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**FEDERAL FACILITIES COMPLIANCE
AGREEMENT MONTHLY PROGRESS REPORT
PERIOD ENDING JULY 31, 1989**

07/31/89

**DOE-FMPC/EPA
10
REPORT**

FEDERAL FACILITIES COMPLIANCE AGREEMENT

MONTHLY PROGRESS REPORT

Period Ending July 31, 1989

INTRODUCTION

The Federal Facilities Compliance Agreement between the U. S. Department of Energy (DOE) and the U. S. Environmental Protection Agency (USEPA), signed July 18, 1986, requires that monthly reports be submitted to USEPA regarding 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, 1989.

Progressive actions associated with the Federal Facilities Compliance Agreement (FFCA) continued during the month of July 1989 and are discussed below. Highlights of work performed this month include the following:

- Sampling of Silo 1 was completed on July 25, 1989. However, the sampling technique used appears to have been unsuccessful, producing core samples much shorter than anticipated. The quantity of residue in the cores was insufficient to be considered representative of the silos' contents. Also, visual inspection of the core samples indicated a higher moisture content in the residue than what had been expected. Because of this, the K-65 Interim Stabilization Project has been suspended until additional samples can be collected from Silos 1 and 2, the analysis completed, and results studied.
- The second annual Progress Report on installation and replacement of emission control devices was transmitted to the USEPA on July 3, 1989.
- The twenty-third RI/FS Monthly Technical Progress Report was transmitted to the USEPA on July 20, 1989.
- The Federal Facilities Compliance Agreement Monthly Progress Report for June 1989 was submitted to the USEPA on July 28, 1989.

WORK ASSIGNMENTS AND PROGRESS

Descriptions of ongoing work progress are presented in the following sections of this report. The status of both ongoing and completed work in support of the FFCA is summarized in Table 1 (attached). In this portion of the report and in Table 1, descriptions of actions are presented in a format consistent with that of the FFCA.

*Federal Facilities Compliance Agreement
Monthly Progress Report*

**COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT (CERCLA)**

1. Initial Remedial Measures

Section C

K-65 Silos Project - Sampling of Silo 1 was completed on July 25, 1989. However, the sampling technique used on Silos 1 and 2 appears to have been unsuccessful, producing core lengths shorter than anticipated. The length of core samples collected ranged from less than one foot to twelve feet. The quantity of residues collected from both Silos 1 and 2 was considered insufficient for use as a representative sample of the silos' contents. The sampling procedure is being evaluated to determine if different equipment and/or procedures are required.

Visual inspection of the samples collected from Silo 2 indicated that the residue appears to have a higher moisture content than was anticipated. Because of the moisture content of the cores and the small volume of sample residue collected, a decision was made to suspend the K-65 Interim Stabilization Project until additional samples can be taken from Silos 1 and 2, the analysis completed, and results studied.

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

Section E

Work Plan - As of July 31, 1989, the FMPC has not received comments from the USEPA on the Feasibility Study Work Plan.

Section F

Groundwater Monitoring Program - Round 5 of the RI/FS groundwater sampling program was completed during the month of May. Analytical results are expected in approximately 60 days from the date of sampling completion.

Installation of the 24 additional onsite wells specified in the first addendum to the RI/FS Work Plan Revision 3 was completed during April 1989. Installation of three of the ten additional offsite wells identified in the second addendum to the work plan was completed. Installation of the remaining seven wells is on hold pending receipt of required license agreements. DOE is currently pursuing CERCLA access authority to permit installation of the additional seven off-site wells.

*Federal Facilities Compliance Agreement
Monthly Progress Report*

3. Reports and Record Keeping

Section B

The twenty-third RI/FS Monthly Technical Progress Report for May 1989 was transmitted to USEPA on July 20, 1989.

CLEAN AIR ACT (CAA)

Section B

The second annual Progress Report on installation and replacement of emission control devices was transmitted to the USEPA on July 3, 1989.

Section C

The Annual Radionuclide Air Emission Report for 1988 was submitted to the EPA on May 18, 1989.

Section D

Stack Tests - The stack testing schedule for 1989 was submitted to USEPA on June 16, 1989.

