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**CONSOLIDATED CONSENT AGREEMENT/
FEDERAL FACILITY COMPLIANCE AGREEMENT
MONTHLY PROGRESS REPORT PERIOD ENDING
AUGUST 31, 1990**

09/17/90

**WMCO/DOE-FMPC
50
REPORT**

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

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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 August 1 through August 31, 1990 and planned actions for the period September 1 through September 30, 1990.

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

- o The Revised South Plume EE/CA was transmitted to the U.S. EPA on August 1, 1990 for review and approval.
- o The K-65 Silos EE/CA was transmitted to the U.S. EPA on August 1, 1990 for review and approval.
- o The revised Plant 6 Work Plan was transmitted to the U.S. EPA on August 10, 1990 for review and approval.
- o The revised Waste Pit Runoff Control EE/CA was transmitted to the U.S. EPA on August 10, 1990 for review and approval.
- o The revised Feasibility Study Work Plan was transmitted to the U.S. EPA on August 9, 1990 for review and approval.

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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 August 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 August. The appropriate solution to the Hazardous Substance List/Volatile Organic Compounds (HSL/VOC) contamination concerns was investigated and the removal action work plan was modified in accordance with the U.S. EPA comments received on July 11, 1990. The revised work plan was transmitted to the U. S. EPA for review and approval on August 10, 1990. 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 - The RA work plans for Plant 2/3 and Plant 9 were resubmitted on July 17, 1990 to the U.S. EPA for review. Additional U.S. EPA comments on the two work plans were received on August 20, 1990. The U.S. EPA disapproved the work plans as submitted and requested the DOE to submit responsiveness summaries and revised work plans to the U.S. EPA within thirty days incorporating their comments. Revised work plans for the Plant 9 and the Plant 2/3 Removal Actions are to be transmitted to the U.S. EPA and the Ohio EPA by September 19, 1990.

Activities in September will center on responding to the U.S. EPA comments on the Plant 9 and the Plant 2/3 Work Plans 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 ongoing.

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Issue revised Plant 6 Work Plan for U.S. EPA review/approval	Completed	August 10, 1990
Receive U.S. EPA comments/approval on Plant 2/3 Work Plan	Completed	August 20, 1990
Receive U.S. EPA comments/approval on Plant 9 Work Plan	Completed	August 20, 1990
Receive U.S. EPA comments/approval on revised Plant 6 Work Plan	Open	September 9, 1990

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RA No. 1, Contaminated Water Beneath FMPC Buildings

Plant 2/3 and Plant 9 (cont'd.)

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Issue revised Plant 2/3 Work Plan for U.S. EPA review/approval	Open On schedule	September 19, 1990
Issue revised Plant 9 Work Plan for U.S. EPA review/approval	Open On schedule	September 19, 1990

RA No. 2, Waste Pit Runoff Control

The U.S. EPA and public comments on the Waste Pit Runoff Control Removal Action EE/CA were received in July 1990. Activities in August centered on the development and transmittal of the responsiveness summaries to the U.S. EPA, Ohio EPA and public comments and the issuance of a revised EE/CA to the U.S. EPA. Upon receipt of the U.S. EPA comments/approval of the revised EE/CA, activities in September will center either on responding to the U.S. EPA comments or the development of the removal action work plan which will be due thirty days after receipt of the U.S. EPA approval of the EE/CA.

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Issue responsiveness summary on U.S. EPA comments on waste Pit Runoff Control EE/CA	Completed	August 10, 1990
Issue responsiveness summary on public comments on Waste Pit Runoff Control EE/CA	Completed	August 10, 1990
Issue revised Waste Pit Runoff Control EE/CA	Completed	August 10, 1990
Receive U.S. EPA comments/approval on the revised Waste Pit Runoff Control EE/CA	Open	September 9, 1990

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RA No. 3, South Groundwater Contamination Plume

The revised EE/CA document was submitted to the U.S. EPA and the Ohio Environmental Protection Agency (EPA) on August 1, 1990.

