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**CONSOLIDATED CONSENT AGREEMENT/
FEDERAL FACILITY COMPLIANCE AGREEMENT
MONTHLY PROGRESS REPORT PERIOD ENDING
SEPTEMBER 30, 1990**

10/15/90

**WMCO/DOE-FMPC
50
REPORT**

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Introduction

The Consent Agreement (CA) under the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) Section 120 and 106(a) and the Federal Facility Compliance Agreement (FFCA) between the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (U.S. EPA), signed April 9, 1990 and July 18, 1986, respectively, require that monthly reports be submitted to the U.S. EPA regarding progress made to meet the provisions of those agreements. This report fulfills those requirements by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period September 1 through September 30, 1990 and planned actions for the period October 1 through October 31, 1990.

Work completed in September by the DOE includes the on-time submittal of the following:

- o The Revised Plant 2/3 Work Plan was transmitted to the U.S. EPA on September 19, 1990 for review and approval.
- o The Revised Plant 9 Work Plan was transmitted to the U.S. EPA on September 19, 1990 for review and approval.
- o The Initial Screening of Alternatives Report for Operable Unit 3 was submitted on schedule to the U.S. EPA on September 24, 1990.
- o The FMPC Open House, held on September 22, 1990, was a resounding success as an estimated 2,000 citizens were in attendance. A major exhibit on the RI/FS was displayed.

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WORK ASSIGNMENTS AND PROGRESS

Descriptions of work progress are presented in the following sections and/or enclosures to this report:

- o CA Section IX - Removal Actions
- o CA Section X - Remedial Investigation/Feasibility Study
- o Enclosure A - Wastewater flows and radionuclide concentrations under CA Section XXIII.B
- o Enclosure B - FFCA: Initial Remedial Measures and Other Open Actions
- o Enclosure C - Drilling/Boring Logs

CA Section IX. Removal Actions

This section provides an update of activities associated with the implementation of Removal Actions (RAs) at the FMPC during September 1990. Information is presented for each of the four removal actions identified in the Consent Agreement, including:

- o RA No. 1, Contaminated Water Beneath FMPC Buildings
- o RA No. 2, Waste Pit Area Runoff Control
- o RA No. 3, South Groundwater Contamination Plume
- o RA No. 4, Silos 1 and 2

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RA No. 1, Contaminated Water Beneath FMPC Buildings

Plant 6 - Groundwater pumping activities from the three (3) wells and the clarifier pit remained curtailed during September. The revised work plan was resubmitted to the U.S. EPA for review and approval in mid-August. The modifications to the work plan identified sampling, analytical and treatability testing and the design, procurement and construction actions necessary to restart the pumping. Actions associated with the collection, analysis and laboratory testing of potential treatment technologies are ongoing.

Plant 2/3 and Plant 9 - Comments on the July 17, 1990 version of the Plant 2/3 and Plant 9 Work Plans were received from the U.S. EPA on August 20, 1990. Revised work plans and responsiveness summaries for the Plant 9 and the Plant 2/3 Removal Actions were transmitted to the U.S. EPA and the Ohio EPA on September 19, 1990.

Activities in October will center on responding to the U.S. EPA comments on the Plant 6 Work Plan and on the planning and engineering necessary to implement the activities for the Plants 2/3, 6 and 9 Removal Actions. Preliminary testing of potential groundwater treatment technologies is complete and test results are being documented.

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Receive U.S. EPA comments/approval on revised Plant 6 Work Plan	Open	September 9, 1990
Issue revised Plant 2/3 Work Plan for U.S. EPA review/approval	Completed	September 19, 1990
Issue revised Plant 9 Work Plan for U.S. EPA review/approval	Completed	September 19, 1990
Receive U.S. EPA comments/approval on Plant 2/3 Work Plan	Open	October 19, 1990
Receive U.S. EPA comments/approval on Plant 9 Work Plan	Open	October 19, 1990

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RA No. 2, Waste Pit Area Runoff Control

The Waste Pit Area Runoff Control EE/CA was conditionally approved by the U.S. EPA and Ohio EPA on September 12, 1990. Efforts to finalize the work plan and the Site Specific Health and Safety Plan were initiated.

Work in October will center on the preparation of the Removal Action work plan and supporting documentation for the review and approval of the U.S. EPA and the Ohio EPA and design revisions based on the EE/CA as conditionally approved.

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Receive U.S. EPA comments/ approval on the revised Waste Pit Area Runoff Control EE/CA	Completed	September 12, 1990

RA No. 3, South Groundwater Contamination Plume

The revised EE/CA document was submitted to the U.S. EPA and the Ohio EPA on August 1, 1990. Phase I of the EE/CA document, Alternate Water Supply, was approved by the U.S. EPA on September 4, 1990. Phase II of the EE/CA document, Pump and Discharge, was disapproved by the U.S. EPA and is currently in informal dispute resolution. A proposed resolution was presented to the U.S. EPA on September 25, 1990. A formal letter summarizing the proposed resolution was transmitted to the U.S. EPA on September 28, 1990. Issuance of the responsiveness summaries to the U.S. EPA and Public comments, and the Removal Action Work Plan for Phase II of the revised South Plume EE/CA will be contingent upon resolution of the informal dispute.

