

2673

**FFCA MONTHLY PROGRESS REPORT FOR
PERIOD ENDING JULY 31, 1988**

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**12
ENCLOSURE**

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SUMMARY

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

In April, FMPC completed installing the 76 on-site monitoring wells, and developed all of the 200 and 300 series wells during the month of May. Drilling continued this month on the 19 off-site wells. Twelve of these wells have been completed to date, nine have been developed, and two are under construction.

For FY 1988, five (5) stacks have been tested; three (3) in February and two (2) in April. Stack test reports for these five stacks have been prepared and reviewed. Comments are currently being incorporated.

The eleventh monthly RI/FS technical progress report was transmitted to the USEPA on July 15, 1988.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (US DOE) and the USEPA signed on July 18, 1986, monthly reports are provided by US DOE to USEPA 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 July 1 through July 31, 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 presented 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 consistent with that of the FFCA.

Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

1. Interim Remedial Measures

Sections 1.A & 1.B

FMPC Standard Operating Procedures are being revised sitewide to address EPA comments received on the CERCLA section of the FFCA.

Section 1.C

FMPC is continuing the design of the K-65 silos internal stabilization using sand for radon attenuation rather than the internal foam application previously considered. This change in design was discussed with US EPA and Ohio EPA at the June 28 TIE Meeting. The Final Design will be completed upon receipt of the structural analysis data from the contractor. The schedule for stabilization will be revised after completion of the structural analysis. The K-65 Sampling Plan is under FMPC review and sampling is scheduled for late October, 1988.

ASI/IT has prepared a radiological analysis for the proposed interim storage thorium warehouse. The study is to determine if FMPC will exceed its Final Safety Analysis Report (FSAR) gamma level limit, established by USEPA, if all the drummed thorium were to be stored in one warehouse. The report has been drafted and reviewed and comments are being incorporated.

On May 18, 1988, DOE received USEPA approval for finishing the system installation for removal of thorium from the Plant 8 silos and bins. Sampling of the material in the silo and bin was completed in June, and redesign of the removal equipment is complete and undergoing review and approval. The subcontractor will begin containment construction in mid-August. Because of the redesign effort, the start for repackaging is now targeted for November 1, 1988.

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

Section 2.A to 2.D

Work on these sections is complete.

Section 2.E

The Work Plan Revision 3 and supporting documents were transmitted to USEPA on March 31, 1988. The Work Plan Revision 3 incorporates necessary revisions resultant from EPA's comments received to date on the RI/FS Work Plan. On May 16, FMPC received USEPA approval on Revision 3 of the RI/FS Work Plan. The Facilities Test Plan has been prepared and is under FMPC review. The Plan will be transmitted to USEPA in mid-August as an addendum to the RI/FS Work Plan.

The Feasibility Study Work Plan has been developed and is currently under FMPC review.

Section 2.F

ASI continued the off-site drilling program, completing installation of twelve of the nineteen new monitoring wells.

Nine of these wells have also been developed, and two additional wells are under construction. FMPC has obtained approval for the installation of all of the nineteen off-site monitoring wells. The well drilling is expected to be complete the third week of August.

ASI/IT is awaiting analysis from the radiological surface soils survey to determine the locations for the biased soil samples, which account for most of the remaining soil samples to be taken. All of the 35 quarterly sediment samples have been collected and sent to IT labs for analysis. Surface water samples are being collected, and the Abandoned-in-Place (AIP) Equipment Survey began during the latter part of July.

The Facilities Test Plan, an addendum to the approved RI/FS Work Plan, has been prepared and is under FMPC review.

Section 2.G to 2.L

Work has not yet begun on these items.

3. Reports and Record Keeping

Section 3.B

The eleventh RI/FS monthly technical progress report was transmitted to USEPA on July 15, 1988.

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 USEPA in August 1986.

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. The Annual Radionuclide Air Emission Report for calendar year 1987 was transmitted to USEPA on June 14, 1988.

Section D.1 & D.2

The proposed yearly particulate stack testing schedule for FY-88 was transmitted to EPA on December 31, 1987. A Revised Stack

Test Schedule was submitted to USEPA on July 15, 1988. Stack tests have been completed on five FMPC emission points during FY 1988. Samples collected have been analyzed by Weston Analytics and the Final reports have been prepared. The reports have been reviewed and comments are being incorporated. The five stacks remaining are to be tested in August.

Section E.2

The seventh Quarterly Particulate Emission Report covering the period from April 11, 1988 through July 5, 1988 is under FMPC review and will be forwarded to USEPA in August.

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

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

A May 12, 1987 letter from William D. Franz to James A. Reafsnnyder provided a second round of USEPA comments on these revised FFCA deliverables. WMCO submitted a Waste Characterization Report to DOE on March 29, 1988, which was subsequently forwarded to EPA on March 29, 1988, in response to RCRA Item A.1. The Waste Characterization Report answers the majority of EPA's RCRA concerns as spelled out in the Franz letter. FMPC's response to the remaining comments on RCRA A1-A7 is under review and will be delivered to US EPA and Ohio EPA in August.