Work in September will center on the resolution of the U.S. EPA and the Ohio EPA final comments on the EE/CA and on the development of the removal action work plan for Phase I of the Removal Action.

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Issue responsiveness summary on U.S. EPA comments on South Plume EE/CA	Completed	August 1, 1990
Issue responsiveness summary on public comments on South Plume EE/CA	Completed	August 1, 1990
Issue revised South Plume EE/CA to the U.S. EPA	Completed	August 1, 1990
Receive U.S. EPA comments/approval on the revised EE/CA	Open	September 4, 1990
Issue responsiveness summary on U.S. EPA comments on South Plume EE/CA	Open On schedule	October 4, 1990
Issue responsiveness summary on public comments on South Plume EE/CA	Open On schedule	October 4, 1990
Issue revised South Plume EE/CA to the U.S. EPA	Open On schedule	October 4, 1990

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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. Copies of the following documents were distributed during the workshop:

<u>Document</u>	<u>Quantity</u>
K-65 EE/CA	66
UC K-65 Risk Assessment	24
Revised South Plume EE/CA	41
Revised Waste Pit EE/CA	46
South Plume EE/CA Responsiveness Summary	35
Waste Pit EE/CA Responsiveness Summary	81
FMPC Site Specific Plan	46
Operable Unit 1 Initial Screening of Alternatives Report	16

A technical meeting to discuss the K-65 Silos EE/CA was held on August 28, 1990 at the U.S. EPA Region V Headquarters. Participants included the U.S. EPA, Ohio EPA and DOE. Work in September will center on responding to the U.S. EPA and the Ohio EPA comments on the K-65 Silos EE/CA and on the development of the removal action work plan.

<u>KEY MILESTONES</u>	<u>STATUS</u>	<u>DUE DATE</u>
Issue K-65 Silos EE/CA to the U.S. EPA	Completed	August 1, 1990
Receive public comments on the K-65 Silos EE/CA	Completed	August 31, 1990
Receive U.S. EPA comments/approval on the K-65 Silos EE/CA	Open	August 31, 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 August 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 Feasibility Study (FS) Work Plan (August 1988) was revised to reflect U.S. EPA comments. The revised Feasibility Work Plan was issued to the U.S. EPA on August 9, 1990.

In response to the U.S. EPA request, DOE initiated activities to revise and update the RI/FS Quality Assurance Project Plan (QAPP). The revised QAPP is on schedule for issuance to the U.S. EPA on September 14, 1990.

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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 distributed for internal review on August 31, 1990.

Comments were received from the U.S. EPA on August 27, 1990 on the RI Work Plan Addendum for additional sampling in the Operable Unit 1 waste pit area. A response to the U.S. EPA comments is being prepared.

<u>Activity</u>	<u>Comments</u>
Issue Draft Remedial Investigation Report to U.S. EPA by February 18, 1991	Open, On schedule 40% complete

b. Issue/Problems

The well drilling team commenced subsurface sampling at a location south of the clearwell near the southwest corner of Waste Pit 1 on August 11, 1990. While field screening the samples taken from a depth of 4-1/2 to 6 feet, a Beta-Gamma reading of 30,000 Counts Per Minute (cpm) were detected. The Beta-Gamma count exceeded the site health and safety action level of 5000 cpm. Work was stopped pending further evaluation. Workers were properly attired in protective clothing and no one was contaminated. Following the field evaluations, the interval sampled was plugged with bentonite pellets. A small depression created by this sampling event was filled with cement on August 12, 1990.

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1.1 Remedial Investigation (cont.d)

c. **Corrective Actions**

It was concluded that the elevated beta-gamma reading was indicative of pit materials and that the drilling site should be relocated to an area beyond the pit boundary. The drilling location was relocated accordingly.

The circumstances were reviewed to ensure that in-place procedures were adequate. One change was made. Future borings and well sites in the waste pit area will be evaluated using historical photographs and maps to minimize the possibility of a recurrence.

d. **Planned Activities for September 1990**

Resolve internal review comments on the Draft Operable Unit 1 RI Report.

