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

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**12
ENCLOSURE**

MONTHLY PROGRESS REPORT FOR PERIOD ENDING OCTOBER 31, 1987**SUMMARY**

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

The FMPC completed installation of eighteen (18) groundwater monitoring wells in support of the Remedial Investigation/Feasibility Study (RI/FS). Vegetation sampling, under the biological resources sampling portion of the RI/FS, was completed during October 1987.

The final copy of Volume 1 of the Characterization Investigation Study (CIS) was issued on October 26, 1987. Volume 2 of the CIS final report will be issued during November 1987. Volume 3 of the CIS final report will be issued during December, 1987.

The second monthly RI/FS technical progress report was transmitted to US EPA on October 16, 1987. The third RI/FS technical progress report will be transmitted to US EPA during the month of November.

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 October 1 through October 31, 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.

A plan and schedule for interim stabilization of the K-65 silos was developed by the FMPC during the month of October. A letter informing US EPA of the interim stabilization schedule, and notifying US EPA of plans to delay K-65 silo internal foaming until Spring 1988 was transmitted by DOE October 26, 1987 via letter #DOE 83-88.

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 were not likely to 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 followed by a letter which transmitted an alternate plan for interim stabilization and a schedule for completion of the project. This letter, dated October 26, 1987 included a discussion of the delay of K-65 internal foaming until spring of 1988, and the reasons for this action.

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.

By the end of October, the FMPC completed installation of eighteen monitoring wells at locations 109, 209, 266, 366, 324, 265, 165, 145, 148, 249, 124, 179, 129, 118, 147, 116, 114, and 132. This required the completion of 697.6 lineal feet of drilling. Wells are currently being installed at locations 129, 324, and 351. Samples were taken from cuttings from the newly installed wells, and the samples were tested for concentrations of organics and radionuclides. The concentration of organics and radionuclides in the field tested samples were not above background (as determined by field screening instruments).

The surface radiological survey of the FMPC sanitary sewage treatment plant was completed during October, 1987. Soil samples have been submitted to the International Technology Corporation (IT) Radiological Sources Lab for radiochemical analysis in order to correlate the soil analysis results with those obtained earlier in the field using a FIDLER detector.

Vegetation sampling, as a part of the biological resources sampling plan of the RI/FS, was completed during the month of October. Samples have been transferred to the IT Radiological Sciences Lab for analysis.

The trapping program for medium sized mammals was completed during October. It is anticipated that this portion of the sampling program will be completed on November, 1987.

Volume 1 of the CIS Final Report was issued on October 26, 1987. Volume 2 of the CIS Final Report will be issued in November, 1987. Volume 3 of the CIS Final Report will be issued in December, 1987.

3 Reports and Record Keeping

Section 3.B

The second RI/FS monthly technical progress report was transmitted to U.S. EPA on October 16, 1987. The third monthly technical progress report will be transmitted during the month of November.

◦ 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/US EPA inspection on July 14-17, 1987. Actions are currently underway to modify existing monitoring stations to meet EPA siting criteria. Modifications of 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 this stack test were transmitted to EPA on October 8, 1987.

US EPA method 5 stack testing was performed on nine (9) additional stacks during the month of September. A summary of results obtained from particulate analyses of these stack tests will be transmitted to US EPA during the month of November. The radionuclide analyses for these stacks will be transmitted as an addendum to the next quarterly emissions report.

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 was transmitted by DOE to EPA on October 23, 1987.

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. Reafsnider provided a second round of US EPA comments on these revised FFCA deliverables.

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.

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 was transmitted to US EPA on October 23, 1987 with the fourth Quarterly FFCA report.

TABLE 1.

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

STATUS OF ACTIONS AS OF 31-Oct-87			
ACTION	DESCRIPTION	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. A letter (WMC0:TD:87-573) was transmitted to DOE to delay the K-65 silo internal foaming project until Spring of 1988. DOE transmitted this information to EPA in letter DOE 83-88 dated 26-Oct-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 was transmitted to DOE via letter #WMC0:TD:87-391 on 31-Jul-87.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	The second technical progress report on the RI/FS was transmitted to US EPA on 16-Oct-87. via letter #DOE 52-88. The third RI/FS technical progress report will be submitted during the month of November.
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 19-Dec-86. Supporting documents were transmitted on 30-Jan-87.

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31-Oct-87

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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 18 groundwater monitoring wells were completed by 31-Oct-87. A request to initiate additional RI/FS tasks was transmitted to DOE on 15-Oct-87 in letter #WMCO:EH:(1A):87-0293. This letter was transmitted to US EPA on 22-Oct-87 via letter #DOE 63-88.
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		A RI/FS progress report was transmitted to U.S. EPA on 16-Oct-87 via letter #DOE 52-88. The third RI/FS technical progress report will be submitted during the month of November.
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.

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ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.4.	Establish schedule for the installation and replacement of emission control devices.	30 days	A schedule was transmitted to DOE on 12-Aug-86 via letter #WMCO:EH:(RC):86-0102. A schedule for FY-88 was transmitted to DOE 6-Nov-87.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	The first annual progress report was transmitted to DOE 6-Nov-87 via letter #WMCO:EH:(IA):87-381.
	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.
C.	-- No Action Required --	----	
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The first annual stack testing schedule was transmitted to EPA in December, 1986. A revised schedule was transmitted 24-Jul-87. The second schedule was transmitted to DOE 6-Nov-87 via WMCO:EH:(EC):87-0654.
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. Particulate analyses information was provided to DOE on 5-Oct-87 via letter #WMCO:EH:(EC):87-0579; and on 6-Nov-87 via letter WMCO:EH:(EC):87-0649. Radiological analyses will be provided as an addendum to the next quarterly report.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The initial report was transmitted on 12-Dec-86. The second report was issued 20-Apr-87. The third report was issued 29-Jul-87. The fourth report was issued 19-Oct-87.
F.	Provide EPA list of environmental air monitoring equipment, including	60 days	Completed.

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ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	location and the O&M program.		
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. Additional comments received on 12-May-87. Comment response and revised deliverable was transmitted to DOE 31-Jul-87 via letter # WMCO:EH:(IA):87-0210.
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	90 days	Completed.

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ACTION	DESCRIPTION	STATUS OF ACTIONS AS OF 31-Oct-87	
		COMPLETION TIME AFTER FFCA SIGNED	STATUS
	RCRA regulated units.		
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	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 265.118.	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. 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 Sep. 86. Sep. 86 issued to US EPA Oct. 86. Oct. 86 issued to US EPA Nov. 86.

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STATUS OF ACTIONS AS OF
31-Oct-87

COMPLETION
TIME AFTER
FFCA
SIGNED

ACTION

DESCRIPTION

STATUS

Nov. 86 issued to US EPA Dec. 86.
Dec. 86 issued to US EPA Jan. 87.
Jan. 87 issued to US EPA Feb. 87.
Feb. 87 issued to US EPA Mar. 87.
Mar. 87 issued to US EPA Apr. 87.
Apr. 87 issued to US EPA May 87.
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.
Sep. 87 issued to US EPA Oct. 87.
Oct. 87 issued to US EPA Nov. 87.