Section E

The tenth Quarterly Particulate Emission Report for the period January 9, 1989 through April 4, 1989 was submitted to USEPA on June 26, 1989. Completion of the eleventh Quarterly Particulate Emission Report is targeted for August 1989.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Section C

Pit 4 Closure - The Flexible Membrane Liner (FML) contractor completed the FML installation on May 26, 1989. The Ohio EPA was contacted on July 3, 1989 to determine the requirements for certifying the Pit 4 closure. Certification must be provided by the professional engineer certifying the closure and by the facility owner, the Department of Energy.

Dredging of the drainage ditch from Pit 4 to Paddy's Run was completed and additional riprap was installed to reduce erosion. These efforts should reduce the amount of suspended solids reaching Paddy's Run from the Waste Storage Area.

*Federal Facilities Compliance Agreement
Monthly Progress Report*

A post-closure plan for Pit 4 is being developed and will be submitted with the revised RCRA Part B Permit Application, which will be submitted on or before September 23, 1989.

RADIATION DISCHARGE INFORMATION

Section A

The tenth Quarterly Liquid Discharge Report covering the period January 9, 1989 through April 3, 1989, was transmitted to EPA on June 26, 1989.

REPORTING REQUIREMENTS

Section B

The Federal Facilities Compliance Agreement Monthly Progress Report for June 1989 was submitted to the USEPA on July 28, 1989.

TABLE 1

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

STATUS OF ACTIONS AS OF
July 31, 1989

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY89 STATUS
CERCLA			
1.	INITIAL 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.
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	Completed.
	Develop and provide to EPA a plan and implementation schedule for control of thorium compounds.		Completed.
1.C	Implement radon control plan approved by the EPA.	----	<p>On October 14, 1988, FMPC received USEPA's comments on the K-65 sampling plan. A revised sampling plan was submitted to USEPA on December 30, 1988. USEPA approval was received on April 25, 1989 to implement the K-65 Silo sampling project. Sampling of Silo 3 was completed on May 17, 1989. Sampling of Silo 2 began the week of June 12, and was completed on June 21, 1989. Sampling of Silo 1 was completed on July 25, 1989. However, the sampling technique used appears to have been unsuccessful. Core lengths ranged from less than one foot to twelve feet. The sampling procedure is being evaluated to determine if different equipment and/or procedures are required.</p> <p>Visual inspection of the samples collected from Silo 2 indicated a higher moisture content in the residue than was anticipated. As a result, the decision was made to halt the K-65 Silo Interim Stabilization Project until additional samples can be taken from Silos 1 and 2, analyzed, and the results studied.</p> <p>The drum filling system for thorium from Plant 8 (silo and bins) was installed during October. Packaging began November 30, 1988. Repackaging of large bin thorium was completed in January, and small bin repackaging was completed on February 3, 1989. Silo repackaging was complete March 17, 1989, completing the Plant 8 thorium repackaging project 2 weeks before the expected completion date of March 31, 1989.</p>
	Implement interim control plan for thorium compounds as approved by the USEPA.		

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TABLE 1

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FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
July 31, 1989

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY89 STATUS
2.	REMEDIAL INVESTIGATION/FEASIBILITY STUDY		
2.A	RI/FS work is to be conducted in accordance with EPA guidelines.	NA	No action required.
2.B	-- No Action Required --	----	
2.C	Provide to EPA the analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed.
2.D	Submit a work plan to EPA for a complete sitewide RI/FS.	90 days	Completed.
2.E	Amend and submit revised RI/FS Work Plan to EPA if deficiencies are found.		<p>As of July 30, 1989, FMPC has not received USEPA comments on the Feasibility Study Work Plan. The Facilities Testing Work Plan, an addendum that incorporated testing within and around the active FMPC production area, was submitted to USEPA November 18, 1988. An addendum for the installation of 24 additional onsite wells was transmitted to USEPA on December 20, 1988, and a second addendum for the installation of 10 additional offsite monitoring wells was transmitted December 22, 1988. During May, FMPC received comments from EPA on RI Addendum for Facilities and Suspect Areas. A response was prepared and submitted to EPA. A meeting was held in Chicago on June 8, 1989, with the EPAs, DOE, and WMCO; USEPA comments on the Facilities Testing Work Plan were addressed and resolved.</p>
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		<p>Installation of the 24 additional onsite wells specified in the first addendum to Rev. 3 of the RI/FS Work Plan was completed in April 1989. Installation of three of the 10 additional offsite wells identified in the second addendum to the Work Plan was completed. Installation of seven remaining wells is on hold, pending receipt of required license agreements. CERCLA Right-of-Access is currently being investigated.</p> <p>Round 5 of the RI/FS groundwater sampling program was completed during the month of May. Analytical results are expected in approximately 60 days.</p>

