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**CATEGORICAL EXCLUSION DETERMINATION
SAMPLE COLLECTION AND SHIPMENT FOR
TREATABILITY STUDIES
NEPA DOC. NO. 376**

04/20/92

**DOE/DOE
NEPA DOC. 376**

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

Sample Collection and Shipment For Treatability Studies
NEPA Document No. 376
Fernald Environmental Management Project (FEMP), Fernald, OH

Proposed Action

The United States Department of Energy (DOE) proposes the collection of samples from various locations at the FEMP site and the shipment of these samples to various laboratories and test facilities for treatability studies.

Location

The proposed sample collection will be performed at various locations on the FEMP site. The FEMP site is located on 1050-acres approximately 18 miles northwest of downtown Cincinnati, Ohio.

Background

A variety of operations were conducted throughout the FEMP's history resulting in the generation of a variety of waste materials (e.g., Hazardous Waste (Resource Conservation and Recovery Act [RCRA]), Mixed [RCRA and Radiological], Radiological). During production operations, waste materials were disposed of at several locations on the FEMP site (e.g., Waste Pits and Storage Silos). Production operations and waste disposal activities have contaminated soil across the FEMP with various physical and chemical forms of uranium.

Samples of soil residues, slurries and other waste material forms will be taken from various areas across the FEMP site that will yield the most representative samples. These samples will be used for treatability studies at various laboratories and facilities to continue the development of technologies and methodologies in support of the remediation effort at the FEMP and other DOE facilities. This CX is being submitted to address the collection and shipment of soil and other forms of waste materials for treatability studies throughout the life of the Integrated Demonstration (ID) and/or the Remedial Investigation and Feasibility Study (RI/FS).

Description of the Proposed Action

Under the proposed action, samples of uranium contaminated soil and other forms of waste materials will be collected at the FEMP and shipped to various laboratories and sites for study. The scope of this NEPA document includes only the collection and shipment of samples and the subsequent return of any unused samples as well as treated materials. In no case will the amount of uranium contaminated soil shipped to any one laboratory or site for any one treatability study exceed 10,000 kg.

FEMP Collection and Shipment

RCRA contaminated soil and RCRA waste material will be collected from the Waste Pit Area. The material collected from this area will be packaged and labeled in accordance with RCRA and Department of Transportation (DOT) requirements. These materials will be used in treatability studies to test technologies and methodologies for the remediation of hazardous and mixed wastes. The quantity of RCRA waste material shipped for any single shipment will not exceed 1000 kg of non-acute hazardous waste, 1 kg of acute hazardous waste, or 250 kg of soils, water, or debris contaminated with acute hazardous waste for each process being evaluated for each generated waste stream (Title 40 Code of Federal Regulations 261.4 [e]).

For purposes of sample collection for the treatability studies, the Quality Assurance (QA) standards addressed under the Remedial Investigation (RI) Sampling Plan will be used. The excavation and sample removal will be conducted in adherence to all of the applicable regulations, DOE Orders and FEMP Site Procedures. Mechanical excavation methods, i.e., backhoes, graders, or manual excavation by shovel, will be used. Sample collection locations will be selected to reflect a range of contamination in order to obtain meaningful results from the treatability studies. No sample collection will take place in areas of the FEMP delineated as wetlands and/or floodplains.

The potential for increased exposure to the public during the sample removal process is minimal due to the quantities involved. However, there is a small potential for increased exposure to workers during the sample removal process. This exposure will be minimized by use of appropriate safety techniques and by following sampling procedures specified in the RI Sampling Plan. Operations will be conducted in a radiologically-safe manner to prevent exposure of personnel. Safeguards include personal dosimeters and frequent surveys with detection equipment.

Upon completion of the treatability studies at the various laboratories and sites, the materials will be returned to the FEMP for storage and final disposition. Shipment of the materials back to the FEMP will be conducted in accordance with RCRA and DOT requirements and will be in accordance with the site approved acceptance criterion. The environmental risks associated with shipping a limited number of soil and waste samples, in compliance with the requirements of DOT regulations, will be minimal.

FEMP Soil Collection and Shipment

CX to be Applied

The Amendments to Section D of DOE's NEPA Guidelines, published in the Federal Register on September 7, 1990 at 54 FR 37174, add classes of actions generally applicable to all DOE actions that normally do not require Environmental Assessments (EA) or Environmental Impact Statements (EIS).

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

Site characterization and environmental monitoring, including siting, construction, and operation of characterization and monitoring devices, where the activities would not introduce or cause the inadvertent or uncontrolled movement of hazardous substances, pollutants or contaminants as defined by Section 101(33) of Comprehensive Environmental Response Compensation & Liability Act (CERCLA), or non-native organisms, and would not adversely affect environmentally sensitive areas. Activities covered include but are not limited to:

- (h) sampling and characterization of water, soil, rock and contaminants.

This CX is appropriate because soil and waste sample collection and shipment to enable treatability studies is an essential part of the FEMP site characterization work. 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 above. Therefore, the proposed action is categorically excluded from further NEPA review and documentation.

Approval: R. E. Tiller
R. E. Tiller, Manager
U.S. Department of Energy, Fernald Office

Date: 4/20/92

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

Signature: Carol Borgstrom
Carol Borgstrom, Director
Office on NEPA Oversight, EH-25

Date: _____

United States Government

Department of Energy

Fernald Office

memorandum

DATE: APR 22 1992
DOE-1416-92

REPLY TO:
ATTN OF: FN:Skintik

SUBJECT: CATEGORICAL EXCLUSION DETERMINATION (CX 376) - SAMPLE COLLECTION AND SHIPMENT FOR TREATABILITY STUDIES - FERNALD ENVIRONMENTAL MANAGEMENT PROJECT (FEMP), FERNALD, OHIO

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 (2) 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 FTS 774-6660 or (513) 738-6660.



R. E. Tiller
Manager

Attachment: As Stated

cc w/att.:

R. S. Scott, EM-20, FORS
K. A. Hayes, EM-424, TREV
L. Lawson, EM-431, TREV (2)
C. J. Brown, WEMCO