.4 in Appendix B of the Methods Document. The method of derivation utilizing these equations and the default exposure assumptions is presented in Section 1 of Appendix B of the Methods Document.

The industrial worker no action numbers calculated using these materials are shown in Table 1. Values in Table 1 were taken from Table A.17 in Appendix A of the Methods Document.

Table 1. Industrial worker No Action screening values for soil in PGDP Human Health Risk Methods document

Chemical	Hazard-based Value (HI=0.1)	Hazard-based Value[a] (HI=1)	Cancer-based Value (Cancer risk=1 × 10^{-6})
TCE	4.70×10^{0}	4.70×10^{1}	2.51×10^{0}
1,1,1-TCA	1.56×10^{2}	1.56×10^{3}	NV

Note:
All values in units of mg/kg (ppm).

HI = Hazard index.
NV = No value available for the cancer risk because analyte is not known to be a carcinogen.

[a] In the Methods Document, the industrial worker no action values are calculated using a target HI of 0.1 to account for multiple contaminants. For a single contaminant, it is more appropriate to use a target HI of 1.

For the current purpose, the industrial worker default no action direct contact risk-based values were converted to site-specific no action values by varying exposure parameters. The scenarios considered, and the values used for the exposure parameters that varied most often between scenarios (i.e., exposure frequency and duration) are as follows:

- Industrial Worker A – a worker that performs grounds maintenance at a landfill and has direct contact with contaminated soil for 16 days per year over a 25 year period;
- Industrial Worker B – a worker that performs grounds maintenance at a landfill and has direct contact with contaminated soil for 16 days per year for a period of one year; and
- Landfill Worker – a worker that performs operation activities at a landfill and has direct contact with contaminated soil for 187.5 days per year for a period of one year.

Exposure parameters for these and other variables used in dose calculations are summarized by exposure route in Tables 2, 3, and 4. Toxicity values are presented in Table 5.

The site-specific exposure frequencies for Industrial Worker A and B match those used in several other projects at the PGDP and are based upon results of interviews with supervisory personnel at the PGDP. The site-specific exposure frequency for the Landfill Worker is based upon the assumption that the exposure frequency of a landfill worker would approximate that of a PGDP default excavation worker.

The site-specific exposure duration for Industrial Worker A is based upon the default rate for industrial workers at the PGDP. The site-specific exposure durations for Industrial Worker B and the Landfill Worker are based upon the assumption that exposure duration for these individuals would be minimized because contaminated materials would be quickly buried.

The site-specific no action screening values calculated using the aforementioned exposure parameters and an HI and cancer risk target of 1 and 1×10^{-6} are shown in Table 6. The smallest site-specific screening values over all receptors for each organic compound are as follows.

For TCE:

Hazard-based value (HI at 1.0) = 63 mg/kg (ppm)
Cancer-based value (Cancer risk at 1×10^{-6}) = 39 mg/kg (ppm)

For 1,1,1-TCA:

Hazard-based value (HI at 1.0) = 2,080 mg/kg (ppm)
Cancer-based value (Cancer risk at 1×10^{-6}) = None (no cancer slope toxicity value available)

Table 2. Exposure parameters used for derivation of dose from ingestion of soil

Parameter	Units	Value used
Concentration in soil = $\mathbf{C_s}$	mg/kg	Calculated value
Ingestion rate = **IR**	mg/day	
Default		50
Industrial Worker A		50
Industrial Worker B		480
Landfill Worker		50
Fraction ingested = **FI**	unitless	1
Exposure frequency = **EF**	day/yr	
Default		250
Industrial Worker A		16
Industrial Worker B		16
Landfill Worker		187.5
Exposure duration = **ED**	year	
Default		25
Industrial Worker A		25
Industrial Worker B		1
Landfill Worker		1
Conversion factor = **CF**	kg/mg	10^{-6}
Body weight = **BW**	kg	70
Averaging time = **AT**	yr × day/yr	70 × 365 (carcinogen) ED × 365 (noncarcinogen)

IR for Default, Industrial Worker A, and Landfill Worker is the PGDP default value for the Industrial Worker scenario. IR for Industrial Worker B is the PGDP default value for the Excavation Worker scenario.

Table 3. Exposure parameters used for derivation of dose from dermal contact with soil

Parameter	Units	Value used
Concentration in soil = C_s	mg/kg	Calculated value
Conversion factor-dermal = CF_d	$(kg\text{-}cm^2)/(mg\text{-}m^2)$	0.01
Surface area[c] = **SA**	m^2/day	0.43
Adherence factor = **AF**	mg/cm^2	1
Absorption factor = **ABS**	unitless	0.25
Exposure frequency = **EF**	day/yr	
Default		250
Industrial Worker A		16
Industrial Worker B		16
Landfill Worker		187.5
Exposure duration = **ED**	years	
Default		25
Industrial Worker A		25
Industrial Worker B		1
Landfill Worker		1
Body weight = **BW**	kg	70
Averaging time = **AT**	yr × day/yr	70 × 365 (carcinogen) ED × 365 (noncarcinogen)

Table 4. Exposure parameters used for inhalation of particulates and vapors emitted by soil

Parameter	Units	Value used
Concentration in soil = C_s	mg/kg	Calculated value
Conversion factor = **CF**	g/kg	10^3
Exposure frequency = **EF**	day/year	
Default		250
Industrial Worker A		16
Industrial Worker B		16
Landfill Worker		187.5
Exposure duration = **ED**	years	
Default		25
Industrial Worker A		25
Industrial Worker B		1
Landfill Worker		1
Exposure time = **ET**	hour/day	8
Volatilization factor = **VF**	m^3/kg	TCE = 3.45×10^3 1,1,1-TCA = 2.34×10^3
Particulate emission factor = **PEF**	m^3/kg	3.21×10^{10}
Total inhalation rate = IR_{air}	m^3/hour	2.5
Body weight = **BW**	kg	70
Averaging time = **AT**	yr × day/yr	70 × 365 (carcinogen) ED × 365 (noncarcinogen)

Table 5. Toxicity values by route of exposure

Analyte	Reference Dose [mg/(kg × day)]			Cancer Slope Factor $[mg/(kg \times day)]^{-1}$		
	Oral	Dermal	Inhalation	Oral	Dermal	Inhalation
TCE	6.00×10^{-3}	9.00×10^{-4}	5.97×10^{-3}	1.10×10^{-2}	7.33×10^{-2}	6.00×10^{-3}
1,1,1-TCA	3.50×10^{-2}	3.15×10^{-2}	2.86×10^{-1}	No value	No value	No value

Table 6. Site-specific industrial worker no action screening values for soil

Chemical	Industrial Worker A		Industrial Worker B		Landfill Worker	
	Hazard	Cancer	Hazard	Cancer	Hazard	Cancer
TCE	7.35×10^{2}	3.92×10^{1}	7.11×10^{2}	9.40×10^{2}	6.27×10^{1}	8.36×10^{1}
1,1,1-TCA	2.44×10^{4}	NV	2.05×10^{4}	NV	2.08×10^{3}	NV

Notes:
All values in units of mg/kg.
See text for explanation of scenarios.
NV = No value calculated because compound is not a carcinogen.
Hazard target used in calculations is 1. Cancer risk target used in calculations is 1×10^{-6}.

Attachment E

The highlighted and underlined portions of this document set forth the requirements of the DMSA Characterization/Remediation Plan that are subject to requirements of this Agreed Order. Those portions of this document not highlighted and underlined are not subject to, or enforceable under, the provision of the Agreed Order and are provided for information purposes only.

Paducah Gaseous Diffusion Plant
Department of Energy Material Storage Area
Characterization/Remediation Plan
Paducah, Kentucky

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Paducah Gaseous Diffusion Plant
Department of Energy Material Storage Area
Characterization/Remediation Plan
Paducah, Kentucky

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Prepared for the
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Office of Environmental Management

BECHTEL JACOBS COMPANY LLC
managing the
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East Tennessee Technology Park
Oak Ridge Y-12 Plant Oak Ridge National Laboratory
Paducah Gaseous Diffusion Plant Portsmouth Gaseous Diffusion Plant

under contract DE-AC05-98OR22700
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U.S. DEPARTMENT OF ENERGY

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CONTENTS

FIGURES

TABLES

ACRONYMS

AHA	Activity Hazard Analysis
AOC	Area of Concern
BA	budget authority
BJC	Bechtel Jacobs Company LLC
DMSA	DOE Material Storage Area
DOE	United States Department of Energy
DQO	Data Quality Objectives
ES&H	Environmental, Safety, and Health
ISMS	Integrated Safety Management System
KDEP	Kentucky Department for Environmental Protection
LLW	Low-Level Radioactive Waste
M&I	Management and Integration
NCS	Nuclear Criticality Safety
NCSA	Nuclear Criticality Safety Approval
NCSE	Nuclear Criticality Safety Evaluation
NDA	Non Destructive Analysis
NEPA	National Environmental Policy Act
NFT	Nuclear Filter Technology Corporation
NOV	Notice of Violation
NRC	Nuclear Regulatory Commission
PCBs	Polychlorinated Biphenyls
PGDP	Paducah Gaseous Diffusion Plant
PORTS	Portsmith Gaseous Diffusion Plant
QA	Quality Assurance
QAP	Quality Assurance Plan
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RCT	Radiological Control Technicians
RFD	Request for Disposal
SA	Safety Advocate
SAP	Sampling and Analysis Plan
SEC	Safety and Ecology Corporation
SME	Subject Matter Experts
SMO	Sample Management Office
STR	Subcontract Technical Representative
SWMU	Solid Waste Management Unit
TBD	to be determined
TSCA	Toxic Substances Control Act
USEC	United States Enrichment Corporation
WBS	Work Breakdown Structure
WGP	Waste Generation Plan
WSMS	Westinghouse Safety Management Solutions LLC
WSS	Work Smart Standards

EXECUTIVE SUMMARY

On September 5, 2000, the Kentucky Department for Environmental Protection issued a Notice of Violation (NOV) to the United States Department of Energy (DOE) alleging that:

1. DOE generated solid waste, failed to characterize that waste and subsequently managed the wastes in Department of Energy Storage Areas (DMSAs);
2. DOE failed to notify the State regarding these Solid Waste Management Units (SWMUs) and;
3. DOE stored hazardous and mixed waste for greater than 90 days without a permit.

The NOV included required remedial measures. Item 4 of the required actions included the submittal of a workplan within 90 days of receipt of the NOV. The workplan is to address the characterization of all wastes managed in DOE Material Storage Areas (DMSAs), Solid Waste Management Units (SWMUs), and Areas of Concern (AOCs). The workplan is to contain schedules for the characterization, proper storage, and final disposition of solid and hazardous wastes managed in DMSAs, SWMUs, and AOCs. All solid and hazardous wastes within DMSAs are to be properly characterized and managed in accordance with the approved workplan no later than June 1, 2001.

This document responds to Item 4 of the above-mentioned NOV. It outlines activities for the characterization of wastes managed in 160 DMSAs. These activities will address Nuclear Criticality Safety (NCS) concerns, and will also include waste determination and/or characterization activities for radioactive waste, solid waste, Resource Conservation and Recovery Act (RCRA) hazardous waste, and asbestos and polychlorinated biphenyls (PCBs) regulated under the Toxic Substances Control Act (TSCA). For purposes of this document, RCRA hazardous wastes are wastes regulated as hazardous under Kentucky Hazardous Waste Regulations. In addition, any required packaging of RCRA hazardous or TSCA generated waste is included. The workplan scope also includes the proper management, treatment, and disposal of all hazardous wastes characterized within the DMSAs. Any resulting non-hazardous solid waste will be disposed on-site at the Paducah Gaseous Diffusion Plant (PGDP) C-746-U Landfill, assuming it meets the waste acceptance criteria. Finally, the scope includes the required permitting and closure activities for those DMSAs that are determined to contain hazardous waste.

The method of accomplishment for the work utilizes the management and integration of a number of subcontractors to build a DMSA Project Team. Prioritization of the DMSAs is used to sequence and schedule the characterization activities by four Field Execution Teams. Field resources include over 60 personnel.

Characterization of all material in 160 DMSAs would be completed approximately 50 months from notice to proceed by DOE. The notice to proceed was assumed to be January 1, 2001. Treatment or disposal of hazardous waste, with available technology, is scheduled to be completed within 12 months of characterization. The workplan calls for a 60-month project schedule to complete characterization, treatment, and disposal activities.

The total budget authority (BA) for this project is estimated to be $82,000,000.

The BA estimated by year is:

FY 2001	$14,000,000
FY 2002	$18,000,000
FY 2003	$18,000,000
FY 2004	$18,000,000
FY 2005	$14,000,000

I. INTRODUCTION

On October 24, 1992, President Bush signed the Energy Policy Act of 1992, Pub. Law 102-486, which established the United States Enrichment Corporation (USEC) as a government corporation. USEC's charter was to provide uranium enrichment services to the government and to private industry on a profitable and competitive basis. To accomplish this purpose, USEC entered into an agreement on July 1, 1993, with the DOE, to lease the operations facilities at the gaseous diffusion plants, located at Paducah, Kentucky (PGDP) and Portsmouth, Ohio (PORTS) from DOE. Through this arrangement, the uranium enrichment activities previously performed by DOE would be taken over by this newly created government corporation. USEC would then perform this scope of work, with the eventual objective of becoming a publicly owned private corporation. As part of this process, DOE would gradually withdraw its role as a regulator for enrichment operations, and the Nuclear Regulatory Commission (NRC) would assume the role of regulator for USEC's operations. The transition to NRC regulation occurred on January 1, 1997.

Prior to the transition to NRC regulation, a number of areas in which various materials were stored within USEC leased space were identified. These materials presented regulatory issues that could prevent the NRC from certifying USEC's continued operation of the gaseous diffusion plants. The lack of characterization data regarding Nuclear Criticality Safety (NCS) concerns was the main issue with respect to these materials. DOE agreed, on May 28, 1996, to accept back the leasehold for these areas, which would return the responsibility and authority for management of materials within these areas to DOE. These "deleased" areas became DOE Material Storage Areas (DMSAs) when the lease was modified on December 31, 1996. The DMSAs contained surplus equipment, parts, materials and low-level radioactive and PCB wastes. The NRC subsequently assumed regulatory authority over the USEC operations at the gaseous diffusion plants. This workplan presents DMSA information limited to the DMSAs located at PGDP.

At the time DOE accepted return of the DMSAs, no accurate inventory of the materials within the DMSAs existed, except the containerized waste stored in the Waste Management Storage Areas. As part of the agreement with USEC to accept the DMSAs, DOE required USEC to produce an inventory of the materials located in the DMSAs. This inventory provided the most complete information regarding the contents of the DMSAs available at that time. In many cases, however, materials were not arranged in a manner that allowed access to all materials within the DMSA. The inventory and identification of all materials in the DMSAs has not been confirmed or completed.

Limited activities in the DMSAs have been conducted since January 1997 to support NCS characterization. Preliminary efforts have categorized the DMSAs as Phase 1 (expected to have no fissionable material, but not fully characterized), Phase 2 (items possibly containing fissionable material), and Phase 3 (items characterized for storage and containing no fissionable materials). Eleven DMSAs were identified as high priority regarding NCS classification. These DMSAs were NCS characterized by USEC during Fiscal Year 2000. As part of this project, potential RCRA hazardous and TSCA concerns were identified.

The NCS characterization effort for a Phase 1 is assumed to be minimal compared to a Phase 2 DMSA. The NCS characterization of a Phase 1 DMSA will still require a review and evaluation of existing data and process knowledge for inventory of items in order to properly prepare the characterization reports. Currently Phase 1 DMSAs contain univentoried, uncharacterized material, therefore, it is anticipated that an additional 10% of NCS sampling will be required in Phase 1 DMSAs compared to the amount of actual field sampling that will be required in the Phase 2 DMSAs. No additional NCS sampling is anticipated for Phase 3 DMSAs. The time required for a Phase 2 DMSA is

significantly greater due to the restrictions of movement of fissile material under NCS requirements. Items uncharacterized for NCS cannot be moved until they are exempted by a DMSA Inspector or sampled and analyzed for the amount of fissionable material.

Phase 3 DMSAs contain items which have been reviewed and determinations have been made for NCS, RCRA, TSCA, etc. The following definitions for a Phase 1, 2, and 3 DMSA are taken from Bechtel Jacobs Company LLC (BJC) procedure PA-3002, "Administration of Paducah DOE Material Storage Areas."

- Phase 1 DMSA – Materials have not been *fully characterized.* However, the DMSA has been walked down by NCS personnel and no fissionable or potentially fissionable materials have been identified.

- Phase 2 DMSA – Materials may or may not be *fully characterized.* However, DMSA is considered to contain fissionable or potentially fissionable material based on walkdown by the NCS specialist or based on NCS characterization.

- Phase 3 DMSA – All materials have been *fully characterized* and no fissionable materials are included.

On September 5, 2000, the Commonwealth of Kentucky, Department for Environmental Protection issued a Notice of Violation (NOV) to DOE for failure to comply with regulatory requirements regarding solid and hazardous waste and for failure to comply with conditions of the PGDP Hazardous Waste Permit. A required remedial measure was identified in the NOV as the submittal of a workplan to fully address the characterization of all wastes managed in DMSAs. The purpose of this plan is to satisfy this required action and includes the scope of work, method of accomplishment, schedule, assumptions, and cost estimate, for characterization of DMSAs and disposition of any resulting solid and RCRA hazardous wastes.

II. SCOPE OF WORK

The scope of this project includes characterization of 160 Department of Energy Material Storage Areas (DMSAs) for NCS, Resource Conservation and Recovery Act (RCRA), Toxic Substances Control Act (TSCA), radioactive, and solid waste concerns. TSCA waste generated will be packaged and stored. Final disposition will be managed in a separate program according to TSCA requirements. RCRA hazardous and solid waste will be packaged, stored, treated and disposed, as required. Material in fixed equipment located within DMSA boundaries will be characterized and the waste generated managed in accordance with regulatory requirements. This workplan assumes that up to 16 fixed equipment systems will be encountered during characterization; however, the scope excludes removal of fixed equipment and standing buildings.

A Part A RCRA hazardous permit application will be submitted for those areas where RCRA hazardous wastes are discovered. Closure of the areas identified in the RCRA hazardous permit will be accomplished in accordance with RCRA hazardous requirements. Although not included in this scope for planning purposes, it is recommended that negotiation of an agreed order be pursued as an alternative to the permitting/closure of DMSAs found to contain hazardous wastes.

Major elements of the work scope include mobilization, characterization, waste management, RCRA hazardous treatment, RCRA hazardous disposal and demobilization. Mobilization will include hiring staff and subcontractors, installation of staff support facilities, and training. Treatment of RCRA hazardous wastes will be completed if the treatment technology is available.

Although not included in this scope for planning purposes, it is recommended that the non-hazardous scrap metal characterized in the DMSA Project be fed into the "Scrap Metal Removal Project" for disposition, either through inclusion under the existing Engineering Evaluation/Cost Analysis or as a separate waste stream.

The preferred alternative action will be determined based upon characterization results and alternatives identified in the "Engineering Evaluation/Cost Analysis for Scrap Metal Disposition at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky." An accurate volume of non-hazardous scrap metal located in DMSAs has not been estimated at this time. A rough order of magnitude estimate is considered to be 140,000 cubic feet of scrap metal with a high uncertainty due to plastic wrapped unknown items.

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III. WORK BREAKDOWN STRUCTURE AND SCHEDULE

In order to establish a schedule for the workplan, which addresses the environmental concerns as indicated in the NOV, the DMSAs were divided into priority levels, with A being the highest priority.

Level A priority includes those DMSAs that present potential for release of hazardous materials to the environment, or that have been currently identified as having a higher potential for containing RCRA hazardous or TSCA waste. A total of 33 DMSAs have been assigned level A priority including the C-400-01, C-400-03, C-400-05 (C-400 Test Loop), C-409-01, and C-409-02 DMSAs, outside DMSAs, and the 11 DMSAs that have been NCS characterized by United States Enrichment Corporation (USEC) and have identified potential RCRA hazardous or TSCA concerns. Level B priority is assumed to be those DMSAs that have a substantial number of uncharacterized containers that potentially contain RCRA hazardous or TSCA wastes. There are currently 11 level B priority DMSAs. All 116 remaining DMSAs will be worked as a level C priority. Characterization will begin with the level A priority actions. Level B and C priority areas will be worked as additional resources are mobilized. Table 1 identifies the priority listing of the DMSAs. Figures 1-11 present maps of the DMSA locations. Appendix A depicts the overall schedule.

Subject Matter Experts (SMEs) will inspect all outside areas and identify potential RCRA hazardous or TSCA concerns that will be managed by priority. Characterization of materials will begin with NCS evaluations as needed, followed by characterization for radiological, asbestos, RCRA hazardous and TSCA (PCBs). Wastes identified as RCRA hazardous or TSCA will be managed appropriately, including packaging, marking, storage, etc.

RCRA hazardous wastes requiring treatment will be treated in accordance with the regulations. Transportation of the RCRA hazardous and solid wastes to approved treatment/disposal sites will begin within 12 months of the waste characterization, and will continue until the wastes are dispositioned. Wastes meeting the respective acceptance criteria may be disposed at government, commercial, and on-site facilities. RCRA hazardous and solid wastes not meeting the disposal facility acceptance criteria will be stored.

Mobilization began in January 2001 and will continue through June 2001. Field crews began activities during February 2001 and will continue through March 2005. Waste treatment and disposal will be completed by the end of December 2005 in accordance with regulatory requirements. Table 1 provides a full listing of DMSAs by priority assignment.

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DMSA PRIORITY LISTING
Table 1

PRIORITY	DMSA #	PHASE	DESCRIPTION OF MATERIALS
A	**C-400-05**	2	Unknown, Process Material, Containers
	C-400-01	2	TCA Degreaser, Uranium Recovery Unit
	C-400-03	2	Gold Dissolver Tank
	C-409-01	2	Slope Test Facility, Unknown Contents
	C-409-02	2	Stabilizing Booths, Unknown Contents
	OS-14	2	Rail Car Tankers
	OS-06	2	Lay Down Yard, Drums
	OS-07	2	Lay Down Yard, Drums and plastic wrapped equipment
	OS-15	½	Process Equipment – Suspect Tanks
	NCS High Priority Top 11		Misc. Equipment (NCS Characterized)
	C-331-09	2	
	C-331-10	3	
	C-331-13	2	
	C-331-14	2	
	C-331-15	2	
	C-333-31	2	
	C-335-04	3	
	C-335-05	2	
	C-337-30	2	
	C-337-36	2	
	C-337-37	3	
	Outside Misc. Phase 1 (OS-02, OS-03, OS-04, OS-05, OS-08, OS-09, OS-10, OS-11, OS-12, OS-13	All Phase 1	Misc. Equipment
	Outside Misc. Phase 2 (OS-16, OS-17, OS-18)	All Phase 2	Misc. Equipment
B	**C-400-06**	2	Cadmium Plating Tanks
	C-331-16	2	B-25 Boxes, Misc. Process Equipment
	C-337-42	2	Drummed Material
	C-337-43	2	Drummed Material
	C-337-44	2	Drummed Material
	C-337-45	2	Drummed Material
	C-333-41	2	Drummed Material
	C-333-42	2	Drummed Material
	C-333-43	2	Drummed Material
	C-335-03	1 (Drums)	Drummed Material
	C-720-01	2	Varnish Tank

PRIORITY	DMSA #	PHASE	DESCRIPTION OF MATERIALS
C	**C-310 Phase 2 (5)** C-310-01, C-310-02, C-310-03, C-310-04, C-310-05	All Phase 2	Misc. Process Equipment
	C-333 Phase 2 (13) C-333-01, C-333-03, C-333-04, C-333-05, C-333-20, C-333-21, C-333-22, C-333-23, C-333-32, C-333-37, C-333-38, C-333-39, C-333-40	All Phase 2	Misc. Process Equipment, LLW
	C-333 Phase 1 (26) C-333-02, C-333-06, C-333-07, C-333-08, C-333-09, C-333-10, C-333-11, C-333-12, C-333-13, C-333-14, C-333-15, C-333-16, C-333-17, C-333-18, C-333-19, C-333-24, C-333-25, C-333-26, C-333-27, C-333-28, C-333-29, C-333-30, C-333-33, C-333-34, C-333-35, C-333-36	All Phase 1	Misc. Process Equipment, LLW, UF_4
	C-337 Phase 2 (7) C-337-23, C-337-25, C-337-27, C-337-29, C-337-35, C-337-40, C-337-41	All Phase 2	Misc. Process Equipment
	C-337 Phase 1 (31) C-337-01, C-337-02, C-337-03, C-337-04, C-337-05, C-337-06, C-337-07, C-337-08, C-337-09, C-337-10, C-337-11, C-337-12, C-337-13, C-337-14, C-337-15, C-337-16, C-337-17, C-337-18, C-337-19, C-337-20, C-337-21, C-337-22, C-337-24, C-337-26, C-337-28, C-337-31, C-337-32, C-337-33, C-337-34, C-337-38, C-337-39, C-337-40	All Phase 1	PCB Waste, UF_4
	C-335 Phase 3 (4) C-335-09, C-335-10, C-335-11, C-335-12	All Phase 3	UF_4, Misc. Process Equipment

PRIORITY	DMSA #	PHASE	DESCRIPTION OF MATERIALS
C (continued)	**C-335 Phase 2 (4)** C-335-02, C-335-03, C-335-06, C-335-07	All Phase 2	Misc. Process Equipment
	C-335 Phase 1 (2) C-335-01, C-335-08	All Phase 1	Misc. Process Equipment
	C-331 Phase 3 (6) C-331-19, C-331-20, C-331-21, C-331-22, C-331-23, C-331-24	All Phase 3	UF_4, Misc. Process Equipment
	C-331 Phase 2 (7) C-331-01, C-331-03, C-331-05, C-331-06, C-331-07, C-331-08, C-331-12	All Phase 2	Misc. Process Equipment
	C-331 Phase 1 (5) C-331-02, C-331-04, C-331-11, C-331-17, C-331-18	All Phase 1	UF_4, Misc. Process Equipment
	C-400 Phase 2 (3) C-400-02, C-400-07, C-400-08	All Phase 2	Closed RCRA hazardous unit, Misc. Equipment
	C-720 Phase 2 (3) C-720-02, C-720-03, C-720-04	All Phase 2	Misc. Equipment

DOE DMSA Map #1

DOE DMSA Map #2

DOE DMSA Map #3

DOE DMSA Map #4

DOE DMSA Map #5

DOE DMSA Map #6

DOE DMSA Map #7

DOE DMSA Map #8

DOE DMSA Map #9

DOE DMSA Map #10

DOE DMSA Map #11

IV. METHOD OF ACCOMPLISHMENT

A. GENERAL

The general method of accomplishment will be the use of the BJC management and integration approach. BJC will use, to the extent possible, existing subcontracts to obtain resources and perform the work. BJC will provide the appropriate management and oversight resources to ensure smooth integration of subcontractors in performing the work as a team project.

