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**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING AUGUST 31, 1987**

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LETTER**

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MONTHLY PROGRESS REPORT FOR PERIOD ENDING AUGUST 31, 1987

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SUMMARY

Progressive work associated with the Federal Facilities Compliance Agreement (FFCA) has continued during the month of August, 1987.

Response to the U.S. EPA and OEPA comments on the RI/FS Work Plan and supporting documentation were formally transmitted to U.S. EPA on August 24, 1987. The transmittal included comment responses to U.S. EPA and OEPA comments, a revised Work Plan volume, and change pages to the support documentation.

The first monthly RI/FS Technical Progress Report was transmitted to U.S. EPA on August 20, 1987.

All radiological and chemical analyses of samples collected in support of the Characterization Investigation Study (CIS) were completed during August, 1987. Complete CIS final reports are currently in the process of being prepared.

In compliance with Item D of the Clean Air Act section of the FFCA, a modified EPA method 5 stack test was performed on emission point EPP-015. The report of the results of the stack test will be transmitted to U.S. EPA in October, 1987.

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 describing actions undertaken at the Feed Materials Production Center (FMPC) during the period of August 1 through August 31, 1987.

WORK ASSIGNMENTS AND PROGRESS

The status of the ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and attendant progress are presented in the following sections. For clarity, Table 1 and the following descriptions of progress are presented in a format consistent with the Compliance Agreement.

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

1. Interim Remedial Measures

Section 1.A

Comments on the CERCLA Section 1.A deliverable were received from U.S. EPA on June 2, 1987. The FMPC responses to the U.S. EPA comments on the CERCLA Section 1.A deliverable were transmitted to U.S. EPA on July 10, 1987.

Section 1.B

The original CERCLA 1.B deliverable was submitted on August 17, 1986. This submittal was revised to incorporate U.S. EPA comments and resubmitted January 21, 1987. A second set of U.S. EPA comments, generated by PRC, were received on June 2, 1987. The FMPC response to the second set of U.S. EPA comments on the CERCLA 1.B deliverable was transmitted to U.S. EPA on July 10, 1987.

2 Remedial Investigation/Feasibility Study (RI/FS)

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. U.S. EPA comments on the Work Plan and support documentation were issued on June 24, 1987. The FMPC responses to the EPA comments on the Work Plan and support documentation were transmitted to U.S. EPA on August 24, 1987. The transmitted documents included comment responses, a revised Work Plan volume, and change pages for the Work Plan supporting documents.

On July 21, 1987, the FMPC received written approval from the U.S. EPA to proceed with the installation of forty-five groundwater monitoring wells. Installation of the monitoring wells was initiated on August 25, 1987.

The biological sampling program and the surface radiological survey were initiated on August 28, 1987. The biological sampling program is initially concentrating on aquatic sampling in the Great Miami River and Paddy's Run Creek. The surface radiological survey was initiated on the 1000 foot grid areas outside of the FMPC production and waste storage areas.

Progressive actions continued on the Characterization Investigation Study (CIS) being performed in support of the sitewide Environmental Impact Statement and the RI/FS. Radiological and chemical analyses of collected samples have been completed. Final reports defining actions taken under the CIS are being prepared. Final CIS reports are anticipated to be issued in October, 1987.

3 Reports and Record Keeping

Section 3.B

The first RI/FS Monthly Technical Progress Report was transmitted to U.S. EPA on August 20, 1987.

- Clean Air Act (CAA)

Section B - Items 1 through 4

The FMPC deliverable addressing Section B - Items 1 through 4 of the Clean Air Act Section of the FFCA was transmitted to U.S. EPA in August 1986.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder stated that the FMPC air monitoring network should be reevaluated for its ability to measure representative concentrations of air pollutants. An evaluation of the FMPC air monitoring network was performed in December, 1986. Mr. Franz's concerns on the location of air monitoring station no. 6 were addressed during the joint OEPA/U.S. EPA inspection on July 14-17, 1987. Actions are currently underway to modify existing monitoring stations to meet EPA siting criteria. Modifications on the monitoring stations will be completed by January 15, 1988.

Section D.1

A proposed stack testing schedule fulfilling the requirements of Item D of the Clean Air Act section of the FFCA was transmitted to EPA on December 12, 1986. A revised stack testing schedule was transmitted to EPA during September, 1987.