The Work Plan for Phase I of the South Plume EE/CA will be submitted to the U.S. EPA on October 4, 1990. Work in October will center on the informal dispute resolution for Phase II of the South Plume EE/CA and on the development of the Removal Action Work Plan for Phase II of the South Plume EE/CA.

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RA No. 3, South Groundwater Contamination Plume (cont'd.)

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Issue responsiveness summary on public comments on South Plume EE/CA	Completed	July 18, 1990
Receive U.S. EPA approval on the revised EE/CA - Phase I	Completed	September 4, 1990
Receive the U.S. EPA comments on the revised EE/CA - Phase II	Completed	September 4, 1990
Issue responsiveness summary on U.S. EPA comments on South Plume EE/CA	Open-Informal Dispute Resolution	21 days after dispute is resolved
Issue revised South Plume EE/CA to the U.S. EPA	Open-Informal Dispute Resolution	TBD

RA No. 4, Silos 1 and 2

The EE/CA document for the Silos 1 and 2 Removal Action was submitted to the U.S. EPA, Ohio EPA, and the public on August 1, 1990 for review and comment. A public workshop to discuss the K-65 Silos EE/CA was conducted on August 16, 1990 with approximately 50 community members in attendance. The workshop provided the public with pertinent information regarding the EE/CA process and the alternative selection process. A formal request was submitted to the U.S. EPA to extend the public comment period to September 18, 1990. The extension was granted.

A technical meeting to discuss the U.S. EPA comments/approval on the K-65 Silos EE/CA is scheduled for October 4, 1990. Participants will include the U.S. EPA and the DOE. Work in October will center on the development of the Removal Action work plan and conceptual design activities necessary to support development of the work plan. The U.S. EPA requested that the Silos 1 and 2 work plan be submitted by October 4, 1990. The DOE submitted a formal request for a due date extension to November 5, 1990 for the work plan.

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RA No. 4, Silos 1 and 2 (cont'd.)

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Receive public comments on the K-65 Silos EE/CA	Completed	September 18, 1990
Receive U.S. EPA comments/approval on the K-65 Silos EE/CA	Completed (Actual)	August 31, 1990 (September 4, 1990)
Submit response to U.S. EPA comments/approval on the K-65 EE/CA	Open	October 4, 1990
Submit the Silos 1 and 2 Removal Action Work Plan to the U.S. EPA	Open	November 5, 1990

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CA Section X. Remedial Investigation and Feasibility Study (RI/FS)

This section provides an update on Operable Unit (OU) and RI/FS Community Relations and Field Activities for September 1990. Status information is presented for each of the five Operable Units (OUs) identified in the Consent Agreement. The five Operable Units are:

- o Operable Unit 1 (OU 1): Waste Pits 1-6, clearwell, burn pit;
- o Operable Unit 2 (OU 2): Other Waste Units - (fly ash piles, lime sludge ponds, solid waste landfill, south field area);
- o Operable Unit 3 (OU 3): Production area and suspect areas outside production area (excluding the D&D of equipment and facilities but including effluent line to Great Miami River);
- o Operable Unit 4 (OU 4): Silos 1, 2, 3, and 4;
- o Operable Unit 5 (OU 5): All environmental media (i.e., including groundwater, surface water, soils, air, flora, fauna, etc.);

RI/FS General Information

The FMPC Open House was held on September 22, 1990. An estimated 2,000 citizens attended. A major exhibit on the RI/FS was displayed.

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Operable Unit 1: Waste Pits

1.1 Remedial Investigation

a. Status of Work - Key Milestones

The draft Remedial Investigation (RI) Report was submitted for internal FMPC review on September 11, 1990. The draft Baseline Risk Assessment was also submitted as part of the RI Report.

A Revised RI Work Plan Addendum for additional sampling in the waste pit area was submitted to U.S. EPA on September 27, 1990. The work plan was revised to incorporate comments received from the U.S. EPA on August 27, 1990.

<u>Activity</u>	<u>Comments</u>
Issue draft Remedial Investigation Report to U.S. EPA by February 18, 1991	Open, On schedule 61% complete

b. Issue/Problems

Completion of vadose zone model is needed to augment the risk assessment process for Operable Unit 1.

c. Corrective Actions

Completion of additional sampling and analysis of the Waste pits is needed to support the development of a vadose zone model.

d. Planned Activities for October 1990

Revise RI Report to incorporate internal FMPC comments.

Initiate additional sampling of waste pit area upon receipt of U.S. EPA approval of the Revised Work Plan Addendum.

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Operable Unit 1: Waste Pits (cont.'d)

1.2 Feasibility Study

a. Status of Work - Key Milestones

On September 19, 1990, the DOE exercised the 20-day extension to revise the Operable Unit 1 Initial Screening of Alternatives Report. The extension is being utilized to comprehensively address U.S. EPA comments that the Initial Screening of Alternatives Report should follow more closely the U.S. EPA RI/FS Guidance document and to incorporate additional technical information. The new schedule for submittal of the revised document to the U.S. EPA is October 12, 1990.

The 20-day extension will not impact other FS submittals.

A presentation on the Detailed Analysis of Alternatives (Task 13) was made to participating organizations at the FMPC on September 27, 1990.

The following activities were completed or in progress during September 1990.