Revise the RI Work Plan Addendum for additional sampling in the Waste Pit area and resubmit to the U.S. EPA.

1.2 Feasibility Study

a. **Status of Work - Key Milestones**

Comments on the Draft Initial Screening of Alternatives Report (Task 12) were received from the U.S. EPA on August 23, 1990 and from the Ohio EPA on August 27, 1990. The comments are being addressed and a responsiveness summary will be submitted for internal review on September 17, 1990. The Draft Final Initial Screening of Alternatives will be submitted to U.S. EPA on September 24, 1990.

The Operable Unit 1 Applicable or Relevant and Appropriate Requirement (ARAR) tables are being revised to reflect the U.S. EPA and the Ohio EPA comments.

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

1.2 Feasibility Study (cont'd.)

a. Status of Work - Key Milestones (cont'd).

The following activities were completed or in progress during August 1990:

<u>Activity</u>	<u>Comment</u>
Issue Draft Final Initial Screening of Alternatives to the U.S. EPA on September 24, 1990.	Open, On schedule, 80% complete
Present the Detailed Analysis of Alternatives to the U.S. EPA	Open, On schedule, 77% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for September 1990

A dry run presentation of the Detailed Analysis of Alternatives (Task 13) is scheduled for September 27, 1990.

Complete the Draft Final Initial Screening of Alternatives and issue to the U.S. EPA on September 24, 1990.

Commence work on the Selection of Preferred Alternative (Task 14) presentation.

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Operable Unit 2: Other Waste Units

2.1 Remedial Investigation

a. Status of Work - Key Milestones

The Draft Remedial Investigation Report was submitted for internal review.

Activity

Comment

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

Open,
On schedule,
67% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for September 1990

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

2.2 Feasibility Study

a. Status of Work - Key Milestones

A revision of the Initial Screening of Alternatives Report (Task 12) was initiated with submittal to the U.S. EPA planned for September 1990. Work continued on the Detailed Analysis of Alternatives (Task 13) presentation.

A meeting was held with the U.S. EPA to discuss Operable Unit 2 ARARs on August 8, 1990. The ARAR list is being revised to reflect the results of the August 8, 1990 meeting.

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Operable Unit 2: Other Waste Units (cont'd.)

2.2 Feasibility Study (cont'd.)

a. Status of Work - Key Milestones (cont'd.)

<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, 93% complete
Present Detailed Analysis of Alternatives to the U.S. EPA.	Open, On schedule, 84% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for September 1990

Complete the Draft Initial Screening of Alternatives Report (Task 12) for submittal to the U.S. EPA. An internal dry-run of the Detailed Analysis of Alternatives Presentation (Task 13) is planned for September 1990.

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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 schedule commitments. Tabulation and evaluation of perched groundwater data continued during August 1990.

<u>Activity</u>	<u>Comment</u>
Issue Draft RI Report to the U.S. EPA on April 8, 1991.	Open, On schedule, 35% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for September 1990

Preparation of Chapter 4, "Nature and Extent of Contamination" of the RI Report will continue in September.

3.2 Feasibility Study

a. Status of Work - Key Milestones

Progress to date on the Draft Initial Screening of Alternatives Report is slightly ahead of schedule. The Detailed Analysis of Alternatives activities continued on schedule during August 1990. The Operable Unit 3 ARARs meeting between DOE and the U.S. EPA was conducted on August 24, 1990.

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Operable Unit 3: Production Area and Suspect Areas (cont'd.)

3.2 Feasibility Study (cont'd.)

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 active production facilities, is consistent with the terms of the Consent Agreement and meets the requirements of CERCLA.

c. Corrective Actions

The issue with respect to the scope of Operable Unit 3 is being reviewed by the DOE. Follow-up discussions are planned with the U.S. EPA in September 1990.

d. Planned Activities for September 1990

The Draft Initial Screening of Alternatives Report will be submitted to the U.S. EPA for review on September 24, 1990. Development of work plans for treatability testing will continue in September.