During the period August 26 through August 29, 1987, stack testing was performed on FMPC emission point EPP-015 in accordance with Item D of the Clean Air Act section of the FFCA. The test involved utilizing a modified EPA method 5 procedure to provide a longer duration sampling time. The results of the stack test will be issued in October, 1987.

Section E.2

The initial Quarterly Particulate Emission Report providing data for the period from January through October, 1986 was transmitted to EPA on December 12, 1986. The second quarterly particulate emission report for the period November, 1986 through February, 1987 was transmitted to the EPA on April 20, 1987. The third quarterly particulate emission report for March through June 1987 was transmitted to the EPA on July 29, 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

U.S. EPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect U.S. EPA comments. The revised Section A was transmitted to the U.S.

EPA on January 23, 1987 for their comment. The revised Section B was transmitted to U.S. EPA on January 28, 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder provided a second round of U.S. EPA comments on these revised FFCA deliverables. Actions are currently underway to address U.S. EPA comments. A response will be transmitted to U.S. EPA in October, 1987.

Section C with Items C.1 and C.2

The FMPC has developed a final closure plan for the Waste Pit 4. The final closure plan was transmitted to the U.S. EPA on July 29, 1987. A post closure plan will be prepared following the RI/FS.

- Radiation Discharge Information

Section A with Items A.1, A.2, and A.3

The FMPC off-site environmental monitoring program and the associated quality assurance plan were provided to the U.S. EPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder provided U.S. EPA comments on these documents. Actions are currently being taken to address the U.S. EPA comments.

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. The quarterly report for the period March, 1987 through June, 1987 was transmitted to the EPA on July 29, 1987.

TABLE 1.

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

ACTION	DESCRIPTION	STATUS OF ACTIONS AS OF	
		COMPLETION TIME AFTER FFCA SIGNED	STATUS

CERCLA ACTIONS			
1	INTERIM 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	Complete. Comments were received from U.S. EPA on June 2, 1987. A comment response was transmitted to U.S. EPA on 10-Jul-87. SOPs in process of being revised.
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 23-Jan-87. Second set of comments on original 17-Aug-86 submittal received 17-Jun-87. A comment response was transmitted to U.S. EPA on 10-Jul-87.
1.C.	Implement radon control plan approved by the EPA.	----	A Feasibility Investigation for the control of radon emissions from the K-65 silos is being prepared for transmittal to EPA in October, 1987.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
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.
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.
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		Draft comments received from U.S. EPA on 14-May-87. Final comments issued from U.S. EPA 24-Jun-87. Comment responses and a revised Work Plan were transmitted to EPA on 24-Aug-87.
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from U.S. EPA. Drilling of the wells was initiated on 25-Aug-87.

TABLE 1.

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

STATUS OF ACTIONS AS OF
31-Aug-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		An RI/FS Progress Report was transmitted to U.S. EPA on 20-Aug-87.
	CLEAN AIR ACT		
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
B.4.	Establish schedule for the installation of emission controls and prepare annual progress report on replacement of control devices.	30 days	Completed.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		In progress. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Actions to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria to be implemented by 15-Jan-88.

TABLE 1.

**STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
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STATUS OF ACTIONS AS OF 31-Aug-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
C.	-- No Action Required --	----	
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The 1987 Stack Testing Schedule was transmitted to EPA in December, 1986.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test	In process. Stack test of EPP-015 was completed 29-Aug-87. Results to be transmitted to EPA in October, 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. Third report issued on July 29, 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 & B	Respond to USEPA comments in Items A.1. - A.7. and Items B.1. - B.5. WDF-JAR dated 12-May-87.		In process. Response to be transmitted to U.S. EPA in October, 1987.
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987. Additional comments received on 12-May-87. Response to be transmitted to U.S. EPA in October, 1987.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis	30 days	Completed.

TABLE 1.
STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 31-Aug-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	program.		
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	Complete. Additional comments received from USEPA on 12-May-87. Response to be transmitted to U.S. EPA in October, 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	60 days	Final closure plan was transmitted

TABLE 1.

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF 31-Aug-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	landfill pursuant to 40 CFR 265.112.		to U.S. EPA on July 29, 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.
RADIATION DISCHARGE INFORMATION			
A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		In process.
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. Third report transmitted July 29, 1987.