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**FEDERAL FACILITIES COMPLIANCE
AGREEMENT MONTHLY PROGRESS REPORT
PERIOD ENDING JANUARY 31, 1990**

02/15/90

WMCO/DOE-FMPC

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REPORT

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**Westinghouse
Materials Company
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WMCO:R:90-128

February 15, 1990

Mr. Ray Hansen
Acting FMPC Site Manager
U. S. Department of Energy
P. O. Box 398705
Cincinnati, Ohio 45239-8705

FEDERAL FACILITIES COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT

Dear Mr. Hansen:

This letter transmits the Federal Facilities Compliance Agreement (FFCA) Monthly Progress Report for the period January 1, 1990 through January 31, 1990. This report is being submitted to the DOE/FMPC for transmittal to the United States Environmental Protection Agency (USEPA).

Very truly yours,

W. A. Weinreich, Vice President
FMPC Restoration

WAW:CJB:sl

Attachment

- c: S. M. Beckman
- L. C. Bogar
- M. B. Boswell
- S. L. Bradley
- D. J. Brettschneider
- C. J. Brown
- J. Craig, DOE/FMPC
- L. Elikan
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- M. J. Galper
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- S. W. Heisler, Jr.
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FEDERAL FACILITIES COMPLIANCE AGREEMENT

MONTHLY PROGRESS REPORT

Period Ending January 31, 1990

INTRODUCTION

The Federal Facilities Compliance Agreement between the U. S. Department of Energy (DOE) and the U. S. Environmental Protection Agency (USEPA), signed July 18, 1986, requires that monthly reports be submitted to USEPA regarding progress made to meet the provisions of that agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period January 1 through January 31, 1990.

Progressive actions associated with the Federal Facilities Compliance Agreement (FFCA) continued during the month of January 1990 and are discussed below. Highlights of work performed in January include the following:

- o The Federal Facilities Compliance Agreement Monthly Progress Report for December 1989 was transmitted to the USEPA on January 19, 1990.
- o The RI/FS Monthly Technical Progress Report for December 1989 was transmitted to the USEPA on January 19, 1990.
- o The Third Annual Progress Report on the installation and replacement of emissions control devices was submitted to the DOE/FMPC on January 31, 1990.

WORK ASSIGNMENTS AND PROGRESS

Descriptions of ongoing work progress are presented in the following sections of this report. The status of both ongoing and completed work in support of the FFCA is summarized in Table 1 (attached). In this portion of the report and in Table 1, descriptions of actions are presented in a format consistent with that of the FFCA.

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA)

1. Initial Remedial Measures

Section C

K-65 Silo Project - WMCO prepared and transmitted to the DOE/FMPC a Statement of Work along with a requisition for the solicitation of proposals from independent contractors to resample the K-65 Silos residues. The Statement of Work requires the Contractor to evaluate the Vibracore sampling method and to modify the procedure if required, and perform the residue sampling. The Statement of Work also requires the contractor to concurrently identify and evaluate alternative sampling methods.

*Federal Facilities Compliance Agreement
Monthly Progress Report*

The K-65 Silo residue materials retrieved during the previous sampling were separated into subsamples for analysis. The subsamples were packaged and shipped to IT Corporation in Oak Ridge for analysis. Samples of the materials shipped to IT Corporation were retained for engineering properties analyses to be performed by IT personnel at the FMPC Laboratory. Engineering properties analyses were initiated on January 15 and completed on January 26, 1990.

2. Remedial Investigation/Feasibility Study (RI/FS)

Section E

Work Plan - As of January 31, 1990, the FMPC has not received comments from the USEPA on the Feasibility Study Work Plan. An addendum to the work plan for additional off-site wells was submitted to USEPA on December 15, 1989.

Section F

Groundwater Monitoring Program - Round 6 of the RI/FS Groundwater Sampling Program was completed in July, 1989. Round 5 of the RI/FS Groundwater Sampling Program was completed during the month of May, 1989. Analytical results for Round 5 have been received and are being validated. Issuance of Round 5 sampling results is expected in February 1990.

Installation of the 24 additional onsite wells specified in the first addendum to the RI/FS Work Plan Revision 3 was completed during April 1989. Installation of three of the ten additional offsite wells identified in the second addendum to the work plan was previously completed. The installation of seven remaining wells had been on hold pending receipt of the required license agreements. Of the seven remaining wells, four were installed in November and the remaining three which had been delayed by inclement weather in December were completed in January, 1990.

