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

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**12  
ENCLOSURE**

**MONTHLY PROGRESS REPORT FOR PERIOD ENDING SEPTEMBER 30, 1987****SUMMARY**

Actions associated with the Federal Facilities Compliance Agreement (FFCA) have continued during the month of September, 1987. Highlights of work completed this month and a separate listing of ongoing actions are listed below.

The FMPC completed installation of four (4) monitoring wells in support of the Remedial Investigation/Feasibility Study (RI/FS).

Sampling undertaken as part of the Characterization Investigation Study (CIS) was completed in August, 1987. The FMPC completed final review of draft volumes 1 and 2, and returned these for comment resolution to the subcontractor. Comment resolution for volumes 1 and 2 of the CIS report are expected in October and November respectively.

The second monthly RI/FS Technical Progress Report was transmitted to the U.S. Environmental Protection Agency (US EPA) on September 20, 1987.

On September 8 and 9, 1987 meetings were held in Columbus, Ohio with Ohio EPA and in Chicago, Illinois with US EPA to review FMPC plans for interim stabilization of the the K-65 silos. During the meeting in Columbus, Ohio EPA informally indicated that permits would likely not be required in order to complete the proposed work since the actions (1) will not result in any increase in emissions from the K-65 silos and (2) will not result in any new emissions from the silos.

US EPA method 5 stack testing was performed for ten FMPC emission points. This action was taken in accordance with Item D of the Clean Air Act section of the FFCA.

**INTRODUCTION**

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

**WORK ASSIGNMENTS AND PROGRESS**

The status of ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and progress on these tasks are shown in the following sections. In both this portion of the monthly report, and in Table 1 (attached) descriptions of assignments are presented in a format similar to that of the FFCA.

• 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 US EPA on June 2, 1987. The FMPC responses to US EPA comments on the CERCLA Section 1.A deliverable were transmitted to US 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 US EPA comments and resubmitted January 21, 1987. A second set of U.S. EPA comments, generated by PRC, was received on June 2, 1987. The FMPC response to the second set of US EPA comments on the CERCLA 1.B deliverable was transmitted to US EPA on July 10, 1987.

Section 1.C

On September 8 and 9, 1987 a meeting was held in Columbus, Ohio between FMPC personnel and representatives of Ohio and US EPA to review FMPC plans for interim stabilization of the the K-65 silos. During this meeting, Ohio EPA informally indicated that permits would likely not be required in order to complete the proposed work since the actions (1) will not result in any increase in emissions from the K-65 silos and (2) will not result in any new emissions from the silos.

FMPC personnel met with representatives from Ohio EPA and their consultants regarding implementation of interim measures for the K-65 silos. This meeting was held onsite during the month of September.

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

Section 2.C

Work on this section is complete.

Section 2.D

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

The FMPC completed installation of four monitoring wells at locations 109, 209, 266, and 366. This required the completion of 282 lineal feet of drilling. Wells are currently being

installed at locations 324 and 265. No detectable concentrations of organics or radionuclides above background have been detected in samples from the cuttings collected from the four newly installed wells (as determined by field screening instruments). A third onsite drilling rig was added during September. This will ensure completion of the 74 onsite wells by the end of February, pending US EPA Region V and Ohio EPA approval.

Surface radiological surveys continued along the FMPC perimeter. The perimeter was divided into 100' x 100' grids. Technicians completed surveys of 20 grids using large volume scintillation detectors and FIDLER detectors.

Benthos and fish were collected in Paddy's Run and the Great Miami River as part of the aquatic resources sampling activity. In addition, samples of three land vertebrate species were collected in the area of the fly ash piles and the retired solid waste incinerator. Vegetation samples were obtained from two separate locations south of the FMPC. Thus far, a total of 131 biological samples have been collected to support the RI/FS.

A final review of the draft volume I report of the CIS, entitled "Geophysical Survey" was performed during September. The final volume 1 report is expected during October.

A draft of volume 2 of the CIS entitled "Chemical and Radiological Characterization of the Waste Pits" was received September 16, 1987. The FMPC anticipates receipt of the final volume 2 report in November.

### 3 Reports and Record Keeping

#### Section 3.B

The second RI/FS Monthly Technical Progress Report was transmitted to U.S. EPA on September 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 CAA section of the FFCA was transmitted to EPA on December 12, 1986. A revised stack testing schedule was transmitted to EPA September 17, 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.

US EPA method 5 stack testing was performed on nine (9) additional stacks during the month of September. A report detailing the results obtained from analyses of these stack tests will be provided to US EPA by November 13, 1987.

#### Section E.2

Three Quarterly Particulate Emission Reports have been provided to EPA thusfar. A fourth Quarterly Particulate Emission Report covering the period from July through September of 1987 will be transmitted to EPA during the month of November.

#### Sections F and G

Work on these sections is complete.

