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CATEGORICAL EXCLUSION DETERMINATION RCRA CLOSURE FOR THE WASTE OIL STORAGE AREA IN THE GARAGE NEPA DOC. NO. 411

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NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

CATEGORICAL EXCLUSION (CX) DETERMINATION

RCRA Closure for the Waste Oil Storage Area in the Garage
NEPA Document No. 411
Fernald Environmental Management Project (FEMP), Fernald, Ohio

Proposed Action

The United States Department of Energy (DOE) proposes a closure plan for the Waste Oil Storage Area in the FEMP Garage. This area has been designated as a Hazardous Waste Management Unit (HWMU) under the Resource Conservation and Recovery Act (RCRA).

Location

The proposed action will take place at the Waste Oil Storage Area of the FEMP Garage (Building 31). The Waste Oil Storage Area is a 10 ft by 10 ft container storage area along the west wall of the Garage. It is bounded on the south by a hydraulic vehicle lift and on the west by the west wall of the building. The northern boundary is approximately three feet north of the previous location of a concrete block wall (a 4-foot high dividing wall that has been removed) and the eastern boundary is ten feet from the west wall. These boundaries are now delineated by yellow boundary lines marked on the Garage floor. Building 31 is located in the southeast corner of the FEMP Process Area. It is bounded on the west and north sides by D Street and 1st Street, respectively. The 1,050 acre FEMP site is located 18 miles northwest of downtown Cincinnati, Ohio.

Background

Building 31 is a garage where maintenance is performed on vehicles and equipment used at the FEMP. The building is constructed of concrete block and has a poured concrete floor. Drums of waste oils, generated through vehicle maintenance in the Garage from 1952 through 1988, were stored on the floor of the storage area. The waste oils generated in the Garage were deemed hazardous because of the presence of 1,1,1-trichloroethane solvent which was routinely used in the Garage.

The Garage contains six floor drains and a catch basin. Prior to 1990, the six floor drains flowed to a oil/water separator, from which the oil was piped to underground storage tank #5 and the separated water flowed to the FEMP Wastewater Treatment System. In early 1990, the floor drains and the tank were disconnected and capped. The catch basin collects wastewaters from cleaning the floor in the Garage and flows to a sump. Liquids are pumped from the sump to, and stored in, an aboveground 500-gallon tank pending laboratory analysis prior to treatment in the FEMP Wastewater Treatment System.

The former area of the Waste Oil Storage in the Garage is inspected on a weekly basis and has been found to be in good condition. No spills or releases from this unit have been reported.

At the present time, no RCRA wastes are stored in the Waste Oil Storage Area. In 1988, four Satellite Accumulation Areas (SAAs) were established in the Garage in accordance with OAC 3745-52-34(c)(1) (40 CFR 264.34[c][1]) to allow accumulation of any hazardous waste generated in the Garage.

After clean closure has been obtained for this HWMU, the FEMP management intends to return this unit to service for non-hazardous vehicle maintenance activities.

Description of Proposed Action

Closure of the unit involves the following general activities: removal of all hazardous wastes and residues, decontamination of the unit's floor surface, and analysis of decontamination rinseate, core samples, and underlying soil samples.

The floor area of the unit will be cleared, and any loose debris vacuumed from the floor and expansion joints. The vacuum device will be fitted with a High Efficiency Particulate Air (HEPA) filter to control the release of particulates. All residue removed from the unit will be drummed and managed as hazardous waste pending waste characterization.

Prior to washing the floor, all cracks and expansion joints, greater than 1/8 inch wide or with loose sealing material, will be filled with expanding portland cement grout. Sealing of the joints and cracks will prevent any water and/or potential contamination from the surface washing from migrating into the cracks and into the underlying soil.

Once the cracks have been filled, an impervious temporary dike will be constructed around the boundaries of the unit to control and collect wash water created during the cleaning of the floor. The temporary dike will be faced with polyethylene or other suitable sheeting and secured with weighted blocks or sand bags.

The floor will be washed with a non-phosphate laboratory grade detergent and tap water solution. A peristaltic pump (or other approved pump) will be used to transfer the wastewater generated during washing into a container. The washing of the unit may be accomplished using an electrically powered floor scrubber. This unit will apply water to the floor, scrub the floor and collect wash water. Each cycle for washing of the entire unit is expected to take approximately 120 gallons. A single washing of the floor constitutes a wash cycle.

