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CATEGORICAL EXCLUSION (CX) DETERMINATION
ACTIVE FLYASH PILE CONTROLS REMOVAL ACTION
NEPA DOC. NO. 366

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CATEGORICAL EXCLUSION DETERMINATION

Active Fly Ash Pile Controls Removal Action
(FEMP NEPA Document No. 366)
Fernald Environmental Management Project, Fernald, Ohio

Proposed Action

The U. S. Department of Energy (DOE) proposes a Removal Action at the Fernald Environmental Management Project (FEMP) to implement interim actions and provide fugitive dust and surface water run-off control at the Active Fly Ash Pile.

Location

The Active Fly Ash Pile is located approximately 3,000 feet south-southeast of the FEMP Waste Storage Area and just east of the South Field disposal area. The FEMP is located 20 miles northwest of downtown Cincinnati, Ohio.

Background

Historically, operations at the FEMP have relied on boiler produced steam for heat and facility operations. Currently, the site's two coal-fired boilers continue to operate and generate approximately 7.0 tons of ash waste per day during fall/winter operations and 3.0 tons per day during the spring/summer. The ash waste is a mixture of bottom ash from the grate below the boiler, fly ash collected from the mid-level of the boiler, and fly ash collected from the electrostatic precipitator pollution control devices. The ash waste is loaded onto tarp-covered dump trucks and transported to the Active Fly Ash Pile several times a week. The Active Fly Ash Pile has received ash waste since the mid-1960s, is still being used, and is estimated to contain approximately 59,000 cubic yards of ash waste.

The pile has a surface area of approximately 3 to 4 acres and has never been covered. In July 1991 high wind conditions produced a large ash cloud that was visible off site. Local residents witnessed the cloud and expressed concern. Water was applied, as needed, as a dust suppressant for a short-term control method to prevent further air emissions.

Two inspections of the Active Fly Ash pile were made by Parsons in September 1991 pursuant to preparation of the Removal Action Work Plan. These inspections revealed small amounts of ash in the grass within 20 feet of the base of the pile and a light dusting on the vegetation surrounding the pile indicating minimal wind erosion. Signs of mild scouring from runoff water were visible on the south and west slopes of the pile.

Samples from the Active Fly Ash Pile have been analyzed and indicate that the ash waste is non-toxic and non-hazardous and contains radionuclides below unrestricted release values.

A Removal Site Evaluation was completed in September 1991 and DOE determined that a Time-Critical Removal Action under CERCLA be implemented. An Action Memorandum has been issued; a Work Plan has been developed and is pending approval.

Description of the Proposed Action

A combination of control measures was selected to implement the Removal Action for the Active Fly Ash Pile. The Removal Action involves a silt trap, a wind barrier, minor regrading and compacting the pile, and the application of chemical dust control agents.

The silt trap will be constructed of permeable geotextile fabric firmly fastened to vertical supports and located approximately 5 feet away from and around the toe of the ash pile. The lower edge of the fabric will be buried beneath the ground to prevent the runoff and suspended material from passing through. The runoff will then infiltrate the ground and leave the suspended solids at the surface.

The wind barrier will consist of ultra-violet stabilized, high density polyethylene fence around the top of the pile. The barrier will be approximately 4 feet high and held upright with supports.

Minor regrading will consist of confining all cut volumes to the upper rim of the Active Fly Ash Pile. This will hold the present peak elevation surface area limits and maintain the present side slope of the ash pile. All material from this regrading will be placed over the remaining area of operation and compacted.

Dust-control agents will be sprayed on the surface of the fly ash pile and at the transfer point as the ash is loaded onto trucks for transport to the pile. Dust-control agents are either surface binders that alter the charge of the particles and allow them to agglomerate and act as an adhesive between the particles or crusting agents that form a flexible, elastomeric bridge between the particles. The dust control agents that will be used are non-hazardous according to the Material Safety Data Sheets and any residuals from the use of these agents will not contain RCRA hazardous waste. Application will be made with the use of fixed sprayers at the transfer point and mobile, hand-held sprayers at the fly ash pile.

The proposed action is expected to cost approximately $500,000.

All Removal Action activities will be completed in accordance with the requirements defined in the National Contingency Plan; Comprehensive Environmental Response, Compensation, and Liability Act; DOE Orders; the FEMP Health and Safety Plan; and the FEMP Quality Assurance Plan.

There is no activity involving environmentally sensitive areas such as wetlands, floodplains, or the sole source aquifer underlying the FEMP site.

Categorical Exclusion (CX) 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 actions that normally do not require Environmental Assessments or Environmental Impact Statements.

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

> 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 following: 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.

The CX is appropriate since the proposed action as described, is to conduct a removal action under 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.

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: 1/22/92

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

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

Date: _____

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United States Government

Department of Energy
Fernald Office

memorandum

DATE: JAN 23 1992
DOE-680-92

REPLY TO
ATTN OF: FO:Skintik

SUBJECT: **CATEGORICAL EXCLUSION DETERMINATION (CX 366) - ACTIVE FLYASH CONTROLS REMOVAL ACTION - 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 Fernald Office 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.

R. E. Tiller

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

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