TABLE 1

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

STATUS OF ACTIONS AS OF
July 31, 1989

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY89 STATUS
3. REPORTS AND RECORD KEEPING			
3.B	Submit monthly RI/FS progress reports.	Monthly	The twenty-third RI/FS progress report for June 1989 was transmitted to the USEPA on July 20, 1989.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
8.1	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
8.2	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.
8.3	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.
8.4	Establish schedule for the installation and replacement of emission control devices.	30 days	Completed.
	Prepare annual progress report on installation and replacement of emission control devices.	yearly	The second annual Progress Report on installation and replacement of emission control devices was submitted to USEPA on July 3, 1989.
	Respond to USEPA comments on Air Monitoring Network (WDF-JAR dated 12-May-87).		Completed.
3.	Provide annual reports to EPA per 40 CFR 61.94(c).	yearly	The Annual Radionuclide Air Emission Report for CY-1988 was forwarded to USEPA on May 18, 1989.
3.1	Provide EPA yearly stack-testing schedule.	yearly	The 1989 stack testing schedule was transmitted to the USEPA on June 16, 1989.

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TABLE 1

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

STATUS OF ACTIONS AS OF
July 31, 1989

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY89 STATUS
D.2	Provide EPA with stack-test results for stacks tested that year.	45 days after test	The first five stack tests for FY88 were sent to USEPA on December 28, 1988. The second set of five reports was submitted to USEPA on February 17, 1989.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The ninth quarterly report for the period October 3, 1988 through January 9, 1989 was submitted May 12, 1989. The tenth quarterly report was transmitted to USEPA on June 26 1989. Completion of eleventh Quarterly Particulate Emissions Report is targeted for August 1989.
F.	Provide EPA with a list of environmental air monitoring equipment, including location and the O&M program.	60 days	Completed.
G.	Develop and provide EPA with an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Completed. The latest revision to the Hazardous Waste Analysis Plan was transmitted to USEPA on March 1, 1989.
A.1	Conduct a hazardous waste determination on all waste streams.	30 days	Completed.
A.2	Commence a hazardous waste analysis program.	30 days	Completed.
A.3	Update operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
4	Include full name, signature, and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
.5	Update the facility closure plan to reflect the year the facility expects	30 days	Completed.

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TABLE 1

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

		STATUS OF ACTIONS AS OF July 31, 1989	
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY89 STATUS
	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 an outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Completed. Revision 1 of the Groundwater Quality Assessment Program Plan was submitted to EPA on March 24, 1989 to fulfill comments received from W. Franz (USEPA) on May 12, 1987.
B.1	Determine groundwater flow at the RCRA-regulated units.	90 days	Completed.
B.2	Provide a map showing the locations of all RCRA monitoring wells.	90 days	Completed.
B.3	Include design and construction specifications 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	The FML installation contractor completed the liner installation on May 26, 1989. The Ohio EPA was contacted on July 3, 1989 to determine the requirements for certifying the Pit 4 closure. Dredging of the drainage ditch from Pit 4 to Paddy's Run was completed and additional riprap was installed to reduce erosion. These efforts should reduce the amount of suspended solids reaching Paddy's Run from the Waste Storage Area.
C.2	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	Post-closure plan is being developed and will be submitted with the revised RCRA Part B Permit Application, on or before 9/23/89.

TABLE 1

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

STATUS OF ACTIONS AS OF
July 31, 1989

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	FY89 STATUS
RADIATION DISCHARGE INFORMATION			
A.	Respond to USEPA comments on Items A.1. - A.3. (WDF-JAR dated May 12, 1987).	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 USEPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	The ninth quarterly report for the period October 3, 1988 through January 9, 1989 was submitted May 12, 1989. The tenth quarterly report was transmitted to USEPA on June 26, 1989.
REPORTING REQUIREMENTS			
B.	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	Monthly	June's FFCA Monthly Progress Report was transmitted to the USEPA on July 28, 1989.