Characterization of the material in DMSAs includes evaluation of the material for NCS, RCRA hazardous, PCB, asbestos, and radioactive contaminants. The characterization of the DMSAs will begin with those areas that are deemed to be of higher priority based on the potential for release of contaminants to the environment and the potential to contain RCRA hazardous or PCB wastes.

It is the goal of this project to maintain an effective program to control personnel exposure to chemical, radiological, and physical stress consistent with established standards of the DOE and the Occupational Safety and Health Administration.

B. PROJECT TEAM

The Project Team will include BJC for project management and integration (M&I), subcontract technical oversight, environmental, safety and health safety advocate oversight, and procurement. Subcontracted resources may be obtained from Weskem LLC for waste operations, Westinghouse Safety Management Solutions LLC (WSMS) for NCS and radiation protection engineering, and Safety and Ecology Corporation (SEC) for field operations radiation protection support, USEC for non-destructive analysis support, Nuclear Filter Technology Corporation (NFT), Incorporated for data management support, and USEC for analytical support. Additional support will be obtained from other subcontractors as needed. See Figures 15 and 16 for Project and Field Execution Team Organization Charts.

Field Team Execution

A team concept will be utilized to accomplish the scope of the DMSA work activities. Four work teams will be placed into the field. Each team will consist of a Front Line Supervisor and nine team members. The team members will include Environmental, Safety and Health (ES&H) technicians, Radiological Control Technicians (RCT), DMSA Inspectors, samplers, decontamination operators, waste operators, and maintenance mechanics.

All field personnel will be required to wear protective clothing and equipment specified in the project-specific health and safety plan. Contamination controls will be maintained at each work site. RCTs will be assigned to provide contamination control support for each field team. An ES&H technician will be assigned to each field team to provide industrial hygiene and safety support.

Field personnel will be knowledgeable of all project-specific documents relevant to the work being performed which may include a health and safety plan, Activity Hazard Analysis (AHA), quality assurance project plan, site-specific sampling and analysis plan (SAP), and waste management plan. A copy of each plan will be available for review by field personnel before the onset and through the duration of any field activities. Field personnel will use these documents as necessary to obtain specific information regarding decontamination, equipment/supplies, health and safety, sample collection/identification, sample packaging, etc.

Work Control

Work will be planned incorporating the following core functions of the Integrated Safety Management System (ISMS):

- Define the scope of work.
- Identify, categorize, and analyze hazards.
- Develop and implement hazard controls.
- Verify readiness and perform the work safely.
- Collect feedback and implement actions for continuous improvement.

Key personnel will plan tasks to ensure that the work will be executed in a manner that addresses safety, health, the environment, and complies with all applicable rules, regulations, and procedures. All needed work permits (e.g., health & safety, radiological) will be addressed and issued. All project task documentation will be complete prior to initiating specific DMSA field activities. Readiness will be verified during a pre-task meeting with personnel performing the work. This ensures personnel understand the requirements and hazards of the task. Work will be performed safely and, if necessary, work will be stopped to address any problems.

Field oversight will be provided to ensure that the work is being performed safely and in accordance with applicable requirements. Post-job briefings will be conducted to review how work was performed and any suggestions for improvements.

C. TECHNICAL APPROACH

Uranium enrichment materials stored in DMSAs are commingled with other materials and present a complex work environment. These materials must be moved and sorted in order to find and characterize all potential RCRA hazardous /TSCA wastes. DMSAs must receive a nuclear criticality safety (NCS) characterization prior to the disturbance of any materials.

Activities Preliminary to DMSA Sorting (NCS Characterization)

NCS characterization provides the information necessary to safely move or manage materials without the threat of an uncontrolled nuclear criticality. This characterization can be very slow in a complicated environment of uranium enrichment process materials. The consequences of an uncontrolled nuclear criticality mandate the characterization. An uncontrolled nuclear criticality will release potentially lethal levels of radiation for personnel that are near the event. This scenario must be prevented.

During the initial NCS characterization, the DMSA Inspector's determination of the proper NCS status for items will be based upon a review of documentation, process knowledge, and/or visual inspection. The DMSA inspector coordinates these activities with the NCS engineer. Only those items that will be moved or disturbed must be characterized using the initial NCS characterization steps.

NCS Documentation Review

As a first step in the NCS characterization process, existing documentation is reviewed by the DMSA Inspector for information on the uranium content of DMSA items. The extent of the documentation review is documented. Such documentation may exist, for example, as Requests for Disposal for waste items or as records of process equipment history/status.

The documentation review is used to categorize items according to these requirements:

- If historical documentation clearly shows an item has no significant uranium accumulation, the DMSA Inspector declares it NCS Exempt.

- If the documentation clearly shows an item does not contain fissionable-assay material, the DMSA Inspector declares it NCS exempt.

- If historical documentation shows an item has a ^{235}U mass and enrichment within the limits for a Spacing-Controlled Item, then the item is controlled as such.

- If historical documentation shows an item has a ^{235}U mass and enrichment exceeding the limits for a Spacing-Controlled Item, then the item is declared a Singularly-Contingent Item and promptly handled per the NCS requirements.

- 5, 30, and 55-gallon drums that meet the criteria for Spacing Exempt Items in Nuclear Criticality Safety Approval (NCSA) 97-001 will be governed by NCSA 97-001.

When documented mass and enrichment data is used to establish the NCS status of an item, there will be:

- clear traceability between the item and the documentation.
- appropriate accounting for uncertainty in mass and enrichment measurements.

NCS Survey Activities

Preliminary NCS characterization has segregated the 160 DMSAs into Phase 1 DMSAs (expected to have no significant uranium-235 isotope (^{235}U) accumulations) and Phase 2 DMSAs (where significant ^{235}U accumulations may exist). Table 1 provides a full listing of DMSAs by priority assignment.

Phase 2 DMSAs contain some equipment, materials, and waste that may contain fissionable-assay material (>1 wt% ^{235}U). Since some of the DMSA materials are uncharacterized and they may contain unquantified amounts of contamination, a single parameter may be protecting against a contingency that could result in an accidental nuclear criticality. Thus, precautions are taken during the planned characterization operations to ensure that any undocumented control is not compromised. Some of these undocumented controls may include mass, absorption, geometry, interaction, concentration, moderation, enrichment, reflection, and volume.

Nuclear Criticality Safety Evaluation (NCSE) 98-001 was developed and approved to cover the NCS characterization of the DMSAs. NCSE 98-001 was prepared in accordance with DOE Order 420.1 as implemented in Bechtel-Jacobs procedures for an NCS program and NCSAs.

Many of the Phase 2 DMSA items have not been exposed to the process gas streams, so there is negligible potential that they contain significant uranium accumulations. The intent in planning the DMSA NCS characterization is to allow those items that are exempt from NCS controls to be readily relocated. At the same time, NCS controls must be maintained for those remaining items that may contain significant uranium accumulations.

For items that have been exposed to process gas streams, the DMSA Inspector may declare any such item to be NCS Exempt, if the visual inspection shows all internal and external surfaces are virtually free of uranium accumulation and liquids. Thus, a piece of process equipment may be declared NCS Exempt based upon visual inspection alone if all surfaces can be inspected. Otherwise, if all surfaces are not visible for visual inspection, the analytical characterization (swipes or Non Destructive Analysis [NDA]) will be used to show that an item has minimal uranium accumulation.

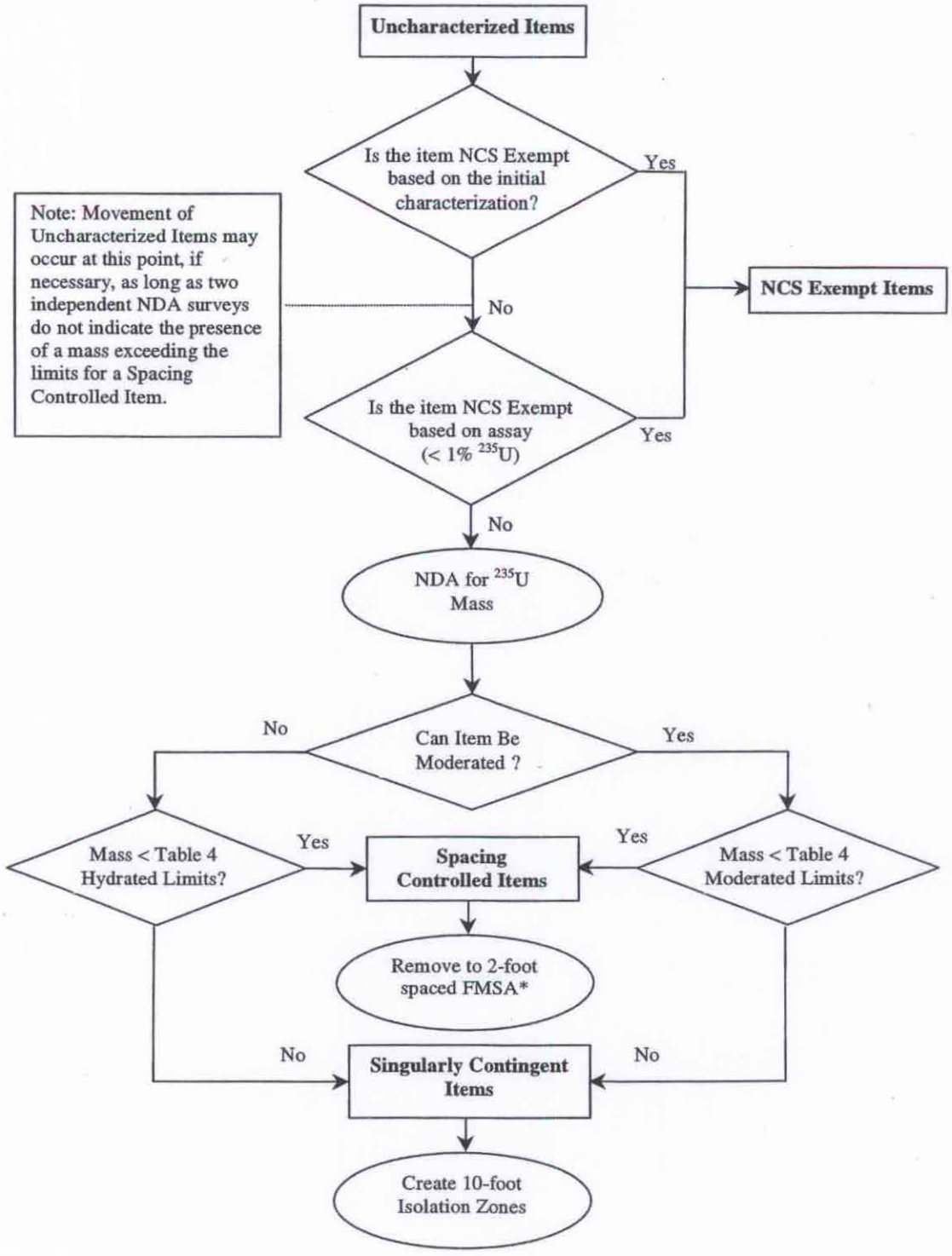

Figure 14: Overview of DMSA NCS Characterization

*Note: FMSA (Fissionable Material Storage Area) – An area where items are stored under NCS controls to comply with the double contingency principle. In addition to FCA signs, FMSAs are posted with "Fissile Storage Array" signs stipulating the appropriate limits, controls, and instructions. FMSAs are posted in accordance with BJC procedure BJC-NS-1005, "Nuclear Criticality Safety Program Elements."

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Assay Swipes for ^{235}U Enrichment

Two independent analyses are used to determine the ^{235}U enrichment and/or the NCS status of an accumulation. Documentation from a previous enrichment analysis may serve as one of the two analyses, so that only one swipe is needed. If such documentation is used, there must be traceability between the document and the item. If documentation is not available, two independent swipes are required. The laboratory analysis of these swipes appropriately account for measurement uncertainty by including a factor of two positive standard deviations.

If two independent analyses of an accumulation show an ^{235}U enrichment less than or equal to 1 wt%, then the item may be declared NCS Exempt.

NDA Mass Survey

NDA mass surveys may be used to scan for uranium accumulations within the DMSAs using NDA techniques similar to those commonly used to locate uranium accumulations in the process areas of PGDP. The NDA is performed by an individual who has approved, documented experience and training. NDA surveys are performed prior to moving or disturbing Uncharacterized or Spacing-Controlled Items. NDA surveys are not required before moving NCS-Exempt Items as long as they can be moved without moving or disturbing other materials.

Waste Characterization and Sorting Activities

The materials in each DMSA will be inspected and inventoried. This activity will require that the material within most DMSAs be sorted. Sorting of DMSAs will only occur after NCS characterization. During the inspections, DMSA materials that are determined to be waste may be classified as RCRA hazardous, TSCA, Low-level radioactive, mixed, or solid waste if enough process knowledge is available. Radiation surveys or analyses may be required to complete waste classifications. Sampling and analyses will be performed in accordance with SW-846.

Waste Classification

The definitions of the waste classifications are provided below:

RCRA Hazardous Waste — Any solid, liquid, or contained gaseous material (compressed gas cylinder) which is characteristically hazardous or is a listed hazardous waste as defined by KRS 224.01-010 and 401 KAR 31:030, and/or any material which has come in contact with a listed hazardous waste, including spill cleanup residue. For purposes of this document, RCRA hazardous wastes are wastes regulated as hazardous under Kentucky Hazardous Waste Regulations.

TSCA Waste — Wastes regulated under the Toxic Substances Control Act as defined in 40 CFR 761 and as regulated under the Uranium Enrichment TSCA Federal Facilities Compliance Agreement.

Low-Level Radioactive Waste — Waste that contains radioactivity but is not, by definition, high-level waste, transuranic waste, spent nuclear fuel, or byproduct material as defined by DOE Order 435.1. Low-level waste does not contain hazardous waste as defined in 401 KAR 31 or materials regulated under the Toxic Substances Control Act as defined in 40 CFR 761.

Mixed Waste — Waste containing both radioactive and RCRA hazardous components as defined by the Atomic Energy Act and the Kentucky Hazardous Waste Regulations. Mixed waste identified by this

project will be managed in accordance with the September 1997, Agreed Order (DWM-30039-042) and approved Mixed Waste Site Treatment Plan.

Solid Waste — Any solid, liquid, or contained gaseous material (compressed gas cylinder) which is not radioactive and is not RCRA hazardous waste or TSCA waste as defined in KRS 224.01-010(31).

RCRA Hazardous Waste Characterization and Management

RCRA hazardous waste will be classified using process knowledge or chemical analysis. RCRA hazardous wastes includes both listed and characteristic wastes as defined by applicable regulations. Inspections will use process knowledge to quickly isolate those wastes readily identified as RCRA hazardous regulated. Disassembly of abandoned equipment within in the DMSA may be necessary to isolate RCRA hazardous wastes.

Other wastes not readily identified may require sampling in order to characterize the waste as RCRA hazardous. Personnel that collect samples will be limited to those individuals who are trained and knowledgeable of field procedures. Field surveillances will be conducted to ensure that the requirements of sampling technique are met.

Specific DMSA material will be sampled and appropriate labels placed on sample containers as directed in the project specific SAP. Quality control samples will be collected as directed by the SAP. Complete chain of custody forms will be initiated for each sample. Chain-of-custody is required for analytical samples to provide traceability of possession from initial sample collection through sample transfer and/or final disposition. The field sampler is responsible for the proper handling and custody of the samples collected until they are properly and formally transferred to another person or the laboratory.

Data tracking procedures will be utilized to maintain sample data integrity, to facilitate the management of analytical laboratory services, to enable project personnel to determine the status of the analytical data at any time, and to ensure that data is reviewed in accordance with project data quality objectives (DQOs). Samples collected for laboratory analysis will be tracked from collection through disposal using various types of sample related documentation, including chain-of-custody forms and sample disposal records.

Only Sample Management Office (SMO) approved laboratories will be utilized for waste analysis. This approval process includes on site audits of the laboratories. Statements of work will be provided to the laboratories to initiate the analysis required.

Analytical data will be reviewed to determine whether the data quality meets the requirements of the project. The level of review is determined by the DQOs established for each sample. A review of the data will be conducted to verify that the analytical subcontractor has met the technical requirements of the analytical subcontract in terms of completeness and compliance with specified analytical and Quality Assurance and Quality Control (QA/QC) protocols. Data Verification will be accomplished by a technical review of data quality and useability against the DQOs. Data Validation will be a formal review process performed by an independent validator if required by the project SAP. Data review is performed by qualified and trained personnel. As a result of the technical review of data quality, data may be flagged, or qualified, to alert the end user to any limitations of the data. Any qualifiers assigned to the data are maintained in the database with the data.

RCRA hazardous wastes will be containerized in appropriate packaging that meets the waste acceptance criteria for Part B permitted storage. The container will be labeled in accordance with procedure and moved into appropriate storage.

A Request for Disposal (RFD) form will be completed for all material in each DMSA. The RFD will provide the description, estimated volume, and preliminary characterization of the material. Process knowledge will be documented using the form and attachments to the form.

RCRA hazardous waste will be shipped to an approved off-site treatment/disposal facility within one year of the waste's accumulation start date.

TSCA (PCB) Waste Characterization and Management

TSCA (PCB) waste will be classified using process knowledge or chemical analysis. Inspections will use process knowledge to quickly isolate those wastes readily identified as TSCA regulated. Disassembly of abandoned equipment within in the DMSA may be necessary to isolate TSCA wastes. Each work crew will segregate DMSA metal from nonmetal materials. Oily material, equipment containing oil, materials that are known to contain or may possibly contain PCB oils, and material contaminated with or potentially contaminated with PCBs will be segregated. Items that have come into contact with PCBs will be managed separately unless decontaminated to less than 10 micrograms PCBs /100 cm2. Capacitors will be removed from equipment managed as PCB waste unless clearly marked as "No PCBs." Equipment reservoirs containing oil will be drained and absorbent material will be added to the reservoir.

Wastes requiring chemical analysis will be sampled and analyzed in the same manner as the RCRA hazardous waste that was previously described.

TSCA (PCB) wastes will be containerized in appropriate packaging that meets the waste acceptance criteria for TSCA (PCB) storage. The container will be labeled in accordance with procedure and moved into appropriate storage.

A Request for Disposal (RFD) form will be completed for all TSCA (PCB) material. The RFD will provide the description, estimated volume, and preliminary characterization of the material. Process knowledge will be documented using the form and attachments to the form.

TSCA (PCB) liquid and soft solid waste will be shipped for disposal to the TSCA (PCB) Incinerator at Oak Ridge, Tennessee as the incinerator is made available. Other TSCA (PCB) solid wastes will be stored in adequate storage until such time as disposal capacity is available.

Low-Level Radioactive Waste (LLW) Characterization and Management

LLW waste will be classified using process knowledge, radiation surveys or radiochemical analysis. Wastes requiring radiochemical analysis will be sampled and analyzed in the same manner as the RCRA hazardous waste that was previously described. A Request for Disposal (RFD) form will be completed for all LLW material. The RFD will provide the description, estimated volume, and preliminary characterization of the material. Process knowledge and any radiation surveys will be documented using the form and attachments to the form.

LLW will be sorted, managed, and stored within the DMSA. Those wastes requiring contamination control will be wrapped in clear plastic.

Mixed Waste Characterization and Management

Mixed waste will be classified using process knowledge, radiation surveys, radiochemical analysis or chemical analysis. Mixed wastes include both listed and characteristic wastes as defined by state regulations. Inspections will use process knowledge to quickly isolate those wastes readily identified as Mixed regulated. Disassembly of abandoned equipment within in the DMSA may be necessary to isolate Mixed wastes. Wastes requiring radiochemical or chemical analysis will be sampled and analyzed in the same manner as the RCRA hazardous waste that was previously described

Mixed wastes will be containerized in appropriate packaging that meets the waste acceptance criteria for Part B permitted storage. The container will be labeled in accordance with procedure and moved into appropriate storage.

A RFD form will be completed for all Mixed waste material in each DMSA. The RFD will provide the description, estimated volume, and preliminary characterization of the material. Process knowledge will be documented using the form and attachments to the form.

Mixed waste will be added to the Site Treatment Plan for the Paducah site and will be treated or disposed as treatment/disposal technology is made available.

Solid Waste Characterization and Management

Solid waste will be characterized using two approaches. Radiation surveys will be performed for potentially surface contaminated material. Radiochemical analysis will be performed for potentially volumetrically contaminated material. Wastes requiring radiochemical analysis will be sampled and analyzed in the same manner as the RCRA hazardous waste that was previously described. A RFD form will be completed for all solid waste material. The RFD will provide the description, estimated volume, and preliminary characterization of the material. Process knowledge and any radiation surveys will be documented using the form and attachments to the form.

Solid waste will be disposed at the PGDP C-746-U Landfill. If DMSA material is known to contain or possibly contain asbestos fibers, an asbestos evaluation and/or sampling will be performed. Asbestos will be removed and the material will be packaged as asbestos containing materials. Solid waste with contaminated asbestos containing material will be disposed at the PGDP C-746-U Landfill according to solid waste regulations.

Permitting/Closure

A Part A RCRA hazardous permit application will be submitted for those areas where RCRA hazardous /Mixed wastes are discovered. Closure of the areas identified in the RCRA hazardous /Mixed permit will be accomplished in accordance with RCRA hazardous /Mixed requirements. Although not included in this scope for planning purposes, it is recommended that negotiation of an agreed order be pursued as an alternative to the permitting/closure of DMSAs found to contain hazardous wastes.

Abandoned fixed equipment within DMSAs will be sampled for characterization. Fixed equipment and systems would be drained and left in place for future D&D for the building containing the equipment. Additional RCRA closure activities for the equipment would be conducted as agreed between DOE and the Kentucky Department for Environmental Protection (KDEP).

Individual items will be sampled as necessary to delineate the extent, if any, of contamination from hazardous, PCBs, or radioactive wastes. Cleanup of releases which may be identified during the execution of this project will be managed according to DOE and the contractors plans and procedures.

