

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #9  
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:** 5/16/2025

**Reporting Period:** 3/14/2025 through 5/16/2025

## 1. Introduction

### 1.1 Background

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

#### 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 3/14/2025 through 5/12/2025 consisted of the following items:

- Shipping of low-level soils and debris continues. As of May 16, 2025, a total of 174 additional intermodals have been shipped to WCS for disposal. This brings the project total between calendar year 2024 and 2025 to 432 intermodals. Volume estimates of remaining contaminated debris and soil on-site predict an

additional 119 intermodals will need to be shipped out in 2025 for a projected project total of 551 intermodals.

- Class C waste remains in the 15'x20' building covered with lead blankets for shielding. The RSO conducted all final surveys of the remaining material in the shed and began preparations for shipment of Class C waste. This includes volume measurements for shipping containers and activity/dose rate calculations to ensure consolidated waste falls within DOT shipping regulations. The RSO has also begun coordinating with the disposal facility and logistics company to arrange for transport and disposal to ensure all permitting requirements by WCS are met.
- Equipment on-site continues to go through needs assessments and items under-utilized get deconned, screened for release by the RSO and returned to their respective rental company.
- Confirmation sampling has begun in the excavation area. The area is roughly the footprint of the former building housing the Hot Cell and the mounded area, where vaults were buried, adjacent to the building. Samples will dictate whether additional excavation is needed to remove target areas or if excavation is no longer needed. Once areas are marked clear, they will be demarcated, administrative and engineering controls will be established to prevent recontamination of "cleared" areas, and the overall footprint of the site will slowly be reduced.

**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	6,998 tons			WCS LLRW
Rad Waste	Debris	778 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 by end of June 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
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$11,000,000.00	\$9,940,567.13	\$1,059,432.87	9.63%
TAT/START	\$228,806.00	\$77,646.50	\$151,159.50	66.06%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$11,228,806.00	\$10,018,213.63	\$1,210,592.37	10.78%

\* 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**

..