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**WITHDRAWAL OF THE REQUEST FOR
APPROVAL OF THE SOUTH PLUME REMOVAL
ACTION ENGINEERING EVALUATION/COST
ANALYSIS AND ITS ADDENDUM AS AN
ENVIRONMENTAL ASSESSMENT**

02/06/92

DOE-HQ/DOE-FN

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memorandum

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DATE: FEB 06 1992

REPLY TO
ATTN OF: EM-424 (S. Frush, FTS 233-8159)

SUBJECT: Withdrawal of the Request for Approval of the South Plume Removal Action Engineering Evaluation/Cost Analysis and its Addendum as an Environmental Assessment

TO: Robert Tiller
Manager
Fernald Office

In November 1991, the Fernald Environmental Management Project (FEMP) Division (EM-424) assembled and forwarded into the DOE Headquarters concurrence chain, a package requesting the approval of the South Plume Engineering Evaluation/Cost Analysis (EE/CA) and its addendum as an Environmental Assessment (EA). The EE/CA addendum was prepared by the Fernald Office in November 1991, to document revisions to the scope of the South Plume Removal Action that had occurred since the EE/CA was originally approved in November 1990. The EE/CA-EA package was intended to fulfill the requirements of the National Environmental Policy Act (NEPA) for Parts 2 and 3 of the South Plume Removal Action.

The South Plume Removal Action originally consisted of four parts. A fifth part was recently added to the removal action. The five parts of the South Plume Removal Action are as follows:

- Part 1 - Alternate Water Supply
- Part 2 - Groundwater Pumping and Discharge
- Part 3 - Interim Advanced Wastewater Treatment (IAWWT) System
- Part 4 - Groundwater Monitoring and Institutional Controls
- Part 5 - Groundwater Modeling and Geochemical Investigation.

A National Environmental Policy Act (NEPA) Memorandum-To-File (MTF) was approved on September 27, 1990, for the implementation of Parts 1 and 4 of the removal action. In addition, on November 7, 1991, a NEPA categorical exclusion (CX) was approved (pending publication of the Floodplain Statement of Findings in the Federal Register and 15 days of public review) for Part 5 of the removal action.

As plans for the South Plume Removal Action progressed, it became evident that the installation of the IAWWT System, and subsequently the Advanced Wastewater Treatment Facility (AWWT), would affect another removal action that was in the planning stages--the Waste Pit Area Storm Water Runoff Control (WPARC) Removal Action. Consequently, the WPARC Removal Action was modified by eliminating a 10-gallon per minute pilot scale treatment system, while relying on the IAWWT System and the AWWT Facility to provide a net reduction of uranium in the effluent discharged to the Great Miami River. This modification was documented in an addendum to the WPARC EE/CA. The WPARC EE/CA and its addendum were approved as an EA on December 11, 1991, and a Finding of No Significant Impact (FONSI) was issued. FEB 13 1992

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The South Plume Removal Action EE/CA-EA package was originally intended to fulfill the NEPA requirements for only Parts 2 and 3 of the removal action, as Parts 1, 4, and 5 had been previously covered by other NEPA documents as discussed above. In early January 1992, discussions between EM-424, EM-43, EM-20, and EH-25 suggested that, because the IAWWT System had been included in the WPARC Removal Action EE/CA-EA package and FONSI, no additional documentation was required to fulfill the requirements of NEPA for Part 3. Therefore, the South Plume EE/CA-EA package, if approved, would serve to fulfill the NEPA requirements for only one part, Part 2, of the removal action (Groundwater Pumping and Discharge).

After additional review of the scope of Part 2 of the South Plume Removal Action, it was determined that Part 2 could be categorically excluded from any further NEPA review and documentation. Therefore, a decision was made by EM-424, EM-43, EM-20, and EH-25, and discussed with the Fernald Office, to withdraw the South Plume Removal Action EE/CA-EA package from the DOE Headquarters concurrence chain. On January 9, 1991, Shirley Frush of my staff directed Ed Skintik of your staff to prepare a CX for Part 2 of the South Plume Removal Action. The Fernald Office must approve the CX before Part 2 of the South Plume Removal Action may be initiated.

If your staff has any questions, please contact Shirley Frush at FTS 233-8159.



Kimberly A. Hayes
Director
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cc:

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