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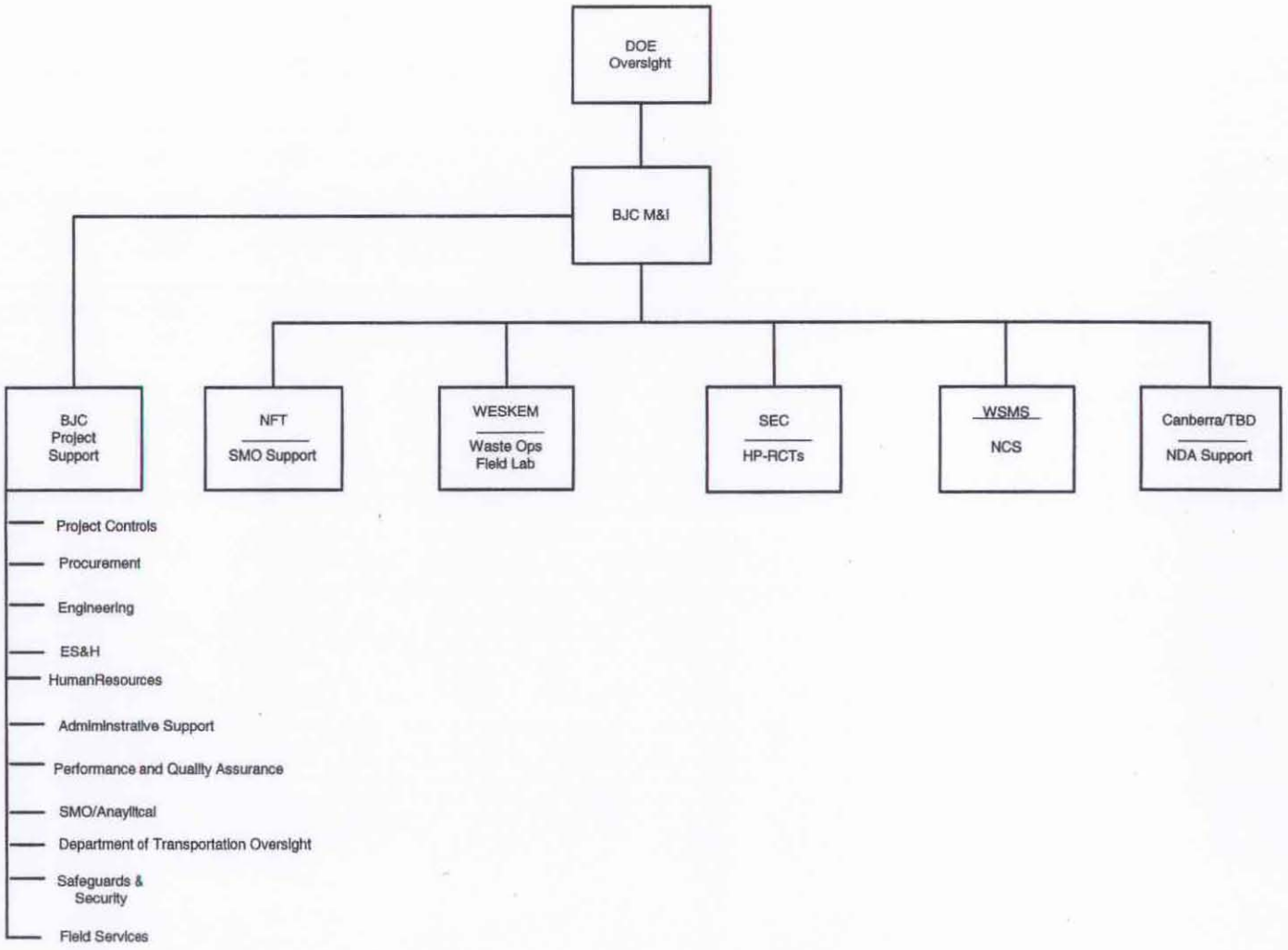
DMSA PROJECT MANAGEMENT AND INTEGRATION (M&I) ORGANIZATION



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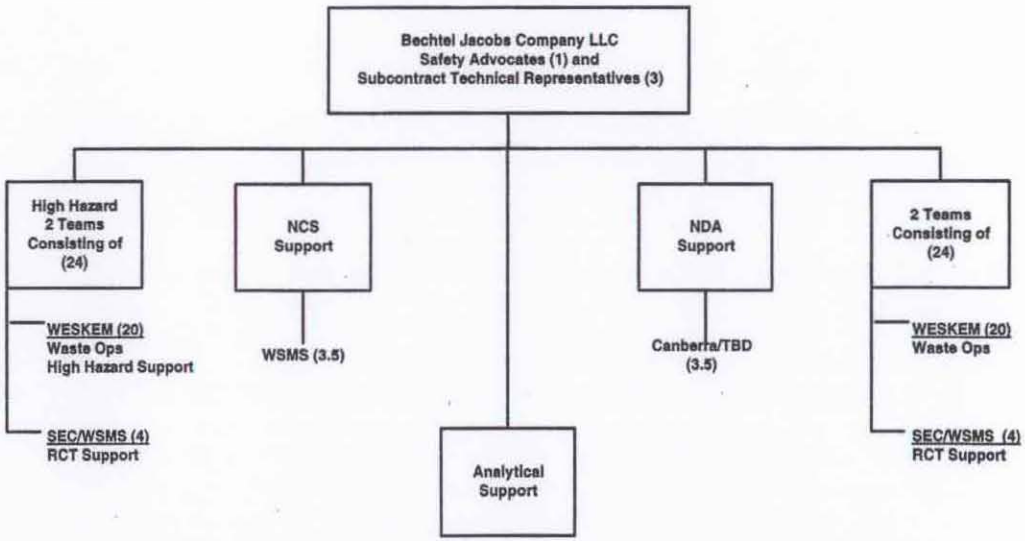
DMSA FIELD EXECUTION TEAMS



Field Resources
Total (61)

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Key Field Position Descriptions

BJC Subcontract Technical Representative (STR)

- The STR directly oversees and verifies the performance of the work. The STR is the primary interface with the subcontractors. The STR reports to the BJC Task Manager.

BJC Safety Advocate (SA)

- The SA provides support to the STR by overseeing the implementation of Integrated Safety Management and ES&H compliance in the field.

Subject Matter Experts (SMEs)

- SMEs will conduct DMSA inspections and inventories. Inspections will determine those materials that are readily identified as RCRA hazardous /TSCA wastes.

NCS Engineer

- The NCS Engineer is familiar with the physics of nuclear criticality and with the associated safety practices to furnish technical guidance to the DMSA management team appropriate to the scope of operations. In addition, the NCS engineer is skilled in the interpretation of data pertinent to nuclear criticality safety and familiar with operations to serve as an advisor to the DMSA team.

DMSA Inspector

- The DMSA Inspector has a minimum of five years experience in either cascade operations or process maintenance, dealing directly with the operation and/or maintenance of enrichment process components. The DMSA Inspector also has a minimum of ten years experience at an operating gaseous diffusion plant in any capacity.

NDA Specialist

- The NDA Specialist has a minimum of three months experience performing and interpreting NDA radiation surveys without required oversight and a minimum of three months gaseous diffusion plant experience.

RCTs

- The RCTs perform radiological surveys, perform dosimetry work, and support field work. RCTs ensure radiological contamination control requirements are met.

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V. MAJOR ASSUMPTIONS

The following list of assumptions were utilized in determining the current project cost and schedules. Exceptions or deviations from these assumptions could impact the scope, cost and schedule of this project:

1. Notice to proceed will be issued by January 1, 2001.
2. Appropriate subcontractor support and equipment for this project will be available to support the schedule.
3. The USEC laboratory will be utilized for the NCS characterization and radiological data.
4. USEC or offsite laboratories will be used for hazardous waste, PCB, and asbestos characterization.
5. Support facilities (change houses, break trailers, and office trailers) will be available. From the notice to proceed, the support facilities and infrastructure will take five months to become fully operational.
6. There will be sufficient space within PGDP to accommodate the additional facilities.
7. No recycling or reuse of materials, will be included as part of this project.
8. BJC will perform all DMSA work under the M&I approach utilizing existing subcontracts under a level of effort basis.
9. Authorization basis documents will be prepared/revised as required without impacts to the prescribed schedule.
10. Equipment will be dedicated to the DMSA work.
11. Highway transportation will be utilized for off-site transportation to the disposal facilities.
12. Appropriate assessments and readiness reviews will be performed as required and there will be no impacts to the prescribed schedule. No additional DOE Oak Ridge readiness reviews will be required.
13. No singularly contingent NCS items will be found during this project. If found, a NCSE will be generated and will be classified as a separate project.
14. Effort to manage classified items when identified will not be significant.
15. Areas may be deleased from USEC space to perform the mission of this project. The de-leased space will be provided in appropriate locations.
16. USEC Plant Operating Review Committee approvals as required will be timely and not impact the project schedule.
17. Twenty percent of the DMSAs will require RCRA hazardous permitting and subsequent RCRA hazardous closure.
    - For inside facilities with concrete flooring, the approach will be to wash the floor one time, sample for verification and assumed clean.
    - Sixteen fixed equipment systems are assumed to exist. This fixed equipment will be classified as part of the building and not removed as part of RCRA hazardous closure.
    - RCRA hazardous closure for the outside facilities will consist of removing the RCRA hazardous /Mixed Waste material. Two inches of soil/rock will be taken from the surface at the area of the RCRA hazardous /Mixed Waste. Sampling of the exposed sub-surface layer will be performed. The soil will then be backfilled and seeded. It is assumed that these actions will be sufficient to complete RCRA hazardous closure. For outside surfaces where concrete is found, the concrete will be washed one time and samples taken for verification and assume clean.

- DMSA OS-04 and DMSA OS-14 consists of radiologically contaminated rail cars and rail tankers that are located on the rail line. These DMSAs will have the soil removed, the sub-layer sampled, the soil backfilled.
- All RCRA hazardous closures will be limited to the existing DMSA boundaries.
- RCRA hazardous closure activity of any fixed structures or piping would be limited to the items within the DMSA boundary and isolated as necessary.

18. The 11 DMSAs worked by USEC will not require further NCS characterization.
19. The estimate and scope of the landlord activities for 160 DMSAs (Work Breakdown Structure 04.60.04.05.01) and the Waste/NCS Characterization resulting from the 11 DMSAs worked by USEC (WBS 04.60.04.05.03) are included in this project.
20. Once notice to proceed is given and funding provided, fieldwork will begin on a limited basis and accelerate, as resources become available and the personnel are trained. The project will be fully staffed within five months.
21. Newly generated RCRA hazardous waste treatable with available treatment technology will be treated within one year. The waste will then be disposed of within one year of completing treatment.
22. Activities under this project, except for treatment and disposal, will be covered under National Environmental Protection Agency (NEPA) categorical exclusions.
23. DOE will receive work plan approval from the Commonwealth of Kentucky no later than April 15, 2001.
24. The programmatic environmental assessment for waste shipments and treatments will be approved by May 2001.
25. DOE Order 435.1, *Radioactive Waste Management* exemptions will be granted in a timely manner for storage and disposal of low-level waste.
26. No additional air permits will be required for this project.
27. No additional controls beyond silt fences, straw bales, and gabions will be required for surface water sediment controls for the project.
28. No substantial delays will occur due to inclement weather.
29. Other organizations such as the Department of Justice will not impact scope, schedule, or cost.
30. UF_4 is not considered a "solid waste" under 40 CFR 261.4 (a).
31. Disposal of TSCA-PCB waste is funded under a separate project.
32. Solid waste will meet the PGDP C-746-U Landfill acceptance criteria for disposal.

VI. ENVIRONMENT, SAFETY AND HEALTH

The following outlines the BJC approach to ES&H for the DMSA Characterization/Remediation project.

ZERO ACCIDENT PERFORMANCE

BJC is dedicated to the concept that all accidents are preventable. Accordingly, BJC is committed to achieving and sustaining "Zero Accident Performance" through continuous improvement practices. "Zero Accident Performance" includes zero unpermitted discharges or releases with respect to protection of the environment. Our subcontractors are required to commit to this philosophy, as well.

INTEGRATED SAFETY MANAGEMENT SYSTEM

BJC is committed to implementing our Integrated Safety Management System (ISMS) that promotes the Company's core values and the principles set forth by DOE. The objective of ISMS is to systematically integrate ES&H protection into management and work practices at all levels so that workers, the public, and the environment are protected while assigned projects are accomplished.

As part of the ES&H plan for this project, an ISMS Matrix will be developed that will specify the appropriate sections of its work control and planning documents where the specific ISMS elements are addressed. This ensures that the work control and planning documents fully encompass the ISMS framework.

EMPLOYEE EMPOWERMENT

BJC has empowered its employees to adhere to all ES&H requirements. Employees and subcontractors will have the right and obligation to report unsafe conditions and to interrupt or Stop Work without fear of reprisal. No one will be asked to complete a task that an individual feels is unsafe or that may endanger the environment.

EMPLOYEE INVOLVEMENT

The ES&H Plan will describe how worker feedback and involvement in work planning will be used to enhance the safety and efficiency of the work performed. Processes will include the following:

- Safety suggestion,
- Near-miss reporting,
- Safety/toolbox meeting,
- Pre-job briefings, and
- Employee involvement in AHA.

ES&H PLAN

Provided below is an outline of elements included in the ES&H Plan that will be prepared prior to work mobilization. As part of plan development, an ES&H crosswalk will be completed that correlates all hazards that are anticipated in the performance of the scope of work with Work Smart Standards (WSS). This will ensure that the requisite protection for those hazards is addressed.

The plan will also describe how the Employee (or team) not only analyzes and solves problems, but also continuously improves the safety culture and conditions affecting the natural

environment. The plan also describes how feedback occurs. The basic tenets of ISMS and its other requirements shall be described fully in the ES&H Plan, and its underlying philosophy shall be implemented through these specific implementation strategies.

The ES&H Plan shall demonstrate written commitment to the implementation of the ISMS Program. The ISMS principles and core functions will be incorporated into the Work. The ES&H Plan shall incorporate the following management functions:

- a description of how Work within this scope will be performed shall be provided;
- the scope of all Work will be clearly understood before it is begun;
- the hazards associated with that Work will be identified, analyzed, and clearly understood;
- appropriate standards and requirements will be identified, tracked for changes, and applied to control the hazards associated with the Work to be performed;
- the Work will be performed in accordance with the standards and requirements identified;
- the process for reviewing, addressing, and communicating lessons learned will be in place and used; and
- a process for worker feedback and continuous improvement will be in place and used.

The ES&H Plan shall also demonstrate that these essential functions have been integrated into all Work:

- line management responsibility for ES&H;
- clear assignment of roles and responsibilities;
- competence commensurate with responsibilities;
- balanced priorities (i.e., cost and schedule not to take precedence over safety);
- clear identification of appropriate ES&H standards and requirements;
- assurance that all Work has been reviewed and is authorized; and
- hazard controls tailored to the Work being performed.

The ES&H Plan shall at a minimum include the following elements as applicable to its Scope of Work:

- Work Area characterization and description,
- Zero Accident Performance,
- employee empowerment,
- employee involvement,
- organization,
- reporting and record keeping,
- medical surveillance/monitoring,
- first-aid and medical services,
- ES&H training,
- ES&H performance measures and incentives,
- ES&H AHA,
- Facility/Site access control,
- environmental protection/compliance,
- emergency management,
- industrial safety requirements,
- industrial hygiene requirements,
- radiation protection requirements,

- radiation and environmental ALARA requirements and performance goals,
- chemical and radiological decontamination requirements,
- monitoring/sampling requirements, and
- pollution prevention requirements

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VII. QUALITY ASSURANCE

The existing DMSA Quality Assurance Plan (QAP) will be revised as part of this overall project plan to identify and document the current approach to ensure that the DMSA project is accomplished as efficiently as possible while obtaining adequate information for decision-making. The QAP will cover the scope of characterizing materials and remediating the DMSAs.

The QAP will identify and document the general quality requirements and the BJC approach to planning, implementation, assessment and decision-making. Likewise, a general Sampling and Analysis Plan (SAP) and a Waste Generation Plan (WGP) will be developed consistent with requirements to be followed throughout the life of the project.

The QAP will include the elements specified in 10 CFR 830.120, *Quality Assurance*, as applicable to project planning, implementation, and assessment. Each element will be taken into consideration to determine if existing systems and operations provide adequate controls. Where the systems in place might fail to produce quality results, additional actions will be developed by the project team and will be detailed in the QAP. The elements to be addressed are shown below.

Because of the size and duration of this project, the project will be divided into more manageable segments by individual or groups of DMSAs. Detailed outputs from the planning stages of each segment will be included in various DMSA-specific documents, including SAPs, WGPs, and project plans. Quality assurance/quality control details will be incorporated into the applicable DMSA-specific plans. When the work is underway, planning for the next segment will occur. The plan/implement/assess process will be reiterated as needed until the project is completed.

QUALITY MANAGEMENT

- Program. Specific members of the project team will be identified, and responsibilities for quality for each member have been identified.
- Training and Qualification. A matrix showing key personnel and the training required for each will be developed. Qualifications for the DMSA inspector, and NDA expert will also be identified for these key members.
- Quality Problems and Improvements. Responsibilities will be assigned to ensure all problems identified are addressed, including developing corrective actions to prevent reoccurrence if required.
- Documents and Records. QA records will be identified, and responsibilities for those records will be specified.

PERFORMANCE

- Planning. Planning will be conducted to encompass DQOs, health and safety controls, and potential noncompliance resolutions.
- Instructions and Procedures. Authorized procedures for field activities will be identified in the project plans. Sampling and analyses will be conducted by specified procedures to meet Waste Acceptance Criteria.
- Inventory, Identification and Control. Identification of containers and items will be detailed in DMSA-specific project plans; control of containers after sampling will be specified in DMSA-specific SAPs.
- Control of Measuring and Test Equipment. Health and safety monitoring and laboratory characterization equipment will be calibrated and maintained to existing procedures.

- Regulatory Compliance. Responsibilities for identifying and preventing potential noncompliances during the project have been delineated in the plan.
- Procurement. Responsibilities for procurement will be specified in the plan.
- Change Control. Changes, change control, and responsibilities will be addressed.

ASSESSMENT AND DECISION-MAKING

- Management Assessments. Readiness assessments meeting the requirements of the BJC procedure BJC-PQ-1510, *Readiness Evaluations*, will be conducted as required. Data verification, validation, and assessment activities will also be specified in the QAP.
- Independent Assessments. Independent assessments will be addressed in the QAP as needed.

VIII. COST ESTIMATE

DMSA Characterization / Remediation
Cost Plan, Roll-up
With NCS Characterization Effort Break Out
$ x 1000

	Fiscal Year						
Work Element Break Down	**2001**	**2002**	**2003**	**2004**	**2005**	**2006**	**Total**
Management & Oversight	525	1,634	1,675	1,724	1,760	440	7,758
Infrastructure-Office/Break/Change Out Facilities	2,261						2,261
NCS/NDA/Analytical Support	**1,231**	**322**	**322**	**322**	**323**		**2,520**
Field Work – Waste Characterization	8,704	13,681	12,708	11,126	4,294	369	50,513
NCS Characterization	**802**	**1,437**	**1,239**	**1,191**	**725**		**5,394**
Treatment & Disposal		329	1,429	3,267	3,682	408	9,115
RCRA Closures	477		1,075	1,107	1,130	282	4,071
Total	**14,000**	**17,403**	**18,448**	**18,737**	**11,914**	**1,499**	**82,001**
Waste Characterization Total	11,967	15,644	16,887	17,224	10,866	1499	**74,087**
NCS Characterization Total	2,033	1,759	1,561	1,513	1,048		**7,914**

Note: In the Executive Summary (page # ix) the table at the bottom of the page shows the expected budget amounts by year to be authorized by DOE for the project. The table above shows how the dollars are expected to be spent based on the resource loaded schedule for the project.

APPENDIX A

WBS and Schedule

APPENDIX B

Work Package Outline

Work packages for executing fieldwork on DMSAs are based upon the Integrated Safety Management System for DOE, and will include the following elements at a minimum:

a. Scope of Work. This includes a description of work steps and/or work instructions.

b. Hazard Analysis. The hazard analysis is performed to identify potential hazards that may be encountered during performance of the work steps.

c. Hazard Controls. This element evaluates the hazards and develops and implements the hazard controls such as administrative controls, engineering controls, or personal protection equipment.

d. Confirmation of readiness and performance to safety perform work. This includes the necessary reviews, walkdowns, briefings, and approvals to verify readiness to perform work.

e. Lessons Learned Feedback and Results. This element allows for worker feedback to provide for continuous improvement of work performance.

In order to maintain the prepared 60-month schedule, KDEP would need to provide significantly expedited review and approval of the work packages, as contrasted to the typical 30 day review.

APPENDIX C

Characterization Report Description

The characterization reports will be submitted to KDEP after completion of the work activities for each DMSA. A characterization report would be generated for each DMSA. The characterization reports would include an inventory listing of items identified in the specific DMSA. For each item inventoried the report would also include the NCS classification and the following waste determinations: non waste resource material, solid waste, hazardous waste, PCB waste, asbestos waste, and radioactive waste. In addition, estimates or actual waste volumes and weights would be included for each container or item inventoried. The method of characterization would be identified as process knowledge, or direct analytical data would be referenced for validation and verification. Finally, the storage or disposition location would be identified for each item inventoried as of the date of the inventory report.

DISTRIBUTION

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M. A. Reeves, Oak Ridge
W. Don Seaborg, Paducah (8)
J. D. Sheppard, Paducah
R. C. Sleeman, Oak Ridge
W. D. Tidwell, Paducah

Attachment F

DMSA PRIORITY LISTING
Table 1

PRIORITY	DMSA #
A	**C-400-05** **C-400-01** **C-400-03** **C-409-01** **C-409-02** **OS-14** **OS-06** **OS-07** **OS-15**
	NCS High Priority Top 11 C-331-09 C-331-10 C-331-13 C-331-14 C-331-15 C-333-31 C-335-04 C-335-05 C-337-30 C-337-36 C-337-37
	Outside Misc. Phase 1 (OS-02, OS-03, OS-04, OS-05, OS-08, OS-09, OS-10, OS-11, OS-12, OS-13
	Outside Misc. Phase 2 (OS-16, OS-17, OS-18)
B	**C-400-06** **C-331-16** **C-337-42** **C-337-43** **C-337-44** **C-337-45** **C-333-41** **C-333-42** **C-333-43** **C-335-03** **C-720-01**

PRIORITY	DMSA #
C	**C-310 Phase 2 (5)** C-310-01, C-310-02, C-310-03, C-310-04, C-310-05
	C-333 Phase 2 (13) C-333-01, C-333-03, C-333-04, C-333-05, C-333-20, C-333-21, C-333-22, C-333-23, C-333-32, C-333-37, C-333-38, C-333-39, C-333-40
	C-333 Phase 1 (26) C-333-02, C-333-06, C-333-07, C-333-08, C-333-09, C-333-10, C-333-11, C-333-12, C-333-13, C-333-14, C-333-15, C-333-16, C-333-17, C-333-18, C-333-19, C-333-24, C-333-25, C-333-26, C-333-27, C-333-28, C-333-29, C-333-30, C-333-33, C-333-34, C-333-35, C-333-36
	C-337 Phase 2 (7) C-337-23, C-337-25, C-337-27, C-337-29, C-337-35, C-337-40, C-337-41
	C-337 Phase 1 (31) C-337-01, C-337-02, C-337-03, C-337-04, C-337-05, C-337-06, C-337-07, C-337-08, C-337-09, C-337-10, C-337-11, C-337-12, C-337-13, C-337-14, C-337-15, C-337-16, C-337-17, C-337-18, C-337-19, C-337-20, C-337-21, C-337-22, C-337-24, C-337-26, C-337-28, C-337-31, C-337-32, C-337-33, C-337-34, C-337-38, C-337-39, C-337-40
	C-335 Phase 3 (4) C-335-09, C-335-10, C-335-11, C-335-12

PRIORITY	DMSA #
C (continued)	**C-335 Phase 2 (4)** C-335-02, C-335-03, C-335-06, C-335-07
	C-335 Phase 1 (2) C-335-01, C-335-08
	C-331 Phase 3 (6) C-331-19, C-331-20, C-331-21, C-331-22, C-331-23, C-331-24
	C-331 Phase 2 (7) C-331-01, C-331-03, C-331-05, C-331-06, C-331-07, C-331-08, C-331-12
	C-331 Phase 1 (5) C-331-02, C-331-04, C-331-11, C-331-17, C-331-18
	C-400 Phase 2 (3) C-400-02, C-400-07, C-400-08
	C-720 Phase 2 (3) C-720-02, C-720-03, C-720-04

G

Attachment G

Sampling and Analysis Plan

Sampling and Analysis Plan
For the Containers of Potentially F and U Listed Hazardous Waste

Issued August, 2003

Prepared by Bechtel Jacobs Co., LLC

1.0 Purpose and Scope

The purpose of this document is to describe the sampling and analysis plan and the characterization approach for the identified containers, which are now suspected to contain listed Resource Conservation and Recovery Act (RCRA) waste. The waste consists of environmental media, debris, and sludge.

Most of the stored waste is contained in 55-gallon containers; however, volume size ranges from B-25 boxes to 5-gallon pails. This plan defines the sampling methodology, identifies waste profiles/populations to be sampled, the basis for determining the number of samples, the number of samples to be taken, the analytical requirements, the quality control of samples and use of data.

The containers will be characterized in approximately 75 populations based on the generation source, location, and/or the activity or task that caused the waste to be generated. This will allow the populations to be characterized by statistical sampling in accordance with SW-846. Population-specific analytical Statements of Work will be developed to implement the goals defined in the following sections of this Plan and will be submitted to the Cabinet for review and approval. Data from the characterization of the waste according to this Plan will be used to make "contained-in" determinations for the containers.

2.0 Background

The environmental media, which is comprised of soil, sediments, water, and sludge, were generated from auger cuttings, borings, and excavation tasks to investigate or clean up spills and releases in various locations at the PGDP. The waste also consists of debris that was generated as a result of performing those tasks. The debris may include, but is not limited to, personal protective equipment (PPE), plastic, absorbents, concrete, construction materials, and grout.

3.0 Contaminants of Concern

The contaminants of concern for this Plan are total, (i.e., bulk), TCE and TCA.

4.0 Sampling and Analytical Strategy

Sampling and analysis protocols for conducting all environmental media and associated debris sampling will be in accordance with the United States Environmental Protection Agency's (USEPA) sampling and analysis protocol as defined in SW-846, 3rd edition, or the most recent edition.

All characterization of populations will be based on sampling a statistically sound subset of the population as outlined in SW-846, Chapter 9. The containers to be sampled will be randomly selected.

Soil and other environmental media matrices are assumed to be homogeneous within each container. In addition, any contamination is assumed to be uniformly distributed. These assumptions are based on the nature of the waste matrices, as well as, the typical nature of waste at the PGDP site. Based on these assumptions, the sample collection methodology will be by grab sampling.

