

United States Government

Department of Energy

Oak Ridge Operations

memorandum

DATE: November 17, 1994

REPLY TO
ATTN OF: EW-93:Hartman

SUBJECT: CX DETERMINATION - REMOVAL ACTION AT THE ASSOCIATE AIRCRAFT SITE

TO: Thomas P. Grumbly, Assistant Secretary for Environmental Management, EM-1

Attached is a categorical exclusion (CX) determination describing the proposed removal and disposal of radioactively contaminated materials at the Associate Aircraft site, Fairfield, Ohio. I have determined that this action conforms to an existing National Environmental Policy Act (NEPA) Subpart D C and may be categorically excluded from further NEPA review and documentation

This memorandum is a routine notification of a CX determination. The authority for this determination was delegated to the Oak Ridge Operations (ORO) Manager by the Assistant Secretary for Environmental Restoration and Waste Management on December 10, 1991.

If you have any questions concerning NEPA compliance issues, please contact Patricia W. Phillips, ORO NEPA Compliance Officer, at (615) 576-4200.


Joe La Grone
Manager

Attachment

- cc w/attachment:
- D. G. Adler, EW-93, ORO
- S. C. Golian, EM-22, TREV II
- L. E. Harris, EM-431, TREV II
- G. S. Hartman, EW-93, ORO
- N. Hendrix, EW-91, ORO
- G. L. Palau, BNI
- P. W. Phillips, SE-311, ORO
- J. Russell, EM-421, BAH, TREV II
- R. S. Scott, EM-20, FORS
- W. M. Seay, EW-93, ORO
- J. D. Waddell, SAIC
- J. W. Wagoner II, EM-421, QO

CONCURRENCES	
RTG SYMBOL	EW-93
INITIALS/SIG	GSH
Hartman	
DATE	9/16/94
RTG SYMBOL	EW-93
INITIALS/SIG	P
Price	
DATE	9/16/94
RTG SYMBOL	SE-311
INITIALS/SIG	Phillips
DATE	10-30-94
RTG SYMBOL	CC-10
INITIALS/SIG	Carnes
DATE	11/8/94
RTG SYMBOL	EW-93
INITIALS/SIG	Phillips
DATE	11/10/94
RTG SYMBOL	M-3
INITIALS/SIG	Polehn
DATE	11/14/94
RTG SYMBOL	M-2
INITIALS/SIG	Smithwaik
DATE	11/14/94
RTG SYMBOL	M-1
INITIALS/SIG	La Grone
DATE	11-14-94

**CATEGORICAL EXCLUSION (CX) FOR
REMOVAL ACTION AT THE
ASSOCIATE AIRCRAFT SITE**

PROPOSED ACTION: Removal of radioactively contaminated materials at the Associate Aircraft site.

LOCATION: Associate Aircraft site, Fairfield, Ohio [FUSRAP site].

The former Associate Aircraft facility is located at 3660 Dixie Highway, Fairfield, Ohio, and is part of DOE's Formerly Utilized Sites Remedial Action Program (FUSRAP). From February to September 1956 Associate Aircraft Tool and Manufacturing Company performed work for National Lead of Ohio (NLO), a prime contractor for the U.S. Atomic Energy Commission (AEC). The machine shop at the Associate Aircraft site produced hollow uranium slugs. Operations included hollow drilling, reaming, and turning uranium slugs to a final outside diameter.

DESCRIPTION OF PROPOSED ACTION: The proposed action is to safely remove, transport, and dispose of radioactively contaminated materials at the Associate Aircraft site, thereby eliminating potential exposure of workers and the public to contamination exceeding applicable cleanup guidelines. Proposed site activities include, but are not limited to, the following: Excavation of concrete floor areas and subsurface soils; excavation of parking lot materials; decontamination of structural surfaces in the portion of the building used for AEC contract work; decontamination of drains and associated drain-lines; temporary onsite storage of wastes; packaging, transportation, and disposal of materials at existing appropriately licensed disposal facilities; and disposal of waste/debris below DOE contamination/radiological release guidelines in a commercial disposal facility. In the event that disposal delays require temporary staging and/or storage of contaminated wastes, storage would be conducted in accordance with all applicable regulations.

The proposed removal action would be conducted under DOE authorities pursuant to the Atomic Energy Act (AEA), would be consistent with the final remedial action for the site, and meets the eligibility criteria for conditions that are integral elements of actions eligible for categorical exclusion as stated in 10 CFR 1021:

1. The proposed action would not threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE orders. All activities would be managed by FUSRAP.
2. The proposed action would not require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators

**CATEGORICAL EXCLUSION (CX) FOR
REMOVAL ACTION AT THE
ASSOCIATE AIRCRAFT SITE (cont.)**

and facilities for treating wastewater, surface water, and groundwater). Wastes generated during the proposed action would be collected, analyzed to determine waste characteristics, and segregated as they are generated into nonhazardous, RCRA-only, mixed, and radioactive-only categories. If hazardous wastes are determined to be commingled with radioactive waste, removal and temporary storage would be done in accordance with applicable requirements; the mixed waste would then be disposed of at an existing facility designed to accept these wastes. Wastes would be transported offsite in accordance with applicable transportation and disposal requirements and disposed of at existing facilities or stored temporarily onsite in accordance with applicable requirements pending evaluation of final disposal options. If temporary storage is required, wastes generated from these activities would be managed in accordance with regulations applicable to the types of wastes being managed.

3. The proposed action would not disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases. The removal action would be conducted in an environmentally responsible manner to ensure site-specific control of environmental contamination.
4. The proposed action would not adversely affect any environmentally sensitive resources defined in the Federal Register Notice referenced below, including archaeological or historical sites; potential habitats of threatened or endangered species; floodplains; wetlands; areas having a special designation such as Federally- and state-designated wilderness areas, national parks, national natural landmarks, wild and scenic rivers, state and Federal wildlife refuges, and marine sanctuaries; prime agricultural lands; special sources of water such as sole-source aquifers; and tundra, coral reefs, or rain forests. The proposed action would occur in a previously disturbed/developed area.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal, and the proposal is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

The estimated cost for this action is less than \$2 million and would take less than 12 months to complete.

**CATEGORICAL EXCLUSION (CX) FOR
REMOVAL ACTION AT THE
ASSOCIATE AIRCRAFT SITE (cont.)**

CX TO BE APPLIED: From the DOE NEPA Implementing Procedures, 10 CFR 1021, Subpart D, Appendix B, under actions that "Normally Do Not Require EAs or EISs," "B6.1 Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action...."

I have concluded that the proposed action meets the requirements for the CX referenced above. Therefore, I recommend that the proposed action be categorically excluded from further NEPA review and documentation.

Patricia W. Phillips 10-3-94
Patricia W. Phillips, ORO NEPA Compliance Officer Date

Based on my review and the recommendation of the ORO NEPA Compliance Officer, I recommend that the proposed action be categorically excluded from further NEPA review and documentation.

Bryan D. Walker 11/10/94
Bryan D. Walker, Acting Assistant Manager for Date
Environmental Restoration and Waste Management, ORO

Based on the recommendations of the ORO NEPA Compliance Officer and the Assistant Manager for Environmental Restoration and Waste Management, I determine that the proposed action is categorically excluded from further NEPA review and documentation.

Joe La Grone 11/15/94
Joe La Grone, Manager, DOE Oak Ridge Operations Office Date