

**U.S. Department of Energy Office of Legacy Management  
Determination of NEPA Adequacy (DNA)**

**Project/Activity:** Structural Enhancements and Site Maintenance Activities at the Fernald, Ohio, Site

**A. Briefly describe the proposed action.**

Several activities have been proposed for the Fernald site. Some activities are functions of ongoing surveillance and maintenance such as quarterly inspections and groundwater sampling (for total uranium, quarterly elevations, and the Onsite Disposal Facility). Other projects proposed for the site include: implementing the second phase of sitewide electrical upgrades, paving and road work, constructing the Sycamore Trail boardwalk, stabilizing the Paddy's Run stream bank, and constructing a water-level control feature.

The first phase of electrical upgrades was mentioned in DNA LM 18-13. The second phase of sitewide electrical upgrades is similar to the first phase, but would cover a different area of the site and consists of replacing overhead electrical lines with underground lines and downsizing some transformers.

DNA LM 18-13 also mentioned that asphalt and paving activities would be taking place throughout the site. The proposed projects for the Lodge Pond trailhead parking lot and Valve House would involve geotechnical investigation, removal of existing gravel, and installation or repair of asphalt and access turnouts at both locations.

The Sycamore Trail boardwalk project entails constructing a wood and composite boardwalk to provide an education area and serve as a trail connector for part of the Sycamore Trail. The work includes, but is not limited to: boardwalk construction, access trail construction on both ends of the boardwalk, and construction and extension of a split-rail fence. The construction area is partially located in a wetland. Due to the wetland location, the subcontractor is restricted to hand-powered tools and equipment while working. No dredge or fill of the wetland basin is planned. An environmental compliance review confirmed the proposed actions are covered under Nationwide Permit 25.

The Paddy's Run streambank stabilization project includes constructing streambank stabilization within a 450-foot reach of Paddy's Run at the Fernald Preserve. Stabilization would consist of channel reconfiguration, installation of a rock toe, soil-encapsulated lifts, two in-stream cross vanes, regrading, and revegetation. The purpose of the project is to keep portions of the Paddy's Run area from eroding and migrating further east into an area where elevated surface water concentrations have been observed since late 2006. The U.S. Army Corps of Engineers confirmed with project personnel that the proposed actions are Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)-related and are covered under Nationwide Permit 38.

DNA LM 18-13 also mentioned future plans for a Main Drainage Corridor water-level control structure. This structure would be designed to mitigate and stabilize conditions affected by beaver dams. Approximately 11,545 square feet of soil riprap would be installed to construct the 3-foot-high berm water-level control structure.

Work for all of the projects noted above would be performed by subcontractors with planning and oversight by the Legacy Management Support (LMS) contractor. Field-activity sequencing is dependent on budget and resource availability. Site-specific details are subject to final project plans.

The proposed activities are within the scope of the *Institutional Controls Plan*, which is Volume II of the *Comprehensive Legacy Management and Institutional Controls Plan*. The *Institutional Controls Plan* is required under the CERCLA remediation process and is a legally enforceable CERCLA document that is considered part of the remedy for the site.

Site conditions and the projects designed to support them are identified in the Five-Year Review reports. DOE conducts Five-Year Reviews at the Fernald Preserve, as required by Section 121 of CERCLA. This Act requires that remedial actions which result in any hazardous substances, pollutants, or contaminants remaining onsite at levels that do not allow for unlimited use and unrestricted exposure be subject to a five-year review. The purpose of the five-year reviews is to ensure that the remedies that were implemented to clean up the site continue to be protective of human health and the environment. Community input and feedback are integral to the document reviews and concurrence is required by the state and the U.S. Environmental Protection Agency. The last Five-Year Review was completed in 2011. The next Five-year Review is scheduled for 2016.

Ecological restoration monitoring is required as a result of the natural resource damage settlement between U.S. Department of Energy (DOE), Ohio Environmental Protection Agency, and U.S. Department of the Interior. *The Fernald Preserve Natural Resource Restoration Plan* (State of Ohio 2008) specifies ecological restoration monitoring

requirements. The Wetland Mitigation Monitoring Reports provide ongoing evaluation of the site's wetland communities through the functional monitoring program.

The annual Fernald Preserve Site Environmental Reports provide the results from the Fernald site's environmental monitoring programs for each year; a summary of the DOE activities conducted onsite; and a summary of the Fernald Preserve's compliance with the various environmental regulations, compliance agreements, and DOE policies that govern site activities.

