

5214

**CATEGORICAL EXCLUSION DETERMINATION
RCRA CLOSURE OF THE NORTH AND SOUTH
SOLVENT TANKS NEPA DOC. NO. 447**

02/25/94

**NEPA DOC 447
DOE-FN/FERMCO
10
CAT EX**

NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)
CATEGORICAL EXCLUSION (CX) DETERMINATION
RCRA CLOSURE OF THE NORTH AND SOUTH SOLVENT TANKS
NEPA Document No. 447
Fernald Environmental Management Project (FEMP)
Fernald, Ohio

Proposed Action

The United States Department of Energy (DOE) proposes to accomplish clean closure of the North and South Solvent Tanks in compliance with requirements for Resource Conservation and Recovery Act (RCRA) closure.

Location

The FEMP site is located approximately 29 km (18 miles) north of downtown Cincinnati, Ohio. The proposed action will occur in an uncovered, flat (elevation approximately 580.5 feet) area outside and west of Building 13A.

Background

The site began operation of the North and South Solvent Tanks in 1954 for storage of mixed extraction solvents. These solvents were stored in the above ground tanks before processing through other systems for recovery or reuse of the usable solvent ingredients. The tanks were not used to store hazardous wastes. The tanks were active through July 1989 when production ceased, but continued to store the solvents until April 21, 1993. After production ceased, the mixture of solvents were designated as mixed, low-level waste under RCRA. At that time the waste was removed from both tanks and transported off site for incineration.

The tanks have been identified as hazardous waste management unit (HWMU) No. 52 and have been included in the list of HWMUs in the latest RCRA Part A and B Permit Applications submitted to the Ohio Environmental Protection Agency (OEPA). The tanks have also been identified as a HWMU in the RCRA compliance schedule submitted pursuant to the 1988 Consent Decree between the State of Ohio and the DOE, as amended by the Stipulated Amendment to the Consent Decree (SACD) in January 1993. A Closure Plan Information and Data (CPID) has been submitted to the OEPA in accordance with the 1993 SACD and RCRA compliance schedule.

Description of the Proposed Action

Prior to performing any work, a radiation survey will be conducted and a Radiological Work Permit will be issued. In addition, a visual inspection of the secondary containment system will be made to identify potential routes of release (e.g., cracks). If a crack is discovered, it will be sealed. A hazard assessment will be completed per the Safe Shutdown Health and Safety Plan to determine applicable work permits.

RCRA Closure of the North and South Solvent Tanks - Page 2

The proposed action will encompass a variety of activities. First, all exterior structures (including process piping, support structures, and equipment) will be brushed, swept, or vacuumed with a HEPA-filtered vacuum until visibly clean i.e., no loose debris remains. Process piping will then be disconnected from the tank flanges and covered to prevent steam cleaning and rinse waters from escaping. Verification that the drain valve is in the closed position will be performed. All electrical connections will be disconnected, tagged, and locked out.

Each tank will then be rinsed with approximately 100 gallons of pressurized water. Note that all rinse water generated during decontamination activities will be characterized and either placed in an approved storage containers (if necessary) or transported to the existing wastewater treatment plant. After each tank is rinsed and the bottom drain valve is closed, a steam line will be inserted into the manway of each tank to remove residues adhering to the side walls and bottom of the tanks. After the steam line is removed, the drain valve underneath the tank will be opened to release the accumulated water into an approved storage container. The drain valve will then be closed. The rinse cycle will be repeated twice before verifying successful decontamination of the tanks.

Ancillary equipment (i.e., spigots, drain lines, sight glass, valves, and transfer pump) will be dismantled from the HWMU and placed in a container where it will be flushed with water to clean off any residuals. The ancillary equipment will be managed as a solid waste and placed in storage until characterization can be completed.

Secondary containment structures will be cleaned through the implementation of two cycles of a pressurized water spray before verifying successful decontamination. Furthermore, all equipment utilized during implementation of the proposed action will be decontaminated in accordance with FEMP site procedures.

Dismantlement and final disposition will be completed during the remediation of Operable Unit 3 and is not part of this proposed action. Since the HWMU will be clean closed, the dismantled tanks i.e., debris will not be regulated under RCRA.

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 C.F.R. 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, Section 1021.410, B6, the following as types of actions that are Categorical Exclusions applicable to Environmental Restoration and Waste Management Activities:

RCRA Closure of the North and South Solvent Tanks - Page 3

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 C.F.R. Part 300).

This Categorical Exclusion is appropriate since the proposed action as previously described will be the RCRA Closure of the North and South Solvent Tanks, specifically:

B.6.1(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 C.F.R. 261), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain.