The waste debris that can be directly associated with a specific population of environmental media will be characterized using the data generated by sampling that population of environmental media, i.e. debris will be assumed to contain TCE and/or TCA at the source levels as the environmental media with which it is associated. If TCE or TCA in the media are below the contained-in levels, the associated debris will be assumed to be

below the contained-in levels. PPE, plastic and other debris that cannot be directly associated with a specific population of media will be sampled and analyzed for total TCE and TCA to determine the possibility of contamination with TCE and/or TCA. The sampling protocol will be designed to be matrix-specific, and includes composite sampling, grid sampling, or other methodologies consistent with the guidance outlined in SW-846, 3rd edition, or the most recent edition

5.0 Sample Shipment

All sample shipments will be made in accordance with DOT hazardous materials regulations.

6.0 Analyses and Data Reporting Schedule

Applicable contracting documents will require analyses to be completed and data supplied within a standard 30-day turnaround time.

7.0 Quality Assurance and Quality Control

The Data Quality Objective (DQO) process was applied for each population in this project, and the output is presented in Appendix 1 of this document.

7.1 Quality Goals

The following quality goals are applicable for the population-specific sampling and analyses events:

- Representativeness will be measured by evaluating the Relative Percent Difference (RPD) between the sample and field sample duplicate. A maximum RPD value of 20% will be used as a standard. If this standard is exceeded, then a determination will be made as to the usability of the data, taking into consideration such parameters as the magnitude of the exceedance, the number of samples in the population, and the average result for the population .
- Completeness goals for the number of measurements required for a data set will be 100 percent. In order to ensure that an adequate number of data points are obtained, a contingency of 20 percent will be added to the number of data points required in order to evaluate a population. The number of data points required, including the 20 percent contingency, are shown in Appendix 1.

7.2 Chain of Custody and Sample Management

Analytical samples will be maintained under chain of custody. Samples to be shipped offsite will be refrigerated and held under chain of custody until shipments are made.

7.3 Documentation

Sampling personnel will document fieldwork in a sampling logbook. Sampling logbooks are quality records. The logbook(s) will be maintained as a quality assurance record in accordance with site procedures.

7.4 Quality Control Samples

One equipment rinseate sample will be collected after the collection of every twentieth sample, at a minimum. Likewise, trip blanks for volatiles analyses will be collected at the same rate.

Duplicate samples will be obtained on a one-to-twenty ratio. If the sample was a composite sample, the duplicate will be collected from the same composited material.

7.5 Preservation

Sample preservation will be noted on the Chains of Custody. Waste samples will be preserved by maintaining the samples at 4° Celsius, +\- 2°. Quality Control Samples will be preserved as described in SW-846, 3rd edition or the most recent edition.

7.4 Tamper Indicator Device

All samples will be secured with a tamper indication device (TID) and removed only upon receipt at the contracted laboratories by approved laboratory personnel.

8.0 Data Review and Use

8.1 Data Review

Following receipt of analytical data, the data will be reviewed. That review will include one hundred percent verification and assessment. Verification includes electronic and document reviews of specified data quality checks. Assessment includes qualitative and quantitative evaluation of the data to determine its limitations and usability for decision-making. Verification and assessment requirements are outlined in site-specific procedures. Quantitative evaluation of the data will be consistent with the requirements found in SW-846, Chapter 9. Qualitative evaluation of the data will be consistent with site-specific procedures.

Data assessment must be completed and documented before data can be used for "contained-in" decision-making purposes. The data assessment will be peer reviewed by qualified personnel and the data review and evaluation will be appropriately documented according to site-specific procedures. The documentation will be managed according to site-specific records management protocol. Electronic data and metadata will be protected (e.g. read only files, electronic file back-ups) and archived according to site-specific protocol.

8.2 Statistical Evaluation of the Data

Statistical evaluation of the data will include distribution and goodness-of-fit evaluations using industry-standard statistical tools (e.g. Shapiro-Wilkes or comparable) per SW-846, Chapter 9. If necessary, the data will be transformed to produce a normal distribution prior to calculating the standard deviation and variance. In addition, calculations will be performed to determine if a sufficient number of samples were collected according to the methodology in SW-846, Chapter 9. If these calculations establish (in accordance with SW-846, Chapter 9) that the number of samples or data points were not statistically sound to make a final characterization, the number of additional samples to be collected will be evaluated.

8.3 Data Use

Statistical calculations will be performed, where appropriate, to determine an eighty percent (two-tailed) confidence interval, consistent with SW-846 guidance. The population will be characterized according to

the upper confidence level (UCL). Statistical evaluations will be applicable whenever at least two data points exist for a population and whenever at least one of the sample results for TCE or TCA yields a concentration that exceeds the laboratory reporting limit. In cases where such statistical calculations are performed, the following proxy values will be utilized:

Data Point Qualifier Flag	Proxy Value
No Flag	Reported Value
"U" (Undetect) Qualifier	Half of the Laboratory Reporting Limit

A minimum, maximum, average and upper 80% confidence level (two-tailed) will be calculated for data sets where not all results are below the laboratory reporting limit.

The contamination level for a population will be based on the upper 80% confidence level unless all results are below the laboratory reporting limit or unless all containers in the population were sampled. In cases where the results are below the laboratory reporting limit then the population will be characterized at the reporting limit. In the case where all containers in the population were sampled then each container will be characterized according to its own result.

9.0 Reporting

A summary report will be prepared annually showing the number of containers characterized, the number of containers sampled, and the data results, including the minimum, maximum, average and the UCL_{80} for the population.

10.0 Acronyms

BJC	Bechtel Jacobs Company
DOE	Department of Energy
DQO	Data Quality Objectives
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act
OREIS	Oak Ridge Environmental Information System
SAP	Sampling and Analysis Plan
SMO	Sample Management Office
TCA	1,1,1-Trichloroethane
TCE	Trichloroethene
TSCA	Toxic Substances Control Act
UCL	Upper Confidence Limit
WAC	Waste Acceptance Criteria

APPENDIX 1

Population Number	Project ID	Process Generating Waste	Total Number of Containers	Number of Env. Containers	Solid Env. Containers	Solid Env. Containers Data Points Required	Aq. Env. Containers	Aq. Env Containers Data Points Required	Number of Non-env. Containers	Non-env. Data Points Required
001	WAG 3	SWMU 4 Soil boring 004-025,022,031,043,044,045,046,047,048,049,050,056,057,053,054,055	16	10	10	3	0	0	6	0
002	Data Gap RI	WAG 3/8/28 DGRI SWMU 4,5,6,99	1	0	0	0	0	0	1	1
004	NSDD	NSDD Trenching and other related waste, decon water	43	17	14	3	3	2	26	0
010	C-400 debris	C-400-04 DMSA and other debris/soils removed from C-400, WM23 tank spill cleanup, C-400 soil NW corner, dirt/rock south side	92	65	65	5	0	0	27	0
011	C-745-K	UST 17 excavation in C-745-K South, UST 18, C-745-M	20	18	7	3	11	3	2	0
012	Phase I	phase I soils and materials, sample residuals, PPE, water	213	36	33	4	3	2	177	0
014	Ditch 2	Misc projects at ditch 2 (also 013)	3	2	2	2	0	0	1	0
015	Ditch 10 and 12	misc projects at outfall ditch 010 and 012, decon water etc from 001, 002, 010, 011, and 012,	5	2	2	2	0	0	3	0
017	Misc projects	unknown sources--suspect based on current guidance; contaminated trash--paprer, plastic, PPE, gravel, sludge	106	36	25	4	11	3	70	0
019	C-403 Neut pit	neut pit cleanup--hypalon, PPE	8	0	0	0	0	0	8	3
023	Activated Carbon	activated carbon from sampling/treatment	3	0	0	0	0	0	3	2
024	WAG 23	WAG 23 samples waste/ other WAG 23 SWMU 1 waste	23	19	16	4	3	2	4	0
027	WAG 27	Wastewater from WAG 27 with TCE detections.	4	4	0	0	4	2	0	0

APPENDIX 1

Population Number	Project ID	Process Generating Waste	Total Number of Containers	Number of Env. Containers	Solid Env. Containers	Solid Env. Containers Data Points Required	Aq. Env. Containers	Aq. Env Containers Data Points Required	Number of Non-env. Containers	Non-env. Data Points Required
028	WAG 22	WAG 22, C-749 investigation C-747--PPE, soil	87	19	19	4	0	0	68	0
029	WAG 15	WAG 15--PPE, plastic sheeting, decon water	3	2	1	1	1	1	1	0
030	SWMU 27	SWMU 27--soil sample residuals, PPE, plastic	3	1	1	1	0	0	2	0
032	Phase 3	Phase 3 from listed sources; drill cuttings, water	31	31	20	4	11	3	0	0
034	C-404	C-404, MW49 abandonment, PPE/Plastic/trash from leachate pit	20	14	13	3	1	1	6	0
035	WAG 6	WAG 6 decon water	2	2	0	0	2	2	0	0
036	Misc samples	Leachate samples from concrete, Solid lab waste from PCB lab, segregation of waste--CAS-6276 & CAS-9733, Soil and sed sample excess--routine, lab waste, solid--ER drillings	32	32	32	4	0	0	0	0
039	C-720	materials from C-720, grass/dirt from C-720, U-cont. metal from sump pit	23	19	4	2	15	3	4	0
040	SWMU 11	materials/waste from SWMU 011	2	0	0	0	0	0	2	2
041	SWMU 4 RGA	RGA borings within SWMU 4; PPE, plastic	26	10	9	3	1	1	16	0
042	AZ-044	project AZ-044 (unrecognized project--unknown source)	22	2	2	2	0	0	20	0
046	C-612	filter cake/misc facility trash/spent resin, PPE	24	1	0	0	1	1	23	4
050	C-340	PCB cleanup--dirt, floorsweep, MgF2, transformer dike work, east side 340 sampling, RCRA/TSCA cleanup, excavation C-340 area 4&6, dirt from area 2 & 3	1446	1444	1441	14	3	2	2	0

APPENDIX 1

Population Number	Project ID	Process Generating Waste	Total Number of Containers	Number of Env. Containers	Solid Env. Containers	Solid Env. Containers Data Points Required	Aq. Env. Containers	Aq. Env Containers Data Points Required	Number of Non-env. Containers	Non-env. Data Points Required
052	Outfalls suspect	o/f 001 and 003 samples	1	1	1	1	0	0	0	0
054	C-409	closure, drum sampling--RCRA testing waste	90	5	3	2	2	2	85	0
059	Phase 2	drill tailings from phase II, soil/mud	58	53	48	5	5	3	5	0
060	Ditch 11	Autosampler and excavated soil, yearly sed samples, outfall flume	1035	1020	1020	13	0	0	15	0
061	Unknown Tank Sludge	tank sludge from unknown sources, sludge tank cleanout stored C-746-H3	59	0	0	0	0	0	59	5
063	Phase 2 sump	Phase II sump clean out	9	0	0	0	0	0	9	3
067	NW Plume	borings "J", multiple soil borings, decon sludge, EW228 cuttings, SB32, SB31, SB27, SB30, MW247	49	49	49	5	0	0	0	0
068	Phase 4 RGA	RGA borings from phase 4--soil	121	108	108	6	0	0	13	0
075	Ditch 001	sump ditch 001 concrete and soil Chl and temp project	23	23	23	4	0	0	0	0
077	O/F 2 lift station	sludge from 002 lift station, flume sludge	17	15	15	3	0	0	2	0
078	Lab waste	misc lab waste	37	12	12	3	0	0	25	0
079	O/F 010	outfall 010 sump lift station sludge	14	14	14	3	0	0	0	0
087	Phase 3 RGA	samples PZ-5G SB-07 etc., PZ 110, PZ117	90	90	11	3	79	6	0	0
092	OF 011/012 Inv	soil cuttings from OF 011 and 012 investigation	4	4	4	2	0	0	0	0
093	CDM UST site	MW-04A UST site--not enough information	1	1	1	1	0	0	0	0
102	SWMU 193/194	drill fluid and cutting PZ107; PPE, glass	3	1	0	0	1	1	2	0

APPENDIX 1

Population Number	Project ID	Process Generating Waste	Total Number of Containers	Number of Env. Containers	Solid Env. Containers	Solid Env. Containers Data Points Required	Aq. Env. Containers	Aq. Env Containers Data Points Required	Number of Non-env. Containers	Non-env. Data Points Required
106	Phase 2 contained	soil/rubber gaskets--phase 2 SI possibly contained in; sump waste, soil	20	4	4	2	0	0	16	0
110	Lab residuals/sampling waste	soils from test area, lab residuals from other projects, other sampling waste (PPE, plastic, paper)	76	22	22	4	0	0	54	0
111	WAG1 SWMU100	WAG 1 SWMU 100 MW 330 auger cuttings, sump clean out, other WAG 1 waste	47	47	46	5	1	1	0	0
112	CDM abandon	well abandonment CDM well purge water, well displacement water	13	12	8	3	4	2	1	0
116	Phase 1 contained	phase 1 MW144, MW145 with TCE totals below 39.2 ppm possibly contained in	275	267	244	8	23	4	8	0
118	Test Pit #5	"contents of drum with sludge (wet soil) from test pit #5	2	2	2	2	0	0	0	0
121	C-750 UST	C-750 UST soil; PPE, rinseate	15	12	12	3	0	0	3	0
121MBR	C-750-C UST contained	rinseate from C-750-C UST closure--possibly contained in	1	1	0	0	1	1	0	0
125	WAG 1&7 sample	sample jars from WAG 1&7--sample#'s listed on RFD 46110	1	1	1	1	0	0	0	0
129	C-746-Q	C-746-Q past water spill (SWMU 46A),PPE/Plastic/trash from C-746-Q	23	1	0	0	1	1	22	0
139	C-720 contained	contaminated water from C-720 below 39.2 ppm threshold possibly contained in	1	1	0	0	1	1	0	0
156	SWMU 136	bentonite from WAG 1 SWMU 136 MW304	73	72	69	5	3	2	1	0
161	Borings in SWMU	borings/wells in listed swmus	4	2	2	2	0	0	2	0

APPENDIX 1

Population Number	Project ID	Process Generating Waste	Total Number of Containers	Number of Env. Containers	Solid Env. Containers	Solid Env. Containers Data Points Required	Aq. Env. Containers	Aq. Env Containers Data Points Required	Number of Non-env. Containers	Non-env. Data Points Required
173	WAG 22 contained	WAG 22 SWMU 2-15-1 borehole with data possibly contained in--soil	1	1	1	1	0	0	0	0
182	Switchyards contained	sludge/water from 540-A, 541-A grounding vault, pads/pigs/etc C-540-A possibly contained in	9	1	1	1	0	0	8	0
184	Lab Waste-no analytical	Misc lab waste--no analytical; both incinerable and non-incinerable solid samples	25	0	0	0	0	0	25	4
188	TCE removal	filter bags from carbon system--TCE removal previously located in C-400	1	0	0	0	0	0	1	1
189	LDR sampling	misc waste from LDR sampling; incinerable and non-incinerable debris	43	6	6	3	0	0	37	0
193	Switchyards non env	environmental and nonenvironmental media (or associated) from C-533, C-537, C-531	126	85	85	6	0	0	41	0
197	C-746-H3 spill	spill cleanup C-746-H3 tank # C-400-11; PPE; vermiculite	1	0	0	0	0	0	1	1
199	C-400 TCLP det	PCB plastic and trash from C-400 with TCE TCLP detection	6	0	0	0	0	0	6	3
205	PCB Carbon Filter	PCB cont carbon filters from PCB carbon filter system	2	0	0	0	0	0	2	2
208	Uranium Precipitate	Uranium Precipitate collection	293	0	0	0	0	0	293	8
D 145	MW66	C-747-A MW66--PPE	1	0	0	0	0	0	1	1
D 154	RGA wells	plastic from EW230, dirty plastic MW325, plastic--abandonment MW47-/51 aband. MW9,12,15, aband PZ1G etc., aband. Z5, Z9;PPE	47	0	0	0	0	0	47	5
D 159	WAG 1&7	WAG 1&7 plastic; gravel, tyvek	15	0	0	0	0	0	15	3

APPENDIX 1

Population Number	Project ID	Process Generating Waste	Total Number of Containers	Number of Env. Containers	Solid Env. Containers	Solid Env. Containers Data Points Required	Aq. Env. Containers	Aq. Env Containers Data Points Required	Number of Non-env. Containers	Non-env. Data Points Required
D 161	Borings in Swmu	Borings/wells in listed swmu's	12	0	0	0	0	0	12	3
D 36	Lab residuals	various projects--lab residuals with sample #'s (some without #'s)	1	0	0	0	0	0	1	1
D 54	C-409	PCB and uranium cont solid waste from C-409; 1-55 gal drum	1	0	0	0	0	0	1	1
D 59	Phase 2 PPE	PPE/Plastic/debris from Phase 2	8	0	0	0	0	0	8	3
D 68	Phase 4	Phase 4 petroleum absorbant pads, ppe/plastic from RGA/plume wells	54	0	0	0	0	0	54	5
D 82	C-746-R	epoxy resin coating from cement pad at C-746-R pad, hypalon/etc from R pad spills	8	0	0	0	0	0	8	3
S 146	Sludge C-416	sump cleanout C-416 decon pad--sludge	17	17	17	4	0	0	0	0

H

Attachment H

MODEL DMSA CHARACTERIZATION REPORT

[THE REPORT WILL BEGIN WITH A GENERAL SYNOPSIS OF THE TYPE AND QUANTITY OF ITEMS ENCOUNTERED IN THE DMSA, THE DATE OF INITIATION OF CHARACTERIZATION ACTIVITIES, AND THE CONCLUSION OF CHARACTERIZATION ACTIVITIES.]

Department of Energy Material Storage Area (DMSA) C-310-02 is located on the east wall of the C-310 process building near columns E12/14-F12/14. It encompasses approximately 600 square feet (ft^2). This DMSA is also identified as Solid Waste Management Unit (SWMU) #231. Within the DMSA is a metal fenced area (cage) used for storage of excess laboratory equipment and supplies. The area surrounding the fenced cage was used for storage of electrical supplies, miscellaneous scrap metal and wooden items. Two metal B-25 storage containers are also located in the DMSA. Numerous Resource Conservation Recovery Act (RCRA) hazardous wastes such as circuit boards, fuses, light bulbs, aerosol cans, vacuum tubes and pump oils were identified in the DMSA. When identified, the hazardous wastes are classified as either "newly generated" or "newly discovered". This classification is explained in greater detail in the RCRA section of the Characterization Report. Recycling and offsite disposal of the circuit boards are also found in the RCRA section. The waste and materials in the DMSA occupied a volume of approximately 1,112 cubic feet (ft^3) with an estimated weight of 16,377 pounds (lbs). Field activities in the DMSA were initiated in August 2002. Completion of field activities occurred in May 2003.

RCRA/RCRA MIXED

[REPORT WILL INCLUDE INFORMATION EITHER IDENTIFYING RCRA/RCRA MIXED WASTE DISCOVERED OR GENERATED OR INDICATING THAT NO RCRA/RCRA MIXED WASTE WAS DISCOVERED OR GENERATED.]

Resource Conservation Recovery Act (RCRA) hazardous wastes are identified as either "newly discovered" or "newly generated". Newly discovered wastes are those hazardous wastes which are found loose or not installed in equipment. Examples of this waste type are aerosol cans or light bulbs lying on the floor. Newly generated wastes are hazardous wastes which must be removed from equipment (such as circuit boards) or drained from equipment (such as oils). These classifications are noted on the "Waste Removed from DMSA C-310-02" section of this report. Numerous circuit boards, two aerosol cans, six lithium batteries, several light bulbs, vacuum tubes and fuses were identified in the DMSA. Also small volumes of oils were drained from three pumps. As items/materials were characterized and classified as hazardous, they were packaged, labeled and transported to a RCRA permitted storage facility. The exceptions to this were the three containers of oils which were placed in a Satellite Accumulation Area (SAA) which was established within the DMSA on November 19, 2002. The aerosol cans were stored in the C-733 RCRA permitted storage facility which is designated for storage of ignitable wastes. The remaining hazardous wastes were stored in the C-752-A RCRA permitted facility. The lithium batteries were segregated from other wastes since they are reactive

hazardous wastes. In May 2003, it was determined that the contents of two of the three containers of waste oils were consumed in the sampling and analytical process. The containers were then verified as "RCRA empty" and placed in a low level waste (LLW) collection container. The third bottle of oil contained a small amount of oil. This waste was transported from the SAA to the C-752-A RCRA permitted facility. Documentation relative to these wastes was amended to reflect the change in status. The SAA was closed on May 12, 2002. The aerosol cans were classified as newly discovered hazardous waste. The remaining hazardous wastes were removed from equipment and classified as newly generated. In December 2002, the Department of Energy (DOE) provided guidance for the recycling of circuit boards which are not radiologically contaminated.[1] These circuit boards are not considered hazardous waste since they meet the scrap metal being recycled exclusion in 40 CFR Part 261.4 (a)(13). Large quantities of the circuit boards from C-310-02 met this criterion and were reclassified as nonhazardous and shipped offsite on February 18, 2003, to Advanced Environmental Recycling Company (AERC) in Allentown, Pennsylvania. The circuit boards which were recycled are indicated under the column "recy" on the DMSA C-310-02 Inventory Report as well as the Inventory and Characterization Report in the attached compact disk. The hazardous wastes in the DMSA which were radiologically contaminated were classified as RCRA/Mixed wastes. The circuit boards and vacuum tubes which were classified as RCRA/Mixed were shipped for disposal to Envirocare of Utah, Incorporated which is located in Clive, Utah, on May 2, 2003. This is noted on the Initial Inventory and Characterization Report and also on the Waste Identified for Removal Report in the attached compact disk.

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[1] Seaborg, W. Don December 31, 2002, Site Manager, Department of Energy, Paducah Site Office, letter to Robert H. Daniell, Division of Waste Management, Kentucky Department for Environmental Protection, Frankfort, Kentucky

Attachment I

CONTAINER MANAGEMENT PLAN FOR THE POTENTIALLY LISTED 5100 CONTAINERS

Inspections

The visible portions of the containers will be inspected weekly. Container surface areas will be inspected within the parameters of the current container storage array.

The containers will be inspected for rust over 75% of the surface area of the container, one or more concave dents of less than or equal to 30 degrees, visible leaks, and legible labeling reading "Hazardous Waste Pending Regulatory Determination."

Labeling

The containers will have labels reading "Hazardous Waste Pending Regulatory Determination."

Missing or illegible labels will be replaced or rewritten to ensure adequate marking.

Container Condition

Within two-hundred and seventy days (270) days of completion of the first inspection, DOE will repackage (i.e., over-packed or transferred to another container) containers that are identified by DOE during the first inspection under this Container Management Plan as: (1) being rusted over 75% of the surface area; (2) having one or more concave dents of less than or equal to 30 degrees; or (3) having visible leaks or penetration. In repackaging the containers, priority will be given to containers stored outside.

Within thirty (30) days of the relevant inspection, DOE will repackage (i.e., over-packed or transferred to another container) containers that are identified by DOE during subsequent inspections under this Container Management Plan as: (1) being rusted over 75% of the surface area; (2) having one or more concave dents of less than or equal to 30 degrees; or (3) having visible leaks.

Container Management

All containers will be placed on pallets or otherwise elevated to prevent contact with rainwater or a spilled material.

Attachment J

Distinct Storage Areas

C-333
C-337
C-746-A
C-746-B
C-746-H3
C-746-Q
C-746-V
C-752-A
C-752-C
C-753-A
C-746-M

Attachment K

DOCUMENTATION REVIEWED BY KDWM AS OF 9/18/03

The Kentucky Division of Waste Management reviewed the following documents pertaining to the C-746-T Landfill:

- C-746-T Logbook kept by landfill operators during the time of operation through approximately 1993, when the landfill entered the closure phase
- A whitepaper entitled, "Whitepaper: C-746-S and C-746-T Landfills – Inventory for Potentially Listed Hazardous Waste"; and
- The TCE Listed Waste Criteria, Revision 7.

The following documents were made available to the Kentucky Division of Waste Management, and were cursorily reviewed:

- Analytical results from the Facility Safety Assessment Report (FSAR) Seismic Investigation;
- Waste sampling procedures for Martin Marietta Energy Systems, Inc. (assuming these were included in the FSAR);
- Sampling Plan for the FSAR Seismic Investigation;
- A map from the FSAR Seismic Investigation,
- Teamup database disposal records for the Inert Landfill;

The C-746-T Landfill logbook was reviewed and the KDWM and requested copies of 8 pages of the document. This document was a record kept from 1991 until 1995 by the landfill operators. They kept general logs of daily activities and the types of waste being disposed. The FSAR Seismic Investigation file also was made available to KDMW; it contained analytical results for the composite samples, a sampling plan, a waste sampling procedure, and a map that designated the locations of the borings that are located within the boundary of the TCE contamination plume. A printout of the Teamup database disposal records was also made available. The white paper discussed above was submitted to the KDWM in July of 2002. This document discussed the process of how the C-746-T Landfill waste was reviewed and the potential for listed waste to have been disposed of in the landfill. This document had a table that correlated the logbook to the database and a directory of the environmental media waste that was investigated as well as those media that were considered a "suspect" or "potentially" listed waste. Lastly, the KDWM has had the opportunity to review the TCE Listed Waste Criteria that were developed to assist in the review process of waste already disposed of in the C-746-S&T and the C-746-U Landfills and on-site/legacy waste storage.

