

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
American Nuclear Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #8
Removal Progress
American Nuclear Corporation
C4N8
Clinton, TN
Latitude: 36.0433521 Longitude: -84.1837529

To: James Webster, USEPA R4 ERRB
Steve Sanders, TDEC

From: Carter Owens, OSC

Date: 3/14/2025

Reporting Period: 2/14/2025 thru 3/14/2025

1. Introduction

1.1 Background

Site Number:	C4N8	Contract Number:	
D.O. Number:		Action Memo Date:	9/12/2023
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	11/15/2023	Start Date:	11/15/2023
Demob Date:		Completion Date:	
CERCLIS ID:	TNN000420811	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time-Critical Removal

1.1.2 Site Description

The Site is a former radiological source manufacturing facility. Operations at the facility caused sitewide radiological contamination. The building remaining on-site contains a former machine shop, electronics lab, office, and a Hot Cell formerly used to load teletherapy sources. The Hot Cell is a shielded radiation containment chamber contained inside a second attached building on the east side of the facility. Key problem areas include the Hot Cell and the surrounding supporting building, drainage piping underneath the building, and contaminated soils.

1.1.2.1 Location

The Site is located at Blockhouse Valley Road, Clinton, Tennessee, 37716. The geographic coordinates of the Site are 36.043251 degrees north and 84.183476 degrees west. The Site is bordered by TVA and County-owned property. Melton Hill Lake and the Clinch River are approximately four tenths of a mile to the west, and Braden Branch Creek is approximately 50 yards to the south of the Site.

1.1.2.2 Description of Threat

Release of Cs-137 and Co-60 to the environment, as well as residual radiological contamination throughout the operations building containing the Hot Cell. Cs-137 and Co-60 are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and are listed as hazardous substances in 40 C.F.R § 302.4.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See Initial POLREP.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

The EPA has documented the presence of Cs-137 and Co-60 above site-specific RMLs within site soils and sediments. Gamma exposure readings inside the building indicate levels as high as 1500 times greater than background levels for the area. Cs-137 and Co-60 are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and are listed as hazardous substances in 40 C.F.R § 302.4.

2.1.2 Response Actions to Date

See Initial POLREP for previous actions

Response actions conducted during the reporting period of 2/14/2025 through 3/14/2025 consisted of the following items:

- Shipping of low-level soils and debris has resumed. As of March 10, 2025, a total of 66 additional intermodals have been shipped to WCS for disposal. This brings the project total between calendar year 2024 and 2025 to 324 intermodals. Volume estimates of remaining contaminated debris and soil on-site

predict an additional 226 intermodals will need to be shipped out in 2025 for a projected project total of 550 intermodals.

- Class C waste remains in the 15'x20' building covered with lead blankets for shielding. The RSO conducted additional surveys of the remaining material in the shed and segregated materials which could be decontaminated and shipped as low-level waste. The decontamination was conducted by health physics technicians under the guidance of the RSO. Class C volume reduction generates substantial cost savings to the project and to date volumes have been reduced by ~92% from original estimates.
- WCS conducted an audit of the Site on March 11, 2025. Per Texas Commission on Environmental Quality (TCEQ) requirements, WCS must conduct an audit and certify all facilities which plan to ship/dispose of Class C waste at their compact waste facility (CWF). The audit goes over all plans and procedures at the site for storing, handling, packaging, labeling, shipping, and tracking of Class C waste. This ensures any waste that is sent meets the Waste Acceptance Criteria (WAC) at the disposal facility. The procedures in place at the Site met the quality standards required by WCS and approval has been given to send Class C waste for disposal.
- Additional equipment no longer needed on-site is being deconned, screened for release by the RSO, and then returned to the rental company.
- The two ~6'x8' lead-cored steel doors from the Hot Cell are scheduled to be picked up by a local recycling company. The RSO has screened and sampled both doors at 25 locations each to ensure they meet the unconditional release standards established by the Nuclear Regulatory Commission (NRC). The results showed levels of ~2% of the maximum allowable limit set by the NRC. The RSO summarized the data and results in a formal release letter certifying the doors meet unconditional release limits for use without restrictions. The recycler will be given a copy of the letter to keep for their records.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

As of July 1980, the State of Tennessee had condemned and taken ownership of the ANC property. The State of Tennessee does not presently have resources or funds available to conduct a removal action at the Site, and referred the Site to the EPA's Superfund program on July 15, 2022.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
C&D Debris	Debris	170 tons			Disposed as Non-haz
Rad Waste	Soil	5,425 tons			WCS LLRW
Rad Waste	Debris	478 tons			WCS LLRW

2.2 Planning Section

2.2.1 Anticipated Activities

Load and ship radiologically contaminated soils and debris from the Site in 25-yard, lined intermodal containers.

2.2.1.1 Planned Response Activities

Load and ship radiologically contaminated soils and debris from the Site in 25-yard, lined intermodal containers.

2.2.1.2 Next Steps

Continue to load and ship radiologically contaminated soils and debris from the Site in 25-yard, lined intermodal containers. Materials with elevated activity levels and/or exposure rates have been safely stored on-site until the proper DOT shipping containers are delivered to the Site for disposal. Shipment of materials with elevated activity levels will occur during the first quarter of calendar year 2025.

2.2.2 Issues

N/A

..

2.3 Logistics Section

..

2.4 Finance Section

2.4.1 Narrative

An Action Memorandum authorizing EPA removal activities has been approved for the Site.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$11,000,000.00	\$10,011,258.19	\$988,741.81	8.99%
TAT/START	\$228,806.00	\$77,646.50	\$151,159.50	66.06%
Intramural Costs				
Total Site Costs	\$11,228,806.00	\$10,088,904.69	\$1,139,901.31	10.15%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the

government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

An ERRS Radiation Safety Officer sub-contractor is on-site during removal activities. The OSC continues to coordinate with the EPA Safety Officer and EPA-ERT Radiation Subject Matter Expert.

2.5.2 Liaison Officer

ERRS coordinates the receipt of equipment and supplies to the Site.

2.5.3 Information Officer

EPA's Public Information Officer coordinates community outreach and provides information to the public.

3. Participating Entities

3.1 Unified Command

EPA
TDEC

4. Personnel On Site

ERRS - Kemron
RSO - Solutient
EPA

5. Definition of Terms

ANC - American Nuclear Corporation
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act of 1980
Co- 60 - Cobalt 60
Cs-137 - Cesium 137
DOT - Department of Transportation
EPA - United States Environmental Protection Agency
LLRW - Low Level Radioactive Waste
RSO - Radiation Safety Officer
TVA - Tennessee Valley Authority
USAEC - United States Army Environmental Command
WCS - Waste Control Specialists

6. Additional sources of information

6.1 Internet location of additional information/report

..

7. Situational Reference Materials

..