<u>Activity</u>	<u>Comment</u>
Issue draft Final Screening of Alternatives to the U.S. EPA on September 24, 1990.	Schedule extended 20 days. New submittal date to the U.S. EPA is October 12, 1990.
Present Detailed Analysis of Alternatives to U.S. EPA	Open, on schedule, 84% complete

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Operable Unit 1: Waste Pits (cont.'d)

1.2 Feasibility Study (cont'd.)

b. Issues/Problems

A major revision of the Detailed Analysis of Alternatives is required. Major issues include: 1) funding levels versus treatment schedule for Alternatives 4 and 5; 2) quantification of residual risk; 3) completion of vadose zone model to allow proper evaluation of Alternative 2; 4) and quantification of reduction in mobility, volume and toxicity.

c. Corrective Actions

None required.

d. Planned Activities for October 1990

Complete the draft Final Initial Screening of Alternatives for submittal to the U.S. EPA on October 12, 1990.

Complete the Detailed Analysis of Alternatives (Task 13).

Work on Selection of Preferred Alternative (Task 14).

Initiate work on draft FS.

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Operable Unit 2: Other Waste Units

2.1 Remedial Investigation

a. Status of Work - Key Milestones

Internal comments were received on the draft Remedial Investigation Report. Comments were also received on the Baseline Risk Assessment for Operable Unit 2 which is an appendix to the RI Report. Responses to comments are nearing completion and preparation of the revised report will be initiated shortly.

Activity

Comment

Issue draft RI Report to the U.S. EPA on February 11, 1991.

Open,
On schedule,
72% complete

b. Issues/Problems

An addendum to the RI work plan calling for additional sampling was transmitted to U.S. EPA on July 25, 1990. The U.S. EPA responded on August 27, 1990 with seventeen comments.

c. Corrective Actions

Respond to the U.S. EPA comments on the addendum to the RI Work Plan.

d. Planned Activities for October 1990

The draft RI Report will be revised to reflect internal review comments.

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Operable Unit 2: Other Waste Units

2.2 Feasibility Study

a. Status of Work - Key Milestones

Internal review comments on the Initial Screening of Alternatives Report were received and revisions to the document is nearing completion. Work on the Detailed Analysis of Alternatives continued in September and preparation of the draft Feasibility Study was initiated.

<u>Activity</u>	<u>Comment</u>
Issue draft Initial Screening of Alternatives Report to the U.S. EPA on October 29, 1990.	Open, On schedule, 97% complete
Present Detailed Analysis of Alternatives to the U.S. EPA.	Open, On schedule, 86% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for October 1990

The Initial Screening of Alternatives Report will be submitted to the U.S. EPA in October 1990. Presentation of the Detailed Analysis of Alternatives to participating FMPC organizations is planned for October 1990. Work on the draft FS will continue.

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Operable Unit 3: Production Area and Suspect Areas

3.1 Remedial Investigation

a. Status of Work - Key Milestones

Progress to-date is consistent with scheduled commitments. During September, tabulation and evaluation of perched groundwater data continued. Tabulation of analytical results from soil samples was initiated during September 1990. Risk assessment activities included development of calculational models for the exposure assessment and preparation of working drafts of the toxicity and exposure assessment chapters for the Baseline Risk Assessment Report.

Activity

Comment

Issue draft RI Report to the
U.S. EPA on April 8, 1991

Open,
On schedule,
37% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for October 1990

Continue preparation of the RI and the Baseline Risk Assessment Reports.

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Operable Unit 3: Production Area and Suspect Areas

3.2 Feasibility Study

a. Status of Work - Key Milestones

The Initial Screening of Alternatives Report was submitted on schedule to the U.S. EPA on September 24, 1990. The Detailed Analysis of Alternatives activities continued ahead of schedule. Recommendations for completion of a treatability study are being reviewed internally prior to submittal to the U.S. EPA.

<u>Activity</u>	<u>Comment</u>
Issue draft Initial Screening of Alternatives Report to the U.S. EPA	Complete, September 24, 1990
Present Detailed Analysis of Alternatives to the U.S. EPA	Open, On schedule, 61% complete

b. Issues/Problems

The U.S. EPA contends that currently active or standby facilities in the FMPC production area are within the scope of Operable Unit 3. It is the DOE position that the current scope of Operable Unit 3, which does not address the residual contamination within the active production facilities, is consistent with the terms of the Consent Agreement and meets the requirements of CERCLA.

c. Corrective Actions

The issue on the scope of Operable Unit 3 resulted in discussions with the U.S. EPA during September 1990. Additional discussions between DOE and the U.S. EPA are planned for October 1990.

d. Planned Activities for October 1990

Upon receipt, incorporate the U.S. EPA comments into the Initial Screening of Alternatives Report. Continue the development of the Detailed Analysis of Alternatives presentation.