**FMPC RI/FS 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																																					28	35
TASK 12 : INITIAL SCREENING OF ALTs																																					85	83
TASK 13 : DETAILED ANALYSIS OF ALTs																																					35	57
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

NOTES:

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

4.1 Remedial Investigation

a. Status of Work - Key Milestones

The Draft Remedial Investigation (RI) Report was submitted to the U.S. EPA on August 27, 1990.

A draft Treatability Study Work Plan for Operable Unit 4 was submitted to the U.S. EPA for review and approval on August 6, 1990.

Activity

Comment

Issue Draft RI Report
to the U.S. EPA.

Complete,
August 27, 1990

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for September 1990

Upon receipt, incorporate the U.S. EPA comments into the Draft RI Report.

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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 final Initial Screening of Alternatives Report was issued to U.S. EPA on August 6, 1990. The report was revised to respond to U.S. EPA comments.

A follow-up meeting was held on August 7, 1990 with U.S. EPA in Chicago to discuss ARARs for Operable Unit 4. The DOE was informed by the U.S. EPA that the agency considers 40CFR191 to be a potential ARAR for the K-65 residues contained in Silos 1 and 2.

<u>Activity</u>	<u>Comment</u>
Issue draft final initial Screening of Alternatives Report	Complete August 6, 1990
Issue draft FS Report to the U.S. EPA on November 25, 1990.	Open, delayed; 51% complete.

b. Issues/Problems

An assessment of the impact of the potential adoption of 40CFR191 as an ARAR is being conducted. If 40CFR191 is adopted as an ARAR, a significant impact on the ongoing Feasibility Study is anticipated.

c. Corrective Actions

Resolution of the 40CFR191 issue is needed to facilitate the efficient completion of the FS Report.

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

4.2 Feasibility Study (cont'd.)

d. **Planned Activities for September 1990**

Preparation of the draft Feasibility Study (FS) Report for internal review will be completed in September 1990.

Upon receipt, incorporate the U.S. EPA and the Ohio EPA comments on the Detailed Analysis of Alternatives Presentation into the draft FS Report.

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Operable Unit 5: All Environmental Media

5.1 Remedial Investigation

a. Status of Work - Key Milestones

<u>Activity</u>	<u>Comment</u>
Issue Draft RI Report to the U.S. EPA on April 8, 1991.	Open, On schedule, 44% complete

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

d. Planned Activities for September 1990

Continue preparation on the Draft RI Report.

5.2 Feasibility Study

a. Status of Work - Key Milestones

The draft Initial Screening of Alternatives Report was transmitted to the U.S. EPA for review on August 27, 1990. Work continues on the Detailed Analysis of the Alternatives.

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Operable Unit 5: All Environmental Media

5.2 Feasibility Study (cont'd)

A listing of proposed ARARs for Operable Unit 5 was transmitted to U.S. EPA on July 25, 1990. A meeting with the U.S. EPA was held on July 27, 1990 to discuss the proposed ARARs. The final discussion of ARARs for Operable Unit 5 was deferred until the August 7, 1990 meeting. A preliminary list of ARARs resulted from the consensus reached during the August 7, 1990 meeting.

<u>Activity</u>	<u>Comment</u>
Issue draft Initial Screening of Alternatives Report to the U.S. EPA	Complete, August 27, 1990
Present Detailed Analysis of Alternatives to the U.S. EPA	Open, On schedule, 60% complete
b. Issues/Problems	
None to Report.	
c. Corrective Actions	
None required.	
d. Planned Activities for September 1990	
Continue preparation of Detailed Analysis of Alternatives.	
Incorporate U.S. EPA comments into proposed ARARs listing.	
Continue development of the Work Plans for Treatability Studies.	