Attachment L

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 1997

Total Number of NOV for 1997 1

The extent of the violations observed is as follows:

1. Noncompliance with conditions of permits S-96-175 (Revised) and S-96-239

Attachment I

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR AIR QUALITY
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

TO: USDOE
Paducah Office Site
P.O. Box 1410
Paducah, Kentucky 42001

Date of Violation: August 7, 1997
County: McCracken
I.D. # (if applicable): 072-2460-0003
Violation Log #: V97-PAD-034

This is to advise you that, because of the circumstances noted below, you are violating the provisions of:
(X) KRS 224, ( ) KRS 151, ( ) KRS 223, ( ) KRS 146, ( ) _____
Regulation: 401 KAR 50:060 Sections 2(2) and 4(1)

The extent of the violations observed is as follows: noncompliance with conditions of permits S-96-175 (Revised) and S-96-239.

Required actions for remedial measures include, but are not limited to: submit a written reply within fifteen (15) days stating actions taken, or to be taken, to achieve and maintain compliance.

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each air quality violation.
To respond to this Notice of Violation, write to:
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR AIR QUALITY
4500 Clarks River Road
Paducah, KY 42003
Attention: Mr. Ken Frye, Regional Supervisor, or call (502) 898-8468

Signature: Stan Cook Title: ENV INSP III # 65 Date: 8/28/97

Name of persons to whom copy was delivered:
Mr. David Tidwell Title: Env. Engineer Date: 8/28/97
How Delivered: Certified Mail ☐ Personal Service ☒

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 1998

Total Number of NOV for 1998 0

No Violations for 1998

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 1999

Total Number of NOV for 1999 2

September 28, 1999 -- NOV

The extent of the violations observed is as follows:

1. **Failure to report planned changes per Conditions III.E.10 and IV.J.1 of the Hazardous Waste Permit.**

   Failure to Comply with Permit Conditions III.E.10 and IV.J.1
   The soil had not been fully characterized was excavated and relocated from SWMUs 193 and 194 without adequate notification.

November 23, 1999

The extent of the violations observed is as follows:

2. **Nov for Paducah Gaseous Diffusion Plant (KY0004049) Outfall 001 WET Failures**

   KPDES permit violation of Whole Effluent Toxicity limits at Outfall 001 for July and August 1999.

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

XC4-DRG
-GWB
-DBE
-JWM
-RJK
-RES
-Rebecca Forsee

RJW 9/29/9

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

September 28, 1999

CERTIFIED MAIL #
RETURN RECEIPT REQUESTED

To: Myrna Redfield
From: Susi Traylor

Mr. Jimmie Hodges, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Jimmy C. Massey, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Failure to Comply with Permit Conditions III.E.10 and IV.J.1
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

On June 7, 1999 the Division of Waste Management (Division) issued a Letter of Warning to DOE in response to two instances in which soil that had not been fully characterized was excavated and relocated from SWMUs 193 and 194 without adequate notification. Notifications were received on April 15, 1999 for a New Sign Installation within SWMU 194 and renovation of the C-745-L cylinder yard located in SWMU 193. However, these notifications did not indicate that approximately 4500 cubic yards of soil would be excavated from the C-745-L cylinder yard and deposited in a large, uncovered spoils area located at the southeastern corner of the SWMU. Nor did the notifications specify that the soil excavated from SWMU 194 would be transported outside the SWMU boundaries and deposited in a pile located near the VORTEC staging area. The Letter of Warning clearly indicated that, "inadequate notifications and subsequent mobilization of contaminated material prior to approval by the Division would be a violation of Condition III.E.10, and IV.J.1 of the Hazardous Waste Permit", and that, "any further infraction, ... , may result in a Notice of Violation."

On August 30, 1999 approximately 245 cubic yards of soil was excavated near the southeastern corner of SWMU 194 as a part of road and parking lot construction activities. This soil, which had not been adequately characterized, was transported from SWMU 194 to the soil spoils area located at the southeastern corner of SWMU 193. These activities were undertaken without prior notification being given to the Division as required by Conditions III.E.10, and IV.J.1 of the Hazardous Waste Permit.

Enclosed is a Notice of Violation issued for failure to comply with the conditions of the Permit. Please contact Tuss Taylor at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MW/tm

attachment

cc: Carl R. Froede, Jr., USEPA Region 4
John Morgan, Bechtel Jacobs
Les Price, ORO/DOE
Myrna Redfield, DOE
Margie Williams, DWM-Paducah
Todd Mullins, DWM-Frankfort
DWM File# 928
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY ROAD
FRANKFORT KY 40601

NOTICE OF VIOLATION

TO: Mr. Jimmie Hodges
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Violation Date: August 30, 1999
County: McCracken
ID #: KY8-890-008-982
Location: 5600 Hobbs Road
West Paducah, Kentucky 42086

Mr. Jimmy C. Massey, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of: KRS 224.46-520 and Hazardous Waste Permit Conditions III.E.10 and IV.J.1.

The extent of the violation(s) is as follows: Failure to report planned changes per Conditions III.E.10 and IV.J.1 of the Hazardous Waste Permit.

Required action for remedial measures include, but are not limited to: Complete required soil sampling of soil removed from SWMU 194 and submit the results to the Division. Analysis to be performed must be for PCBs, volatile organics, total metals, and radioactivity. Data must be reviewed by the Division prior to any additional work being performed in SWMU 194. Sample results must be provided to the Division within 60 days of receipt of this Notice of Violation. Violations of the above-cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation. To respond to this Notice of Violation, write to:

Michael V. Welch, Manager, Hazardous Waste Branch
Division of Waste Management
14 Reilly Road
Frankfort KY 40601

or call: Tuss Taylor at (502) 564-6716, ext. 244.

Signature: Michael V. Welch
Branch Manager Date: 9/28/99

Delivered by Certified Mail #

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

Z 258 075 084

November 23, 1999

Mr. J. Dale Jackson, Acting Site Manager
Department of Energy
Paducah Site Office
P.O. Box 1410
Paducah, KY 42001

Dec. 1
10 10 20 31

RE: NOV for Paducah Gaseous Diffusion Plant (KY0004049) Outfall 001 WET Failures.

Dear Mr. Jackson:

On October 27, 1999, the Division of Water received the toxicity test report for the Paducah Gaseous Diffusion Plant (KY0004049) Outfall 001, for tests conducted in July and August 1999. These test results showed significant toxicity to the fathead minnow (TUc=1.79 and 1.91) above your KPDES permit limit of 1.00 TUc.

Therefore, as stated in your permit, Part IV, Section 3.A., a Toxicity Reduction Evaluation (TRE) plan and implementation schedule must be submitted to the Division. As toxicity was demonstrated with only the minnow, TRE activities may be conducted using only that species. However, commencing immediately, the frequency of your routine compliance toxicity testing (using both species) will be changed to monthly and will continue for the duration of the TRE.

The TRE plan and schedule shall be sent by **December 28, 1999** to the attention of Doug Allgeier, Supervisor, Industrial Section, KPDES Branch.

If you have any question you may contact me at 502-564-3410, extension 497.

Sincerely,

Charles A. Roth

Charles A. Roth, Supervisor
Bioassay Section

c: Teresa Clements, Enforcement Branch
John Gowins, Enforcement Branch
Doug Allgeier, KPDES Branch
Data Inventory and Management Section
Paducah Regional Office
Mike Welch, Hazardous Waste Branch
DOW Files
Dan Guminski, PGDP

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
Frankfort, KY 40601

NOTICE OF VIOLATION

TO:
Mr. J. Dale Jackson, Acting Site Manager
Department of Energy
Paducah Site Office
P.O. Box 1410
Paducah, KY 42001

I.D.# KY0004049
County: McCracken

Date of Violation: July and August 1999

This is to advise you that, as specified below, you are in violation of the provisions of ( ) KRS 146, ( ) KRS 151, ( ) KRS 223, (X) KRS 224

Regulation: 401 KAR 5:065 Section: 1(1)

A description of the violation(s) follows: KPDES permit violations of Whole Effluent Toxicity limits at Outfall 001 for July and August 1999.

Remedial measures required include, but are not limited to: Submission of a Toxicity Reduction Evaluation (TRE) plan and schedule as set forth in the accompanying letter. In addition, monthly compliance monitoring must commence immediately.

Remedial measures must be completed by **December, 28, 1999**

Violations of the above cited statutes and regulations are subject to penalties of up to $25,000 per day. Compliance with remedial measure deadlines does not provide exemption from liability for violations during the period of remediation. Any person who knowingly violates the aforementioned statutes may be subject to criminal prosecution. To discuss this Notice of Violation, please contact the undersigned at: **(502) 564-3410 ext. 497.**

Issued By: Charles A. Roth Date: 11/23/99

_____ Date: _____

Name of person to whom copy was delivered:

_____ Date: _____

How Delivered: X Certified Mail __ Personal Service

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 2000

Total Number of NOV for 2000 6

January 14, 2000 -- NOV

The extent of the violations observed is as follows:

1. **Deteriorated silt fences at numerous locations and are no longer effective in filtering the solid UF4, uranium and other contaminated sediments from the scrapyards surface water runoff.**

May 23, 2000 -- NOV

The extent of the violations observed is as follows:

2. **Failure to comply with permit condition II.J.9.a.**
   Failure to sample for all RAD parameters listed in Table VIII/Condition II.J.9 of the Hazardous Waste Permit in accordance with Condition II.J.9 a and in accordance to the schedule identified in Condition II.J.7.c.

July 13, 2000 -- NOV

The extent of the violations observed is as follows:

3. Reasonable precautions were not been taken to prevent particulate matter from becoming airborne from the Drum Mountain baler and associated transfer point.

July 13, 2000 -- NOV

The extent of the violations observed is as follows:

4. Denial of Cabinet personnel entrance to Drum Mountain for the purpose of inspection for the ascertaining of compliance. Entry for the inspection of Drum Mountain removal project was denied for a period of one hour and three minutes.

July 27, 2000 -- NOV

The extent of the violations observed is as follows:

5. U.S. DOE has violated Part II.I.5 of the Hazardous Waste Management Permit and 401 KAR 34:180, Section 8, by failing to separate containers of hazardous waste from incompatible materials by a dike, berm, wall or other device.

September 5, 2000 -- NOV

The extent of the violations observed is as follows:

6. Failure to characterize and notification requirements for newly discovered SWMUs and Areas of Concern as defined in 401 KAR.
   Investigation and characterization of DMSA C-400-04 identified hazardous and mixed radioactive hazardous wastes, which have been stored greater than 90 days without a permit.

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

January 14, 2000

CERTIFIED MAIL # Z 258 073 941
RETURN RECEIPT REQUESTED

Mr. J. Dale Jackson, Acting Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Failure to Comply with Permit Conditions III.E.6 and III.E.5
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

On November 4, 1999, staff from the Division of Waste Management conducted a visual inspection of the silt fences around SWMUs 12, 14 and 15. The silt fences have deteriorated at numerous locations and are no longer effective in filtering the solid UF_4, uranium and other contaminated sediments from the scrapyards surface water runoff. Division staff also observed drain pipes crossing the northern fenced boundary of the scrapyards. These drains are not shown in the as-built drawings contained in the Interim Measures Report & Operation and Maintenance Plan for Containment of Scrapyard Sediment Runoff at the PGDP (DOE/OR/07-1299&D1).

The silt fences installed in April 1994 as an Interim Corrective Measure have not been maintained in accordance with Condition III.E.6 of the facilities Hazardous Waste Management Permit. Additionally, reasonable steps have not been taken to minimize releases to the environment as required by Condition III.E.5 of the facilities Hazardous Waste Management Permit. The Division is further concerned with the statement in Section 5.5 of the August 1999 Five-Year Review of the Surface Water Operable Unit that includes "...the fencing is in good condition." Enclosed is a Notice of Violation issued for failure to comply with the Conditions III.E.6 and III.E.5 of the Permit. Please contact Tuss Taylor at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Debra Meyer for

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MW/mg

Enclosure – Notice of Violation

cc: Carl R. Froede, Jr., USEPA Region 4
Les Price, ORO/DOE
Myrna Redfield, DOE
Margie Williams, DWM-Paducah
DWM File# 700
DOE Reading File

received
5/26/00 dlm

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

May 23, 2000

CERTIFIED MAIL # Z 258 073 863
RETURN RECEIPT REQUESTED

Mr. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Failure to Comply with Permit Condition II.J.9.a
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

As stated in your letter of May 4, 2000, certain RAD parameters, as listed in Table VIII/Condition II.J.9 of your permit, were not analyzed for the July 1998, January 1999, July 1999 and January 2000 sampling events. This is a violation of Condition II.J.9.a of your permit and a violation of Kentucky Revised Statutes 224.99-010 (1) . The Division acknowledges, as stated in your letter, that you intend to sample for the required RAD parameters during the July 2000.

Post-it® Fax Note 7671	Date 5/26/00	# of pages ▶ 3
To Patrick Willison	From Danny Gumnisky	
Co./Dept.	Co.	
Phone #	Phone #	
Fax #	Fax #	

Enclosed is a Notice of Violation issued for failure to comply with the conditions of the Permit. Please contact Tuss Taylor at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MW/bkb

attachment

cc: Carl R. Froede, Jr., USEPA Region 4
Dianna Feireisel, DOE
Dave Dollins, DOE
John Morgan, Bechtel Jacobs
Rorbert Sleeman, ORO/DOE
Margie Williams, DWM-Paducah
Gaye Brewer, Paducah Site Office
Connie Smith, Enforcement Branch
Dale Burton/Brian Baker, Hazardous Waste Branch
DWM File # 870
DOE Reading File

Re. Failure to sample for Uranium # TC-99 at C-404 Landfill

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY ROAD
FRANKFORT KY 40601

NOTICE OF VIOLATION

TO: Mr. Don Seaborg,
Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Jimmy C. Massey,
Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

Violation Date: May 23, 2000
ID #: KY8-890-008-982
County: McCracken
Location: 5600 Hobbs Road
West Paducah, Kentucky 42086

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of Hazardous Waste Permit Condition II.J.9.a. and the Kentucky Revised Statutes 224.99-010.

The extent of the violation(s) is as follows: Failure to sample for all RAD parameters listed in Table VIII/Condition II.J.9 of the Hazardous Waste Permit in accordance with Condition II.J.9.a and in accordance to the schedule identified in Condition II.J.7.c.

Required action for remedial measures include, but are not limited to: Conducting the required sampling and analyses during the July 2000 sampling event and for the life of the permit. Violations of the above-cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 for each day during which a violation continues. To respond to this Notice of Violation, write to:

Michael V. Welch, Manager, Hazardous Waste Branch
Division of Waste Management
14 Reilly Road
Frankfort KY 40601

or call: Tuss Taylor at (502) 564-6716, ext. 244.

Signature: Michael V. Welch
Branch Manager Date: 5/23/00

Delivered by Certified Mail # Z 258 073 863

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR AIR QUALITY
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

TO: United States Department of Energy.
P.O. Box 1410
Paducah, Kentucky 42002-1410

DATE OF VIOLATIONS: July 13, 2000

COUNTY: McCracken
ID# 21-145-00003
VIOLATIONS LOG #: V00-PAD-023

This is to advise the United States Department of Energy that because of the circumstances noted below, the United States Department of Energy, is violating the provisions of:
(X) KRS 224, () KRS 151, () KRS 223, () KRS 146, () 401 KAR 63:010, 401 KAR 50:055 Section 2.
The extent of the violations observed is as follows:
Reasonable precautions were not being taken to prevent particulate matter from becoming airborne from the Drum Mountain baler and associated transfer point. Drum Mountain baler and associated transfer point and their associated air pollution control equipment were not being maintained and operated in a manner consistent with good air pollution control practices to minimize emissions.

Required actions for remedial measures include, but are not limited to:
Cease operation of the Drum Mountain baler and associated transfer point until air pollution controls are in place. Before resuming operations notify the Paducah Regional Office of the Division for Air Quality when controls are in place and when compliance shall be demonstrated at the baler and it's associated transfer point.

Violations of the above-cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each air quality violation.

To respond to this Notice of Violation, write to:
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR AIR QUALITY
4500 Clarks River Road
Paducah, Kentucky 42003
Attention: Mr. Ken Frye, Regional Supervisor
Telephone: 270-898-8468
Signatures: Stan Cook Title: Environmental Inspector #65 Date: 7-24-200

The name of persons to who copy was delivered:
Mr. Danny Gerwinski Title: Environmental Compliance Manager

How Delivered: Certified Mail #____
Personal Service V

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR AIR QUALITY
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

TO: Mr. W. Don Seaborg
Paducah Site Office
United States Department of Energy.
P.O. Box 1410
Paducah, Kentucky 42001-1410

DATE OF VIOLATIONS: July 13, 2000
COUNTY: McCracken
ID# 21-145-00003
VIOLATIONS LOG #: V00-PAD-024

This is to advise the United States Department of Energy that because of the circumstances noted below, the United States Department of Energy, is violating the provisions of:
(X) KRS 224, () KRS 151, () KRS 223, () KRS 146, ()
224.10-100

The extent of the violations observed is as follows:
Denial of Cabinet personnel entrance to Drum Mountain for the purpose of inspection for the ascertaining of compliance. Entry for the inspection of Drum Mountain removal project was denied for a period of one (1) hour and three (3) minutes.

Required actions for remedial measures include, but are not limited to:
USDOE shall provide access pursuant to KRS 224.10-100 and the Federal Facilities Agreement Section XXVIII.

Violations of the above-cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each air quality violation.

To respond to this Notice of Violation, write to:
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION FOR AIR QUALITY
4500 Clarks River Road
Paducah, Kentucky 42003
Attention: Mr. Ken Frye, Regional Supervisor
Telephone: 270-898-8468

Signature: Stan Cook Title: Environmental Inspector #65 Date: 7/28/2000

The name of persons to who copy was delivered:
Mr. W. Don Seaborg Title: Site Manager

How Delivered: Certified Mail # 7099 3220 0007 2586 6833
Faxed to Paducah Site Office on Friday, July 28, 2000

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

To: U.S. Department of Energy
P.O. Box 1410
Paducah, KY 42001

Date Violation Observed: 7/27/00
County: McCracken
ID# (if applicable): KY8-890-008-982

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of [X] KRS 224, [ ] KRS 151, [ ] KRS 223, [ ] KRS 146, [X] 401 KAR

The extent of the violation(s) observed is as follows:

1. **U.S. DOE has violated Part II.I.5. of the Hazardous Waste Management Permit and 401 KAR 34:180, Section 8, by failing to separate containers of hazardous waste from incompatible materials by a dike, berm, wall or other device.**

Required action for remedial measures include, but are not limited to:

1. **The United States Department of Energy must immediately comply with 401 KAR 34:180, Section 8, and the Part B Permit Part II.I.5. by separating containers of hazardous waste from other incompatible materials by a dike, berm, wall or other device.**

These Remedial measures are effective and must be implemented immediately upon the receipt of this notice. Violations of the above-cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation and $5,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management
4500 Clarks River Road
Paducah, KY 42003-0823

Attention: B. Parrish Roush, or call (502) 898-8468

Signature: B. Parrish Roush Title: Env. Inspector III Date: 8/8/00

Name of person or persons to whom copy was delivered:

Mr. Don Seaborg Title: Site Manager Date: 8/8/00

delivered: [X] Hand Delivered

SEP 7 2000

Danny

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
PADUCAH REGIONAL OFFICE
4500 CLARKS RIVER RD
PADUCAH KY 42003-0823

September 5, 2000

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001
CERTIFIED MAIL #7099 3220 0007 2586 7113

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053
CERTIFIED MAIL #7099 3220 0007 2586 7106

RE: Failure to Comply with Permit Conditions IV.B
Failure to Comply with Kentucky Hazardous Waste Regulations
Paducah Gaseous Diffusion Plant
KY8-890-008-982

Gentlemen:

The Division of Waste Management has reviewed the May 17, 2000 information provided pursuant to the RCRA Section 3007 Information Request issued by Region IV, EPA on April 4, 2000. The Division has also conducted visual site inspections of the DOE Material Storage Areas (DMSAs). As the DOE acknowledges in the 3007 Submittal, DMSA's include wastes which have not been characterized and managed in accordance with 401 KAR 32:010, Section 2. Clearly, DMSA's include Units that are Solid Waste Management Units and the DOE has failed to notify the Division of these SWMUs.

Enclosed is a Notice of Violation issued for failure to comply with Permit Condition IV.B, 401 KAR 32:010, Section 2, 401 KAR 32:030, 401 KAR 38:010, Section 4 and KRS 224.46-520.

Should you have questions concerning the findings of inspections of the DMSAs, please contact Parrish Roush at (270) 898-8468. Please contact Tuss Taylor at (502) 564-6716 if you wish to schedule a meeting to discuss a resolution to the violations.

Sincerely,

Margie Williams

Margie Williams
Environmental Control Supervisor
Division of Waste Management

MW/MG/PR

Enclosure – Notice of Violation issued 8/29/00

C: Mike Welch, DWM, Frankfort
Bill Burger, DWM, Frankfort
Robert Sleeman, ORO/DOE
DWM File# 1020
DOE Reading File
Larry Lamberth, USEPA Region IV
Jeff Crane, USEPA Region IV

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

To: United States Dept. of Energy Date Violation Observed: 6/12/00-8/9/00

P.O. Box 1410 County: McCracken

Paducah, KY 42001 ID# (if applicable): KY8-890-008-982

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of the following statute(s) and/or regulation(s):

1. The U.S. DOE generated solid wastes as defined in 401 KAR Chapter 31. The U.S. DOE failed to characterize these wastes in violation of KRS 224.46-520 and 401 KAR 32:030, Section 2. These wastes have subsequently been managed in approximately 150 units referred to as DOE Material Storage Areas (DMSAs).

2. DMSA's include Solid Waste Management Units (SWMUs) subject to Part IV of the Hazardous Waste Management Permit and 401 KAR 34:060. U.S. DOE violated the notification requirements of Part IV.B. of the hazardous Waste Management Permit for newly discovered SWMUs and Areas of Concern (AOCs).

3. Investigation and characterization of DMSA C-400-04 identified hazardous and mixed radioactive hazardous wastes which have been stored greater than 90 days without a permit in violation of 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the Hazardous Waste Management Permit. U.S. DOE failed to characterize these wastes in accordance with 401 KAR 32:010, Section 2, when the contents of C-400-04 were abandoned in the late 1980's. These wastes have subsequently been managed in violation of all applicable provisions of 401 KAR Chapters 30 through 40.

Required action for remedial measures include, but are not limited to:

1. Submit a notification for any newly identified SWMUs or AOCs within fifteen (15) calendar days of the receipt of this Notice. The notification for any newly identified SWMUs or AOCs shall include the information required under condition IV.B.2 of the Hazardous Waste Management Permit.

2. Submit a SWMU Assessment Report (SAR) for any newly identified SWMUs within ninety (90) calendar days of receipt of this notice. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the Hazardous Waste Management Permit. The SARs shall also include a proposal from the DOE regarding any further investigation recommended for any of the SWMUs or AOCs.

DIVISION OF WASTE MANAGEMENT
NOTICE OF VIOLATION CONTINUATION SHEET

Facility Name U.S. Dept. of Energy Identification# KYD-985-072-008

Date of NOV 9/5/00 Date Violation Observed 6/12/00-8/9/00

3. Submit a revised Part A Application to include Room C-400-04 within sixty (60) calendar days of the receipt of this notice. Submit a closure plan to address closure of Room C-400-04, the C-400-04 process equipment and floor drain within ninety (90) calendar days of receipt of this notice.

4. Within 90 days of the receipt of this notice, submit a workplan to fully address the characterization of all wastes managed in DMSAs, SWMUs, and AOCs in accordance with KRS 224.46-520 and 401 KAR 32:010, Section 2. The workplan shall contain schedules for the characterization, proper storage and final disposition of all solid and hazardous wastes managed in DMSA's, SWMUs and AOCs. All solid and hazardous wastes within DMSA's must be properly characterized and managed in accordance with an approved workplan no later than June 1, 2001.

5. Cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately. All hazardous waste at the Paducah Gaseous Diffusion Plant must be managed in accordance with all applicable provisions of Chapters 30-38 of Title 401 of the Kentucky Administrative Regulations.

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation and $5,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management
14 Reilly Road
Frankfort, Kentucky 40601

Attention: B. Parrish Roush, or call (270) 898-8468

Signature: B. Parrish Roush Title: Env. Inspector III Date: 9/5/00

Name of person or persons to whom delivered:

Mr. Don Seaborg Title: Site Manager Date: 9/5/00

How Delivered: Certified Mail # 7099 3220 0007 2586 7113

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 2001

Total Number of NOV for 2001 4

February 28, 2001 -- NOV

The extent of the violations observed is as follows:

1. Failure to submit a Discharge Monitoring Report for Outfall 017-X for November 2000.

July 30, 2001 -- NOV

The extent of the violations observed is as follows:

2. Failure to provide a well abandonment and replacement workplan for C-404 Landfill monitoring well MW-87.

July 31, 2001 -- NOV

The extent of the violations observed is as follows:

3. Investigation and characterization of DMSA C-331-10 identified hazardous waste which has been stored greater than 90 days without a permit.

October 9, 2001 -- NOV

The extent of the violations observed is as follows:

4. Investigation and characterization of DMSAs C-331-15, C-335-05, and C-333-31 identified hazardous waste, which has been stored greater than 90 days without a permit.