**FMPC RI/IFS FFA TRACKING
OPERABLE UNIT 3 - PRODUCTION AND SUSPECT AREAS**

ACTIVITY	FY 1990												FY 1991												FY 1992												% COMPL		
	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	PLN	ACT	
RI REPORT/RISK ASSESSMENT *																																						37	37
TASK 12 * INITIAL SCREENING OF ALTs																																						100	100
TASK 13 † DETAILED ANALYSIS OF ALTs																																						53	61
TASK 14 - SELECTION OF PREFERRED ALT																																					0	0	
TASK 15/16 * ** FS REPORT																																					6	6	
TASK 17 * PROPOSED PLAN																																					0	0	
TASK 18 † RESPONSIVENESS SUMMARY																																					0	0	
TASK 19 - DRAFT RECORD OF DECISION																																					0	0	

LEGEND: PLANNED AS/IT MILESTONE - DEL TO EPA
 PROGRESS - DOE MILESTONE

NOTES: * - PRIMARY DOCUMENT
 ** DOE MAY EXTEND 20 DAYS
 † - SECONDARY DOCUMENT/PRESENTATION

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Operable Unit 4: Silos 1, 2, 3, and 4

4.1 Remedial Investigation

a. Status of Work - Key Milestones

The U.S. EPA comments on the draft RI Report were received on September 27, 1990. The U.S. EPA and the Ohio EPA comments on the preliminary Treatability Study Plan were received. Preparation of responses to the U.S. EPA and the Ohio EPA comments was initiated.

Activity

Comment

Preparation of the draft
final RI Report

Open, in progress

b. Issues/Problems

The draft RI was disapproved by the U.S. EPA primarily due to the lack of data from sampling efforts. Comments are to be resolved by October 27, 1990. Since the major issue concerns additional sampling data which cannot be resolved within the 30-day limit given to respond to the U.S. EPA comments and revise the RI Report, a revised schedule will be required for the submittal of the revised RI Report.

c. Corrective Actions

In cooperation with the U.S. EPA, develop a revised schedule for the submittal of the revised RI Report.

d. Planned Activities for October 1990

Prepare responses to specific U.S. EPA comments.

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Operable Unit 4: Silos 1, 2, 3, and 4

4.2 Feasibility Study

a. Status of Work - Key Milestones

The draft FS was submitted for internal review during September 1990.

The U.S. EPA comments and disapproval of the draft final Initial Screening of Alternatives Report were received on September 5, 1990. The report was placed in informal dispute resolution by the U.S. EPA. All issues cited by the U.S. EPA were resolved during September 1990 with the exception of the inclusion of 40CFR191, Subparts A and B, as Applicable or Relevant and Appropriate Requirements (ARARs). Informal dispute resolution on this issue is ongoing.

<u>Activity</u>	<u>Comment</u>
Issue draft FS to EPA on November 25, 1990	Open, behind schedule; 63% complete.

b. Issues/Problems

To date, no comments have been received from U.S. EPA on the Detailed Analysis of Alternatives presentation made on July 18, 1990.

Delays have resulted from ARARs determination and informal dispute resolution of the Initial Screening of Alternatives Report.

c. Corrective Actions

A request for a schedule extension in accordance with the provisions of the CA may be required pending finalization of the ARARs.

d. Planned Activities for October 1990

Resolve and incorporate internal comments on the draft Feasibility Study.

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Operable Unit 5: All Environmental Media

5.1 Remedial Investigation

a. Status of Work - Key Milestones

Progress to date is consistent with schedule commitments.

Activity

Comment

Issue draft RI Report
to the U.S. EPA on
April 8, 1991

Open,
On schedule,
46% complete

b. Issues/Problems

An issue is the cumulative impact of perched water and contaminated soils on the risk assessment.

c. Corrective Actions

None required.

d. Planned Activities for October 1990

Continue preparation of the draft RI Report.

5.2 Feasibility Study

a. Status of Work - Key Milestones

Comments from the U.S. EPA on the Operable Unit 5 draft Initial Screening of Alternatives Report were received on September 27, 1990. Responses to the U.S. EPA comments and preparation of the draft final Initial Screening of Alternatives Report were initiated with submittal to the U.S. EPA due on October 29, 1990.

Work is proceeding on the Detailed Analysis of Alternatives and comments received on the Initial Screening of Alternatives Report will be reflected in the FS.

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Operable Unit 5: All Environmental Media

5.2 Feasibility Study (cont'd.)

<u>Activity</u>	<u>Comment</u>
Prepare draft final Initial Screening of Alternatives Report for the U.S. EPA comments/approval	Open, On schedule, October 29, 1990
Prepare Detailed Analysis of Alternatives for presentation to the U.S. EPA	Open, On Schedule, 63% complete
b. Issues/Problems	
Although the comments from the U.S. EPA stated that the Initial Screening of Alternatives Report generally addressed all areas required by the National Contingency Plan (NCP), several deficiencies were noted and the report was disapproved.	
c. Corrective Actions	
Comments received from the U.S. EPA will be addressed and incorporated into the revised report.	
d. Planned Activities for October 1990	
Continue preparation of Detailed Analysis of Alternatives.	
Revise the Initial Screening of Alternatives Report to reflect the U.S. EPA comments.	
Incorporate the U.S. EPA comments, specifically the RCRA requirements, into the OU5 ARARs listing.	
Continue development of work plans for soil and groundwater treatability studies for OU5.	

