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**CATEGORICAL EXCLUSION DETERMINATION - FEMP ROUTINE SHIPPING
ACTIVITIES - CY 1994 NEPA DOC. NO. 450**

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NATIONAL ENVIRONMENTAL POLICY ACT**CATEGORICAL EXCLUSION DETERMINATION****FEMP Routine Shipping Activities - CY 1994****NEPA Document No. 450****Fernald Environmental Management Project****Fernald, Ohio****Proposed Action**

The United States Department of Energy (DOE) proposes to conduct shipping of non-contaminated equipment, supplies, waste, and recyclable materials to and from the Fernald Environmental Management Project (FEMP) as part of facility operation and routine maintenance activities.

Location

The proposed action will occur at various regional locations, including the FEMP site. The 1050 acre FEMP site is located in a rural area of southwest Ohio, within Butler and Hamilton Counties, approximately 18 miles northwest of downtown Cincinnati, Ohio.

Background

Buildings, structures, infrastructures, equipment, and offices must be kept in a suitable condition in order to accomplish the FEMP mission of the safe environmental restoration and compliance of the site. Facility operation and routine maintenance activities at the FEMP are required to maintain and preserve these structures, equipment, and working conditions. Also, new, non-contaminated equipment must be shipped from the FEMP site as part of the Safe Shutdown Program (Removal Action No. 12). This NEPA documentation applies specifically to shipping activities associated with routine plant operation and maintenance activities and the clean equipment as part of the Safe Shutdown Program. This NEPA documentation will be updated on an annual basis.

Description of Proposed Action

The proposed action will involve a variety of shipments supporting facility operation and routine maintenance activities to and from various local and regional locations. Many different kinds of equipment and supplies are required to preserve the appearance, working conditions, and sanitation of the FEMP. Common items that are shipped to the FEMP as part of facility operation and routine maintenance activities include equipment and materials associated with the maintenance, repair or replacement of the following:

- process equipment and associated systems
- utility systems, including water, electrical, communication, and data processing systems
- small-scale structures or buildings
- safety hazard and prevention equipment, devices, and structures
- security systems
- heating, ventilation, and air conditioning systems and high efficiency particulate air filters

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- materials, equipment, and structures associated with routine plant service activities, such as landscaping, snow removal, furniture assembly, infrastructure repair, vehicle and heavy equipment repair, and janitorial and housekeeping activities.

In addition to the above shipping activities, routine non-contaminated waste disposal activities are required as part of facility operations. Office trash generated on the administrative side of the FEMP, as well as clean, non-contaminated process-side office trash is shipped to a local landfill. Eleven dumpsters are emptied daily and shipped by the landfill owner. This represents approximately 13,100 cubic meters of office trash shipped per year.

Non-contaminated Flyash and bottom ash is produced as a result of routine boiler plant operation at the FEMP. The ash is administratively controlled and monitored to ensure that it is non-contaminated. Approximately 140 tons of flyash and bottom ash are produced and shipped to a local landfill each month.

Non-contaminated asbestos containing material generated on the non-process side of the FEMP is collected and shipped to a local landfill. Less than 150 cubic meters of non-contaminated asbestos containing material is forecasted to be shipped in the next three years.

As part of the FEMP Safe Shutdown Program (Removal Action No. 12), new, non-contaminated equipment will be shipped from the FEMP site to other DOE facilities, various governmental agencies and their subcontractors, or private industry. These shipments are also mandated under DOE's and the U.S. Government property management regulations which seek to obtain the maximum, effective, and economic utilization of property already owned by the Federal Government.

Categorical Exclusion to be Applied

The authority for finding this project to be subject to NEPA Categorical Exclusion is contained in Subpart D of 10 CFR Part 1021, entitled "National Environmental Policy Act Implementing Procedures and Guidelines." The Final Rule and Notice, effective May 26, 1992, includes a 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, B1.3 and B6.1, the following as a type of action that is a Categorical Exclusion applicable to Specific Agency Actions:

B1.3 Routine maintenance activities and custodial services for buildings, structures, infrastructures (e.g., roads), and equipment, during which operations may be suspended and resumed. Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (that is, repair), preventative, and predictive (as defined in DOE Order 4330.4, "Maintenance Management"), are required to maintain and

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preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that the replacement is in kind and is not a substantial upgrade or improvement. Routine maintenance does not include replacement of a major component that significantly extends the useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life).

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).

For CX B1.3, while shipping activities are not specifically mentioned in the referenced CX listing, it is implied that shipping is covered as part of the activity. For instance, trash removal as a routine maintenance activity includes the placement of receptacles for the trash, physical collection of the trash, temporary storage of the trash (e.g., a dumpster), and shipment of the trash to a landfill. In addition, the removal action basis (B6.1) is identified because a component of the Safe Shutdown Removal Action includes dispositioning of non-contaminated equipment.

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 adversely impact any environmentally sensitive areas (e.g., wetlands, floodplains, or the sole-source aquifer). Therefore, the proposed action is applicable to the above referenced CX.

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