

2668


— G-000-711.15 —

**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING FEBRUARY 29, 1988**

XX/XX/XX

**12
ENCLOSURE**

[REDACTED]

MONTHLY PROGRESS REPORT FOR PERIOD ENDING FEBRUARY 29, 1988

2668

SUMMARY

Actions associated with the Federal Facilities Compliance Agreement (FFCA) continued during the month of February, 1988. Highlights of work completed this month, and a separate listing of ongoing actions are shown below.

On February 17, 1988, DOE transmitted to US EPA and Ohio EPA a technical summary of the FMPC project to repackage thorium materials located in the Plant #8 silo and bins. This thorium handling project is on-schedule. Removal activities are projected to begin in June, 1988.

FMPC personnel completed the preparation of responses to US EPA comments on the RI/FS Work Plan. During a February 4, 1988 meeting with US EPA in Chicago, Illinois, agreements were reached on remaining technical issues in the Work Plan. Revision 2 of the RI/FS Work Plan was transmitted to US EPA and Ohio EPA on February 11, 1988.

By the end of February, FMPC completed the installation of fifty monitoring wells. Eight new wells were completed during the reporting period. In addition, FMPC personnel contacted landowners in areas adjacent to the FMPC to initiate agreements supporting the installation of off-site monitoring wells.

The sixth monthly RI/FS technical progress report was transmitted to the US EPA on February 18, 1988.

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 February 1 through February 29, 1988.

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 actions are presented in a format similar to that of the FFCA.

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

2668

1. Interim Remedial Measures

Sections 1.A & 1.B

Work on these sections is complete.

Section 1.C

The K-65 Interim Stabilization Completion Report is currently being reviewed prior to transmittal to the US EPA. This report describes FMPC activities associated with the installation of a layer of insulating foam on top of the K-65 silos.

FMPC prepared an Invitation for Bid (IFB) for the installation of foam in the interior of the K-65 silos. The IFB will be issued to qualified contractors during March 1988. The K-65 interim stabilization project is on schedule to support completion of foaming the silo internals during June 1988.

A kick-off meeting was conducted with contractor personnel to discuss sampling of the K-65 silos. The scope of work for the sampling was reviewed. Actions are underway to prepare the Health & Safety Plan and required National Environmental Policy Act (NEPA) documentation. Current schedules support sampling of K-65 residues immediately following completion of K-65 interim stabilization activities.

On February 17, 1988, DOE transmitted to US EPA and Ohio EPA a technical summary of the FMPC project to repackage thorium materials located in the Plant #8 silo and bins. Included with this transmittal were a copy of the Environmental Assessment prepared to address the alternatives considered by DOE and a copy of the NEPA decision rendered for this project by the DOE. This thorium handling project is on-schedule. Removal activities are scheduled to begin in June, 1988.

Engineering activities are proceeding on the FMPC project to overpack warehoused thorium materials. A purchase requisition for repackaging the initial two hundred twelve (212) containers will be issued in March. NEPA documentation to support this overpacking effort will also be issued to DOE in March. This portion of the project is on-schedule for initiation of repackaging in June, 1988.

Engineering activities continue for overpacking the remaining 15,000 containers of thorium. The FMPC was recently notified that these materials cannot be shipped to NTS in Nevada for retrievable storage. The FMPC is therefore evaluating options for interim storage of the overpacked materials at the FMPC.

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

2668

Section 2.A to 2.D

Work on these sections is complete.

Section 2.E

FMPC personnel completed the preparation of responses to the second round of EPA comments on the FMPC RI/FS Work Plan. A meeting was conducted on February 4, 1988, at US EPA - Region 5 headquarters in Chicago, Illinois to discuss FMPC proposed resolutions to EPA comments on the Work Plan. Agreements were reached on the remaining technical issues. Revision 2 of the RI/FS Work Plan, which incorporated the agreements made during this meeting, was transmitted to US EPA - Region 5 on February 11, 1988.

During the week of February 22, 1988, FMPC participated in a conference call with US EPA - Region 5 on well development. Per the agreements reached during this discussion, FMPC will sample well #184 and analyze the sample for substances on the HSL Plus list. The analysis results will be submitted to US EPA - Region 5 for review. Based upon the results of this review, US EPA will provide the FMPC direction regarding the disposition of water collected during the development and purging of wells located in the FMPC Waste Storage Area.