3. Reports and Record Keeping

Section B

The RI/FS Monthly Technical Progress Report for December 1989 was transmitted to USEPA on January 19, 1990.

CLEAN AIR ACT (CAA)

Section B

The Third Annual Progress Report on the installation and replacement of emission control devices was submitted to the DOE/FMPC on January 31, 1990.

*Federal Facilities Compliance Agreement
Monthly Progress Report*

Section D

Stack Tests - The stack testing schedule for 1989 was submitted to USEPA on June 16, 1989. The USEPA was informed by letter (DOE-1615-89) on September 15, 1989, that due to the current uncertainty concerning resumption of production activities, the 1989 FFCA Stack Testing Program was being deferred. Notification of future stack testing dates will be provided to the USEPA following the restart of production activities at the FMPC.

REPORTING REQUIREMENTS

Section B

The Federal Facilities Compliance Agreement Monthly Progress Report for December 1989 was submitted to the USEPA on January 19, 1990.

TABLE 1

**STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS**

**STATUS OF ACTIONS AS OF
January 31, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
CERCLA			
1.	INITIAL REMEDIAL MEASURES		
1.A	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Completed.
1.B	Develop and provide to EPA a plan and implementation schedule for the interim control of radon at the K-65 Silos.	30 days	Completed.
	Develop and provide to EPA a plan and implementation schedule for control of thorium compounds.		Completed.
1.C	Implement radon control plan approved by the EPA.	-----	No longer applicable. The K-65 Silo Interim Stabilization Project has been placed "on hold" indefinitely. WMCO recommended to the DOE/FMPC on September 14, 1989 (WMCO:R:89-349) future actions to be taken with respect to the K-65 Silos. WMCO's Management Plan and schedule of K-65 Silo activities were transmitted to the DOE/FMPC on October 16, 1989 (WMCO:R:89-401).
	Implement interim control plan for thorium compounds as approved by the USEPA.		Completed.
2.	REMEDIAL INVESTIGATION/FEASIBILITY STUDY		No action required.
2.A	RI/FS work is to be conducted in accordance with EPA guidelines.	N/A	
2.B	-- No Action Required --	-----	An addendum to the work plan for additional off-site wells was submitted to USEPA on December 15, 1989.
2.C	Provide to EPA the analysis results for laboratory certification -- SOW Task 7b.	45 days	Completed.
2.D	Submit a work plan to EPA for a complete sitewide RI/FS.	90 days	Completed.
2.E	Amend and submit revised RI/FS Work Plan to EPA if deficiencies are found.		As of January 31, 1990, FMPC has not received USEPA comments on the Feasibility Study Work Plan. The Facilities Testing Work Plan, an addendum that incorporated testing within and around the active FMPC production area, was submitted to USEPA November 18, 1988. An addendum for the installation of 24 additional onsite wells was transmitted to USEPA on December 20, 1988, and a second addendum for the installation of 10 additional offsite monitoring wells was transmitted December 22, 1988. During May, FMPC received comments from EPA on RI Addendum for Facilities and Suspect Areas. A response was prepared and submitted to EPA. A meeting was held in Chicago on June 8, 1989, with the EPAs, DOE, and WMCO; USEPA comments on the Facilities Testing Work Plan were addressed and resolved. The final draft was transmitted to USEPA on October 13, 1989.

