

4461

**CATEGORICAL EXCLUSION (CX)
DETERMINATION K-65 DECANT SUMP TANK
REMOVAL ACTION NEPA DOC 312**

12/21/90

NEPA DOC. 312

DOE/DOE

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CATEGORICAL EXCLUSION (CX) DETERMINATION

Proposed Action

K-65 Decant Sump Tank Removal Action

Location

Feed Materials Production Center (FMPC), Fernald, Ohio

Description of the Proposed Action

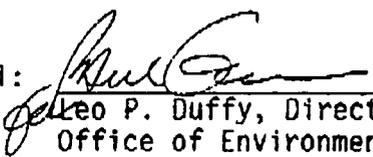
The proposed action will consist of removing the liquid contents from the K-65 decant sump and performing a Hazardous Substance List (HSL) analysis on the decant liquid. Liquid removed from the decant sump will be managed as a potential hazardous waste until the results of the HSL test have been completed and analyzed. Any liquid found to contain HSL constituents will be treated as necessary prior to transferring the liquid to existing FMPC water treatment facilities. Suspect contaminants, such as lead and constituents regulated by National Pollutant Discharge Elimination System (NPDES) permits, will be addressed once the decant liquid is removed and stored for HSL analysis. This project will not threaten a violation of applicable statutory, regulatory, or permit requirements. It will not affect "environmentally sensitive areas."

CX to be Applied

Under the September 7, 1990, Section D Amendments to the National Environmental Policy Act (NEPA), removal actions under the Comprehensive Environmental Response, Comprehensive, and Liability Act (CERCLA) (including those taken as final response actions and those taken before remedial action) and actions similar in scope under the Resource Conservation and Recovery Act (RCRA) and other authorities (including those taken as partial closure actions and those taken before corrective action) do not require Environmental Assessments or Environmental Impact Statements. These removal activities under CERCLA and actions similar in scope under RCRA and other authorities could include, but are not limited to, the following types of actions: excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas, that are not receiving contaminated surface or waste water, where surface or groundwater would not collect, and where such actions would reduce the spread of, or direct contact with, the contamination. This project will cost less than \$2 million dollars and take less than 1 year from the time activities begin.

Compliance Action

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

Approval: 
Leo P. Duffy, Director
Office of Environmental Restoration
and Waste Management, EM-1

Date: 12/21/90

Concurrence: Carol Borgstrom, Director
Office of NEPA Oversight, EH-25

Date: _____

EM-20 ENVIRONMENTAL COMPLIANCE RECORD OF REVIEW

EM Document Control Number: EM # 9001945
Subject: NEPA Determination for Two Removal Actions at the Feed Materials
Production Center - Part 1: K-65 Decant Sump Tank Removal Action

Action Required: Concurrence on Categorical Exclusion Determination

Analysis/Comments: EM-20 has reviewed the categorical exclusion determination for the K-65 Decant Sump Tank Removal Action. Several questions were raised during this review and after talking with Randi Allen (EM-40), EM-20 contacted the FMPC project manager, Jack Craig (513/738-6159). The questions raised, and their answers are provided below.

1. What is the size of the tank and how full is it? Answer: It is a 9,000 gallon tank and it is completely full.
2. Does FMPC know the source of the liquid in the K-65 sump tank (ie., liquid from the residues in the K-65 silos or rainwater)? Answer: The liquid could be from one of two sources, or a combination of both. First, it could be rainwater percolating through the berms, entering the underdrain system beneath the silos and entering the tank. The second possible source is that it is leftover K-65 residues decant liquid. Also, it could be a combination of these two. FMPC has collected samples of the liquid from the tank and based on the radiological results, it does appear that at least some of the liquid is from the K-65 residues.
3. Does FMPC have any idea of whether the tank will fill up again or if pumping this liquid out will induce more liquid from the silos to enter the tank? Answer: No, FMPC does not know if the tank will fill up again. If it does, then it may help them find out the source of liquid. If the liquid is coming from inside the silos, it is not expected that it would migrate through the bottom of the silos and into the underdrain system very quickly. Also, the consensus is that it is better for the liquid to enter the tank than to migrate downward into the aquifer.
4. If the tank fills up again, will FMPC continue to remove the liquid under this removal action? Answer: FMPC will only empty the tank one time under this removal action. Based on how fast and how much liquid comes into the tank, FMPC may consider another removal action to empty the tank or they may have to address the need for a more continuous removal system. Also, FMPC is not sure they have the storage capacity to keep removing liquid from the tank.
5. Will this removal action address anything more than removal and temporary storage of the liquid withdrawn from the tank (eg., tank integrity or plugging)? No, FMPC is not planning to do anything to the tank.
6. What length of time is scheduled for this project? Answer: 4.5 months from the time FMPC receives EPA's approval on the work plan. The work plan schedule for the removal action does not include the time needed to analyze the liquid removed from the tank.
7. Does FMPC currently have the capacity to store the waste on-site? Answer: Yes, the waste will be stored in tanks, that are diked, in an existing storage area.
8. What is the likelihood that this is mixed waste? Answer: Pretty good.
9. If it does turn out to be mixed waste, then is it correct to say that FMPC will not begin treatment of this mixed waste and the part of this categorical exclusion relative to treating the liquid in the tank will not be carried out? Answer: Correct, if it is mixed waste, then all FMPC can do is store it indefinitely, along with its other mixed waste. It would not be treated as mentioned in the categorical exclusion determination.