**FMPC RI/FS FFA TRACKING
 OPERABLE UNIT 5 - ENVIRONMENTAL MEDIA**

ACTIVITY	FY 1990			FY 1991												FY 1992												% COMPL.	
	O	N	D	J	F	M	A	M	J	J	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	PLN
RI REPORT/RISK ASSESSMENT																												38	44
TASK 12 : INITIAL SCREENING OF ALTs																												100	100
TASK 13 : DETAILED ANALYSIS OF ALTs																												42	60
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 PROGRESS AS/IT MILESTONE DEL TO EPA

NOTES : * - PRIMARY DOCUMENT
 ** - DOE MAY EXTEND 30 DAYS
 + - SECONDARY DOCUMENT/PRESENTATION

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RI/FS Community Relations

6.1/6.2 Remedial Investigation

a. Status of Work - Key Milestones

Revised RI/FS Community Relations Plan

- o Submitted revised RI/FS Community Relations Plan to the U.S. EPA on August 10, 1990.

Administrative Record

On August 6, 1990, the Feed Materials Production Center new Public Environmental Information Center (PEIC) located at 10845 Hamilton-Cleves Road, Harrison, Ohio, was opened to the public. Administrative Record files from the Lane Public Library in Hamilton, Ohio and the FMPC Administration Building were consolidated at the new location. The PEIC has a small meeting room. The PEIC business hours are as follows:

M, Th 9 am - 8 pm;
T, W, F 9 am - 4:30 pm;
Sat 9 am - 1 pm

b. Issues/Problems

None to report.

c. Corrective Actions

None required.

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RI/FS Community Relations (cont'd.)

6.1/6.2 Remedial Investigation (cont'd.)

d. **Planned Activities for September 1990**

Participate in the FMPC Open House on September 22, 1990.

Hold RI/FS Community Meeting on September 25, 1990.

Poll community residents regarding the acceptance of the location and business hours of the FMPC Public Environmental Information Center.

Poll community residents regarding their preferences for future community meetings with respect to meeting days, times and locations.

Arrange meeting between the DOE Site Manager and community leaders.

Finalize FMPC Cleanup Update

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Field Activities

Surveying Activities

Surveying activities continued during August on establishing the horizontal and vertical coordinates for borings and installed monitoring wells. Surveying activities were initiated in August to establish landowner boundaries in support of the Paddy Run South Seepage Investigation.

Monitoring Wells Installations -Task 3.2.1

Cable-tool installation was initiated in August for the eight (8) additional monitoring wells being installed in the Waste Storage Area. The eight wells being installed will be used to support the RI/FS and the RCRA Groundwater Assessment Program. Two 1000-series wells were installed on the west side of Pit 4. Table 1 summarizes the monitoring well drilling status for August 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>
1643	8-24-90	25.5	25.5
1644	8-28-90	26.0	25.0

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Field Activities (cont'd.)

Monitoring Well Development - Task 3.2.1

During August, five monitoring wells were developed: Wells 2396, 3390, 3396, 2397, and 2388. The wells were sampled after development for full Radiological and General Water Quality parameters. Table 2 summarizes the wells developed during August.

TABLE 2: MONITORING WELL DEVELOPMENT

<u>Monitoring Well No.</u>	<u>Date Started</u>	<u>Date Completed</u>
2396	8-02-90	8-07-90
3390	8-12-90	8-15-90
3396	8-09-90	8-11-90
2397	8-16-90	8-23-90
2388	8-25-90	8-28-90

Water Sampling: Monitoring Wells - Task 3.2.4

During August, a total of 11 monitoring wells were sampled, five of which were sampled after being developed.

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Period Ending August 31, 1990

Field Activities (cont'd.)

Production and Additional Suspect Areas Drilling Program - Task 3.7

The Production and Additional Suspect Areas Drilling Program continued during August with eight (8) borings completed. Boring 1285 was drilled and sampled in Building 69 (Decontamination Building) and no water was encountered. This concluded the subsurface soil characterization of Building 69. Sectors 1 and 4 HSL soil sampling was started in August. Seven borings were completed according to the plan for the Plant 9 (S.E. corner) sump area. No significant groundwater was encountered during the drilling operation for these borings. Therefore, no piezometers were set. Table 3 summarizes the Production and Additional Suspect Areas Drilling Program for August 1990. Boring logs can be found in Enclosure C.

