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*CATEGORICAL EXCLUSION DETERMINATION WASTE
PIT 5 EXPERIMENTAL TREATMENT FACILITY
REMOVAL ACTION NEPA DOC. NO. 354*

11/15/91

DOE-HQ/DOE-FN

NEPA DOC. 354

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CAT EX

CATEGORICAL EXCLUSION DETERMINATION
Waste Pit 5 Experimental Treatment Facility Removal Action
Fernald Environmental Management Project, Fernald, Ohio

Proposed Action

The U.S. Department of Energy (DOE) proposes to remove, containerize, and store waste materials associated with the Waste Pit 5 Experimental Treatment Facility (ETF) and investigate the soil surrounding the ETF to determine if contamination has occurred.

Location

The ETF is located within the Fernald Environmental Management Project (FEMP) Waste Pit Area, near the southwest corner of Waste Pit 5. The Waste Pit Area is situated on the western edge of the FEMP property. The FEMP is located 20 miles northwest of downtown Cincinnati, Ohio.

Background

The ETF was constructed in 1984/1985 with the intention of dewatering (drying) sludge materials from Waste Pit 5. The original design consisted of a sand/gravel filter bed underlain by a plastic liner with 6-foot high wooden retaining walls bordering the perimeter of the facility. The ETF was covered by a greenhouse type enclosure that served to facilitate the thermal drying of the Pit 5 sludge material and provided protection from wind and precipitation.

On February 23, 1988, high winds removed the plastic roof from the ETF that contained the dry Pit 5 material. A small amount of this material was blown out of the ETF onto the surrounding soils. To minimize the material being blown from the ETF, water was sprayed over the remaining residues and a tarpaulin, secured with concrete blocks, was placed over the filter bed and the waste material. These interim measures were taken to reduce the amount of material released as a result of severe weather and precipitation.

The ETF contains an estimated total of 101 cubic yards of waste material. Eleven samples of the dried waste and filter bed materials were collected from five locations within the ETF structure after the February 1988 storm. The samples were analyzed for radioactive contamination. Uranium concentrations ranging from 173 to 687 parts per million were found in the first 12 inches of material sampled. The ETF is considered a Hazardous Waste Management Unit (HWMU) under the Resource Conservation and Recovery Act (RCRA) since it treated waste material from Waste Pit 5. The material in the ETF will be sampled and analyzed for RCRA constituents. There was no sampling of the soils surrounding the ETF following the 1988 storm. Samples will be taken of soil as part of this removal action.

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Description of the Proposed Action

The proposed action is to remove the waste and filter bed materials from the ETF and place this material into containers for temporary storage and to characterize the soil surrounding the ETF.

The first step of the removal action will be to barricade the area around the ETF. The work area and the materials to be removed will be watered to minimize the fugitive dust emissions. The waste materials will be removed with a backhoe. The bucket of the backhoe will be fitted with a sleeve, and the backhoe operators will be trained on the use of the sleeved bucket to ensure that the liner beneath the sand/gravel filter bed will not be breached during the removal of the waste material. The waste material will be loaded into storage containers via a funnel-type device. After the materials are removed from the ETF, the wooden structure will be dismantled, generating approximately 10 cubic yards of contaminated wood. The wood will be placed into approximately 37 drums for temporary storage.

A comprehensive Sampling and Analysis Plan will be developed to characterize the soil surrounding the ETF. The data gathered will be incorporated into the site-wide characterization information. Any removal of soil surrounding the ETF will be part of a separate action and another National Environmental Policy Act (NEPA) document. Such an action is now planned for Operable Unit 1, of which the ETF is a part.

The proposed action is considered a removal action and will be conducted in accordance with the requirements of RCRA and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The proposed action is specifically listed in the amended CERCLA Consent Agreement (signed by the Environmental Protection Agency on 9/20/91); will not threaten a violation of applicable statutory, regulatory, or permit requirements; and will not adversely affect environmentally sensitive areas. This project will cost approximately \$320,000 and take about 4 months from the time activities begin.

Categorical Exclusion to be Applied

The Amendments to Section D of DOE's NEPA Guidelines, published in the Federal Register on September 7, 1990, add classes of actions generally applicable to all DOE that normally do not require Environmental Assessments or Environmental Impact Statements.

The Amendments specifically list the following as types of actions that are included:

- 1) Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and actions similar in scope under RCRA (including those taken as partial closure actions and those taken before corrective action). These activities include the

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following: 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 waste water, where surface water or groundwater would not collect, and where such actions would reduce the spread of or direct contact with, the contamination.

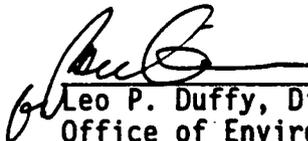
- 2) Site characterization and environmental monitoring, including siting, construction, and operation of characterization and monitoring devices, under CERCLA and RCRA, where the activities would not introduce or cause the inadvertent or uncontrolled movement of hazardous substances, as defined in section 101(14) of CERCLA, pollutants or contaminants as defined by section 101(33) of CERCLA, or non-native organisms, and would not adversely affect environmentally sensitive areas. Activities covered include, but are not limited to sampling and characterization of water, soil, rock and contaminants.

The categorical exclusion (CX) is appropriate since the proposed action, as described above, is to conduct a removal action under CERCLA and site characterization activities under RCRA and CERCLA; will not threaten a violation of applicable statutory, regulatory, or permit requirements; will not require siting and construction or major expansion of waste disposal, recovery, or treatment facilities; and will not adversely affect environmentally sensitive areas. The area affected by this proposed action is not receiving contaminated surface water or waste water and is not an area where surface water or groundwater would collect. The proposed action will serve to reduce the spread of, and direct contact with, the contamination. The proposed action also will not introduce or cause the movement of hazardous substances, pollutants, contaminants, or non-native organisms.

Compliance Action

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

Approval:



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

Date:

11/15/91

EH-25 has reviewed this determination and has no objection.

Signature:

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

United States Government

Department of Energy

memorandum

DATE: NOV 18 1991
REPLY TO: EM-424 (B. Wright, 3-8158)
ATTN OF:
SUBJECT: Categorical Exclusion Determination - Waste Pit 5 Experimental Treatment Facility Removal Action, Fernald Environmental Management Project, Fernald, Ohio
TO: Carol Borgstrom, EH-25

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

I request that you notify me within 2 weeks, in accordance with the Interim Procedural Guidelines for implementation of SEN-15-90, whether you have any objection to this determination.



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

Attachment

cc:
L. Lawson, EM-431
M. Kleinrock, EM-20

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