EM-20 ENVIRONMENTAL COMPLIANCE RECORD OF REVIEW

Recommendation: EM-20 agrees that a categorical exclusion is appropriate for this action. However, the categorical exclusion determination submitted by EM-40 should be revised to reflect somewhat more detailed information about the proposed removal action, similar to that contained in this record of review. This will allow other reviewers to have more complete description of the proposed removal action. The revision should continue to use the CERCLA Removal Action category for this determination; however, if an example is provided, EM-20 suggests that the example be one that matches the proposed action. This revised categorical exclusion determination should then be resubmitted to EM-20 for concurrence.

Reviewer: J. Clay

Date: December 17, 1990

Concurrence: W. Kleinsch, Environmental Compliance

Date: 12/17/90

Approval: [Signature], Director, Office of Quality Assurance and Quality Control

Date: 12/18/90

DATE: December 17, 1990

ROUTING AND TRANSMITTAL SLIP

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- TO: 1. Randal S. Scott, EM-20 12/18/90
- 2.
- 3.
- 4.
- 5.
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SUBJECT: Removal Action At FMPC

The attached Categorical Exclusion is being transmitted for your approval to return the document to EM-40 for corrections. The proposed removal action was part of a package that we received from EM-40 containing two Categorical Exclusions. The categorical exclusion covering Waste Pit 6 at FMPC was forwarded to EM-1 for approval on December 14, 1990, since the action was necessary to meet a date set by EPA. Since we had several questions regarding this action, we separated the two Categorical Exclusions to assist the program in expediting the review and approval.

Based on our review, as noted in the EM-20 Environmental Compliance Record of Review, we are requesting that the document be returned to EM-40 to be revised to include answers to the questions we asked of the field.

If there are any questions, please call me.

Michael Kleinrock

FROM: MICHAEL KLEINROCK, EM-20, 8H-050, 586-0338

TO FILE

4461
copy

United States Government

Department of Energy

memorandum

DATE: DEC 24 1990

REPLY TO
ATTN OF: EM-422 (R. Allen, 3-5625)

SUBJECT: National Environmental Policy Act Determination for Two Removal Actions at the Feed Materials Production Center

TO: Leo P. Duffy, EM-1

This is to notify you that we have reviewed the subject proposed removal actions and concur with the Feed Materials Production Center recommendation that they be categorically excluded from further National Environmental Policy Act (NEPA) documentation under the September 7, 1990, Section D Amendments of the Department of Energy (DOE) NEPA Guidelines.

The proposed removal actions are to (1) remove the liquid contents from the K-65 decant sump, and (2) mitigate the continued release of contaminants from Waste Pit 6. Each removal action will cost less than \$2 million dollars and take less than 1 year from the time activities begin, as specified in the September 7, 1990, Amendments to the DOE NEPA Guidelines.

In accordance with the authority delegated to you by the Secretary of Energy Notice 15 of February 5, 1990, we recommend that you sign the attached memorandum transmitting the Categorical Exclusions to the Office of Environment, Safety and Health.



R. P. Whitfield
Associate Director
Office of Environmental Restoration

Attachments

memorandum

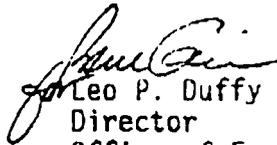
DATE: DEC 24 1990

REPLY TO
ATTN OF: EM-422 (R. Allen, 3-5625)

SUBJECT: Categorical Exclusions for Two Removal Actions at the Feed Materials
Production Center

TO: Carol Borgstrom, EH-25

I have approved the subject categorical exclusions under the September 7,
1990, Section D Amendments to the Department of Energy's National
Environmental Policy Act Guidelines and am forwarding it to you for review.



Leo P. Duffy
Director
Office of Environmental Restoration
and Waste Management

Attachment