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**CATEGORICAL EXCLUSION DETERMINATION-
REMOVAL ACTION 28 - FIRE TRAINING
FACILITY NEPA DOC. NO. ~~403~~**

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NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)**CATEGORICAL EXCLUSION (CX) DETERMINATION****Removal Action 28 - Fire Training Facility
NEPA Document No. 397
Fernald Environmental Management Project (FEMP)
Fernald, Ohio****Proposed Action**

The United States Department of Energy (DOE) at the Fernald Environmental Management Project (FEMP) proposes the dismantling and removal of the Fire Training Facility (FTF) which has been designated a Hazardous Waste Management Unit (HWMU).

Location

The proposed action will take place north of the FEMP Process Area and Building 63, just outside of the fenced perimeter on the North Access Road. The 1,050 acre FEMP site is located 18 miles northwest of downtown Cincinnati, Ohio.

Background

The Fire Training Facility (FTF) was used to simulate fire response activities by local community fire departments approximately 60 days during each year from 1966 through April 1990. The North Construction Gravel Road (Gravel Perimeter Road) and the newly installed FTF boundary fence serve as the HWMU boundaries. Document and record reviews, analytical results of soil and groundwater, and physical examination of the site indicate that various materials such as petroleum hydrocarbons, wood materials, solvents, vehicles, furniture, and metallic sodium and magnesium were probably burned and/or stored at the FTF. Some of the waste solvents burned at the FTF were determined to be contaminated with radionuclides. As a result, several structures were detected to be radioactively contaminated.

The structures and associated materials burned are described as follows:

- A two story concrete block building was used to burn straw, furniture, and pallets. Flammable liquids were reportedly used to re-ignite wet combustible materials during training to create repeated fires. Excess liquids flowed onto the surrounding asphalt pad.
- A 50 foot long, eight foot diameter, steel pressure vessel was cut open at the eastern end of the vessel to practice confined space egress and ingress in a smoke-filled environment.
- A 500 gallon skid mounted, steel tank is situated on two concrete pedestals. The tank sits above a pond which is approximately 15 feet in diameter. The bottom of the tank is severely corroded although the tank was not reported to be used for holding or burning flammable liquids. Oil, waste solvents, gasoline, and kerosene were burned in the pond.

Removal Action 28 - Fire Training Facility

- An underground sump was used to drain the pond as needed. The sump is located approximately 50 feet south of the pond.
- The base of an open top rectangular steel tank rests 1.5 feet below grade. Construction details show that the tank was removed from the Plant 6, No. 6 salt bath. During fire training exercises, this open top tank was filled with waste oil or solvents and set on fire.
- Two ground surface burn areas are located south of the pressure vessel. One area located 20 feet to the south of the pressure vessel, was reportedly used to burn magnesium and sodium metal. The area is approximately six feet in diameter. The other area is approximately 10 feet x 20 feet and was used to burn wood and vehicles; it is located approximately 30 feet to the southeast of the pressure vessel.
- A former drum and tank storage area was used to hold flammable liquids for fueling fires and is located east of the block building, across the North Access Road.

Description of the Proposed Action

The estimated nature and extent of contamination associated with the FTF structures, equipment, surficial soils, and the perched groundwater-bearing zone are based on preliminary analyses of soils from eight shallow soil borings, three radiation surveys, and groundwater samples.

The preliminary analyses described above show low-level radioactive wastes located in the area underlying and surrounding the skid tank pond and the open top tank as well as the area surrounding the sump. The concrete floor of the block house, the pressure vessel, and the skid tank were identified with spots of fixed radiation contamination. The open top tank showed evidence of surface contamination. Mixed waste was only identified in the skid tank pond. Surface radiation contamination was detected at the perimeter of the pond. Possible hazardous waste is indicated within the magnesium burned ground surface area.

Seven stages of activities will be implemented during the proposed Removal Action to include: 1) Site preparation and equipment staging, 2) removal of surface water, 3) removal of structures, 4) removal of contaminated surface soil to background concentrations, 5) soil sampling and analysis, 6) backfilling of soil excavations, and 7) preparation of a final report.

Site preparation will include surveying and marking the FTF HWMU boundaries, removal of site access barriers, set-up of operating equipment for demolition and excavation, and development of a decontamination area. Prior to dismantling and removal activities, all liquids will be removed from the open top tank, the skid tank pond, the sump, and the horizontal pressure vessel end piece. These liquids will be treated prior to disposal. Each of these structures, in addition to the block building and asphalt pad, will be demolished and removed for disposal. Recycling or disposal of the structure materials (debris) and soils will be managed according to the Removal Action No. 17 Work Plan, "Improved Storage of Soil and Debris," and Removal Action No. 9, "Removal of Waste Inventories," for packaging, shipment, and disposal of low-level radioactive wastes.

Removal Action 28 - Fire Training Facility

Soil excavation and soil characterization activities will include removal of radiologically contaminated soil and characterization of soils left in place. Excavated environmental media will be separated as potential mixed wastes, potential low-level wastes, and hazardous waste for proper storage. Excavated areas determined to be clean will be backfilled following Removal Action No. 17 guidelines. Additional soil samples will be collected from outlying areas in the HWMU to verify the extent of contaminated soils and that removal of contaminated surficial soils has been achieved. Finally, additional monitoring wells will be installed to monitor the groundwater quality of the shallow perched groundwater zone. Two existing monitoring wells will serve to monitor the site in the Great Miami Aquifer.

The FEMP will provide certification of interim closure of the FTF upon completion of the above-described remediation efforts and submit a final report summarizing the results.

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(a) and B6.1(b), as types of actions that are Categorical Exclusions applicable to specific Agency Actions, as follows:

B6.1 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:

- (a) 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 wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination.

Removal Action 28 - Fire Training Facility

(b) Removal of bulk containers (for example, drums, barrels) that contain or may contain hazardous substances, pollutants, contaminants. CERCLA-excluded petroleum or natural gas products, or hazardous wastes (designated in 40 CFR part 261), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain.

Removal Action 28 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:

Ray Hansen
Raymond J. Hansen, Acting Manager
U.S. Department of Energy, Fernald Office

Date:

7-22-93

United States Government

Department of Energy

Fernald Field Office

memorandum

DATE: JUL 23 1993
DOE-2457-93

REPLY TO:
ATTN OF: FN:Skintik

SUBJECT: CATEGORICAL EXCLUSION DETERMINATION (CX 397) - REMOVAL ACTION 28 - FIRE TRAINING FACILITY

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 regarding this matter, please contact Ed Skintik at (513) 648-3151.


Raymond J. Hansen
Acting Manager

Attachment: As Stated

cc w/att:

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