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**CATERGORICAL EXCLUSION DETERMINATION - NEW RESPIRATOR WASH  
FACILITY NEPA DOC. NO. 446**

05/06/94

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## NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)

## CATEGORICAL EXCLUSION (CX) DETERMINATION

## NEW RESPIRATOR WASH FACILITY

NEPA Document No. 446

G-000-108.30

Fernald Environmental Management Project  
Fernald, OhioProposed Action

The United States Department of Energy (DOE) proposes to construct a new respirator washing facility in the existing Service Building, Room 199.

Location

The FEMP site is located approximately 29 km (18 miles) northwest of downtown Cincinnati, Ohio. The proposed action will take place on the south side of the former Production Area in the existing Service Building, Room 199.

Background

Within the next few years, remedial activities are expected to increase, causing a demand for larger and more operational respirator wash facilities. Consequently, the current respirator wash facility is unable to handle the increasing volume of respirators to be decontaminated. The new respirator wash facility, previously planned for an area inside Service Building, Room 198, will now to be relocated to Service Building, Room 199 resulting in a more cost effective and constructable facility. Dimensions of the facility will be 22 feet wide by 23 feet and six inches in length.

Description of the Proposed Action

The project involves the renovation of a room within the existing FEMP laundry area. Equipment to be installed includes: a ventalized unloading station, three respirator washer units, and three electric dryers along with all necessary electric, plumbing, and ventilation connections. Renovation to the room includes: constructing new entrance ways, walls, flooring, and fencing. All ventalized equipment will be connected to a prefilter HEPA fan located outside of the Service Building. The wash water will be discharged to a collection sump and treated in the existing FEMP water treatment system until the Advanced Waste Water Treatment Facility (AWWTF) is constructed. An Article 113 Determination "Minimization and Control of Radioactive Liquid Wastes (Article Number 451, FN-Fermco-451-3-19) was issued in a response to section 451.5 and 451.6 of the U.S.DOE Radiological Control Manual (DOE N 5480.6).

I. Equipment Procurement.

- A. Procure new equipment as specified by FERMCO including: 2 new

combination respirator washer/dryer units, a new ventilation fan/HEPA filter unit, a new ventilation table for unloading rad-contaminated respirators, and new locking cabinets for storing clean respirators outside of Room 199.

## II. Preparation Inside Room 199 Prior to Equipment Installation

- A. The north wall of the room will be opened and a solid locking door will be installed to provide access from the room to the controlled area.
- B. Installation of a 5-foot wide double door on the south wall of the room.
- C. Close the west most existing entry way with brick.
- D. Seal off the existing square exhaust vent going to the roof of Room 199.
- E. Seal each of the two 8-inch inlet air diffusers on the west wall to prevent possible particulates from entering the duct connecting Room 199.
- F. Seal all roof-to-wall voids, piping, and duct penetrations through the walls to prevent possible particulates from leaving the room.
- G. Install copper lines from the existing source on the east wall. Supply tie-ins for the existing hood, sink, and washer to be relocated from the current Respirator Wash Trailer.
- H. Install copper water lines from the existing source on the east wall to allow tie-ins to the two new combination washer/dryer units.
- I. Cut into concrete flooring to install a new drain at the east wall for both new washers plus the existing sink/washer unit. All piping will discharge to the floor drain in the center of the room, which will drain into the contaminated water collection sump. This water will be treated, sampled, and discharged.
- J. Install PVC piping for drains on the existing sink/washer and the two new washers. Restore floor to original condition.
- K. Install electric conduit as detailed on FERMCO drawings.
- L. Install duct work on walls leading from equipment locations through the wall at the north side of the building for tie-in to the new HEPA fan unit.
- M. Tie-in water lines running above Column L-3 in the laundry area. Install lines down the side of Column L-3 and connect hoses to provide laundry cart washing at this location.

## III. Preparation Work Outside Room #199 Prior to Equipment Installation

- A. Open Controlled Area fence just north of Room 199 and extend a new fence to create a 6-foot wide strip of additional Controlled Area.
- B. Pour a 4-inch thick concrete pad on which to set the new fan/HEPA filter outside the north wall of Room 199.

IV. New Equipment Installation & Temporary Facility Acceptance

- A. Install and tie-in water supply lines, drains, electric power, and exhaust ducts to both new combination washer/dryer units.
- B. Install and tie-in ventilation table for unloading contaminated respirators.
- C. Install and tie-in both duct and electric to the new fan/HEPA unit. A screen with one half-inch openings will be installed over the end of the stack.
- D. Energize all new electric circuits.
- E. Install the new clean respirator cabinets outside of Room 199.
- F. Relocate benches, tables, wet vacuum, and portable eyewash station from the current Respirator Wash Trailer to Room 199. Locate a personnel contamination monitor (PCM) for exit surveys.

V. Install Existing Equipment and Work Completion

- A. At the existing Respirator Wash Trailer, disconnect all water and electric lines and ducts from the following pieces of equipment: existing sink, hood, washer unit, and large electric dryer.
- B. Utilizing appropriate radiological controls, open one end of the existing Respirator Wash Trailer, and remove the equipment.
- C. Relocate the existing sink, hood, washer unit, and large dryer to Room 199. Complete all electrical, water, and duct connections.
- D. Seal all openings created in the Respirator Washer Trailer and utilize the trailer for storage.

Categorical Exclusion to be Applied

The authority for finding this project 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, B1.15 and B2.3, the following as types of actions that are

Categorical Exclusions applicable to Specific Agency Actions:

B1.15 Siting, construction, and operation of small-scale support buildings and support structures (including prefabricated buildings and trailers) and/or small-scale modifications of existing buildings or structures, within or contiguous to an already developed area (where site utilities and roads are available). Covered support buildings and structures (and/or modifications) include those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; employee health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (including security posts); fire protection; and similar support purposes, but excluding facilities from waste storage activities, except as provided in other parts of this appendix.

B2.3 Installation of, or improvements to, equipment for personnel safety and health, including, but not limited to, eye washes, safety showers, radiation monitoring devices, and fumehoods and associated collection and exhaust systems, provided that emissions would not increase.

This Categorical Exclusion is appropriate since the proposed action will be the renovation of an existing building (i.e., Service Building, Room 199) and the installation of new health and safety equipment (i.e., respirator washers, dryers, and decontamination wash sinks) within the FEMP boundaries. 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:

Wally Quaid for  
J. Phil Hamric, Manager

U.S. Department of Energy, Fernald Field Office

Date:

5-6-94