#### • Resource Conservation and Recovery Act (RCRA)

##### Sections A and B - Items A.1 through A.7 and Items B.1 through B.5

US EPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect US EPA comments. The revised Section A was transmitted to the US EPA on January 23, 1987. The revised Section B was transmitted to the US EPA on January 28, 1987.

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder provided a second round of US EPA comments on these revised FFCA deliverables. Actions are currently underway to address US EPA comments. A response will be transmitted to US EPA following completion of FMPC internal review.

Section C with Items C.1 and C.2

The FMPC developed a closure plan for Waste Pit 4. The closure plan was transmitted to the US 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 US EPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided US EPA comments on these documents. Actions are currently being taken to address US EPA comments.

Three Quarterly Liquid Discharge Reports have been transmitted to EPA thus far. The fourth Quarterly Liquid Discharge Report for the period from July through September, 1987 will be transmitted during the month of November.

TABLE 1.

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

| STATUS OF ACTIONS AS OF<br>30-Sept-87 |   |  |  |
|---------------------------------------|---|--|--|
| ACTION                                | DESCRIPTION   | COMPLETION<br>TIME AFTER<br>FFCA<br>SIGNED | STATUS   |
| <b>CERCLA ACTIONS</b>                 |   |  |  |
| <b>1</b>                              | <b>INTERIM REMEDIAL MEASURES</b>  |  |  |
| 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.  |
| <b>2</b>                              | <b>REMEDIAL INVESTIGATION/INVESTIGATION STUDY</b>   |  |  |
| 2.A.                                  | RI/FS work to be conducted in accordance with EPA guidelines.   | NA   | The second technical progress report on the RI/FS was issued on 18-Sep-87.   |
| 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. A total of 4                                 |

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|---------------------------------------|--|--|--|
| ACTION                                | DESCRIPTION  | COMPLETION<br>TIME AFTER<br>FFCA<br>SIGNED | STATUS   |
|                                       |  |  | groundwater monitoring wells were completed by 30-Sep-87.  |
| 3                                     | REPORTS AND RECORD KEEPING   |  |  |
| 3.B                                   | RI/FS Progress Report  |  | A RI/FS Progress Report was transmitted to U.S. EPA on 20-Sep-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<br>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. |

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|---------------------------------------|---|--|---|
| ACTION                                | DESCRIPTION   | COMPLETION<br>TIME AFTER<br>FFCA<br>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. Revised schedule was transmitted 24-Jul-87.  |
| D.2                                   | Provide EPA stack-test results for stacks tested that year.   | 45 days after test analyses completed      | Final stack tests were completed in September 87. Radiological analyses will be submitted as a supplement when available.   |
| 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. The fourth report will be issued in November, 87.              |
| 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 following completion of internal review.   |
| 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 following completion of internal review. |

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|--------|---|--|---|
|        |   | COMPLETION<br>TIME AFTER<br>FFCA<br>SIGNED | STATUS  |
| A.1.   | Conduct hazardous waste determination on all waste streams.                                 | 30 days                                    | Completed.  |
| A.2.   | Commence a hazardous waste analysis program.  | 30 days                                    | Completed.  |
| 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 following completion of internal review. |
| 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.  |

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|--------|--|--|--|
|        |  | COMPLETION<br>TIME AFTER<br>FFCA<br>SIGNED | STATUS   |
| 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                                    | Final closure plan was transmitted to U.S. EPA on July 29, 1987. |
| C.2.   | Develop a post-closure plan for the landfill pursuant to 40 CFR 265.418. | 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.<br>Second report transmitted April 20, 1987.<br>Third report transmitted July 29, 1987.<br>Fourth report to be transmitted in November. |

## REPORTING REQUIREMENTS

|   |   |         |  |
|---|---|---------|--|
| B | Issue monthly progress report of actions taken to ensure compliance with FFCA requirements. | 30 days | Aug. 86 issued to US EPA<br>Sep. 86 issued to US EPA<br>Oct. 86 issued to US EPA<br>Nov. 86 issued to US EPA<br>Dec. 86 issued to US EPA<br>Jan. 87 issued to US EPA<br>Feb. 87 issued to US EPA<br>Mar. 87 issued to US EPA<br>Apr. 87 issued to US EPA |
|---|---|---------|--|

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STATUS OF ACTIONS AS OF  
30-Sept-87

| ACTION | DESCRIPTION | COMPLETION<br>TIME AFTER<br>FFCA<br>SIGNED | STATUS                            |
|--------|-------------|--|-----------------------------------|
|        |             |  | May 87 issued to US EPA Jun. 87.  |
|        |             |  | Jun. 87 issued to US EPA Jul. 87. |
|        |             |  | Jul. 87 issued to US EPA Aug. 87. |
|        |             |  | Aug. 87 issued to US EPA Sep. 87. |
|        |             |  | Jan. 86 issued to US EPA Feb. 86. |
|        |             |  | Feb. 86 issued to US EPA Mar. 86. |
|        |             |  | Mar. 86 issued to US EPA Apr. 86. |