Furthermore, the proposed action will not violate applicable statutory, regulatory, or permit requirements; it will not require siting and construction nor major expansion of waste disposal, recovery, or treatment facilities; and it will not have significant adverse impact on 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: _____


J. Phil Hamric, Manager
U.S. Department of Energy, Fernald Field Office

FEB 25 1994

Date: _____

5214



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

FEB 25 1994
DOE-1112-94

Mr. W. C. Breen
Fernald Environmental Restoration
Management Corporation
P.O. Box 398704
Cincinnati, Ohio 45239-8704

Dear Mr. Breen:

**APPROVED CATEGORICAL EXCLUSION, CX 447 - RESOURCE CONSERVATION AND RECOVERY
ACT CLOSURE OF THE NORTH AND SOUTH SOLVENT TANKS**

- Reference:
1. DOE Memorandum, T. A. O'Toole to Distribution, "Eliminating the Requirement for Submitting Categorical Exclusion (CX) Determinations to the Office of NEPA Oversight," dated December 16, 1993
 2. DOE Memorandum, T. P. Grumbly to Distribution, "Requirements for Submitting Categorical Exclusion Determinations to the Office of Environmental Restoration and Waste Management," dated February 9, 1994

The enclosed categorical exclusion (CXs) under Subpart D of the Department of Energy's National Environmental Policy Act Procedures and Guidelines, 10 CFR 1021, effective May 26, 1992, has been approved by our office. Per the referenced Memorandum from DOE Headquarters, it is no longer necessary to submit categorical exclusions to the Office of National Environmental Policy Act (NEPA) Oversight (EH-25) for approval/objection. As stated in the referenced memorandum, this does not reduce line management responsibility to ensure that CXs are properly applied and documented. For the purpose of NEPA compliance, reference 2 (enclosed) requests copies of categorical exclusions to EM-20 and the appropriate EM program office.

If you have any questions on this subject, please direct them to Ed Skintik, 648-3151.

Sincerely,


J. Phil Hamric
Manager

FN: Skintik

4

Enclosure: As Stated

cc w/enc:

R. S. Scott, EM-20, FORS
K. A. Chaney, EM-424, TREV
M. E. Nelson, FERMCO/65-2
Administrative Record, FERMCO

H-2362

memorandum

DATE: FEB 09 1994
REPLY TO:
ATTN OF: EM-22 (Kleinrock:6-0338)

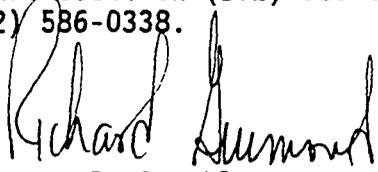
SUBJECT: Requirements for Submitting Categorical Exclusion Determinations to the Office of Environmental Restoration and Waste Management

TO: Distribution

The purpose of this memorandum is to provide guidance for those Operations and Field Office Managers to whom I have delegated my authority to make categorical exclusion determinations for actions undertaken by the Environmental Restoration and Waste Management (EM) program.

On December 16, 1993, the Office of Environment, Safety and Health (EH) issued guidance (attached) that eliminated the requirement to provide the Office of NEPA Oversight (EH-25) with copies of Appendix B categorical exclusion determinations for the purpose of review and objection within a two week period. In that memorandum, EH requested the Cognizant Secretarial Officers to provide guidance to the field on their specific program requirements. Therefore, effective as of this date, please provide one copy of each categorical exclusion determination made for EM projects to my NEPA Compliance Officer, Randal S. Scott, Deputy Assistant Secretary for Oversight and Self-Assessment (EM-20), and one copy to the appropriate EM program contact(s). The determinations will be used by my NEPA Compliance staff for information purposes only. You should provide the categorical exclusion determinations to EM-20 within two weeks of your making the determination.

If you have any questions, please call Mr. Scott on (202) 586-8754, or your staff may call Michael Kleinrock on (202) 586-0338.


for
Thomas P. Grumbly
Assistant Secretary for Environmental
Restoration and Waste Management

Attachment

cc:
Ken Glozer, EM-10
Jill Lytle, EM-30
R. Pat Whitfield, EM-40
Clyde Frank, EM-50
Willis Bixby, EM-60
Carol Borgstrom, EH-25

Distribution of Memorandum dated FEB 09 1994 :

Manager, Albuquerque Operations Office
Manager, Chicago Operations Office
Manager, Fernald Field Office
Manager, Idaho Operations Office
Manager, Nevada Operations Office
Manager, Oak Ridge Operations Office
Manager, Richland Operations Office
Manager, Rocky Flats Office
Acting Manager, San Francisco Operations Office
Manager, Savannah River Operations Office
Director, Morgantown Energy Technology Center