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

February 28, 2001

10 23 PM 2

Certified No. 7000 0600 0029 0709 2099
Return Receipt Requested

Mr. W. Don Seaborg, Site Manager
US DOE Paducah Gaseous Diffusion Plant
Post Office Box 1410
Paducah, Kentucky 42002

Re: KPDES No. KY0004049
McCracken County, Kentucky
DOW 01019

Dear Mr. Seaborg:

Enclosed please find a Notice of Violation for failure to submit a Discharge Monitoring Report (DMR) for Outfall 017-X, at the referenced facility. This violation places the US DOE Paducah Gaseous Diffusion Plant in significant violation of its discharge permit.

Please provide a written explanation of reasons for the violation and what is being done to maintain compliance at this time. The response must be submitted to this office by April 1, 2001. Failure to comply subjects your facility to penalties as specified in the Clean Water Act. Your cooperation and assistance in this matter is appreciated. If you have any questions, please contact Teresa L. Clements of my staff at (502) 564-3410, extension 174.

Sincerely,

Gary F. Levy,
Environmental Control Manager
Enforcement Branch
Division of Water

GFL/TLC
Enclosure
c: Paducah Regional Office
Beth Walls, U.S. EPA
KPDES Branch

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION of WATER

NOTICE OF VIOLATION

TO:
US DOE Paducah Gaseous Diffusion
Post Office Box 1410
Paducah KY 42002
Attn: Mr. W. Don Seaborg

SITE:
Wastewater Treatment Facility

Site ID #: KY0004049
County(ies): McCracken
Notifications/Complaints System #:
NOV Tracking #:

Date(s) of Violation(s): November 2000

This is to advise you are in violation of the provisions of KRS Chapter 224 due to the circumstances cited below:

Statutes/Regulations:
401 KAR 5:065

A description of the violation(s)
Failure to submit a Discharge Monitoring Report for Outfall 017-X for November 2000.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Provide a written explanation of reasons for the violations and what is being done to maintain compliance at the facility by April 1, 2001.

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

A written response to this Notice of Violation shall be sent to the undersigned by April 1, 2001

Division of Water
14 Reilly Road
Frankfort, KY
Telephone #502-564-3410
Teresa L. Clements

Issued By: Teresa L. Clements — Date: 2/28/01
Environmental Control Supervisor

Issued By: Gary F. Levy — Date: 2/28/01
Environmental Control Manager

How Delivered: Certified Mail

...ES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

July 30, 2001

CERTIFIED MAIL # 7000 1670 0007 9753 1007
RETURN RECEIPT REQUESTED

Mr. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Failure to Comply with Hazardous Waste Permit Condition II.J.1
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

On March 26, 2001 the Division of Waste Management (Division) issued a letter to the Department of Energy (DOE) requiring that a well abandonment and replacement workplan be submitted for several compliance monitoring wells within 45 days following DOE's receipt of the letter. This correspondence stated that the Division had determined these wells to be corroded and therefore no longer suitable for use as monitoring wells. One of the corroded wells is monitoring well MW-87, a C-404 Landfill compliance well. Downhole well video of MW-87 provided by DOE plainly indicates that a large hole is present in the well's stainless steel casing at 54 feet, 3 inches.

On May 14, 2001 DOE submitted a letter proposing in part to redevelop MW-87 and perform another downhole camera survey of the well. This work was to be conducted in conjunction with similar work to be performed at the C-746 S&T and C-746 U landfills. However, no schedule was provided for any of these activities.

DOE's failure to submit a well abandonment and replacement workplan for MW-87 is a violation of Condition II.J.1 of the PGDP Hazardous Waste Management Permit. Enclosed is a Notice of Violation issued for failure to comply with the conditions of the Permit. Please contact Tuss Taylor at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch, P.E., Manager
Hazardous Waste Branch

MW/tm

Attachment

cc: Carl R. Froede, Jr., USEPA Region 4
John Morgan, Bechtel Jacobs
Robert Sleeman, ORO/DOE
Gary Bodenstein, DOE-Paducah
Margie Williams, DWM-Paducah
Gary Brewer, AIP-Paducah
Todd Mullins, FFA-Frankfort
Tony Hatton, FFA-Frankfort
DWM File# 870
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY ROAD
FRANKFORT KY 40601

NOTICE OF VIOLATION

TO: Mr. Don Seaborg
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Violation Date: May 14, 2001
County: McCracken
ID #: KY8-890-008-982
Location: 5600 Hobbs Road
West Paducah, Kentucky 42086

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of: KRS 224.46-520 and Hazardous Waste Permit Condition II.J.1.

The extent of the violation(s) is as follows: Failure to provide a well abandonment and replacement workplan for C-404 Landfill monitoring well MW-87.

Required action for remedial measures include, but are not limited to: DOE must provide an abandonment and replacement workplan for MW-87 by August 24, 2001. The plan must specify the abandonment method to be used as well as the replacement casing type that will be used. The plan must also satisfy Condition II.J.1.h of the Permit. The new well must be installed within 45 days of Division approval. Violations of the above-cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation. To respond to this Notice of Violation, write to:

Michael V. Welch, Manager, Hazardous Waste Branch
Division of Waste Management
14 Reilly Road
Frankfort KY 40601

or call: Tuss Taylor at (502) 564-6716, ext. 244.

Signature: Michael Welch
Branch Manager Date:

Delivered by Certified Mail #7000 1670 0007 9753 1007

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

July 31, 2001

CERTIFIED MAIL # 7000 1670 0007 9753 3247
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Unpermitted Storage of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

On June 18, 2001, the Division of Waste Management was notified of the DOE's identification of hazardous waste in DMSA C-331-10. Enclosed is a Notice of Violation issued for failure to comply with 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the facility's Hazardous Waste Management Permit.

Please contact Mike Guffey at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MW/mg

Enclosure – Notice of Violation

cc: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Robert Sleeman, ORO/DOE
David Tidwell, DOE
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, HWB-Paducah
DWM File# 101
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

To: United States Dept. of Energy Date Violation Observed: 6/11/01

P.O. Box 1410 County: McCracken

Paducah, KY 42001 ID# (if applicable): KY8-890-008-982

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of the following statute(s) and/or regulation(s):

The extent of the violation(s) observed is as follows:

Investigation and characterization of DMSA C-331-10 identified hazardous waste which has been stored greater than 90 days without a permit in violation of 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the Hazardous Waste Management Permit.

uired action for remedial measures include, but are not limited to:

1. Submit an amended SWMU Assessment Report (SAR) for SWMU 244 within ninety (90) calendar days of the receipt of this notice. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit.
2. Submit a revised Part A Application to include DMSA 331-10 (SWMU 244) within thirty (30) calendar days of receipt of this notice.
3. Submit a closure plan to address closure of DMSA 331-10 (SWMU 244) within sixty (60) calendar days of receipt of this notice.
4. Cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately. All hazardous waste at the Paducah Gaseous Diffusion Plant must be managed in accordance with all applicable provisions of Chapters 30-38 of Title 401 of the Kentucky Administrative Regulations.

DIVISION OF WASTE MANAGEMENT
NOTICE OF VIOLATION CONTINUATION SHEET

Facility Name U.S. Dept. of Energy Identification# KYD-985-072-008

Date of NOV 7/31/01 Date Violation Observed 6/11/01

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation and $5,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management
14 Reilly Road
Frankfort, KY 40601

Attention: Michael V. Welch, or call (502) 564-6716

Signature: Michael V. Welch Title: Manager, KDWM-HWB Date: 8/31/01

Name of person or persons to whom copy was delivered:

Mr. Don Seaborg Title: Site Manager-DOE Date: 8/31/01
Mr. Gordon Dover Title: Paducah Manager of Projects BJC Date: 8/31/01

How Delivered: Certified Mail

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

October 9, 2001

CERTIFIED MAIL # 7000 1670 0007 9753 1052
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Unpermitted Storage of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

On September 20, 2001, the Division of Waste Management was notified of the DOE's identification of hazardous waste in DMSAs C-335-05, C-331-15 and C-333-31. Enclosed is a Notice of Violation issued for failure to comply with 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the facility's Hazardous Waste Management Permit. Please note that these violations do not address the items removed from equipment in C-331-15 and C-335-04.

Please contact Mike Guffey at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MW/mg

Enclosure – Notice of Violation

cc: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Robert Sleeman, ORO/DOE
David Tidwell, DOE
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, HWB-Paducah
DWM File# 101
DOE Reading File

DIVISION OF WASTE MANAGEMENT
NOTICE OF VIOLATION CONTINUATION SHEET

Facility Name U.S. Dept. of Energy **Identification#** KYD-985-072-008

Date of NOV 10/9/01 **Date Violation Observed** 9/20/01

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation and $5,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management
14 Reilly Road
Frankfort, KY 40601

Attention: Michael V. Welch, **or call** (502) 564-6716

Signature: Michael V. Welch **Title:** Manager, KDWM-HWB **Date:** 10/9/01

Name of person or persons to whom copy was delivered:

Mr. Don Seaborg **Title:** Site Manager-DOE **Date:** 10/10/01
Mr. Gordon Dover **Title:** Paducah Manager of Projects BJC **Date:** 10/10/01

How Delivered: Certified Mail

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

To: United States Dept. of Energy Date Violation Observed: 9/20/01

P.O. Box 1410 County: McCracken

Paducah, KY 42001 ID# (if applicable): KY8-890-008-982

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of the following statute(s) and/or regulation(s):

The extent of the violation(s) observed is as follows:

Investigation and characterization of DMSAs C-331-15, C-335-05 and C-333-31 identified hazardous waste which has been stored greater than 90 days without a permit in violation of 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the Hazardous Waste Management Permit.

quired action for remedial measures include, but are not limited to:

1. **Submit amended SWMU Assessment Reports (SARs) for SWMUs 249, 287 and 301 within ninety (90) calendar days of the receipt of this notice. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit.**
2. **Submit a revised Part A Application to include DMSAs C-331-15, C-335-05 and C-333-31 within thirty (30) calendar days of receipt of this notice.**
3. **Submit a closure plan(s) to address closure of DMSAs C-331-15, C-335-05 and C-333-31 within sixty (60) calendar days of receipt of this notice.**
4. **Cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately. All hazardous waste at the Paducah Gaseous Diffusion Plant must be managed in accordance with all applicable provisions of Chapters 30-38 of Title 401 of the Kentucky Administrative Regulations.**

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 2002

Total Number of NOV for 2002 7

January 18, 2002 -- NOV

The extent of the violations observed is as follows:

1. Failure to characterize these wastes. Investigation, characterization, subsequent reporting and/or other available information regarding SWMUs and identified hazardous waste which have been stored greater than 90 days without a permit.

February 28, 2002 -- NOV

The extent of the violations observed is as follows:

2. Investigation, characterization, subsequent reporting and/or other available information regarding SWMUs. Hazardous waste identified which have been stored greater than 90 days without a permit.

March 11, 2002 -- NOV

The extent of the violations observed is as follows:

3. Unpermitted Storage of Hazardous Waste. Investigation, characterization, subsequent reporting and/or other available information regarding SWMUs. Hazardous waste identified which have been stored greater than 90 days without a permit.

November 12, 2002 -- NOV

The extent of the violations observed is as follows:

4. Failure to comply with KSR 224and numerous waste management regulations. Failure to make a hazardous waste determination for wastes disposed of in SWMU 209, the C-746-S Solid Waste Landfill and SWMU 210, the C-746-T Solid Waste Landfill. Disposal of hazardous waste without notifying the cabinet and obtaining construction and operationg permits from the cabinet.

November 12, 2002 -- NOV

The extent of the violations observed is as follows:

5. Generated wastes as defined in 401 KAR Chapter 31 and failure to characterize these wastes in violation of KRS 224.46-510. These wastes have been managed in the following SWMUs 351, 287, 219, 464, 277, 276, 240, 239, 231, and 250.

November 12, 2002 -- NOV

The extent of the violations observed is as follows:

6. Failure to make a hazardous waste determination for wastes disposed of in SWMU 208, the C-746-U Solid Waste Landfill by failure to determine if the waste is listed as a hazardous waste in 401 KAR 31:040, in violation of KAR 32:010(2)(2). Disposing of hazardous waste without first notifying the Cabinet and obtaining construction and operation permits.

November 12, 2002 -- NOV

The extent of the violations observed is as follows:

7. Recordkeeping. A generator shall keep a copy of each manifest signed in accordance with KAR32:020 in addition to the signed copy returned for the designated facility which received the waste. Both copies shall be retained on record for at least three years from the due date of the report.

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTO
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

10 11

January 18, 2002

CERTIFIED MAIL # 7099 3220 0008 0368 1969
7099 3220 0008 0368 1976
RETURN RECEIPT REQUESTED

Post-it® Fax Note 7671	Date 1-25-02	# of pages ▶ 5
To Dover / Massey / Davis	From Batteen	
Co./Dept. Kellogg / Kellum	Co.	
Phone #	Phone #	
Fax #	Fax #	

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Unpermitted Storage of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

Enclosed, is a Notice of Violation issued for failure to comply with 401 KAR 32:030, Section 2, 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the facility's Hazardous Waste Management Permit.

Please note that the Division does not agree with the "newly generated" determination made on the mercury-contaminated oil removed from the Welch pump on December 11, 2001. This wastestream will need to be addressed within the C-331-15 Closure Plan (submitted on December 7, 2001), as will be reflected in our forthcoming comments on the C-331-15 Closure Plan.

Please contact Mike Guffey at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MVW/mg

Enclosure – Notice of Violation

cc: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Robert Sleeman, ORO/DOE
David Tidwell, DOE
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, HWB-Paducah
DWM File# 101
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
FRANKFORT, KENTUCKY 40601

NOTICE OF VIOLATION

To: United States Dept. of Energy

Dates Violation Observed:
3/13/01 thru 3/16/01 and
8/10/01 thru 1/9/02

P.O. Box 1410 County: McCracken

Paducah, KY 42001 ID# (if applicable): KY8-890-008-982

This is to advise you that, because of the circumstances noted below, you are in violation of the provisions of the following statute(s) and/or regulation(s):

The extent of the violation(s) observed is as follows:

1. The U.S. DOE generated wastes as defined in 401 KAR Chapter 31. The U.S. DOE failed to characterize these wastes in violation of KRS 224.46-520 and 401 KAR 32:010, Section 2. These wastes have subsequently been managed in Solid Waste Management Units 206 (C753-A), 464(C-746-A), and 159(C-746-H3 pad).

2. Investigation, characterization, subsequent reporting and/or other available information regarding Solid Waste Management Units (SWMUs) #'s 206 (C753-A), 159 (C-746-H3 pad), 214 (DMSA OS-3), 216 (DMSA OS-5), 220 (DMSA OS-9), 222 (DMSA OS-11), 223 (DMSA OS-12), 249 (DMSA 331-15), 287 (DMSA C333-31), 351 (DMSA C-400-05), 354 (DMSA C-409-01), 355(DMSA C-409-02) and 464 (C-746-A) have identified hazardous waste(s) which have been stored greater than 90 days without a permit in violation of 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the Hazardous Waste Management Permit.

Required action for remedial measures include, but are not limited to:

1. DOE shall characterize all waste discovered in SWMU Nos. 206 (C753-A), 464 (C-746-A), and 159 (C-746-H3 pad), in accordance with KRS 224.46-520 and 401 KAR 32:010, Section 2 by March 1, 2002. All solid and/or hazardous wastes discovered in SWMU Nos. 206, 464(C-746-A), and 159 (C-746-H3 pad) shall be managed in accordance with the requirements of KRS Chapter 224 and 401 KAR Chapters 30-49.
2. DOE shall submit amended SWMU Assessment Reports (SARs) for SWMUs #,206 (C753-A), 159 (C-746-H3 pad), 214 (DMSA OS-3), 216 (DMSA OS-5), 220 (DMSA OS-9), 222 (DMSA OS-11), 223 (DMSA OS-12), 249 (DMSA 331-15), 287 (DMSA C333-31), 351 (DMSA C-400-05), 354 (DMSA C-409-01), 355(DMSA C-409-02) and 464 (C-746-A) within one hundred and eighty (180) calendar days of the receipt of this notice. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit.

DIVISION OF WASTE MANAGEMENT
NOTICE OF VIOLATION CONTINUATION SHEET

Facility Name U.S. Dept. of Energy **Identification#** KYD-985-072-008

Date of NOV 1/18/02 **Dates Violation Observed** 3/13/01 thru 3/16/01 and 8/10/01 thru 1/9/02

3. DOE shall submit a revised Part A Application to include SWMUs # 206 (C753-A), 159 (C-746-H3 pad), 214 (DMSA OS-3), 216 (DMSA OS-5), 220 (DMSA OS-9), 222 (DMSA OS-11), 223 (DMSA OS-12), 351 (DMSA C-400-05), 354 (DMSA C-409-01), 355(DMSA C-409-02) and 464 (C-746-A) and to update the wastestreams for SWMUs 249 (DMSA 331-15) and 287 (DMSA C333-31), within thirty (30) calendar days of receipt of this notice.

4. DOE shall submit a closure plan(s) to address closure of SWMUS # , 206 (C753-A), 159 (C-746-H3 pad), 214 (DMSA OS-3), 216 (DMSA OS-5), 220 (DMSA OS-9), 222 (DMSA OS-11), 223 (DMSA OS-12), 351 (DMSA C-400-05), 354 (DMSA C-409-01), 355(DMSA C-409-02) and 464 (C-746-A) within one-hundred and eighty (180) calendar days of receipt of this notice.

5. DOE shall revise the closure plans for SWMUs # 249 (DMSA 331-15) and 287 (DMSA C333-31) to address the wastestreams discovered on 11/08/01, 11/09/01, 11/13/01 and 12/12/01 within one-hundred and eighty (180) calendar days of receipt of this notice.

6. DOE shall cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately. All hazardous waste at the Paducah Gaseous Diffusion Plant must be managed in accordance with all applicable provisions of Chapters 30-38 of Title 401 of the Kentucky Administrative Regulations.

Violations of the above cited Kentucky Revised Statutes are subject to the maximum penalties of $25,000 per day for each hazardous waste violation and $5,000 per day for each solid waste violation.

To respond to this Notice of Violation, write to:

Division of Waste Management
14 Reilly Road
Frankfort, KY 40601

Attention: Michael V. Welch , or call (502) 564-6716

Signature: Michael V. Welch Title: Manager, KDWM-HWB Date: 1/18/02

DIVISION OF WASTE MANAGEMENT
NOTICE OF VIOLATION CONTINUATION SHEET

Facility Name U.S. Dept. of Energy **Identification#** KYD-985-072-008

Date of NOV 1/18/02

Dates Violation Observed
3/13/01 thru 3/16/01 and
8/10/01 thru 1/9/02

Name of person or persons to whom copy was delivered:

Mr. Don Seaborg	Title: Site Manager-DOE	Date: 1/18/02
Mr. Gordon Dover	Title: Paducah Manager of Projects BJC	Date: 1/18/02

How Delivered: Certified Mail , # 7099 3220 0008 0368 1969 and 7099 3220 0008 0368 1976

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

9 59

February 28, 2002

CERTIFIED MAIL # 7099 3220 0007 9753 1083
7099 3220 0007 9753 1090
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Unpermitted Storage of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

Enclosed, is a Notice of Violation issued for failure to comply with 401 KAR 32:010, Section 2; 401 KAR 32:030, Section 5; 401 KAR 38:010, Section 4; KRS 224.46-510, KRS 224.46-520 and Part II of the facility's Hazardous Waste Management Permit.

Please contact Mike Guffey at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MVW/mg

Enclosure – Notice of Violation

cc: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Robert Sleeman, ORO/DOE
David Tidwell, DOE\
Randy McDowell, Office of Legal Services
Virginai Baker, Office of Legal Services
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, HWB-Paducah
DWM File# 101
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
February 28, 2002

NOTICE OF VIOLATION

TO:
United States Department of Energy
P.O. Box 1410
W. Paducah KY 42001
Attn: W. Don Seaborg Site Manager – Paducah DOE, Gordon Dover Paducah Manager of Projects - BJC

SITE:
Paducah Gaseous Diffusion Plant
P.O. Box 1410
W. Paducah KY 42001

Site ID #: KY8-890-008-982

Date(s) Violation(s) Observed: Jan. 17, Jan. 31, Feb. 11, Feb. 12 Feb. 18 & Feb. 19 2002.

County: McCracken
Notifications/Complaints System #:
NOV Tracking #:

OLS Case #:

This is to advise that you are in violation of the provisions cited below:

KRS 224.46-510
KRS 224.46-520
401 KAR 32:010, Section 2
401KAR 32:030, Section 5
401KAR 38:010, Section 4
Part II of the PGDP Hazardous waste Permit

A description of the violation:

1. The U.S. DOE generated wastes as defined in 401 KAR Chapter 31. The U.S. DOE failed to characterize these wastes in violation of KRS 224.46-520 and 401 KAR 32:010, Section 2. These wastes have subsequently been managed in Solid Waste Management Units 248 (DMSA C-331-14), 287(DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02).

2. Investigation, characterization, subsequent reporting and/or other available information regarding Solid Waste Management Units (SWMUs) #'s 248 (DMSA C-331-14), 287(DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02) have identified hazardous waste(s) which have been stored greater than 90 days without a permit in violation of 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-510 and Part II of the Hazardous Waste Management Permit.

The required remedial measure(s), and date(s) to be completed by; are as follows:

1. DOE shall submit amended SWMU Assessment Reports (SARs) for SWMUS 248 (DMSA C-331-14), 287(DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02) within one hundred and eighty (180) calendar days of the receipt of this notice. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit.

2. DOE shall submit a revised Part A Application to include SWMU # 248 (DMSA C-331-14) and to update the wastestreams for SWMUs 287(DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02) within thirty (30) calendar days of receipt of this notice.

3. DOE shall submit a closure plan(s) to address closure of SWMU # 248 (DMSA C-331-14) within one-hundred and eighty (180) calendar days of receipt of this notice.

4. DOE shall revise the closure plans for SWMUs 287(DMSA C-333-31), 351 (DMSA C-400-05) and 355 (DMSA C-409-02) to address the additional wastestreams, discovered on 1/31/02, 2/11/02, 2/12/02, 2/18/02 and 2/19/02, within one hundred and eighty (180) calendar days of receipt of this notice.

5. DOE shall cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately. All hazardous waste at the Paducah Gaseous Diffusion Plant must be managed in accordance with all applicable provisions of Chapters 30-38 of Title 401 of the Kentucky Administrative Regulations.

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division of Waste Management
14 Reilly Road
Frankfort, KY 40601
(502) 564-6716
ATTENTION: Michael V. Welch

Issued By: Michael V. Welch
Manager, Hazardous Waste Branch

Date: 2/28/2002

How Delivered: Certified Mail / Certified# 7000 1670 0007 9753 1083
Certified# 7000 1670 0007 9753 1090

MAR 14 2002

JAMES E. BICKFORD
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

March 11, 2002

CERTIFIED MAIL # 7099 1670 0007 9753 0963
7099 1670 0007 9753 0970
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

Mr. Gordon L. Dover, Paducah Manager of Projects
Bechtel Jacobs Company LLC
761 Veterans Avenue
Kevil, Kentucky 42053

RE: Unpermitted Storage of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Gentlemen:

Enclosed, is a Notice of Violation issued for failure to comply with 401 KAR 32:010, Section 2; 401 KAR 32:030, Section 5; 401 KAR 38:010, Section 4; KRS 224.46-510, KRS 224.46-520 and Part II of the facility's Hazardous Waste Management Permit.

Please contact Mike Guffey at (502) 564-6716 if you have questions concerning this issue.

Sincerely,

Michael V. Welch P.E, Manager
Hazardous Waste Branch

MVW/mg

Enclosure – Notice of Violation

cc: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Robert Sleeman, ORO/DOE
David Tidwell, DOE
Randy McDowell, OLS
Virginia Baker, OLS
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, HWB-Paducah
DWM File# 101
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
March 11, 2002

NOTICE OF VIOLATION

TO:
United States Department of Energy
P.O. Box 1410
W. Paducah KY 42001
Attn: W. Don Seaborg Site Manager – Paducah DOE, Gordon Dover Paducah Manager of Projects - BJC

SITE:
Paducah Gaseous Diffusion Plant
P.O. Box 1410
W. Paducah KY 42001

Site ID #: KY8-890-008-982

Date(s) Violation(s) Observed: September 20, 2001 and March 5, 2002.

County: McCracken
Notifications/Complaints System #:
NOV Tracking #:

OLS Case #:

This is to advise that you are in violation of the provisions cited below:

KRS 224.46-510
KRS 224.46-520
401 KAR 32:010, Section 2
401KAR 32:030, Section 5
401KAR 38:010, Section 4
Part II of the PGDP Hazardous waste Permit

A description of the violation:

1. The U.S. DOE generated wastes as defined in 401 KAR Chapter 31. The U.S. DOE failed to characterize these wastes in violation of KRS 224.46-510 and 401 KAR 32:010, Section 2. These wastes have subsequently been managed in Solid Waste Management Units 287(DMSA C-333-31) and 355 (DMSA C-409-02).

2. Investigation, characterization, subsequent reporting and/or other available information regarding Solid Waste Management Units (SWMUs) #'s 287 (DMSA C-333-31)) and 355 (DMSA C-409-02) have identified hazardous waste(s) which have been stored greater than 90 days without a permit in violation of 401 KAR 32:030, Section 5, 401 KAR 38:010, Section 4, KRS 224.46-520 and Part II of the Hazardous Waste Management Permit.

