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**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING APRIL 30, 1987**

XX/XX/XX

**8
ENCLOSURE**

SUMMARY

Work to be performed under the terms of the compliance agreement has continued during the period. The Characterization Investigation Study (CIS) to support a sitewide Environmental Impact Statement (EIS) has continued and quarterly reports of particulate emissions and liquid discharge sampling results have been prepared and transmitted to the U.S. Environmental Protection Agency (USEPA).

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (DOE) and the U. S. EPA signed on July 18, 1986, monthly reports are to be provided by the DOE to the EPA with regard to the progress made to meet the provisions stipulated by the agreement. This report fulfills that requirement by description of the various actions undertaken at the Feed Materials Production Center (FMPC) during the period of April 1 through April 30, 1987.

WORK ASSIGNMENTS AND PROGRESS

The work that has been assigned and is currently being performed is summarized in Table 1. Additional description of the work being done and attendant progress is given in the following paragraphs that are referenced to the pertinent sections of the Compliance Agreement.

° Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

Section 1.A

Although some comment has been given by EPA concerning the adequacy of the DOE treatment for this section, additional comments are anticipated by EPA contractors. Revision of the section will await receipt of the added commentary.

Section 1.B

This section was amended per EPA commentary. The revised section was transmitted to EPA on January 23, 1987.

Section 2.C

Work on this section is complete.

Section 2.D

The site-wide RI/FS Work Plan was transmitted to U. S. EPA December 19, 1986.

Task 1 - "Description of Current Situation" and supporting documents for the RI/FS Workplan were transmitted to U.S. EPA on January 30, 1987.

A recently received report entitled "The History of Paddy's Run and Surrounding Areas" cites a relocation of the stream and a listing of the waste pit areas. Based upon this information, revisions will be required for Task 1 and possibly for the sampling plan provided as part of Task 2. Recommended revisions to the work plan will be incorporated during resolution of U.S. EPA comments on the January 30, 1987 submittal.

On April 23, 1987, a teleconference was conducted with Steve Clough of U.S. EPA, Graham Mitchell of Ohio EPA, and Rick Collier and Bob Conner of the FMPC. Items discussed included the type of well casings to be utilized at the FMPC; well placements and the use of historical well monitoring data to support the RI/FS. Preliminary agreements were reached on the above items. FMPC personnel agreed to provide a letter to U.S. EPA describing drilling techniques and materials of construction to be used at the FMPC. The letter will also confirm proposed well placements based on data obtained in the waste storage area to date. Following issue of this letter, the FMPC plans to proceed with the installation of those wells identified in the RI/FS work plan. Near term installation of these wells is required to support the data requirements of the FMPC Environmental Impact Statement.

Data collection in support of the sitewide Environmental Impact Statement and the Remedial Investigation/Feasibility Study has continued during the period. The current status of the study is as follows:

- ° Sampling of contents of Pits 1, 2, 3, 4, 5, 6 and lime sludge ponds complete. Sampling ongoing in burn pit, sanitary landfill and fly ash pile.
- ° Radiological measurement program in waste storage area is 99% complete.
- ° Composite samples from waste storage facilities undergoing chemical analysis at WESTON Analytical and radiological analysis at TMA Eberline.
- ° A gamma spectrographic system is in operation in an on-site trailer. Collected soil samples from the waste storage area are undergoing analysis in the on-site lab for the presence of gamma emitting radionuclides.
- ° Personnel are being mobilized in order to proceed with seven tasks in parallel with the EPA review of the work plan. A letter will be issued to the U.S. EPA

during May identifying those tasks which the FMPC will be performing in the near term.

° Clean Air Act (CAA)

Section B - Items 1 through 4

Work on this section is complete.

Section D.1

An annual stack testing schedule was developed and transmitted to EPA on December 12, 1986. A response to EPA review comments on this section has been issued.

Section E.2

The initial monthly particulate emissions report from the stacks of FMPC facilities was transmitted to the EPA on December 12, 1986. The initial report furnished data for the period from January through October, 1986. The second quarterly particulate emission report for the period November, 1986 through February, 1987 was transmitted to the EPA on April 20, 1987.

Sections F and G

Work on these sections is complete.

° Resource Conservation and Recovery Act (RCRA)

Section A - Items A.1 through A.7 and Section B - Items B.1 through B.5

Both of these sections were revised to reflect EPA comments.

Section A as amended was transmitted to the EPA on January 23, 1987 and Section B was revised and transmitted on January 28, 1987.

Section C with Items C.1 and C.2

The FMPC is proceeding with development of a final closure plan for the Pit #4 landfill. The FMPC is targeting transmittal of this plan to the U.S. EPA during the month of July, 1987. A post closure plan for the landfill will be developed following completion of the Remedial Investigation/Feasibility Studies.

° Radiation Discharge Information

Section A with Items A.1 and A.2

Work on this section is complete.

Section A - Item A.3

The results from monitoring continuous liquid discharge samples are to be reported on a quarterly basis. The initial report for the period from January through October, 1986, was transmitted to EPA on December 12, 1986. The quarterly report for the period November, 1986 through February, 1987 was transmitted April 20, 1987.

TABLE 1.

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

ACTION	DESCRIPTION	STATUS OF ACTIONS AS OF 01-May-87	
		COMPLETION TIME AFTER FFCA SIGNED	STATUS
CERCLA ACTIONS			
1.A	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Completed
1.B.	Develop and provide to EPA a plan and implementation schedule for the control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on January 23, 1987
1.C.	Implement radon control plan approved by the EPA.	----	
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	
2.B.	-- No Action Required --	----	
2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed. EPA requests assurance that the labs will accept radioactive samples. Verified January 23, 1987.
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted December 19, 1986. Supporting documents transmitted on January 30, 1987. Expect draft comments May 8, 1987.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample	30 days	Completed.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

ACTION	DESCRIPTION	STATUS OF ACTIONS AS OF 01-May-87	
		COMPLETION TIME AFTER FFCA SIGNED	STATUS
	collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.		
B.4.	Establish schedule for the installation of emission controls and prepare annual progress report on replacement of control devices.	30 days	Completed.
C.	-- No Action Required --	----	
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test	Initial stack to be tested August 1987.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	Initial report transmitted on December 12, 1986. Second report issued on April 20, 1987.
F.	Provide EPA list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 01-May-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and 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	Completed.
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Revisions to EPA January 30, 1987.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.
B.3.	Include design and construction specs 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	In process. Plan to be transmitted to U.S. EPA in July, 1987.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.

TABLE 1.

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

STATUS OF ACTIONS AS OF 01-May-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
RADIATION DISCHARGE INFORMATION			
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	Initial report transmitted on December 12, 1986. Second report transmitted April 20, 1987.