**B. If under a CERCLA authority, is 1) the action and location of the action described in the remedy documents or 2) the action inherent to the remedy? Provide a document reference.**

N/A (Not a CERCLA site)     Yes     No

If either answer is 'Yes', no further NEPA documentation or review is needed and the remaining questions do not need to be answered, continue with Section E.

**C. Identify applicable NEPA documents (by title and NEPA Number) and any other relevant documents that relate to the proposed action.**

NEPA Documents

*DOE Policies on Application of NEPA to CERCLA and RCRA Cleanup Actions, July 2002*

- DOE relies on the CERCLA process for review of actions to be taken under CERCLA. Typically, this means that no separate NEPA document (such as an Environmental Impact Statement or an Environmental Assessment) or NEPA process is required.
- DOE addresses NEPA values (such as analysis of cumulative, offsite, ecological, and socioeconomic impacts) to the extent practicable in the CERCLA process

LM 19-11, NEPA Action Review, July 25, 2011

DNA LM 18-13, *Structural Enhancements and Site Maintenance Activities at the Fernald, Ohio, Site*

Rev 1. Final DOE/EA-1273, *Environmental Assessment for Proposed Final Land Use at the Fernald Environmental Management Project*, June 1999

DOE/EA-1273, *Finding of No Significant Impact for the Fernald Environmental Management Project Proposed Final Land Use Environmental Assessment*, April 20, 1999

CERCLA Documents

*Final Record of Decision for Remedial Actions at Operable Unit 5, 1996*

*Fernald Preserve, Fernald, Ohio, Comprehensive Legacy Management and Institutional Controls Plan, Volume II, 2014*

*Five Year Review Report for the Fernald Preserve, 2011*

*Fernald Preserve 2013 Site Environmental Report, 2013 (issued May 2014)*

**D. NEPA Adequacy Criteria (Not required for CERCLA sites)**

1. Is the proposed action, or are continuing site activities, the same as, or essentially similar to (qualitatively or quantitatively), an alternative analyzed in an existing NEPA document(s)? If NO, stop here and prepare required NEPA documentation.

Response

2. Will the proposed action and associated activities take place in or near the same area evaluated in a NEPA document, or, if the project location was not specifically evaluated in a NEPA document, are the geographic and resource conditions similar to those analyzed in the existing NEPA document(s)? If there are differences, provide the reason why site specific analysis does not need to be prepared.

Response

3. Have there been changes in federal laws or requirements that require additional evaluation? Is the existing analysis still valid in light of potential changes in information or circumstances (such as recent endangered species listings, changes in wetland definitions)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the action?

Response

4. For new proposed projects, has the potentially disturbed area been inventoried for cultural resources? If so, was the cultural resource inventory completed more than 10 years ago? If the potentially disturbed area has not been inventoried for cultural resources, or if the inventory is older than 10 years, determine the need to have a cultural resource inventory conducted of the potentially affected area. If a cultural resource inventory is required, summarize the results of the inventory and the results of the SHPO or THPO consultation.

Response

5. Are the direct, indirect, and cumulative effects that would result from implementation of the new action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Response

6. Are the public/tribal involvement and interagency review associated with existing NEPA document(s) adequate for the current action? Are there new or changing circumstances that might need additional consideration?

Response**E. Conclusion/Approvals**

1. Based on the review documented above, I recommend that,

Existing NEPA and CERCLA Documentation fully covers the proposed action. Additional NEPA review is not warranted at this time.

One or more of the criteria in Section E were not met. Prepare an Environmental Checklist.



Digitally signed by Dana M. Ravelojaona  
Date: 2014.09.04 10:05:50 -06'00'

Dana Ravelojaona  
LMS Contractor NEPA Coordinator

Date

2. Based on the review documented above, I conclude that,

Existing NEPA and CERCLA Documentation fully covers the proposed action and constitutes LM's compliance with the requirements of the NEPA.

Additional NEPA review and documentation are warranted.

Comments:



Gwendolyn N. Hooten  
2014.09.04 14:33:35 -06'00'