ACTIVITY		FY 1990												FY 1991												FY 1992												% COMPL	
		O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	PLN	ACT
RI REPORT/RISK ASSESSMENT *																																						44	46
TASK 12 * INITIAL SCREENING OF ALTs																																					100	100	
TASK 13 † DETAILED ANALYSIS OF ALTs																																				60	63		
TASK 14 - SELECTION OF PREFERRED ALT																																				0	0		
TASK 15/16 * - ** FS REPORT																																				0	0		
TASK 17 * PROPOSED PLAN																																				0	0		
TASK 18 † RESPONSIVENESS SUMMARY																																				0	0		
TASK 19 - DRAFT RECORD OF DECISION																																				0	0		

LEGEND: PLANNED AS/IT MILESTONE DEL TO EPA PRIMARY DOCUMENT
 PROGRESS DOE MILESTONE DOE MAY EXTEND 20 DAYS
 SECONDARY DOCUMENT/PRESENTATION

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RI/FS Community Relations

6.1/6.2 Remedial Investigation/Feasibility Study

a. Status of Work

Meeting with community leaders

The DOE Site Manager conducted a meeting with local township officials, educators, and a representative of FRESH to discuss communications between DOE and the community. Several suggestions made were implemented in September during community events including:

- o An extended "poster station" session which precedes each community meeting.
- o Shorter presentations and a later starting time for the September 25, 1990 Community Meeting.
- o Present more information about the "good news" of cleanup activities at the FMPC during the DOE presentation at the September 25, 1990 Community Meeting and at the Open House.
- o Meet with Ross High School science teachers to explore opportunities for the DOE to be a resource to science programs.
- o Offering the FMPC Public Environmental Information Center to community groups for meetings when the center is open.

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RI/FS Community Relations

6.1/6.2 Remedial Investigation/Feasibility Study (cont'd.)

a. Status of Work (cont'd.)

FMPC Open House

An estimated 2,000 persons attended the FMPC Open House held on September 22, from 9 a.m. to 5 p.m. The Open House focused on cleanup. About 900 persons participated in the tour of the Production Area and the Waste Storage Area. A major exhibit about the RI/FS included:

- o An RI/FS overview, summaries of each of the five operable units and related removal actions, and a profile of the RI/FS-Environmental Impact Statement.
- o Five videotapes that described and gave the status of each operable unit.
- o Models of remediation process technologies.

Approximately 50 surveys were collected at the Open House. The surveys revealed strong public acceptance of the Open House and identified areas where participants felt more information was needed.

RI/FS Community Meeting

Approximately 50 community members attended the fall RI/FS Community Meeting held on September 25, 1990. The meeting included an extended poster station session which began at 6:30 p.m., in response to community comment. Technical presentations were made via videotapes at all poster stations. The poster stations included exhibits shown at the Open House -- the RI/FS technical display, as well as general displays from companies involved in remedial design at the FMPC. To accommodate meeting attendees, the FMPC Public Environmental Information Center remained open until 7 p.m. on September 25, 1990. The formal meeting lasted one and one-half hours in response to community comment.

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6.1/6.2 Remedial Investigation/Feasibility Study (cont'd.)

a. Status of Work (cont'd.)

RI/FS Community Meeting (cont'd.)

Videotape presentations on the five RI/FS operable units are now available for public viewing and short-term checkout at the FMPC Public Environmental Information Center. A copy of each presentation was given to the local citizens' environmental group, FRESH, at their request.

K-65 Removal Action Public Comment Period

The public comment period for the K-65 Engineering Evaluation and Cost Analysis (EE/CA) ended on September 18, 1990. Two written comments were received, and about five comments were made at the public meeting.

Community Interest and Information Polls

Two telephone polls were conducted in September, 1990. Topics included public knowledge and acceptance of the FMPC Public Environmental Information Center which opened in August, 1990, and public preference for days, times, and locations for future community meetings.

Presentations to Community Groups

DOE met with members of FRESH at the group's September meeting and answered questions about cleanup.

FMPC Cleanup Update

The fall 1990 issue of the FMPC Cleanup Update is being reviewed internally.

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RI/FS Community Relations

6.1/6.2 Remedial Investigation/Feasibility Study (cont'd.)

b/c. Problems/Corrective Actions

In response to comments made by the U.S. EPA and community members, notably FRESH, the date and location of the fall RI/FS Community Meeting were changed from September 22 (as part of the FMPC Open House) to September 25 and to an offsite location.

d. Planned Activities for October 1990

- o Prepare Responsiveness Summary for K-65 EE/CA by October 17, 1990.
- o Make September 25, 1990 Community Meeting transcript available in the FMPC Public Environmental Information Center and Reading Rooms.
- o Issue first FMPC Cleanup Update to the 900-name FMPC mailing list; see item in August Monthly Report.
- o Respond to information requests made at the FMPC Open House and the September 25, 1990 Community Meeting.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Field Activities

Surveying Activities

Surveying activities continued during September on establishing the horizontal and vertical coordinates for borings and installed monitoring wells. Surveying activities continued in September on establishing landowner boundaries in support of the Paddys Run South Seepage Investigation.

Monitoring Wells Installations -Task 3.2.1

Well installation continued for the RCRA Groundwater Quality Assessment Program in the Waste Storage Area. Two 1000-series wells, MW 1645 and MW 1646, were installed on the eastern boundary of Pit 4. One 2000-series well was installed downgradient of Pit 4, MW 2648. The one 4000-series well in this program was installed outside of the Waste Storage Area, MW 4011.

A 3000-series contingency monitoring well was installed following receipt of analytical data from a sample collected from MW 2032. Table 1 summarizes the monitoring well drilling program for September 1990. Boring logs can be found in Enclosure C.

TABLE 1: MONITORING WELL INSTALLATIONS

<u>Monitoring Well No.</u>	<u>Date Completed</u>	<u>Depth Drilled (Ft.)</u>	<u>Depth to Bottom of Casing (Ft.)</u>
1645	9-12-90	25.5	25.0
1646	9-09-90	25.5	25.0
2648	9-25-90	80.0	75.0
4011	9-13-90	193.0	182.0
3032	9-27-90	123.1	120.0

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Field Activities (cont'd.)