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 August, a total of 33 piezometers were sampled within the production area.

CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT

Period Ending August 31, 1990

Field Activities (cont'd.)

Water Level Measurements: Monitoring Wells and Piezometers

Water level measurements were completed for 212 monitoring wells and 183 piezometers contained in the RI/FS.

K-65 Sampling Program

The U.S. EPA comments on the K-65 residue sampling plan were received on August 15, 1990. Responses to the U.S. EPA comments are being prepared for submittal to the U.S. EPA on September 14, 1990.

The U.S. EPA comments on the K-65 subsoils and slant boring programs were received on August 27, 1990. Responses to the U.S. EPA comments are being prepared for submittal to the U.S. EPA on September 26, 1990.

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

PERIOD ENDING AUGUST 31, 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 August 31, 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 August 1990.

Summary - August 1990

The total quantity of uranium discharged from the FMPC to the Great Miami River via Manhole 175 (Outfall 1I000004001) was 28.05 kilograms. The average uranium concentration for the previous twelve months was 0.78 mg/l. This is 87.6 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. Based on 3.40 inches of rainfall in August, 1990, the total quantity of uranium discharged to Paddy's Run from uncontrolled areas of the FMPC is estimated to be 15.30 kilograms.

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

Period Ending August 31, 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
Manhole 175 (Effluent to Great Miami River)

MONTH: August 1990

<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	0.240	477	203	0.62	0.56	209
2	0.312	356	144	0.58	0.68	196
3	0.361	387	216	0.52	0.71	176
4	0.289	383	221	0.66	0.72	223
5	0.253	428	333	0.58	0.56	196
6	0.247	577	392	1.12	1.05	378
7	0.244	577	243	1.00	0.92	338
8	0.453	432	320	0.74	1.27	250
9	0.155	387	198	0.60	0.35	203
10	0.251	414	288	0.58	0.55	196
11	0.435	302	257	0.64	1.05	216
12	0.601	162	135	0.32	0.73	108
13	0.564	608	167	0.74	1.58	250
14	0.578	324	320	0.46	1.01	155
15	0.301	306	248	0.40	0.46	135
16	0.326	284	261	0.54	0.67	182
17	0.211	315	135	0.54	0.43	182
18	0.282	441	396	0.80	0.85	270
19	0.253	486	459	0.84	0.80	284
20	0.239	459	482	1.02	0.92	345
21	0.333	189	347	0.24	0.30	81
22	0.272	293	306	0.42	0.43	142
23	0.439	378	500	0.46	0.76	155
24	0.513	275	414	0.30	0.58	101
25	0.585	261	171	0.46	1.02	155
26	0.519	324	135	0.66	1.30	223
27	0.519	324	162	0.52	1.02	176
28	0.560	275	338	0.40	0.85	135
29	0.406	545	505	0.90	1.38	304
30	1.335	230	333	0.48	2.42	162
31	1.034	293	167	0.54	2.11	182
<u>Total</u>	13.110				28.05	

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

Period Ending August 31, 1990

Wastewater Flows and Radionuclide Concentrations (cont.)

FACILITY: Feed Materials Production Center

LOCATION: 001 Total Discharge

MONTH: August 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.	0.423	345	276	0.57	0.90	191
Max.	1.335	608	505	1.12	2.42	378
Min.	0.155	162	135	0.24	0.30	81

The average uranium concentration for the previous twelve months was 0.78 mg/l. This is 87.6 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 August 31, 1990

Wastewater Flows and Radionuclide Concentrations (cont.)

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: August 1990

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

Based on 3.40 inches of rainfall in August, 1990, the uranium discharge to Paddy's Run from uncontrolled areas of the FMPC is estimated to be 15.30 kgs.