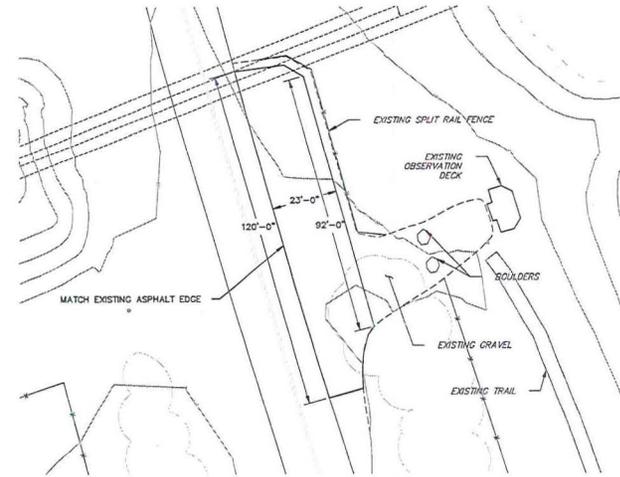
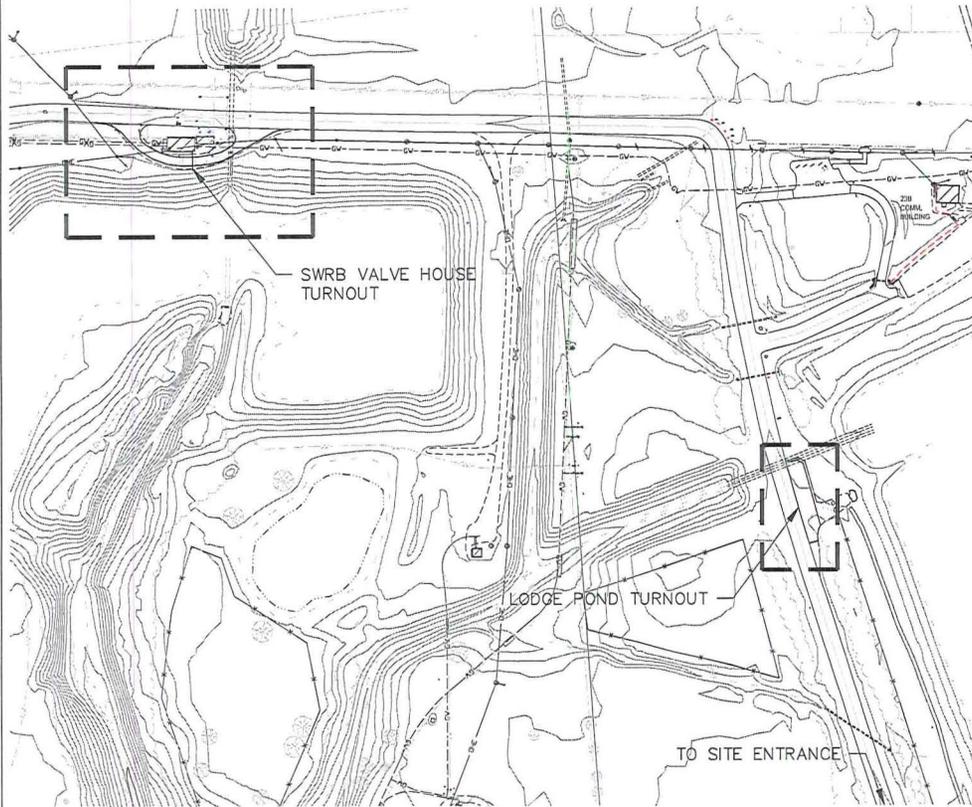
Gwendolyn Hooten  
LM Site Manager

Date

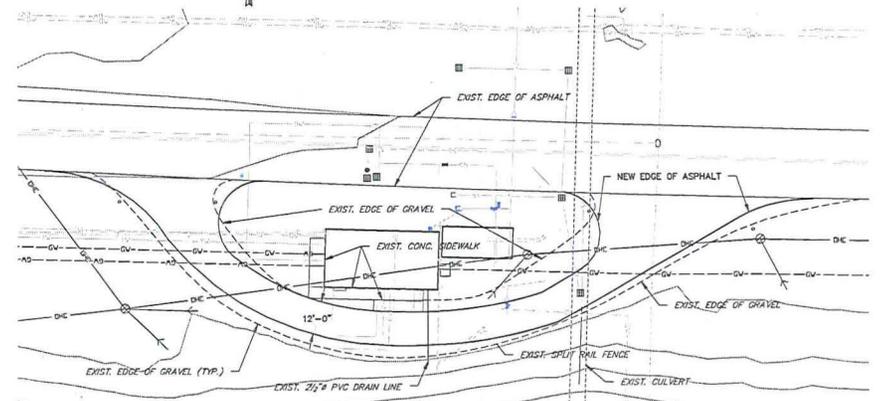
Distribution upon signature:  
All Signatures

Tracy Ribeiro, DOE  
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Sandy Beranich, Stoller  
Scott Osborn, Stoller  
Mary Sizemore, Stoller  
rc-ohio