Monitoring Well Development - Task 3.2.1

During September, one monitoring well, MW 1643, was developed and sampled.

Water Sampling: Monitoring Wells - Task 3.2.4

During September, a total of five monitoring wells were sampled.

Production and Additional Suspect Areas Drilling Program - Task 3.7

The Production and Suspect Areas Drilling Program continued during September with 15 borings completed. Two borings were completed at the Pilot plant, 1258 and 1259. Thirteen borings were completed as part of the Sectors 1 and 4 HSL Soil Sampling Plan. Five borings, 1601-1605, were completed south of the maintenance building, and eight borings were completed on the north side of the maintenance building. According to plan, no piezometers were installed. Table 2 summarizes the Facility Testing Drilling Program for September 1990. Boring logs can be found in Enclosure C.

TABLE 2: FACILITY TESTING DRILLING PROGRAM

<u>Boring No.</u>	<u>Date Completed</u>	<u>Depth Drilled (-Ft.)</u>	<u>Piezometer Installed Yes/No</u>	<u>Sector No.</u>
1258	9-11-90	20.0	Yes	3
1259	9-08-90	20.0	Yes	3
1601	9-13-90	4.5	No	4
1602	9-11-90	5.5	No	4
1603	9-10-90	5.5	No	4
1604	9-09-90	5.5	No	4
1605	9-18-90	4.5	No	4
1584	9-25-90	10.0	No	4
1585	9-26-90	10.0	No	4
1586	9-26-90	10.0	No	4
1588	9-20-90	10.0	No	4
1589	9-23-90	10.0	No	4
1590	9-20-90	10.0	No	4
1591	9-23-90	10.0	No	4
1592	9-25-90	10.0	No	4

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Field Activities (cont'd.)

Production and Additional Suspect Areas Drilling Program - Task 3.7 (cont'd.)

Geophysical studies performed north of the FMPC Production Area revealed an area of disturbed soils. This location is consistent with historical photographic evidence of soil excavation and reports by former employees of a past burial operation. This operation was characterized by the former employees as a disposal vault. A records review and preparation of an investigation work plan are ongoing.

TABLE 3: PRODUCTION AND ADDITIONAL SUSPECT AREAS DRILLING PROGRAM

<u>Boring No.</u>	<u>Date Completed</u>	<u>Depth Drilled (Ft.)</u>	<u>Piezometer Installed Yes/No</u>	<u>Sector No.</u>
1285	8-26-90	20.0	No	4
1562	8-09-90	16.0	NA	4
1565	8-14-90	16.0	NA	4
1566	8-28-90	16.0	NA	4
1567	8-24-90	16.0	NA	4
1568	8-15-90	16.0	NA	4
1569	8-22-90	16.0	NA	4
1570	8-23-90	16.0	NA	4

Water Sampling: Facility Testing - Task 3.7.4

During September, a total of nine piezometers were sampled within the production area of the FMPC.

Water Level Measurements: Monitoring Wells and Piezometers

Water level measurements were completed on 204 monitoring wells and 163 piezometers contained in the RI/FS.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Field Activities (cont'd.)

K-65 Sampling Project

The necessary internal approval was received for modification of the sampling program to permit installation of the safety nets on the silo domes.

U.S. EPA and Ohio EPA comments were received and responses submitted on the K-65 Silo Sampling Plan. One issue remains on the holding time for organic analyses. Investigation into alternative laboratories capable of accepting high activity samples for CLP analysis are being investigated. Other alternatives, including on-property organic preparation (extraction), are being examined.

U.S. EPA comments were received on the K-65 berm and slant boring program. Comment responses and boring program modification are in preparation.

CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY

COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT

PERIOD ENDING SEPTEMBER 30, 1990

ENCLOSURE A

WASTEWATER FLOWS AND RADIONUCLIDE

CONCENTRATIONS UNDER CA SECTION XXIII.B

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Introduction

The accompanying Effluent Radiation Reports provide, in accordance with the requirements of Section XXIII.B of the Consent Agreement under CERCLA Section 120 and 106(a), data on the daily wastewater flows and radionuclide concentrations and loadings released to the Great Miami River and an estimate of runoff and radionuclide concentrations to Paddy's Run during September 1990.

Summary - September 1990

The total quantity of uranium discharged from the FMPC to the Great Miami River via Manhole 175 (Outfall 1I000004001) was 39.69 kilograms. The average uranium concentration for the previous twelve months was 0.80 mg/l. This is 89.9 percent of the Derived Concentration Guide (DOE Order 5400.5) for ingested water.

