



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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November 29, 2018

Ms. May Ma
Office of Administration
Mail Stop TWFN-7-A60M
Docket ID NRC-2017-0143
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: 1278540002 – Massac County
Honeywell International, Inc.
RCRA Permit
Permit Correspondence

Docket ID: NRC-2017-0143
Draft Environmental Assessment for the
Proposed Renewal of Source Material License SUB-526
Metropolis Works Uranium Conversion Facility (Docket No. 040-03392)

Dear Ms. Ma:

This letter is written in response to the U.S. Nuclear Regulatory Commission's Draft Environmental Assessment for the Proposed Renewal of Source Material License SUB-526 for the Honeywell International, Inc. facility referenced above. The subject submittal was dated October 2018 and received by the Illinois EPA on November 19, 2018.

The following is a list of Illinois EPA, Bureau of Land (BOL), comments on the subject submittal:

1. Section 1.5.1, Table 1-1; RCRA Permit (#B-65R2) is all that needs to be listed. It is not necessary to try and keep track of the most up to date modification (M-33 is the most up to date modification but that will change by the time the final EA is issued).
2. Section 1.5.1, Table 1-1; RCRA Permit – regulates the storage of calcium fluoride sludge in surface impoundments (Ponds B, C, D, and E) and the storage of drummed hazardous waste in two hazardous waste container storage buildings. IEPA suggest revising this table.
3. Section 2.2, U.S. NRC should check with Honeywell to see if Pond D is active, not active at all or used sometimes. They modified their wastewater treatment plant to not use Pond D anymore to prepare for closure of the Ponds. The status of Pond D should be clearly stated throughout the document.

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E-RIDS=ADM-03
ADD=Antoinette Walker-Smith,
Christine Pineda, Cinthya
Roman-Cuevas

COMMENT (1)
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4. Section 2.3.9.2, Groundwater Monitoring; At the beginning of this section in the first paragraph, it is stated that Honeywell employs three groundwater contaminant monitoring programs at the Metropolis Works Plant (MTW). However, there are four (4) monitoring programs at the facility. The Old Creosoter Area groundwater detection monitoring program is not mentioned in this section.

IEPA BOL's suggested revision, "Honeywell employs four groundwater contaminant monitoring programs at the MTW, including the sanitary well monitoring program, the process wells under routine monitoring, the Old Creosoter Area detection monitoring program, and the inactive landfill monitoring program. The following information briefly describes the monitoring programs."

Additionally, groundwater monitoring results for any of the four programs are not provided or discussed within this section.

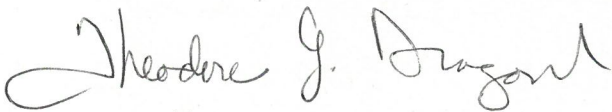
5. Section 2.3.9.2, Groundwater Monitoring, first bullet point – suggested revisions, "The first program monitors both the sanitary well and process well #3, which are tested for inorganic constituents, volatile organic compounds, radionuclides, and general parameters, including pH, turbidity, chlorine, total coliform, and fecal coliform. These two wells are regulated by the Illinois Department of Public Health as non-transient non-community water supply wells."
6. Section 2.3.9.2, Groundwater Monitoring; under the second bullet point the calcium fluoride surface impoundments (known as Ponds B, C, D and E) have a single liner with a leachate collection system, (not sure what two-part liner is). Also, IEPA suggest adding a short sentence acknowledging this monitoring program is regulated under the Illinois EPA BOL.
7. Section 2.3.9.2, Groundwater Monitoring, third bullet point – suggested revisions, "The third program, also under RCRA and regulated by the Illinois EPA BOL, monitors the inactive landfill area. The monitoring network consists of eight wells and monitors for pH, specific conductance, other environmental constituents, gross alpha, gross beta, radon-226, and radium-228.
8. Section 2.3.9.2, Groundwater Monitoring, first paragraph after the bullets: It is stated that Figure 2-6 shows the locations of the groundwater wells that support the three monitoring programs. However, it only shows the first two and not the landfill monitoring wells or the fourth program for the Old Creosoter Area.
9. Section 2.3.9.2, Table 2-5, Summary of Effluent and Environmental Monitoring Programs; this table does not list groundwater.
10. Section 2.3.9.2, Groundwater Monitoring; the last sentence should state "the on-going inspection of underground process sewers", instead of "closure".
11. Section 2.3.9.2, Process Sewers; second paragraph, "These remedial measures including filling the trenches" should be changed to state the remedial measures included repairing the trenches in the GF2 Building. The trenches that were filled in were in the GF2 South building and this was done because that building is no longer in use. Honeywell is also required to

establish an institutional control and environmental land use control for the AOC-1. No further remediation is required for AOC-2 (SU-562).

12. Section 2.3.9.2, Process Sewers; third paragraph, The MTW will continue its "soil investigation", this should be only "investigation". In the future, soil investigations may be warranted, but right now they are only inspecting the process sewers. Also, "additional areas of groundwater contamination.", should be changed to only "contamination".
13. Section 3.12.1, Low-Level Radioactive Waste, the paragraph after Table 3-19. The sentence, "The facility holds a RCRA Part B permit and is permitted to dispose of waste that includes residuals of source material in permitted levels." Honeywell holds a RCRA permit for storage purposes only (in surface impoundments and container storage buildings). They are not allowed to dispose of waste in any of their permitted units. Honeywell will remove all waste from the surface impoundments and dispose of it off-site at a properly permitted landfill by December 31, 2020.
14. Section 3.12.3 Hazardous Waste, in this section IEPA BOL suggests using the term "surface impoundments" instead of "ponds". Such as, wastes stored in surface impoundments (known as Ponds B, C, D and E).

If you have any questions regarding the groundwater comments, please contact Adam Shade at 217/785-9633. For all other questions please contact Kelly Huser at 217/524-3867.

Sincerely,



Theodore J. Dragovich, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

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KDH ANSWER WAS
cc: U.S. Nuclear Regulatory Commission (NRC)
Christine Pineda, U.S. NRC
Kelly Horn, Harold Osborn, IEMA
James Blough, USEPA Region V

