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**CATEGORICAL EXCLUSION (CX)  
DETERMINATION CLOSURE OF DRUMMED  
HYDROFLUORIC ACID (HF) RESIDUE STORAGE,  
NW OF PLANT 4 NEPA DOC. NO. 419**

**DOE-FN/DOE-HQ**

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**CAT EXC**

**NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)****CATEGORICAL EXCLUSION (CX) DETERMINATION****Closure of Drummed Hydrofluoric Acid (HF)****Residue Storage, Northwest of Plant 4****NEPA Document No. 419****Fernald Environmental Management Project (FEMP)****Fernald, Ohio****Proposed Action**

The United States Department of Energy (DOE) proposes closure of the Drummed Hydrofluoric Acid (HF) Residue Storage Hazardous Waste Management Unit (HWMU No. 7) located northwest of Plant 4.

**Location**

HWMU No. 7 is located in a gravel area northwest of Plant 4, and is surrounded by B Street on the west and by 2nd Street on the north. The 1050 acre FEMP site is located 18 miles northwest of downtown Cincinnati, Ohio.

**Background**

HWMU No. 7 had stored three white metal boxes (containing six 55-gallon drums each) and one 85-gallon overpack drum (containing one 55-gallon drum). The 55-gallon drums had been filled with anhydrous hydrofluoric acid (AHF) residues generated from emptying and cleaning the HF storage tanks in the Tank Farm. The residues consisted of liquid AHF, lime, and sludge. The lime had been added to the tank to absorb any free liquids remaining after the AHF had been removed, and to neutralize any remaining AHF. The sludge consisted of rust, scale, and AHF residues.

The nineteen 55-gallon drums of residue had previously been stored inside the Plant 4 area now referred to as HWMU No. 6. In October, 1989, the drums were overpacked into the three white metal boxes and the 85-gallon overpack drum and transferred to the Pilot Plant Warehouse (Building 68). In January, 1990, the overpacked drums were moved to the area now identified as HWMU No. 7. This move was made because an initial determination declared the drummed AHF residues to be non-Resource Conservation and Recovery Act (RCRA) hazardous waste. The overpacked drums were stored in HWMU No. 7 through August, 1990, when they were relocated to a gravel area south of the Cooling Towers by the Tank Farm sump pit. This gravel area is now identified as HWMU No. 8. In October, 1990, it was determined that the drum residues were RCRA waste. In June, 1991, the drums were relocated to Plant 9 for a period of less than 90 days, and then transferred to the Plant 1 pad where they remain stored until final disposition or treatment is determined.

## Closure of Drummed HF Residue Storage, NW of Plant 4

### Description of Proposed Action

The proposed action involves closure of HWMU No. 7, a 25 feet wide by 30 feet long area, located northwest of Plant 4. Closure of HWMU No. 7 would entail soil sampling, sample analyses, and a limited removal of soil if it is determined to be necessary.

Prior to sampling activities in HWMU No. 7, the site drawings would be reviewed with the facility engineer to ensure that there are no underground utilities, pipes, wiring, or similar structures that might interfere with the soil sampling. Next, the HWMU would be divided into twelve sections with two soil samples to be collected from each of the sections within HWMU No. 7. One sample will be taken at a depth ranging from zero to six inches and the second sample would be taken from twelve to eighteen inches.

In addition, three sampling locations would be randomly selected around Plant 4, not within HWMU No. 7, to establish a production area background concentration of pH and fluorides. Twelve sets of soil samples would also be taken from each of the three locations. The sampling depths would be the same as those to be taken within the HWMU. The mean of the samples collected from the three sample locations around Plant 4 will be compared with the samples collected from within HWMU No. 7. If analyses indicate that the fluoride concentration is significantly higher, or that the pH level is significantly lower than the levels from the production area background, soil would be removed from those locations within HWMU No. 7 where contamination is indicated. If completion of closure requires the removal of more than six inches of soil from within HWMU No. 7, a revised Closure Plan Information Data (CPID) document will be prepared to discuss the need for additional clean-up actions. All wastes generated or collected (i.e., soil, sampling equipment, etc.) during closure of HWMU No. 7 would be managed and disposed of according to all applicable radiological, hazardous, and solid waste rules and regulations.

The closure of HWMU No. 7 is expected to take less than 180 days to complete and is estimated to cost \$100,000.

### Categorical Exclusion to be Applied

The authority for finding this project to be subject to NEPA Categorical Exclusion is contained in Subpart D of the revision to 10 CFR 1021, entitled "National Environmental Policy Act Implementing Procedures and Guidelines." The Final Rule and Notice, effective May 26, 1992, includes a list of categorical exclusions that are classes of actions that normally do not require the preparation of either an Environmental Impact Statement or an Environmental Assessment.

**Closure of Drummed HF Residue Storage, NW of Plant 4**

The Final Rule and Notice specifically lists in Part 1021, Appendix B to Subpart D, Sec. 1021.410, B6.1(a), the following as types of actions that are Categorical Exclusions applicable to Specific Agency Actions:

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. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and time limits (National Contingency Plan, 40 CFR part 300). These actions include, but are not limited to:

(a) Excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas that are not receiving contaminated surface water or wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination.

This Categorical Exclusion is appropriate since the proposed action as described is a closure of HWMU No. 7. Information gained from the sampling and analyses of the collected soil will be used to determine if HWMU No. 7 contains contaminated soils. If soil excavation is necessary, only a limited soil removal would be permitted under the scope of this categorical exclusion. This would entail the removal of no more than six inches (13.89 cubic yards) of soil from the HWMU.

The proposed action will not violate applicable statutory, regulatory, or permit requirements; it will not require siting and construction nor major expansion of waste disposal, recovery or treatment facilities. The proposed actions will have no significant adverse impact on any environmentally sensitive areas (e.g., wetlands, floodplains, critical habitats, or the sole-source aquifer).

**Compliance Action**

I have determined that the proposed action meets the requirements for the CX referenced. Therefore, the proposed action is categorically excluded from further NEPA review and documentation.

Approval:

*Ray Hansen for*  
 Thomas J. Rowland, Acting Manager  
 U.S. Department of Energy, Fernald Office

Date:

*May 6, 1993*