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**CATEGORICAL EXCLUSION (CX)
DETERMINATION CLOSURE OF DRUM
STORAGE AREA NEAR LOADING DOCK NEPA
DOC. NO. 420**

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NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)**CATEGORICAL EXCLUSION (CX) DETERMINATION**

**Closure of Drum Storage Area Near Loading Dock
NEPA Document No. 420
Fernald Environmental Management Project (FEMP)
Fernald, Ohio**

Proposed Action

The United States Department of Energy (DOE) proposes the closure of the Drum Storage Area Near the Loading Dock (Lab) as a partial facility closure of the FEMP. This area is referred to as Hazardous Waste Management Unit No. 4 (HWMU No. 4).

Location

The proposed action will take place at HWMU No. 4, an area located on the west side of the Laboratory Building (Building No. 15) that was previously used for temporary storage of drummed wastes. Building 15 is located in the southwest region of the FEMP. The FEMP site is located 18 miles northwest of downtown Cincinnati, Ohio.

Background

From interviews with Laboratory personnel and some limited records of material movements, it was determined that drums of waste had been intermittently stored in the area of the Laboratory loading dock from 1953 through 1989. However, the loading dock and surrounding area included in HWMU No. 4 were not designed nor intentionally operated for prolonged storage of drummed wastes. A review of laboratory waste generation records from 1988-1991 infers the following suspect waste streams: a variety of waste acids and bases, spent solvents, waste oils and mercury waste. The area was designated a HWMU as part of the Hazardous Waste Management Unit Review (HWMUR) conducted under the Proposed Amended Consent Decree (PACD) for storage of hazardous waste exceeding 90 days.

Surface radiological surveys in 1988-1989 identified two contaminated areas: one along the southwest corner of the Laboratory building and an area northwest of the loading dock, in the vicinity of the previous catch basin No. 24. To reduce potential exposures and minimize potential migration to unaffected areas, a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action was initiated in the Fall of 1988 and completed in 1990. In 1990, the contaminated soil and the catch basin were excavated, boxed or drummed, and stored on the Plant 1 Pad for characterization.

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The area was then backfilled, regraded, and new concrete was poured as part of the Lab Upgrade. The only area within the current HWMU that was not excavated and upgraded was the original elevated concrete loading dock. Since HWMU No. 4 has not been used to store hazardous wastes since 1989, the surface areas upgraded in 1990 are considered to be clean. Therefore, cleaning will be limited to the original loading dock, ramp, and base of the dock.

Due to HWMU No. 4 being in the path of construction traffic during the renovation of the Lab, the exposed upgraded concrete was covered with plastic. Concrete squares were then placed on the plastic. This was done to prevent contamination of the new concrete that could result from use of the area for building access during the Lab Upgrade.

Description of the Proposed Action

Closure of the unit involves the following activities: removal of all hazardous residues by decontamination of the unit's floor surface (the original loading dock), and analysis of decontamination rinseate and underlying soil samples.

Prior to decontamination of the original loading dock, area preparation will be required to remove the plastic and concrete squares, vacuum up any loose dirt or debris, and construct temporary rinseate containment berms to protect the monitor wells and catch basins inside HWMU No. 4. To facilitate collection of wash and rinse waters, the adjacent ramp (on the south end) and the east side of the ground level driveway area at the base of the loading dock will also be washed and rinsed.

The surface area of the loading dock, ramp, and ground level paved area at the base of the loading dock will be pressure washed with potable water, increasing the pressure (up to 10,000 psi), as needed, to remove visible contamination such as dirt, debris, and oily films. That rinse water will be directed toward the base of the loading dock where it will be vacuumed or pumped into a drum for further waste characterization. This rinsing process will be repeated until the rinse is visibly clean.

A final rinse, using deionized water, will be collected in a clean sample collection drum, using an uncontaminated sampling pump. Samples of the rinse waters will be collected using a Coliwasa sampler and analyzed for the presence of the waste constituents or hazardous waste characteristics listed in Table 1 of the Closure Plan Information and Data (CPID).

If sample analysis indicates contamination in excess of the cleanup action levels listed in Table 2 of the CPID, another effort to clean the concrete surfaces and a second set of rinse samples will be collected. The cleaning method will be dependant upon the type of contamination remaining. If necessary, a total of three cleaning attempts will be made.

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Because previous sampling and analyses from 1988-1990 does not include analyses for all chemicals associated with the hazardous waste that may have been managed in the unit, additional area sampling and analyses will be conducted. These samples include: two samples from the combined surface rinse of the concrete on the top and exposed side of the original loading dock, and five soil samples from five separate locations in and adjacent to the unit, three of which will be analyzed for waste constituents and characteristics listed in Table 1. The soil samples will be taken from a depth of 36 to 42 inches below grade. All sampling and analyses will be conducted in accordance with the FEMP Site-Wide CERCLA Quality Assurance Project Plan.

If Resource Conservation and Recovery Act (RCRA) closure certification is not achieved through the activities discussed above, a revised CPID and schedule will be prepared. The CPID will be incorporated into the final remediation under the Record of Decision (ROD) for Operable Unit 3 (OU 3), consistent with the ROD for OU 5. Closure is expected to be completed in 180 days or less, and not to exceed a cost of \$100,000.

Waste generated will be containerized and managed as mixed waste pending characterization and determinations in accordance with the FEMP Waste Analysis and Waste Determination Plans. Depending on the results of the characterization, all wastes will be managed, stored, treated, or disposed in accordance with applicable OEPA and USEPA solid and hazardous waste requirements and DOE Orders for low-level radioactive wastes.

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 revised and expanded 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.

The Final Rule and Notice specifically lists in Part 1021, Appendix B to Subpart D, Sec. 1021.410, B6.1 (1), 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:

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(1) Use of chemicals and other materials to retard the spread of the release or to mitigate its effects if the use of such chemicals would reduce the spread of, or direct contact with, the contamination.

The Closure of the Drum Storage Area Near the Loading Dock (Lab) meets the requirements for the Categorical Exclusion listed above. Decontamination of the Loading Dock will reduce the spread of contaminants. The results of the sampling and analyses will determine whether further action will be necessary to reduce the spread of contaminants or to mitigate the effects of the contamination. Furthermore, 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; and it will not significantly impact 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 Dawson for
Thomas J. Rowland, Acting Manager
U.S. Department of Energy, Fernald Office

Date:

May 6, 1993