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

PERIOD ENDING AUGUST 31, 1990

ENCLOSURE B

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

CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT

Period Ending August 31, 1990

INTRODUCTION

Enclosure B describes actions undertaken at the Feed Materials Production Center (FMPC) during the period August 1 through August 31, 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 both ongoing and completed work in support of the Federal Facility Compliance Agreement (FFCA) is summarized in Table 1 of Enclosure B. 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. Responses to the comments are being prepared for submittal to the U.S. EPA on September 14, 1990.

Comments on the K-65 subsoils and plant boring programs were received from the U.S. EPA on August 27, 1990. Responses to the comments are being prepared for submittal to the U.S. EPA on September 26, 1990.

The work plan for the Treatability Testing of the K-65 materials was submitted to the U.S. EPA and the Ohio EPA in August for review and approval.

CONSOLIDATED CONSENT AGREEMENT/FEDERAL FACILITY
COMPLIANCE AGREEMENT MONTHLY PROGRESS REPORT

Period Ending August 31, 1990

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

1. Initial Remedial Measures (cont'd.)

Section C

K-65 Silo Project (cont'd.)

System integrity checks were performed on the Radon Treatment System (RTS) to ensure that the cracked PVC pipeline had been repaired and that the remainder of the RTS had not been damaged. Pressure testing of the RTS in accordance with the criteria included in the approved work package was conducted. Radiological measurements were made during the operation of the RTS for the removal of any residual radon in the system. Additional pressure testing will be conducted to support the radiological measurements and visual inspection that have confirmed the successful repair of the RTS.

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 July 1990 was transmitted to U.S. EPA on August 17, 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.

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

Period Ending August 31, 1990

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

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.

REPORTING REQUIREMENTS

Section B

The Federal Facilities Compliance Agreement Monthly Progress Report for July 1990 was transmitted to the U.S. EPA on August 17, 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
 AUGUST 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 U.S. EPA a plan and implementation schedule for the interim control of radon at the K-65 Silos.	30 days	Completed.
	Develop and provide to U.S. EPA a plan and implementation schedule for control of thorium compounds.		Completed.
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.
	Implement interim control plan for thorium compounds as approved by the U.S. EPA.		Completed.
2.	REMEDIAL INVESTIGATION/FEASIBILITY STUDY		No action required.
2.A	RI/FS work is to be conducted in accordance with the U.S. EPA guidelines.	N/A	
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.C	Provide to U.S. EPA the analysis results for Laboratory certification -- SOW Task 7b.	45 days	Completed.
2.D	Submit a work plan to U.S. EPA for a complete sitewide RI/FS.	90 days	Completed.
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).

TABLE 1

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

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

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
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 July 1990 was transmitted to the U.S. EPA on August 17, 1990 (DOE-1740-90).
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.
	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 transmitted to the U.S. EPA on February 22, 1990 (DOE-617-90).
	Respond to U.S. EPA comments on Air Monitoring Network (WDF-JAR dated 12-May-87).		Completed.
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).

TABLE 1

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

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

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
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 production at the FMPC is made.
D.2	Provide U.S. 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. 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).
	Provide U.S. EPA with a list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide U.S. 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	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.

TABLE 1

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

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

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
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 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.
A.6	Begin collection of all run-off from the active portions of Pit 4.	30 days	Completed.
A.7	Prepare and maintain an outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to U.S. EPA for approval a detailed groundwater monitoring plan.	90 days	Completed. Revision 1 of the Groundwater Quality Assessment Program Plan was submitted to U.S. EPA on March 24, 1989 to fulfill comments received from the U.S. EPA 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.
	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 Ohio EPA on September 22, 1989 (DOE-1653-89).

TABLE 1

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

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

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY90 STATUS
RADIATION DISCHARGE INFORMATION			
A.	Respond to U.S. EPA comments on Items A.1. - A.3. (WDF-JAR dated May 12, 1987).	Completed.	
A.1	Provide U.S. EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide U.S. EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
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	July's FFCA Monthly Progress Report was transmitted to the U.S. EPA on August 17, 1990 (DOE-1740-90).