A Final Closure Plan for the Pit 4 landfill was transmitted to USEPA on July 29, 1987. OEPA granted approval of the closure plan on February 9, 1988. On May 3, 1988, FMPC provided OEPA with construction specifications and drawings for closing Pit 4. OEPA sent approval of the closure plan, which was received June 29, 1988, with sixteen conditions. DOE sent an appeal to these conditions to USEPA on July 29, 1988. A revised Waste Analysis Plan was transmitted to USEPA on July 20, 1988.

A Closure Plan for the Trane Liquid Incinerator was submitted to USEPA on January 29, 1988. FMPC received USEPA's disapproval and comments of this Plan on June 29. FMPC appealed several of the conditions in a July 29 letter to USEPA.

A Closure Plan for the Barium Chloride facility was submitted to USEPA for approval in September, 1987. Approval was transmitted to FMPC in a February 3, 1988 letter, with conditions of submitting several sampling plans. FMPC submitted a sampling plan for the drummed waste (residue) to USEPA on March 3, 1988. The sampling plan for the rinseate is currently being prepared.

Section C.1

Work on this item is complete.

Radiation Discharge Information

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

Six Quarterly Liquid Discharge Reports have been transmitted to the EPA thus far. The seventh quarterly report covering the period from April through July is under FMPC review and will be transmitted to USEPA in August.

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	Completed. 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 interim 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 June TIE meeting.
1.C.	Implement radon control plan approved by the EPA.	----	External foaming of K-65 interim remedial action was completed Dec. 6, 1987. Internal material applications are being re-evaluated using sand for radon attenuation rather than foam. The schedule for stabilization is being revised. Sampling is planned to begin in late September.
	Implement interim control plan for thorium compounds as approved by the US EPA.		The Technical Summary of Plant 8 (silos & bins) thorium repackaging was transmitted to USEPA on 17-Feb-88. USEPA comments on the summary were issued on 25-Mar-88. The Thorium Technical Information Package (TIP) has been reviewed by US EPA, and approval obtained on May 18, 1988 for the subcontractor to begin construction of the removal equipment and containment facilities. A thorium silo sampling program was completed in June. The subcontractor will begin containment construction in mid-August. Repackaging is targeted for November 1, 1988.
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 --	----	

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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.
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		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.
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		USEPA comments on the Work Plan Rev. 1 were received on December 28, 1987. The Work Plan Rev. 2 was transmitted to USEPA on February 11, 1988. Revision 3 of the Work Plan and supporting documentation was transmitted to USEPA on March 31, 1988. Revision 3 of the Work Plan was approved by US EPA on May 16, 1988.
3	REPORTS AND RECORD KEEPING		A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from USEPA. Drilling of the wells was initiated on August 25, 1987. The FHPC received approval for installation of remainder of the monitoring wells on February 18, 1988. A total of 76 groundwater monitoring wells were completed by April 30, 1988, completing the drilling of all on-site wells. Installation of 19 off-site wells is continuing.
3.B	RI/FS Progress Report		The eleventh monthly RI/FS progress report was transmitted to US EPA on July 15, 1988.
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.

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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	The schedule is included with the Annual Progress Report, sent to USEPA on April 4, 1988. A total of 57 dust collectors will be replaced.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	The first Annual Progress Report on the Replacement of Air Pollution Control Devices-FFCA, Clean Air Act Section was submitted to USEPA on April 4, 1988.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		Completed. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Modifications to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria were completed by April 30, 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 Annual Radionuclide Air Emission Report for calendar year 1987 was forwarded to US EPA on June 14, 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 stack test schedule for 1988 was transmitted to EPA on December 31, 1987. A revised schedule will be transmitted in July, 1988.
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, 1987. Stack test results for 10 stacks (including particulate radiological results) were submitted to EPA on March 18, 1988. Stack tests have been completed on five FMPC emission points during FY 1988. A revised stack test schedule was

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			submitted to US EPA on July 15, 1988. The five completed reports have been reviewed by DOE/SO and DOE/ORO, and comments are being incorporated.
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 was transmitted to EPA during the month of March. The sixth Quarterly Particulate Emission Report covering the period of Jan. 4-Apr. 11, 1988 period was sent to US EPA on June 20, 1988. The seventh quarterly report for the April 11, 1988-July 5, 1988 period is under FMPC review, and will be sent to US EPA in August.
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. FMPC's final response to US EPA is anticipated by August, 1988. A Hazardous Waste Analysis Plan was transmitted to USEPA on March 29, 1988. A revised plan was transmitted to US EPA on July 20, 1988.
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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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 US EPA on May 12, 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	Completed. Final closure plan was transmitted to US EPA on July 29, 1987. OEPA granted approval of the closure plan on February 9, 1988. On May 3, 1988, FMPC provided OEPA construction specifications and drawings for capping over Pit 4. OEPA sent approval of the closure plan, with 16 conditions, received 6-29-88. DOE sent an appeal to these conditions to US EPA on July 29, 1988.

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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.		Completed.
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 was transmitted in November, 1987. The fifth quarterly report was transmitted to USEPA on March 18, 1988. The sixth quarterly report was sent to EPA on June 20, 1988. The seventh quarterly report is under FMPC review, and will be transmitted to US EPA in August.
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.