There was no discharge from the Stormwater Retention Basin (Outfall 1I000004002) to Paddy's Run via the Storm Sewer Outfall Ditch in September 1990. Based on 3.30 inches of rainfall in September 1990, the total quantity of uranium discharged to Paddy's Run from uncontrolled areas of the FMPC is estimated to be 14.85 kilograms.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Wastewater Flows and Radionuclide Concentrations

FACILITY: Feed Materials Production Center, U.S. Department of Energy
7400 Willey Road, P.O. Box 398704
Cincinnati, Ohio 45239 Hamilton
9002 M 9501 900212

LOCATION: 1I000004001; 001 Total Discharge **MONTH:** September 1990
Manhole 175 (Effluent to Great Miami River)

<u>Day</u>	<u>Flow (MGD)</u>	<u>Total Alpha (pCi/l)</u>	<u>Total Beta (pCi/l)</u>	<u>Total U (mg/l)</u>	<u>Total U (kgs)</u>	<u>Calculated Total U-238 (pCi/l) (1)</u>
1	0.948	243	225	0.58	2.08	196
2	1.012	338	135	0.70	2.68	236
3	0.675	356	523	0.60	1.53	203
4	0.447	315	135	0.54	0.91	182
5	0.657	293	261	0.58	1.44	196
6	0.648	261	135	0.36	0.88	122
7	0.649	230	347	0.34	0.83	115
8	0.593	212	153	0.42	0.94	142
9	0.547	252	135	0.50	1.03	169
10	0.475	126	158	0.46	0.83	155
11	0.594	270	135	0.54	1.21	182
12	0.717	171	275	0.54	1.46	182
13	0.656	279	212	0.50	1.24	169
14	0.486	365	149	0.66	1.21	223
15	0.646	270	104	0.54	1.32	182
16	0.746	216	86	0.42	1.19	142
17	0.498	257	95	0.32	0.60	108
18	0.533	216	135	0.38	0.77	128
19	0.518	176	153	0.36	0.71	122
20	0.526	207	135	0.34	0.68	115
21	0.182	54	167	0.10	0.07	34
22	0.734	401	509	0.64	1.78	216
23	0.648	486	550	0.70	1.72	236
24	0.590	459	383	0.82	1.83	277
25	0.702	523	261	0.60	1.59	203
26	0.688	482	248	0.88	2.29	297
27	0.708	302	333	0.60	1.61	203
28	0.690	505	351	0.82	2.14	277
29	0.591	626	613	1.04	2.33	351
30	0.471	302	167	0.44	0.78	149
<hr/>						
Total	18.575				39.69	

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Wastewater Flows and Radionuclide Concentrations (cont.)

FACILITY: Feed Materials Production Center

LOCATION: 001 Total Discharge

MONTH: September 1990

	<u>Flow (MGD)</u>	<u>Total Alpha (pCi/l)(2)</u>	<u>Total Beta (pCi/l)(2)</u>	<u>Total U (mg/l)(2)</u>	<u>Total U (kgs)</u>	<u>Calculated Total U-238 (pCi/l)(1)(2)</u>
Avg.	0.619	316	250	0.56	1.32	191
Max.	1.012	626	613	1.04	2.68	351
Min.	0.182	54	86	0.10	0.07	34

The average uranium concentration for the previous twelve months was 0.80 mg/l. This is 89.9 percent of the Derived Concentration Guide (DOE Order 5400.5) for ingested water.

- Comments: (1) The calculated total U-238 is based on a conversion factor of 337.84 applied to the measured value of total uranium.
- (2) Average values presented are flow-weighted.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

Wastewater Flows and Radionuclide Concentrations (cont.)

EFFLUENT RADIATION REPORT

FACILITY: Feed Materials Production Center, U.S. Department of Energy
7400 Willey Road, P.O. Box 398704
Cincinnati, Ohio 45239 Hamilton
9002 M 9501 900212

LOCATION: 1I000004002, 002 Discharge (Overflow) to Storm Sewer Outfall Ditch
Stormwater Retention Basin Spillway (Effluent to Paddy's Run)

MONTH: September 1990

There was no discharge to Paddy's Run from the Stormwater Retention Basin in September 1990.

Based on 3.30 inches of rainfall in September 1990, the uranium discharge to Paddy's Run from uncontrolled areas of the FMPC is estimated to be 14.85 kgs.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT
PERIOD ENDING SEPTEMBER 30, 1990**

**ENCLOSURE B
FFCA: INITIAL REMEDIAL MEASURES
AND OTHER OPEN ACTIONS**

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

INTRODUCTION

Enclosure B describes actions undertaken at the Feed Materials Production Center (FMPC) during the period September 1 through September 30, 1990 that are not covered by the reporting requirements of the Consent Agreement under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120 and 106(a).

WORK ASSIGNMENTS AND PROGRESS

Descriptions of ongoing work progress are presented in the following sections of this report. The status of ongoing work in support of the Federal Facility Compliance Agreement (FFCA) is summarized in Table 1 of Enclosure B. Completed work previously reported upon has been eliminated for brevity sake. 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 - Comments from the U.S. EPA on the K-65 Residue Sampling Plan were received on August 15, 1990. A revised sampling and Analysis Plan addressing the U.S. EPA comments has been prepared for internal review.

The work plan for the Treatability Testing of the K-65 materials was discussed with the U.S. EPA on September 26, 1990. Two open items which require closure prior to initiating Treatability Testing were reviewed in particular. A revised work plan was requested by the U.S. EPA. The revised work plan will address the tests that are necessary to screen the alternatives and will focus on chemical separation treatability.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

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

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

Status information on the Remedial Investigation/Feasibility Study (RI/FS) normally reported in this section is being provided separately in accordance with the requirements of Section X of the Consent Agreement under CERCLA Section 120 and 106(a).