Section 2.F

By the end of February, the FMPC completed the installation of fifty (50) groundwater monitoring wells. Eight new wells (368, 337, 146, 304, 237, 104, 137 and 370) were completed during the reporting period. In February, 751 lineal feet of drilling were completed.

Wells are currently being installed at locations 344, 173 and 175. Samples were collected from cuttings taken from the newly installed wells and tested for concentrations of organics and radionuclides. The concentrations of organics and radionuclides in the field tested samples were not above background (as determined by field screening instruments).

Monitor Well 146 was relocated approximately fifty (50) feet North of the originally planned location due to geophysical anomalies. This action was taken with the concurrence of US EPA - Region 5.

Monitoring well development began on February 18, 1988. Monitoring wells 311 and 367 were developed to below 5 NTU turbidity. The 5 NTU turbidity level could not be reached during the development of monitoring wells 366 and 266, which were installed in clay and sandy clay.

FMPC personnel have discussed plans to install off-site monitoring wells with landowners at the proposed well locations. Two landowners chose not to allow the installation of monitoring wells on their property. Alternate well locations were chosen and were reviewed with US EPA and Ohio EPA personnel on February 23, 1988.

FMPC personnel finalized a contract to obtain the formal agreement of landowners for the installation of off-site monitoring wells. These contracts are currently being provided to the landowners for review and signature.

Surface radiological surveys continued on a limited bases (one crew only) during February. Surface radiological surveys were conducted east of the Production Area in the buffer zone, in the northeast section of the Waste Storage Area, and in the north portion of the Production Area. To date, 200 complete grids and 68 partial grids have been surveyed with SPA-3 and FIDLER detection systems.

FMPC personnel completed a review of the Characterization Investigation Study (CIS) final reports to determine potential impacts to the RI/FS work plan. Additional field and analysis requirements resulting from this review were incorporated into Revision 2 of the RI/FS work plan. These changes were discussed during the February 4, 1988 meeting with US EPA - Region 5 and outlined again during the February Technical Information Exchange (TIE) meeting.

Section 2.G to 2.L

Work has not yet begun on these items.

3. Reports and Record Keeping

Section 3.B

The sixth RI/FS monthly technical progress report was transmitted to US EPA on February 18, 1988. The seventh monthly technical progress report will be transmitted during the month of March.

° 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 April 1, 1988. The annual progress report for 1987 replacement of control devices is currently undergoing internal review. This report will be submitted to EPA during March, 1988.

Section C

Under the FFCA, DOE will comply with the reporting provisions contained in 40 CFR 61.94 (c). Under these provisions, the DOE is required to, by June 1 annually, submit a report which includes the results of monitoring emissions from points subject to 40 CFR 61 Sub-part H and their associated dose calculations. The annual report for calendar year 1986 emissions was provided to EPA in 1987, in accordance with the requirements of 40 CFR 61.94 (c). The annual report for calendar year 1987 is due for transmittal to EPA by June 1, 1988.

Section D.1 & D.2

The yearly particulate stack testing schedule for FY-88 was transmitted to EPA on December 31, 1987. The results of the FY-87 stack tests are complete. The ten (10) particulate stack test reports for 1987, including radiological results, will be transmitted to US EPA during the month of March.

Section E.2

The fifth Quarterly Particulate Emission Report covering the period from October through December of 1987 will be transmitted to EPA during the month of March.

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. The FMPC response to these comments will be forwarded to US EPA in February.

Section C.1

Work on this item is complete.

• 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.

Four Quarterly Liquid Discharge Reports have been transmitted to EPA thus far. The fifth Quarterly Liquid Discharge Report for the period from October through December, 1987 will be transmitted to US EPA during the month of March.

TABLE 1.