The required remedial measure(s), and date(s) to be completed by; are as follows:

1. DOE shall submit amended SWMU Assessment Reports (SARs) for SWMUS 287 (DMSA C-333-31) and 355 (DMSA C-409-02) within one hundred and eighty (180) calendar days of the receipt of this notice. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit.

2. DOE shall submit a revised Part A Application to update the wastestreams for SWMUs 287 (DMSA C-333-31) and 355 (DMSA C-409-02) within thirty (30) calendar days of receipt of this notice.

3. DOE shall revise the closure plans for SWMUs 287(DMSA C-333-31) and 355 (DMSA C-409-02) to address the additional wastestreams discovered on 9/20/01 and 3/5/02 within one hundred and eighty (180) calendar days of receipt of this notice.

4. DOE shall cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately. All hazardous waste at the Paducah Gaseous Diffusion Plant must be managed in accordance with all applicable provisions of Chapters 30-38 of Title 401 of the Kentucky Administrative Regulations.

HENRY C. LIST
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY RD
FRANKFORT KY 40601-1190

November 12, 2002

CERTIFIED MAIL #7000 1670 0007 9753 1199
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

RE: Unpermitted Storage and Disposal of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Dear Mr. Seaborg:

Enclosed are Notices of Violation (NOVs) issued for failure to comply with KRS 224 and numerous waste management regulations promulgated pursuant to those statutes. Please contact me at (502) 564-6716 if you have questions.

Sincerely,

Robert H. Daniell
Director

Enclosures – Notices of Violation (4)

c: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Randy McDowell, Office of Legal Services
Ron Gruzesky, Solid Waste Branch
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, Hazardous Waste Branch-Paducah
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

TO:
US DEPT. OF ENERGY
PO BOX 1410
5600 HOBBS ROAD
PADUCAH KY 420021410
Attn: MR. W. DON SEABORG, SITE MANAGER

SITE:
US DOE PADUCAH GAS DIFFUSION PLT
5600 HOBBS ROAD
PADUCAH KY 42001

Site ID #: KY8890008982
County: Mccracken
Notifications/Complaints System #:
NOV Tracking #: 6916

Date(s) Violation(s) Observed: 07/09/2002
OIG Case #:
Enforcement Case #: DWM # 02143

This is to advise that you are in violation of the provisions cited below:

Statute/Regulation(No. 1): KRS 224.46-510(2) 401 KAR 32:010 2(2)

A description of the violation:
Failure to make a hazardous waste determination for wastes disposed of in SWMU 209, the C-746-S Solid Waste Landfill and SWMU 210, the C-746-T Solid Waste Landfill, by failure to determine if the waste is listed as a hazardous waste in 401 KAR 31:040, in violation of KRS 224.46-510(2) and 401 KAR 32:010(2)(2).

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall submit amended SWMU Assessment Reports (SARs) for SWMU 209, the C-746-S Solid Waste Landfill and SWMU 210, the C-746-T Solid Waste Landfill. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit. To be completed by: 12/20/2002

Statute/Regulation(No. 2): KRS 224.46-520(1) 401 KAR 38:010 4

A description of the violation:
Disposal of hazardous waste in SWMU 209, the C-746-S Solid Waste Landfill and SWMU 210, the C-746-T Solid Waste Landfill, in violation of KRS 224.46-520(1) and 401 KAR 38:010(4), by disposal of hazardous waste without first notifying the cabinet and obtaining construction and operation permits from the Cabinet.

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall submit the following information to the Cabinet:
(a) A map of the PGDP site delineating all areas (e.g., ditches, sumps, etc.) where US DOE has concluded that either listed or characteristic hazardous wastes have been discharged.
(b) An inventory of any and all wastes/media that have been removed from those areas in which US DOE has concluded that hazardous wastes have been discharged. This list shall include types and quantities of wastes/media removed, date of removed, method and location of storage and/or disposal.
(c) A listing of all drums and/or other storage receptacles, including but not limited to, low level or TSCA waste containers, currently stored on site, whereby US DOE considers the original waste determination to be suspect. This listing shall include all available information regarding the point of generation, date of generation and current storage locations of the waste.
(d) An inventory of all previous waste shipments off site whereby US DOE considers the original waste determination to be suspect. This list shall include a listing of the types and quantities of wastes disposed, the point of generation, date of generation, method of shipment, shipping manifests and all receipts of disposal.
(e) An inventory of all previous waste streams disposed of in any on site landfill(s), which US DOE considers the original waste determination to be suspect. This list shall include the point of generation for these wastes, date of generation, disposal location and date of disposal.

(f) Provide a detailed overview of the uses of TCE and TCA throughout the PGDP and all documentation associated with the management and disposal practices of TCE and TCA.
To be completed by: 12/20/2002

Statute/Regulation(No. 3): KRS 224 401 KAR 47:040 3(3) [1984]

A description of the violation:
Disposal of hazardous waste in a Solid Waste Landfill, in violation of KRS 224 and 401 47:040(3)(3), which states that no liquids or hazardous wastes shall be discharged to or placed in a landfill without obtaining a permit modification or a written variance from the Cabinet.

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall submit to the Cabinet an Investigation and Corrective Action Work Plan for SWMU 9, the C-746 S Solid Waste Landfill and SWMU 10, the C-746-T Solid Waste Landfill. To be completed by: 01/06/2003

Statute/Regulation(No. 4): KRS 224 401 KAR 48:090 8

A description of the violation:
Disposal of hazardous waste in a Solid Waste Landfill, in violation of KRS 224 and 401 KAR 48:090(8), which states that the owner or operator of a contained landfill shall only dispose of wastes that (a) are not hazardous wastes regulated pursuant to 401 KAR Chapters 30 thorugh 40, except for limited quantity hazardous wastes and exempt spill residues.

The required remedial measure(s), and date(s) to be completed by; are as follows:
See remedial measure for violation no. 3 (i.e., Investigation and Corrective Action Work Plan). To be completed by: 01/06/2003

Statute/Regulation(No. 5): KRS 224 401 KAR 47:040(3)1 [1984]&47:120.1

A description of the violation:
Failure to comply with the conditions of the Solid Waste Disposal Permit No. 00073.15, including the inert landfill plans approved in February 1985 for the C-746-T Solid Waste Landfill, in violation of KRS 224, 401 KAR 47:040(3)(1) [1984] and 401KAR 47:120(1).

The required remedial measure(s), and date(s) to be completed by; are as follows:
See remedial measure for violation no. 3 (i.e., Investigation and Corrective Action Work Plan). To be completed by: 01/06/2003

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division Of Waste Management
Central Office
14 Reilly Road
Frankfort, Ky 40601
502-564-6716 EXT. 285
Jami West, Environmental Enforcement Specialist III

Issued By: Jami West — **Date:** 11/13/2002
Jami West Environmental Enforcement Specialist III

Issued By: — **Date:** 11/13/2002

James M. Gailey Environmental Engineering Assistant III

How Delivered: Certified # cc: HW, ENF, OLS, File, RO

HENRY C. LIST
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY RD
FRANKFORT KY 40601-1190

November 12, 2002

CERTIFIED MAIL #7000 1670 0007 9753 1199
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

RE: Unpermitted Storage and Disposal of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Dear Mr. Seaborg:

Enclosed are Notices of Violation (NOVs) issued for failure to comply with KRS 224 and numerous waste management regulations promulgated pursuant to those statutes. Please contact me at (502) 564-6716 if you have questions.

Sincerely,

Robert H. Daniell
Director

Enclosures – Notices of Violation (4)

c: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Randy McDowell, Office of Legal Services
Ron Gruzesky, Solid Waste Branch
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, Hazardous Waste Branch-Paducah
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

TO:
US DEPT. OF ENERGY
PO BOX 1410
5600 HOBBS ROAD
PADUCAH KY 420021410
Attn: MR. W. DON SEABORG, SITE MANAGER

SITE:
US DOE PADUCAH GAS DIFFUSION PLT
5600 HOBBS ROAD
PADUCAH KY 42001

Site ID #: KY8890008982
County: Mccracken
Notifications/Complaints System #:
NOV Tracking #: 6584

Date(s) Violation(s) Observed: 03/12/2002
OIG Case #:
Enforcement Case #: 02143

This is to advise that you are in violation of the provisions cited below:

Statute/Regulation(No. 1): KRS 224.46-510(2) 401 KAR 32:010 2

A description of the violation:
US DOE generated wastes as defined in 401 KAR Chapter 31 and failed to characterize these wastes in violation of KRS 224.46-510(2) and 401 KAR 32:010(2). These wastes have been managed in the following Solid Waste Management Units (SWMUs):
SWMU 351 / DMSA C-400-05;
SWMU 287 / DMSA C-333-31;
SWMU 219 / DMSA OS-8;
SWMU 464 / C-746-A (West End Smelter);
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02; and
SWMU 250 / DMSA C-331-16.

The required remedial measure(s), and date(s) to be completed by; are as follows:
[1] US DOE shall submit amended SWMU Assessment Reports (SARs) for the following SWMUs. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit.
SWMU 351 / DMSA C-400-05;
SWMU 287 / DMSA C-333-31;
SWMU 219 / DMSA OS-8;
SWMU 464 / C-746-A (West End Smelter);
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02; and
SWMU 250 / DMSA C-331-16. To be completed by: 05/09/2003

Statute/Regulation(No. 2): KRS 224.46-510 401 KAR 32:030 5

A description of the violation:
On March 12, April 24 and 29, May 29, June 17, July 26, August 6, 8, 12, 14, 20, 21 and 22, September 25, October 16, 17, 22 and 29, 2002 the US DOE submitted notifications to the Cabinet documenting that US

DOE stored hazardous waste(s) for greater than ninety (90) days, in violation of KRS 224.46-510 and 401 KAR 32:030(5), in the following Solid Waste Management Units (SWMUs):
SWMU 351 / DMSA C-400-05;
SWMU 287 / DMSA C-333-31;
SWMU 219 / DMSA OS-8;
SWMU 464 / C-746-A (West End Smelter);
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02; and
SWMU 250 / DMSA C-331-16.

The required remedial measure(s), and date(s) to be completed by; are as follows:
[2] US DOE shall submit to the Cabinet a revised Part A Application to include the following SWMUs as hazardous waste managment units.
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02;
SWMU 219 / DMSA OS08; and
SWMU 250 / DMSA C-331-16. To be completed by: 02/07/2003
[3] US DOE shall submit to the Cabinet a revised Part A application to update the wastestreams for the following SWMUs:
SWMU 287 / DMSA C-333-31;
SWMU 351 / DMSA C-400-05; and
SWMU 464 / C-746-A (West End Smelter). To be completed by: 02/07/2003
[4] US DOE shall submit to the Cabinet closure plans to address closure of the following SWMUs:
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02;
SWMU 219 / DMSA OS08; and
SWMU 250 / DMSA C-331-16. To be completed by: 05/09/2003
[5] US DOE shall submit revised closure plans for the following SWMUs to address the additional wastestreams discovered on March 12, July 26, August 8 and 22, October 17, 22, and 29.
SWMU 287 / DMSA C-333-31;
SWMU 351 / DMSA C-400-05; and
SWMU 464 / C-746-A (West End Smelter). To be completed by: 05/09/2003
[6] US DOE shall cease the unpermitted storage of hazardous waste at all locations owned or operated by the US DOE at the Paducah Gaseous Diffusion Plant (PGDP) immediately. To be completed by: 11/07/2002

Statute/Regulation(No. 3): KRS 224.46-520(1) 401 KAR 38:010 4

A description of the violation:
On March 12, April 24 and 29, May 29, June 17, July 26, August 6, 8, 12, 14, 20, 21 and 22, September 25, October 16, 17, 22 and 29 2002 the US DOE submitted notifications to the Cabinet documenting that US DOE stored hazardous waste(s) for greater than ninety (90) days in the Solid Waste Management Units (SWMUs) listed below. Therefore US DOE is in violation of KRS 224.46-520(1) and 401 KAR 38:010(4), which states that no person shall engage in the storage, treatment, recycling, or disposal of hazardous waste without first notifying the Cabinet and obtaining construction and operation permits from the Cabinet.
SWMU 351 / DMSA C-400-05;
SWMU 287 / DMSA C-333-31;

SWMU 219 / DMSA OS-8;
SWMU 464 / C-746-A (West End Smelter);
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02; and
SWMU 250 / DMSA C-331-16.

The required remedial measure(s), and date(s) to be completed by; are as follows:
[7] US DOE shall submit to the Cabinet a revised Part A Application to include the following SWMUs as hazardous waste managment units.
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02;
SWMU 219 / DMSA OS08; and
SWMU 250 / DMSA C-331-16. To be completed by: 02/07/2003
[8] US DOE shall submit to the Cabinet a revised Part A application to update the wastestreams for the following SWMUs:
SWMU 287 / DMSA C-333-31;
SWMU 351 / DMSA C-400-05; and
SWMU 464 / C-746-A (West End Smelter). To be completed by: 02/07/2003
[9] US DOE shall submit to the Cabinet closure plans to address closure of the following SWMUs:
SWMU 277 / DMSA C-333-21;
SWMU 276 / DMSA C-333-20;
SWMU 240 / DMSA C-331-06;
SWMU 239 / DMSA C-331-05;
SWMU 231 / DMSA C-310-02;
SWMU 219 / DMSA OS08; and
SWMU 250 / DMSA C-331-16. To be completed by: 05/09/2003
[10] US DOE shall submit revised closure plans for the following SWMUs to address the additional wastestreams discovered on March 12, July 26, August 8 and 22, October 17, 22 and 29.
SWMU 287 / DMSA C-333-31;
SWMU 351 / DMSA C-400-05; and
SWMU 464 / C-746-A (West End Smelter). To be completed by: 05/09/2003
[11] US DOE shall cease the unpermitted storage of hazardous waste at all locations owned or operated by the US DOE at the Paducah Gaseous Diffusion Plant (PGDP) immediately. To be completed by: 11/07/2002

Statute/Regulation(No. 4): KRS 224 401 KAR 32

A description of the violation:
Failure to meet the hazardous waste generator requirements found in 401 KAR Chapter 32.

The required remedial measure(s), and date(s) to be completed by; are as follows:
[12] All hazardous waste at the PGDP shall be managed in accordance with all applicable provisions of Chapters 32 of Title 401 of the Kentucky Administrative Regulations. To be completed by: 11/07/2002

Statute/Regulation(No. 5): KRS 224 401 KAR 34

A description of the violation:
Failure to meet requirements for treatment, storage, and disposal facilities found in 401 KAR Chapter 34.

The required remedial measure(s), and date(s) to be completed by; are as follows:

[13] All hazardous waste at the PGDP shall be managed in accordance with all applicable provisions of Chapter 34 of Title 401 of the Kentucky Administrative Regulations. To be completed by: 11/07/2002

Statute/Regulation(No. 6): KRS 224 401 KAR 38:030 1(1)

A description of the violation:
Failure to comply with Part II.A.2 of the Hazardous Waste Permit in violation of KRS 224 and 401 KAR 38:030(1)(1), which states that the permittee must comply with all conditions of this permit.

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall comply with all applicable provisions of the Hazardous Waste Management Permit immediately. To be completed by: 11/07/2002

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division Of Waste Management
Central Office
14 Reilly Road
Frankfort, Ky 40601
502-564-6716 EXT. 285
Jami West, Environmental Enforcement Specialist III

Issued By: _____ **Date:** 11/06/2002
Jami West Environmental Enforcement Specialist III

Issued By: _____ **Date:** 11/06/2002
James M. Guffey Environmental Engineering Assistant III

How Delivered: Certified # **cc:** HW, ENF, OLS, File, RO

HENRY C. LIST
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY RD
FRANKFORT KY 40601-1190

November 12, 2002

CERTIFIED MAIL #7000 1670 0007 9753 1199
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

RE: Unpermitted Storage and Disposal of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Dear Mr. Seaborg:

Enclosed are Notices of Violation (NOVs) issued for failure to comply with KRS 224 and numerous waste management regulations promulgated pursuant to those statutes. Please contact me at (502) 564-6716 if you have questions.

Sincerely,

Robert H. Daniell
Director

Enclosures – Notices of Violation (4)

c: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Randy McDowell, Office of Legal Services
Ron Gruzesky, Solid Waste Branch
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, Hazardous Waste Branch-Paducah
DOE Reading File

COMMONWEALTH OF KENTUCKY.
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

TO:
US DEPT. OF ENERGY
PO BOX 1410
5600 HOBBS ROAD
PADUCAH KY 420021410
Attn: MR. W. DON SEABORG, SITE MANAGER

SITE:
US DOE PADUCAH GAS DIFFUSION PLT
5600 HOBBS ROAD
PADUCAH KY 42001

Site ID #: KY8890008982
County: Mccracken
Notifications/Complaints System #:
NOV Tracking #: 6917

Date(s) Violation(s) Observed: 05/03/2002
OIG Case #:
Enforcement Case #: DWM # 02143

This is to advise that you are in violation of the provisions cited below:

Statute/Regulation(No. 1): KRS 224.46-510(2) 401 KAR 32:010 2(2)

A description of the violation:
Failure to make a hazardous waste determination for wastes disposed of in SWMU 208, the C-746-U Solid Waste Landfill, by failure to determine if the waste is listed as a hazardous waste in 401 KAR 31:040, in violation of KRS 224.46-510(2) and 401 KAR 32:010(2)(2).

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall complete hazardous waste determinations in accordance with 401 KAR 32:010(2)(2), in order to prevent disposal of hazardous waste in the C-746-U Solid Waste Landfill. To be completed by: 11/13/2002

Statute/Regulation(No. 2): KRS 224.46-520(1) 401 KAR 38:010 4

A description of the violation:
Disposal of hazardous waste in SWMU 208, the C-746-U Solid Waste Landfill, in violation of KRS 224.46-520(1) and 401 KAR 38:010(4), by disposal of hazardous waste without first notifying the Cabinet and obtaining construction and operation permits from the Cabinet.

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall cease all unpermitted disposal of hazardous waste in the C-746-U Solid Waste Landfill immediately. To be completed by: 11/13/2002
US DOE shall submit the following information to the Cabinet:
(a) A map of the PGDP site delineating all areas (e.g., ditches, sumps, etc.) where US DOE has concluded that either listed or characteristic hazardous wastes have been discharged.
(b) An inventory of any and all wastes/media that have been removed from those areas in which US DOE has concluded that hazardous wastes have been discharged. This list shall include types and quantities of wastes/media removed, date of removal, method and location of storage and/or disposal.
(c) A listing of all drums and/or other storage receptacles, including but not limited to, low level or TSCA waste containers, currently stored on site, whereby US DOE considers the original waste determination to be suspect. This listing shall include all available information regarding the point of generation, date of generation and current storage locations of the waste.
(d) An inventory of all previous waste shipments off site whereby US DOE considers the original waste determination to be suspect. This list shall include a listing of the types and quantities of wastes disposed, the point of generation, date of generation, method of shipment, shipping manifests and all receipts of disposal.
(e) An inventory of all previous waste streams disposed of in any on site landfill(s), which US DOE considers the original waste determination to be suspect. This list shall include the point of generation for these wastes, date of generation, disposal location and date of disposal.
(f) Provide a detailed overview of the uses of TCE and TCA throughout the PGDP and all documentation associated with the management and disposal practices of TCE and TCA.

To be completed by: 12/20/2002
US DOE shall submit an amended SWMU Assessment Report (SAR) for SWMU 208, the C-746-U Solid Waste Landfill. At a minimum, the SAR shall provide the information required under Condition IV.B.3 of the facility Hazardous Waste Management Permit. To be completed by: 12/20/2002

Statute/Regulation(No. 3): KRS 224 401 KAR 48:090 2

A description of the violation:
Failure to effectively implement a program at the facility for detecting and preventing the disposal of regulated hazardous waste as defined in 401 KAR Chapter 31 by failure to properly identify listed hazardous wastes in violation of 401 KAR 48:090 Section 2.

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall submit to the Cabinet a revised Waste Inspection Program that accurately describes the wastestreams being disposed of in the C-746-U Solid Waste Landfill, and meets the requirements of 401 KAR 48:090(2). To be completed by: 12/20/2002

Statute/Regulation(No. 4): KRS 224 401 KAR 47:120 1

A description of the violation:
Failure to comply with all conditions of the Solid Waste Disposal Facility Permit No. 073.00045, in violation of KRS 224 and 401 KAR 47:120(1), by disposal of hazardous waste in the C-746-U Solid Waste Landfill.

The required remedial measure(s), and date(s) to be completed by; are as follows:
US DOE shall comply with all applicable conditions of the Solid Waste Disposal Facility Permit No. 073.00045 immediately. To be completed by: 11/13/2002
US DOE shall submit a plan to address the disposal of hazardous wastes in SWMU 208, the C-746-U Solid Waste Landfill. The plan shall describe the course of action for removal of hazardous waste containers and all releases associated with these containers.
Alternatively, the plan shall describe a sampling effort to obtain bulk analyses from the containers of hazardous waste disposed of in the C-746-U Solid Waste Landfill for purposes of a revised regulatory determination. To be completed by: 12/20/2002

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division Of Waste Management
Central Office
14 Reilly Road
Frankfort, Ky 40601
502-564-6716 EXT. 285
Jami West, Environmental Enforcement Specialist III

Issued By: Jami West — **Date:** 11/13/2002
Jami West Environmental Enforcement Specialist III

Issued By: James M. Guffey — **Date:** 11/13/2002
James M. Guffey Environmental Engineering Assistant III

How Delivered: **Certified #** **cc:** HW, ENF, OLS, File, RO

Fact Sheet
Wednesday November 13, 2002
Notice of Violation Issued by Kentucky Department for Environmental Protection to the Department of Energy - Paducah

Description

- On Tuesday November 12, 2002, the Director of the Department for Environmental Protection, issued a notice of violation (NOV) entitled "Unpermitted Storage of Hazardous Waste Paducah Gaseous Diffusion Plant McCracken County, Kentucky, KY8-890-008-982".
- DOE received this NOV on Wednesday November 13, 2002.
- The NOV focuses on the Paducah DOE Material Storage Areas (DMSAs) C-400-05, C-333-31, OS-8, C-333-21, C-333-20, C-331-06, C-331-05, C-310-02, and C-331-16. It also includes the C-746-A West End Smelter
- Items discovered in these DMSA's include light bulbs, circuit boards, capacitor, sealant, aerosol cans, a light starter, a mercury manometer, a fluorescent light starter, paint, mercury-wetted relays, and a light bulb base
- The violations occurred on March 12, April 24 and 29, May 29, June 17, July 26, August 6, 8, 12, 14, 20, 21 and 22, September 25, October 16, 17, 22 and 29, 2002.
    - Note that the RCRA notifications on August 8 and 21, 2002, only identified Newly Generated waste, not Newly Discovered

Background

- A current project is ongoing at Paducah to characterize the 160 DMSAs.
- These DMSAs contain a variety of materials with the potential to contain nuclear criticality safety and hazardous material concerns.
- As the DMSA Project identifies hazardous waste as either "newly discovered" or "newly generated", notifications are self reported to KDEP by DOE.
- The Commonwealth has previously issued NOV's to DOE on September 5, 2000, July 31, 2001, October 9, 2001, January 18, 2002, February 28, 2002, and March 11, 2002 for similar violations that apply to DMSAs. In addition, an administrative complaint has been filed by the Commonwealth against DOE on October 26, 2001.
- The NOV's appear to be for "newly discovered" hazardous waste only, with the exception of August 8 and 21, 2002, as noted above.

NOV Required Actions

1. DOE is to submit amended Solid Waste Management Unit (SWMU) Assessment Reports by 5/9/03.
2. DOE is to submit a revised Part "A" Application for the hazardous waste management permit by 2/7/03.
3. DOE is to submit a revised Part "A" Application to update the wastestreams by 2/7/03.
4. DOE is to submit revised closure plans by 5/9/03.
5. DOE is to submit revised closure plans to address the additional waste streams by 5/9/03.
6. DOE is to cease the unpermitted storage of hazardous waste at all locations owned or operated by the DOE at the Paducah Gaseous Diffusion Plant immediately.

Other Points of Emphasis

- Violations are subject to civil penalties of up to $25,000 per day per violation.
- To date, DOE has received 7 NOV's (including this one) affecting numerous DMSAs, for similar violations. Some of these DMSAs have been cited in multiple NOV's as additional hazardous waste has been discovered.
- DOE has been in negotiations with the Commonwealth over the past few months in an attempt to settle their outstanding Administrative Complaint.

HENRY C. LIST
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
14 REILLY RD
FRANKFORT KY 40601-1190

November 12, 2002

CERTIFIED MAIL #7000 1670 0007 9753 1199
RETURN RECEIPT REQUESTED

Mr. W. Don Seaborg, Site Manager
US Department of Energy
Paducah Site Office
PO Box 1410
Paducah, Kentucky 42001

RE: Unpermitted Storage and Disposal of Hazardous Waste
Paducah Gaseous Diffusion Plant
McCracken County, Kentucky
KY8-890-008-982

Dear Mr. Seaborg:

Enclosed are Notices of Violation (NOVs) issued for failure to comply with KRS 224 and numerous waste management regulations promulgated pursuant to those statutes. Please contact me at (502) 564-6716 if you have questions.