3. Reports and Record Keeping

Section B

The RI/FS Monthly Technical Progress Report for August 1990 was transmitted to U.S. EPA on September 19, 1990 as an integral part of the Consolidated Consent Agreement/Federal Facility Compliance Agreement (CA/FFCA) Monthly Progress Report in accordance with requirements of Section X of the Consent Agreement.

CLEAN AIR ACT (CAA)

Section E

The fifteenth Quarterly Particulate Emissions Report for the period April 3, 1990 through July 3, 1990 was submitted to the U.S. EPA on August 15, 1990.

RADIATION DISCHARGE INFORMATION

Section A

The fifteenth Quarterly Liquid Discharge Report for the period April through June 1990 was submitted to the U.S. EPA on August 15, 1990.

**CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT**

Period Ending September 30, 1990

REPORTING REQUIREMENTS

Section B

The Federal Facilities Compliance Agreement Monthly Progress Report for August 1990 was transmitted to the U.S. EPA on September 19, 1990 as Enclosure B of the Consolidated Consent Agreement Federal Facility Compliance Agreement (CA/FFCA) Monthly Progress Report.

TABLE 1

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

**STATUS OF ACTIONS AS OF
SEPTEMBER 30, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
CERCLA			
1. INITIAL REMEDIAL MEASURES			
1.C	Implement radon control plan approved by the U.S. EPA.	-----	No longer applicable. Progress on actions to address radon emissions from the K-65 Silos are being reported separately under Section IX-Removal Actions of the Consent Agreement/FFCA Monthly Progress Report.
2. REMEDIAL INVESTIGATION/FEASIBILITY STUDY			
2.A	RI/FS work is to be conducted in accordance with the U.S. EPA guidelines.	N/A	No action required.
2.B	-- No Action Required --	-----	Status information on the RI/FS is being reported in accordance with the requirements of Section X of the Consent Agreement under CERCLA Section 120 and 106(a).
2.E	Amend and submit revised RI/FS Work Plan to U.S. EPA if deficiencies are found.		Status information on the RI/FS is being reported in accordance with the requirements of Section X of the Consent Agreement under CERCLA Section 120 and 106(a).
2.F	Implement tasks described in the approved RI/FS Work Plan.		Status information on the RI/FS is being reported in accordance with the requirements of Section X of the Consent Agreement under CERCLA Section 120 and 106(a).
3. REPORTS AND RECORD KEEPING			
3.B	Submit monthly RI/FS progress reports.	monthly	The RI/FS Monthly Progress Report for August 1990 was transmitted to the U.S. EPA on September 19, 1990 (DOE-1965-90).
CLEAN AIR ACT			
B.4	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 transmitted to the U.S. EPA on February 22, 1990 (DOE-617-90).
C.	Provide annual reports to U.S. EPA per 40 CFR 61.94(c).	yearly	The Annual NESHAP Compliance Report for CY 1989 was transmitted to the U.S. EPA on July 9, 1990 (DOE-1392-90).
D.1	Provide U.S. EPA with yearly stack-testing schedule.	yearly	The 1989 stack testing schedule was transmitted to U.S. EPA on June 16, 1989. A letter (DOE-1615-89) was transmitted to the U.S. EPA 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 U.S. EPA if and when a decision on the restart of facilities at the FMPC is made.

TABLE 1

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

**STATUS OF ACTIONS AS OF
SEPTEMBER 30, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
D.2	Provide U.S. EPA with stack-test results for stacks tested that year.	45 days	Stack testing is currently on hold pending resumption of manufacturing operations. Notification of future stack testing dates will be provided to the U.S. EPA if and when a decision on the restart of production activities at the FMPC is made.
E.1	Maintain records of monthly particulate matter emissions.	-----	Continuing.
E.2	Provide quarterly reports to U.S. EPA on these emissions.	quarterly	The fourteenth Quarterly Particulate Emissions Report was transmitted to the U.S. EPA on May 18, 1990. The fifteenth Quarterly Particulate Emissions Report for the period April 3, 1990 through July 3, 1990 was transmitted to the U.S. EPA on August 15, 1990 (DOE-1747-90).
RCRA			
A.1	Conduct a hazardous waste determination on all waste streams.	30 days	Pursuant to the amended Consent Decree, a RCRA waste evaluation will be conducted on all site materials by 10/92.
A.2	Commence a hazardous waste analysis program for materials in the landfill and going to the incinerator.	30 days	Complete. Operations 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. However, further review of both the waste streams and the potential of the units to be hazardous waste management units are being evaluated as actions required by the amended Consent Decree. Final results are due October 30, 1992.
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 most recently in Section 1 of the RCRA Part B Permit Application submitted to the U.S. EPA on September 22, 1989. Facility closure will be completed on the date the last TSD unit is closed.

TABLE 1

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

**STATUS OF ACTIONS AS OF
SEPTEMBER 30, 1990**

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
RADIATION DISCHARGE INFORMATION			
A.3	Report to U.S. EPA, Ohio EPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	The fourteenth Quarterly Liquid Discharge Report was transmitted to the U.S. EPA on May 18, 1990. The fifteenth Quarterly Liquid Discharge Report for the period April through June 1990 was transmitted to the U.S. EPA on August 15, 1990 (DOE-1747-90).
REPORTING REQUIREMENTS			
B.	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	monthly	August's FFCA Monthly Progress Report was transmitted to the U.S. EPA on September 19, 1990 (DOE-1965-90)