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

STATUS OF ACTIONS AS OF 29-Feb-88			
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 July 10, 1987. 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 January 23, 1987. Second set of comments on original August 17, 1986 submittal received June 17, 1987. A comment response was transmitted to U.S. EPA on July 10, 1987.
	Develop & provide to EPA a plan & implementation schedule for control of thorium compounds.		This schedule was provided to US EPA in the revised deliverable transmitted on January 23, 1987. Updates of thorium repackaging activities were presented to the US EPA during the February TIE meeting.
1.C.	Implement radon control plan approved by the EPA.	----	Phase I of K-65 interim remedial action is complete. Phase II to begin in Spring 1988.
	Implement interim control plan for thorium compounds as approved by the US EPA.		The thorium repackaging effort for Plant 8 thorium remains on schedule.
2	REMEDIAL INVESTIGATION/INVESTIGATION STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	No Action Required.
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 were transmitted on January 30, 1987.

TABLE 1.

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

		STATUS OF ACTIONS AS OF 29-Feb-88	
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		<p>Draft comments received from U.S. EPA on May 14, 1987. Final comments issued from U.S. EPA June 24, 1987. Comment responses and a revised Work Plan were transmitted to EPA on August 24, 1987.</p> <p>A meeting was held December 10, 1987 at US EPA-Region V in Chicago, Ill to discuss draft EPA comments on the Work Plan Rev. 1. Significant progress was realized at this meeting toward resolving the outstanding technical issues associated with the RI/FS Work Plan. Final US EPA comments on the Work Plan Revision 1 were received at the FMPC on December 28, 1987.</p> <p>A meeting was conducted with US EPA - Region 5 on February 4, 1988, to review proposed resolutions to EPA comments on the Work Plan. Agreements were reached on remaining open technical issues. Revision 2 of the RI/FS Work Plan was transmitted to US EPA - Region 5 on February 11, 1988.</p>
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		<p>A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from US EPA. Drilling of the wells was initiated on August 25, 1987. A total of 50 groundwater monitoring wells were completed by February 29, 1987. A request to initiate additional RI/FS tasks was transmitted to DOE on October 15, 1987 in letter #WMC0:EH:(1A):87-0293. This letter was transmitted to US EPA on October 22, 1987 via letter #DOE 63-88. The FMPC received approval for installation of remainder of the monitoring wells on February 18, 1988.</p>
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		The sixth RI/FS progress report was transmitted to US EPA on February 18, 1988.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors	30 days	Completed.

TABLE 1.

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

ACTION	DESCRIPTION	STATUS OF ACTIONS AS OF 29-Feb-88	
		COMPLETION TIME AFTER FFCA SIGNED	STATUS
	on all MAJOR emission points. Also list non-alarmed emission points.		
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 and replacement of emission control devices.	30 days	A schedule was transmitted to DOE on August 12, 1986 via letter #WMC0:EH:(RC):86-0102. An updated schedule for FY-88 is in final review.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	The first annual progress report is undergoing internal review.
	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 April 1, 1988
C.	Provide annual reports to EPA per 40 CFR 61.94(c)	yearly	The annual report for CY-1986 was transmitted to EPA in 1987. The next annual report is due for transmittal by June 1, 1988.
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 July 24, 1987. The second schedule was transmitted to DOE November 6, 1987 and transmitted to EPA on December 31, 1987.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test analyses	Final stack tests were completed in September, 1987. Stack test results for 10 stacks (including particulate radiological results) were submitted to EPA by December,

TABLE 1.

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

STATUS OF ACTIONS AS OF 29-Feb-88			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
		completed	1987. These results will also be transmitted to US EPA during the month of March, 1988 along with the fifth quarterly reports.
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 December 12, 1986. The second report was issued April 20, 1987. The third report was issued July 29, 1987. The fourth report was issued October 19, 1987. The fifth quarterly report will be transmitted to EPA during the month of March.
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. Additional comments received on May 12, 1987. Response to be transmitted to US EPA following completion of internal review.
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	30 days	Completed.

TABLE 1.

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

STATUS OF ACTIONS AS OF
29-Feb-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	reflect the year the facility expects to begin closure.		
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 US EPA on May 12, 1987. 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.
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 US EPA on July 29, 1987. OEPA granted approval of the closure plan on February 9, 1988.
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.

TABLE 1.

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

STATUS OF ACTIONS AS OF
29-Feb-88

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
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 was transmitted in November. The fifth quarterly report will be transmitted to US EPA during the month of March.
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. 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. Nov. 87 issued to US EPA Dec. 87. Dec. 87 issued to US EPA Jan. 88. Jan. 88 issued to US EPA Feb. 88.