Following each wash cycle, the Project Engineer will decide whether to attempt another wash cycle or collect a rinseate sample from the floor. If a rinseate sample is desired, a separate decontamination verification rinse will be conducted, and the rinse water collected in a separate container. The equipment used to collect the verification rinse waters shall be cleaned or decontaminated. A representative sample of the decontamination verification rinseate will be collected and analyzed for the parameters listed in Table 1 of the Closure Plan. Decontamination of the floor will be determined by the Cleanup Action Levels (CALs) listed in Table 1 of the Closure Plan. If decontamination has not been achieved, the wash cycle followed by a verification rinse will be repeated (up to 3 cycles).

After surface decontamination has been completed, floor core samples will be taken in accordance with the Sample Analysis Plan (SAP) and analyzed for the parameters listed in Table 1 of the Closure Plan. Soil samples from beneath the floor of the unit will be collected through holes cored into the concrete floor, exposing the sub-base and soil underlying the floor.

Additional samples will be taken from two locations outside the unit boundaries (near the hydraulic lift pit in the southeast corner of the unit, and the catch basin near the northeast corner of the unit). These samples will be used to evaluate possible contamination outside the unit boundaries. Since there are sources of contamination not related to the waste oil storage activities, the data from samples outside the unit will be used to document existing contamination in the Garage for future remediation and will not affect the closure of the Waste Oil Storage Area. All reusable equipment used during the sampling effort will be properly decontaminated, to prevent cross-contamination.

All wastes will be containerized and managed in an approved RCRA hazardous waste storage location on site pending waste characterization and determinations in accordance with the approved FEMP Waste Analysis and Waste Determination Plans. The location for waste storage has not yet been determined. Wastewaters from decontamination of the unit will be either stored or discharged to the FEMP Wastewater Treatment System General Sump, according to appropriate regulations. Radioactive non-hazardous wastes will be managed in accordance with applicable DOE orders. The expected time frame to complete the proposed action is under 180 days.

If soil contamination or possible impacts on groundwater quality are suspected or indicated while conducting closure actions, or it is determined that clean closure cannot be achieved, revised Closure Plan Information and Data (CPID) will be submitted to the Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (USEPA). The CPID will include a revised schedule of activities and describe how the RCRA closure activities will be integrated with Comprehensive Environmental Response Compensation and Liability Act (CERCLA) response actions required to mitigate existing or potential threats to human health and the environment.

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 part 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 types of actions that are Categorical Exclusions applicable to Specific Agency Actions:

> 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 Plan for the Waste Storage Area in the Garage meets the requirements for the Categorical Exclusion listed above. Furthermore, the proposed action will not violate applicable statutory, regulatory, or permit requirements; it will not require siting and construction or major expansion of waste disposal, recovery or treatment facilities; and it will not impact any environmentally sensitive areas (e.g., wetlands, floodplains, 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: Tom Rowland

Thomas J. Rowland, Acting Manager
U.S. Department of Energy, Fernald Field Office

Date: 4/2/93

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United States Government

Department of Energy

Fernald Field Office

memorandum

APR 0 2 1993

DATE: DOE-1540-93

REPLY TO ATTN OF: FN:Skintik

SUBJECT: **CATEGORICAL EXCLUSION DETERMINATION (CX 411) RESOURCE CONSERVATION AND RECOVERY ACT CLOSURE FOR THE WASTE OIL STORAGE AREA IN THE GARAGE**

TO: Carol Borgstrom, EH-25, FORS

The subject categorical exclusion (attachment) under Section D of the Department of Energy's National Environmental Policy Act Guidelines has been approved and is being forwarded for your review.

The Department of Energy, Fernald Field Office (DOE-FN) requests that you notify us within two weeks, in accordance with the Interim Procedural Guidelines for implementation of SEN-15-90, whether you have any objection to this determination.

If you have any questions, please contact Ed Skintik at 513 648-3151.

Tom Rowland

Thomas J. Rowland
Acting Manager

Attachment: As Stated

cc w/att:

R. S. Scott, EM-20, FORS
K. A. Hayes, EM-424, TREV
L. Harris, EM-431, TREV
C. J. Brown, FERMCO/51-7

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