Sincerely,

Robert H. Daniell
Director

Enclosures -- Notices of Violation (4)

c: Carl R. Froede, Jr., USEPA Region 4
Larry Lamberth, USEPA Region 4
Randy McDowell, Office of Legal Services
Ron Gruzesky, Solid Waste Branch
Margie Williams, DWM-Paducah
Connie Smith, Enforcement Branch
Gaye Brewer, Hazardous Waste Branch-Paducah
DOE Reading File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT

NOTICE OF VIOLATION

TO:
US DEPT. OF ENERGY
PO BOX 1410
5600 HOBBS ROAD
PADUCAH KY 420021410
Attn: W. DON SEABORG

SITE:
US DOE PADUCAH GAS DIFFUSION PLT
5600 HOBBS ROAD
PADUCAH KY 42001

Site ID #: KY8890008982
County: Mccracken
Notifications/Complaints System #:
NOV Tracking #: [redacted]

Date(s) Violation(s) Observed: [redacted]
OIG Case #:
Enforcement Case #:

This is to advise that you are in violation of the provisions cited below:

Statute/Regulation(No. 1): KRS 224 401 KAR 32:040

A description of the violation:
401 KAR 32:040 Sections 1 & 2 state: Section 1. Recordkeeping. (1) A generator shall keep a copy of each manifest signed in accordance with Section 4(1) of 401 KAR 32:020 in addition to the signed copy returned from the designated facility which received the waste. Both copies shall be retained on record for at least three (3) years from the date the waste was accepted by the initial transporter.
(2) A generator shall keep a copy of each annual report and exception report for a period of at least three (3) years from the due date of the report (March 1).
(3) A generator shall keep records of any test results, waste analyses, or other determinations made in accordance with Section 2 of 401 KAR 32:010 for at least three (3) years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.
(4) A generator shall keep a log showing all facility and equipment inspections as required in Section 6 of 401 KAR 35:020.
(5) The periods of retention referred to in this section are extended automatically during the course of any unresolved enforcement action regarding the regulated activity or as requested by the secretary.
Section 2. Annual Reporting. (1) A generator who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States shall prepare and submit a Hazardous Waste Annual Report, DEP Form 7072-91, incorporated by reference in Section 5 of this administrative regulation. The Hazardous Waste Annual Report shall be submitted to the cabinet no later than March 1 for the preceding calendar year.
(2) Any generator who treats, stores, or disposes of hazardous waste on-site shall submit the Hazardous Waste Annual Report covering those wastes in accordance with provisions of 401 KAR Chapters 34, 35, 36, and 38. Reporting for exports of hazardous waste outside the United States is not required on the annual report form but shall be accomplished by a separate annual report pursuant to 401 KAR 32:050.
(3) Generators shall provide a duplicate copy of the Hazardous Waste Annual Report to the county judge/executive of the county or chief executive officer of an urban county government within which the waste site or facility which will receive waste from the generator is located and to the county judge/executive of the county or chief executive officer of an urban-county government within which the generator is located in order that the county judge/executive or chief executive officer may make the report available to the county law enforcement and emergency services for emergency planning purposes.

At the beginning of the CEI on May 6, 2002 a copy of the inspection agenda was provided to Danny Guminski (Bechtel Jacobs), which included a list of the records I would be inspecting. On May 16, 2002 inspection of the requested records was done. The 1999-2001 Hazardous Waste Annual Reports provided for review were "working copies" and were not copies of the signed annual reports submitted to DWM.

The 1999 annual report indicated that there were 10 manifested hazardous waste shipments. Review of copies of manifests provided by the facility found only 3 manifests. The 2000 annual report indicated that there were 15 manifested hazardous waste shipments. Review of copies of manifests provided by the facility found 13 manifests. The 2001 annual report indicated that there were 4 manifested hazardous waste shipments. Review of copies of manifests provided by the facility found only 2 manifests.

There was not any evidence provided that the annual reports had been submitted to the McCracken Co. Judge/Executive.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Perform a detailed reconciliation of hazardous waste manifests and hazardous waste annual reports for the years 1999-2001. Include in the reconciliation document a listing describing the type of waste for all waste manifests (hazardous, non-hazardous, TSCA, etc.) generated from 1999-2001, sorted by manifest number. Submit to the Paducah Regional Office and the Division of Waste Management Hazardous Waste Branch.
To be completed by: 12/06/2002
Provide evidence that the 1999-2001 hazardous waste annual reports were submitted to the McCracken Co. Judge/Executive. Submit to the Paducah Regional Office and the Division of Waste Management Hazardous Waste Branch.
To be completed by: 12/06/2002

Statute/Regulation(No. 2): KRS 224 401 KAR 34:020 7

A description of the violation:
In accordance with the Hazardous Waste Facility Permit issued to this facility, 401 KAR 34:020 Section 7 is applicable and states, in part: (5) Training records on current personnel shall be kept until closure of the facility; training records on former employees shall be kept for at least three (3) years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

Training records/training program were reviewed at the Weskem office located at Kevil. The records were found to be generally complete for Weskem personnel; however, it appears that personnel other than employees of Weskem may be involved in hazardous waste operations and implementation of the contingency plan. The records for personnel other than Weskem were not available at the Weskem office, and it was unclear where such records would be located.

The facility does not have the required records in its possession. It appears that the various sub-contractors all maintain separate record keeping systems.

The required remedial measure(s), and date(s) to be completed by; are as follows:
The permittee shall make a determination of which personnel at this facility are required to be trained in accordance with 401 KAR 34:020 Section 7, regardless of the employee's employer, and maintain copies of the required training records in a central location.
To be completed by: 12/06/2002

Statute/Regulation(No. 3): KRS 224 401 KAR 32:040 1

A description of the violation:
401 KAR 32:040 Section 1 states: Recordkeeping. (1) A generator shall keep a copy of each manifest signed in accordance with Section 4(1) of 401 KAR 32:020 in addition to the signed copy returned from the designated facility which received the waste. Both copies shall be retained on record for at least three (3) years from the date the waste was accepted by the initial transporter.

401 KAR 32:100, Appendix on hazardous waste manifest and instructions, is also applicable.

During review of generator manifests it was noted that the required copies of the manifest document (original and generator copy) were mixed in with various other internal documents associated with the shipment, and that there were skips in the sequential numbering system. Facility personnel advised that the various sub-contractors contacted Weskem for sequential manifest numbers when waste was to be shipped, and that the sequential numbering system was utilized for all waste shipments (hazardous, PCB, low level radioactive). Each sub-contractor maintained their copies of manifests. I requested copies of all hazardous waste manifests for 1999-2002 (original, generator copy, and land disposal restriction notice) to be sent to my office by May 24, and descriptions of other manifests in order to evaluate the sequential numbering systems accuracy. Manifest numbers of hazardous waste manifests provided include:

- 00347 - 08/31/1999
- 00345 - 09/03/1999
- 00348 - 09/23/1999
- 00353 - 01/06/2000
- 00354 - 01/06/2000
- 00357 - 05/24/2000
- 00358 - 05/24/2000
- 00359 - 05/24/2000
- 00362 - 07/25/2000
- 00364 - 09/08/2000
- 00365 - 09/08/2000
- 00367 - 09/28/2000
- 00368 - 09/28/2000
- 00369 - 09/28/2000
- 00371 - 09/28/2000
- 00373 - 12/08/2000
- 00379 - 09/11/2001
- 00380 - 10/30/2001

The copies of the requested manifests are not complete. There is insufficient documentation to determine if the sequential numbering system is being followed; in fact, manifest # 00347 was shipped on 08/31/1999 and manifest # 00345 was shipped on 09/03/1999, which was 3 days after #00347 was shipped. There are also gaps in the manifest numbers that I am unable to reconcile with the documentation provided.

It is noted that manifest # 00379 does not have the correct EPA hazardous waste number in Item I, and does not have a waste handling code in Item K. Manifest # 00380 does not have a waste handling code in Item K.

The required remedial measure(s), and date(s) to be completed by; are as follows:

Provide documentation that a sequential numbering system is being used for hazardous waste manifests. Submit documentation to the Paducah Regional Office and the Division of Waste Management Hazardous Waste Branch.
To be completed by: 12/06/2002

Correct manifest # 00379 by placing the proper EPA hazardous waste number in Item I and the proper waste handling code in Item K. Correct manifest # 00380 by placing the proper waste handling code in Item K.
To be completed by: 12/06/2002

Provide an explanation of why manifest # 00345 was dated as being shipped after manifest # 00347. Submit documentation to the Paducah Regional Office and the Division of Waste Management Hazardous Waste Branch.
To be completed by: 12/06/2002

Statute/Regulation(No. 4): KRS 224 401 KAR 37:010 7

A description of the violation:

401 KAR 37:010 Section 7 requires that land disposal restriction notices have the manifest number listed that is associated with the waste shipment.

It was noted that the LDR notice associated with manifest # 00380 does not have the manifest number.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Correct the LDR notice associated with manifest # 00380 by placing the manifest number on the notice.
To be completed by: 12/06/2002

Statute/Regulation(No. 5): KRS 224 401 KAR 34:050 6

A description of the violation:
As was previously noted, the 1999-2001 Hazardous Waste Annual reports provided were not the signed copies submitted to DWM, and the number of manifested shipments of waste reported does not correspond with the number of hazardous waste manifests provided by the facility.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Perform a detailed reconciliation of hazardous waste manifests and hazardous waste annual reports for the years 1999-2001. Include in the reconciliation document a listing describing the type of waste for all waste manifests (hazardous, non-hazardous, TSCA, etc.) generated from 1999-2001, sorted by manifest number, and submit to the Paducah Regional Office and the Division of Waste Management Hazardous Waste Branch.
To be completed by: 12/06/2002

Statute/Regulation(No. 6): KRS 224 401 KAR 32:030 5(1)(B)

A description of the violation:
401 KAR 32:030 Section 5(1)(b) states: The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container;

Two mobile tanks and one drum in the 90 day storage area at C-746-S & T Landfills were noted to lack the accumulation date. The dates were added to the labels to correct the violation, which was confirmed later in the inspection.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Take appropriate measures to ensure that all containers of hazardous waste are in compliance with Kentucky hazardous waste regulations.
To be completed by: 12/06/2002

Statute/Regulation(No. 7): KRS 224 401 KAR 35:180 5

A description of the violation:
401 KAR 35:180 Section 5 states: Inspections. The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration of containers and the containment system caused by corrosion or other factors.

It was noted that there were several instances where inspections of the 90 day storage areas were not done every 7 days, which is the common interpretation of the regulatory requirement. A 7 day schedule is utilized for other inspections that the facility conducts.

It was also noted that the form being used to document the inspections of the 90 day areas appears to be designed for TSCA storage areas. The form needs to be modified/replaced with a form specific for 90 day RCRA waste storage area requirements.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Take appropriate measures to ensure that all storage areas are inspected weekly (i.e. every 7 days), and that the results of the inspections are documented properly.
To be completed by: 12/06/2002

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division Of Waste Management
Paducah Regional Office
4500 Clarks River Road
Paducah, Ky 420030823
270-898-8468 (8:00 AM TO 4:00 PM WEEKDAYS)
Gary Morgan, ENVIRONMENTAL INSPECTOR III

Issued By: _____ **Date:** 11/04/2002
Gary Morgan ENVIRONMENTAL INSPECTOR III

Issued By: _____ **Date:** 11/04/2002

How Delivered: Certified Mail **Certified #:** **cc:** Copies to File, DWM-Frankfort, OLS

Bechtel Jacobs Company LLC
Notice of Violations (NOV)

For 2003

Total Number of NOV for 2003 3

January 24, 2003 -- NOV

The extent of the violations observed is as follows:

1. Hazardous Waste Generator Reporting Requirements.

March 17, 2003 -- NOV

The extent of the violations observed is as follows:

2. KPDES permit violations of whole Effluent Toxicity limit in Outfall 001.

April 15, 2003 -- NOV

The extent of the violations observed is as follows:

3. Failure to pay Missouri annual registration renewal fee. The registration renewal fee is required from any generator whose registration status is active.

TO: Glen Galen
From: Danny Gumiński

Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.state.mo.us

U S DEPT OF ENERGY
[illegible] HOBBS RD (B)
WEST PADUCAH, KY 42086
EPA ID: KY8890008982 MO ID: 038874

JAN 27 AM10:34

CERTIFIED MAIL **NOTICE OF VIOLATION** January 24, 2003

RE: Hazardous Waste Generator Reporting Requirements

This is to notify you that as a registered hazardous waste generator in Missouri, you are in violation of the Missouri Hazardous Waste Management Law, because you have not submitted required reports to the Department, in violation of 40 CFR Part 262, Subpart D, as incorporated and modified by 10 CSR 25 5.262. As a registered generator of hazardous waste, you are obligated to comply with Missouri reporting requirements, including submission of manifest summary reports. As of the date of this letter, the Department of Natural Resources has not received manifest summary reports on your hazardous waste activity for the period July 1, 2001 to June 30, 2002.

If you complete these reports correctly and file them with the department within 30 days of your receipt of this letter, no further punitive action will be taken against your company for the situation noted above. If your cooperation is not forthcoming in accordance with that schedule, two punitive measures may be taken:

a) **All Missouri facilities which either treat, store, or dispose of hazardous waste from offsite, or which conduct recycling of offsite waste under a Missouri Resource Recovery Certificate, shall be informed that if they accept any hazardous waste from you before you have updated your registration information, they are subject to prosecution for a knowing violation of the Missouri Hazardous Waste Management Law and Regulations and appropriate enforcement and penalties shall be sought by the State.**

b) **Your company may be referred to the Attorney General's Office for a determination of whether pursuit of monetary or other penalties is appropriate.**

If you did not generate or ship hazardous waste during this period, please complete Part I of the "*Generator's Hazardous Waste Summary Report*" form and indicate "No waste" appropriately on the form. If your firm no longer generates waste, please send a written request on company letterhead to the department asking that your generator ID number be made inactive.

Upon receiving your manifest summary reports, the Hazardous Waste Program will calculate any fees and taxes due and a billing will be sent to you with an explanation of the calculations. If your hazardous waste generation activity has resulted in liability for any fees and taxes under 260.380, 260.475 or 260.479 RSMO, failure to pay those fees and taxes may also result in enforcement action. In addition to any fees and taxes due, certain penalties and interest are required by statute in situations where the generator has failed to pay hazardous waste fees and taxes.

If you have questions, or need to obtain a copy of the "*Generator's Hazardous Waste Summary Report*", please contact Mr. David Green of the Hazardous Waste Program at (573) 751-3204. If you need a report form and have internet access, you may download the form from the following address:

www.dnr.state.mo.us/oac/forms/780-1097.pdf

The report is in a PDF file format and requires "Acrobat Reader" to be able to successfully download it.

Please send all correspondence concerning this matter to the Missouri Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102.

Thank you for your prompt attention to this matter.

Sincerely,

HAZARDOUS WASTE PROGRAM

Betty Wyse
Acting Director

BW: dgj

Enclosure

HENRY C. LIST
SECRETARY

TO: Glen Golew

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
FRANKFORT OFFICE PARK
14 REILLY RD
FRANKFORT KY 40601

March 17, 2003

Certified No. 7002 2030 0002 3577 3580
Return Receipt Requested

Paducah Gaseous Diffusion Plant
Department of Energy
ATTN: Brian Bell
5600 Hobbs Road
Paducah, Kentucky 42002-1410

Re: DOE/BJC/PGDP
McCracken County, Kentucky
Case No. DOW 03137 (NOV # 8899)
KPDES No. KY0004049

Dear Mr. Bell:

DOE is in violation of KRS 224 401 KAR 5:065 1(1) as referenced in the attached Notice of Violation.

In order to avoid further enforcement action, comply with the remedial measures set forth in the attached Notice of Violation. Failure to comply subjects your facility to penalties as specified in KRS 224. Your cooperation and assistance in this matter is appreciated. If you have any questions, please contact Mark Vogel at (502) 564-3410.

Sincerely,

Phillip A. Bromall
Environmental Control Supervisor
Enforcement Branch
Division of Water

PAB/csa
Enclosure
c: Mark Vogel, KPDES Branch
Paducah Regional Office
Cathleen Adams, Enforcement Branch
KPDES File

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER

NOTICE OF VIOLATION

TO:
DEPARTMENT OF ENERGY
5600 HOBBS RD
PADUCAH KY 420021410
Attn:

SITE:
DOE/BJC/PGDP
5600 HOBBS
WEST PADUCAH KY 42086

Site ID #: KY0004049
County: Mccracken
Notifications/Complaints System #:
NOV Tracking #: 8899

Date(s) Violation(s) Observed: 10/01/2002
OIG Case #:
Enforcement Case #: 03137

This is to advise that you are in violation of the provisions cited below:

Statute/Regulation(No. 1): KRS 224 401 KAR 5:065 1(1)

A description of the violation:
KPDES permit violations of Whole Effulent Toxicity limit in Outfall 001.

The required remedial measure(s), and date(s) to be completed by; are as follows:
Submission of a Toxicity Reduction Evaluation (TRE) Plan and implementation schedule by March 31, 2002. In addition, monthly compliance monitoring must continue for the duration of the TRE and quarterly progress reports are due before the 28th day of the month following the end of the quarter. To be completed by: 03/31/2002

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division Of Water
Central Office
14 Reilly Road
Frankfort, Ky 40601
(502) 564-3410

Issued By: Cathleen Adams, Environmental Enforcement Specialist **Date:** 03/17/2003

Issued By: Cathleen Adams Environmental Enforcement Specialist **Date:** 03/17/2003
Mark Vogel

How Delivered: Certified Mail Certified #: 7002 2030 0002 3577 3580

cc: Paducah RO
KPDES Branch

DEP 4025

MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR AND LAND PROTECTION DIVISION

NOTICE OF VIOLATION

HAZARDOUS WASTE PROGRAM

April 15, 2003

US DEPT OF ENERGY
KY8890008982
038874

ANNUAL REGISTRATION RENEWAL FEE DETAIL INFORMATION

The annual registration renewal fee is authorized by Section 26.380 RSMo. This registration renewal fee is required from any generator whose registration status is active.

FOR THE PERIOD JANUARY 1, 2003 TO DECEMBER 31, 2003.....$100.00*

FORMULA

$100.00 PER CALENDAR YEAR

* If you do not wish to renew your registration, you must make that request in writing to the department. However, please note that generators who inactivate and who later in that same year request to re-activate will be subject to a $50.00 administrative reinstatement fee in addition to the $100.00 registration renewal fee.

* If you are located in Missouri and generate or accumulate regulated quantities of hazardous waste, you may not inactivate your registration. It is a violation of the Missouri Hazardous Waste Management Law to generate or accumulate regulated quantities of hazardous waste while your registration is inactive.

* If you are located in Missouri and do not generate or accumulate regulated quantities of hazardous waste, you may request in writing that your registration be made inactive.

* If you are located outside of Missouri and no longer ship hazardous waste into Missouri, you may request in writing that your registration be made inactive. However, before you can ship hazardous waste into Missouri again, you will be required to re-activate your registration and pay the registration fee.

* If you are registered as a Conditionally Exempt Small Quantity Generator but wish to inactivate your registration, please see the enclosed form for further instructions.

If the registration renewal fee is not paid or a written request to inactivate your registration is not received by the department within 15 days from the date of this invoice, your registration will be administratively inactivated. If you later wish to re-activate your registration, you may be subject to a $50.00 administrative reinstatement fee in addition to the $100.00 registration renewal fee.

Additionally, Missouri Treatment, Storage, or Disposal (TSD) facilities and hazardous waste transporters licensed to operate in Missouri are prohibited from accepting hazardous waste from any site that generates or accumulates enough hazardous waste to be regulated and is unregistered, or from a site that has an inactive registration. If you are located in Missouri, it is a violation of the Missouri Hazardous Waste Management Law to generate or accumulate reportable quantities of hazardous waste, as defined in 10 CSR 25-5.262, while your registration is inactive.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
AIR AND LAND PROTECTION DIVISION

NOTICE OF VIOLATION

HAZARDOUS WASTE FEES AND TAXES INVOICE

CERTIFIED MAIL

April 15, 2003

RECEIVED APR 21 2003

RICHARD KUEHN
US DEPT OF ENERGY
PO BOX 1410
PADUCAH, KY 42002

Dear RICHARD KUEHN:

As of April 15, 2003, the Department has not received your payment for the annual registration fee for the period of January 1, 2003 through December 31, 2003 and/or for the fees and/or taxes levied on the hazardous waste which was generated and/or disposed of in Missouri during the period July 1, 2001 through June 30, 2002. A summary of the amount(s) due is given at the end of this page.

This Notice of Violation is based on our review of the summary reports and payments received to date from your firm. At this time your company is in violation of the Missouri Hazardous Waste Management Regulations at 10 CSR 25-5.262 and 10 CSR 25-12.010.

Questions should be referred to Mary Williams at (573) 751-2919. Mail inquiries should be directed to the Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102

Check or money order is to be made payable to the Missouri Department of Natural Resources. Payment is due within 15 days from the date you receive this invoice. Accounts remaining unresolved will be referred to the Hazardous Waste Program Enforcement Section for further action. Send all payments and the section below to the following address:

MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
P.O. BOX 477
JEFFERSON CITY, MO 65102

PLEASE RETURN THIS SECTION WITH PAYMENT

US DEPT OF ENERGY
5600 HOBBS RD (B)
WEST PADUCAH, KY 42086

EPA #: KY8890008982
MO #: 038874

2002

SUMMARY OF HAZARDOUS WASTE FEES & TAXES

Category Tax Due.....	$0.00
$1.00 Per Ton Generator Fee Due.....	$0.00
$25.00 Per Ton Land Disposal Tax Due.....	$0.00
$100.00 Registration Renewal Fee.....	$100.00
TOTAL FEES AND/OR TAXES DUE.....	$100.00

Failure to return this section may result in your account not being credited properly.

HENRY C. LIST
SECRETARY

PAUL E. PATTON
GOVERNOR

COMMONWEALTH OF KENTUCKY
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
PADUCAH REGIONAL OFFICE
4500 CLARKS RIVER RD
PADUCAH KY 42003-0823
(270) 898-8468

September 11, 2003

SEP 15 AM10:55

Sept 30

U.S. Department of Energy
Paducah Site Office
Attn: Mr. W. Don Seaborg
PO Box 1410
Paducah, KY 42002-1410

RE: ID# 21-145-00003
~~AI# 3059~~

Dear Mr. Seaborg:

A review of the Division for Air Quality files for your facility has been completed and it has been determined that an Annual Compliance Certification for 2002 was not submitted by January 30, 2003, as required by regulation 401 KAR 52:020, Section 21. As a result of this non-compliance, the enclosed Notice of Violation is being issued at this time.

In order to correct the aforementioned violation, an Annual Compliance Certification for 2002 (form DEP 7007 CC) must be submitted to the DAQ Paducah Regional Office, DAQ Central Office, and EPA Region IV within 15 days of receipt of this correspondence. The certification form can be accessed through the NREPC website at http://www.environment.ky.gov.

If you have any questions, please contact me.

Sincerely,

Bill Clark

Bill Clark, Supervisor
Division for Air Quality

BC
enclosure

COMMONWEALTH OF KENTUCKY –
NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
Division for Air Quality

NOTICE OF VIOLATION

TO:

U.S. Department of Energy
Paducah Site Office
Attn: Mr. W. Don Seaborg
PO Box 1410
Paducah, KY 42002-1410

County: McCracken

This is to advise that you are in violation of the provisions cited below:

Requirement	Subject Item	Description of Non-Compliance
COMPLIANCE CERTIFICATION: The permittee shall certify compliance with the terms and conditions contained in this permit and shall submit compliance certification: Due annually, by the 30th of January to the Regional Office listed on the front of this permit. Compliance Certification Form (DEP 7007CC) (or an approved alternative) shall be used in accordance with the following requirements:a. Identification of each term or condition;b. The compliance status regarding each term or condition of the permit;c. Whether compliance was continuous or intermittent; andd. The method used for determining the compliance status for the source, currently and over the reporting period.e. For an emissions unit that was still under construction or which has not commenced operation at the end of the year covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the Regional Office listed on the front of this permit and the following addresses: U.S. EPA Region IV, Air Enforcement Branch, Atlanta Federal Center, 61 Forsyth St., Atlanta, GA 30303-8960: Division for Air Quality, Central Files, 803 Schenkel Lane, Frankfort, KY 40601, Division for Air Quality, Paducah Regional Office, 4500 Clarks river Road, Paducah, KY 42003. [401 KAR 52:020 Section 21]	AIOO0000003059	The source failed to submit the 2002 Annual Compliance Certification as required.

The required remedial measure(s), and date(s) to be completed by are as follows:

Remedial Measures
The source must complete and submit an Annual Compliance Certification for 2002 (form DEP 7007 CC) within 15 days of receipt of this notice. The certification must be submitted to the DAQ Paducah Regional Office, DAQ Central Office, and EPA Region IV.

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to $25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Division for Air Quality
Paducah Regional Office
4500 Clarks River Road
Paducah, KY 42003
270/898/8468 (8:00 AM – 4:30 PM)
Bill Clark, Regional Supervisor

Issued By: Bill Clark Date: September 11, 2003
Bill Clark, Regional Supervisor

Issued By: _____ Date:

How Delivered: Certified Mail Certified/Registered # 7000 1530 0003 2096 8402