TABLE 1

**STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS**

**STATUS OF ACTIONS AS OF
January 31, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		Installation of the 24 additional onsite wells specified in the first addendum to Rev. 3. of the RI/FS Work Plan was completed in April 1989. Installation of three of the 10 additional offsite wells identified in the second addendum to the Work Plan was completed. Of the seven remaining wells to be installed, four were completed in November. Installation of three wells scheduled for completion in December 1989 was delayed by inclement weather. These wells were completed in early January 1990. Round 6 of the RI/FS Groundwater Sampling Program was completed in July, 1989. Round 5 of the RI/FS groundwater sampling was completed in May. Analytical results for Round 5 have been received and are being validated. Issuance of Round 5 sampling results is expected in February 1990.
3.	REPORTS AND RECORD KEEPING		
3.B	Submit monthly RI/FS progress reports.	monthly	The RI/FS Monthly Progress Report for December 1989 was transmitted to the USEPA on January 19, 1990 (DOE-460-90).
CLEAN AIR ACT			
A.	-- No Action Required --	-----	
B.1	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
B.2	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
B.4	Establish schedule for the installation and replacement of emission control devices.	30 days	Completed.
	Prepare annual progress report on installation and replacement of emission control devices.	yearly	The Third Annual Progress Report on installation and replacement of emission control devices was submitted to the DOE/FMPC on January 31, 1990 (WMCO:R:90-092).
	Respond to USEPA comments on Air Monitoring Network (WDF-JAR dated 12-May-87).		Completed.
C.	Provide annual reports to EPA per 40 CFR 61.94(c).	yearly	The Annual Radionuclide Air Emission Report for CY-1988 was Forwarded to USEPA on June 1, 1989.

TABLE 1

**STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS**

**STATUS OF ACTIONS AS OF
January 31, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
D.1	Provide EPA with yearly stack-testing schedule.	yearly	The 1989 stack testing schedule was transmitted to USEPA on June 16, 1989. A letter (DOE-1615-89) was forwarded to the USEPA on September 15, 1989 indicating that due to the uncertainty concerning resumption of production at the FMPC, the 1989 FFCA Stack Testing Program was being deferred. Notification of future stack testing dates will be provided to the USEPA following the restart of production at the FMPC.
D.2	Provide EPA with stack-test results for stacks tested that year.	45 days after test	Stack testing is currently on hold pending resumption of manufacturing operations. When production resumes, the USEPA will be notified of future stack testing dates.
E.1	Maintain records of monthly particulate matter emissions.	-----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The eleventh quarterly report was transmitted to USEPA on August 18, 1989. The twelfth Quarterly Particulate Emissions Report for the period July 5, 1989 through October 2, 1989 was transmitted to the USEPA on November 27, 1989 (DOE-257-90).
F.	Provide EPA with a list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA with an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Completed.
A.1	Conduct a hazardous waste determination on all waste streams.	30 days	Complete. Determinations for known waste streams was completed on August 17, 1986 and submitted as a 30-day FFCA deliverable. Approximately 16,000 drums of suspect waste are to be sampled by September 30, 1990.
A.2	Commence a hazardous waste analysis program for materials in the landfill and going to the incinerator.	30 days	Complete. Operation of these units was discontinued and data on the waste which had gone to them was provided in a 30-day FFCA deliverable on August 17, 1986.
A.3	Update operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4	Include full name, signature, and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
A.5	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	The facility closure date is dependent upon closure schedules for individual TSD units as presented in Section I of the RCRA Part B Permit Application. Facility closure will be completed on the date the last TSD unit is closed.
A.6	Begin collection of all run-off from the active portions of Pit 4.	30 days	Completed.

TABLE I

**STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS**

**STATUS OF ACTIONS AS OF
January 31, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
A.7	Prepare and maintain an outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Completed. Revision 1 of the Groundwater Quality Assessment Program Plan was submitted to EPA on March 24, 1989 to fulfill comments received from the USEPA in 2/89.
B.1	Determine groundwater flow at the RCRA-regulated units.	90 days	Completed.
B.2	Provide a map showing the locations of all RCRA monitoring wells.	90 days	Completed.
B.3	Include design and construction specifications for all RCRA wells.	90 days	Completed.
B.4	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed.
C.1	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	Completed.
C.2	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	Completed. The post-closure plan for Waste Pit 4 was submitted as part of RCRA Part B Permit Application which was transmitted to OEPA on September 22, 1989 (DOE-1653-89).
RADIATION DISCHARGE INFORMATION			
A.	Respond to USEPA comments on Items A.1. - A.3. (WDF-JAR dated May 12, 1987).		Completed.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to USEPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	The eleventh quarterly report was transmitted to USEPA on August 18, 1989. The twelfth Quarterly Liquid Discharge Report for the period July through September 1989 was transmitted to the USEPA on November 27, 1989 (DOE-257-90).
REPORTING REQUIREMENTS			
B.	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	monthly	December's FFCA Monthly Progress Report was submitted to the USEPA on January 19, 1990 (DOE-459-90).