**ASPHALT PARKING AT LODGE POND-PLAN**



**ASPHALT PARKING AT SWRB VALVE HOUSE -PLAN**



U.S. DEPARTMENT OF ENERGY		Work Performed by The S.M. Stoller Corporation	
GRAND JUNCTION, COLORADO		Under DOE Contract No. DE-AC05-07OR21400	
PROJECT LOCATION	FERNALD PRESERVE HARRISON, OHIO	APPROVALS	ASPHALT PAVING 2014 GEOTECHNICAL INVESTIGATION PLAN VIEWS
DATE	5/20/14	DATE	5/20/14
BY	S. FITTON	DATE	5/20/14
BY	S. FITTON	DATE	5/20/14
BY	A. PIZZOPPA	DATE	5/20/14
BY	M. MADRIL	DATE	5/20/14
BY	D. MINAHAN	DATE	5/20/14
BY	B. MERTEL	DATE	5/20/14
PROJECT NO. S11638-RAA-CD1-D+		SHEET NO. 1 OF 1	





# UNITED STATES DEPARTMENT OF ENERGY LEGACY MANAGEMENT FERNALD PRESERVE

## MAIN DRAINAGE CORRIDOR WATER CONTROL



### INDEX OF DRAWINGS

SHEET	TITLE	DRAWING NO.
1	TITLE SHEET	S11XXX-RXX-T01-D+
2	PROJECT SITE PLAN	S11XXX-RXX-C01-D+

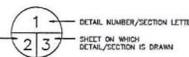


### DRAWING LEGEND

PLAN	DETAIL SYMBOL
<ul style="list-style-type: none"> <li>— BOUNDARY OF WORK</li> <li>— SITE BOUNDARY</li> <li>— BURIED - TELEPHONE/OPTICAL/WATER</li> <li>— BURIED - ELECTRICAL/GAS LINES/IRRIGATION PIPE</li> <li>— RAILROAD TRACK</li> <li>— CHAIN LINK FENCE</li> <li>— PLASTIC FABRIC/ROPE FENCE W/ T-POST</li> <li>— SPLIT RAIL FENCE</li> <li>— DRAINAGE DITCH/WATER LINE LIMITS</li> <li>— EXISTING ASPHALT ROAD/PARKING LOT</li> <li>— EXISTING UNIMPROVED DIRT ROAD</li> <li>— ABOVE GROUND CATED FLOOD IRRIGATION PIPELINE</li> <li>— OVERHEAD ELECTRICAL LINE</li> <li>— TREES/SHRUBS/BRUSH</li> </ul>	<ul style="list-style-type: none"> <li>← PROJECT ACCESS/MAIL ROUTE</li> <li>○ UTILITY POLE</li> <li>— UNDERGROUND DRAINAGE DUCTILE</li> <li>○ EXISTING MONITORING WELL</li> <li>— HIGHWAY</li> <li>— SLOPE/FLOW ARROW</li> <li>▲ SLOPE - TRIANGLE POINTS DOWN/SLOPE</li> <li>⊙ SURVEY CONTROL POINT</li> <li>⊙ DEPTH OF CONTAMINATION</li> <li>■ CONTAMINATED MATERIAL</li> <li>— EXISTING CONTOUR</li> <li>— NEW CONTOUR</li> <li>▨ BUILDING/STRUCTURE</li> <li>▨ EXISTING ASPHALT SURFACE</li> <li>▨ CONCRETE</li> </ul>

NOTE: EXIST. FEATURES ARE SHADED

### DETAIL SYMBOL



### ABBREVIATIONS

APPROX. APPROXIMATE	HA NOT APPLICABLE
ASTM AMERICAN SOCIETY FOR TESTING AND MATERIALS	ND. NUMBER
BOTT. BOTTOM	NTS NOT TO SCALE
CL CENTER LINE	OC ON CENTER
CLP CLEAR	OSHA OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
CMP CORRUGATED METAL PIPE	PSI POUNDS PER SQUARE INCH
DDE DEPARTMENT OF ENERGY	PSP POUNDS PER SQUARE FOOT
EA EACH	SHT SHEET
E EASTING	THK THICK
EXIST. EXISTING	TP TYPICAL
HORIZ. HORIZONTAL	
MAX. MAXIMUM	
MIN. MINIMUM	
N NORTHING	

**GENERAL PROJECT NOTES:**

- PLOTTING OR PRINTING OF THESE DRAWINGS TO ANY SHEET SIZE OTHER THAN 24 X 36 OR BY USING FORMATS OTHER THAN AutoCAD PLOT FILES WILL RESULT IN INCORRECT SCALES AND HATCH PATTERN DISTORTIONS. THE USER IS CAUTIONED AND SHOULD EITHER OBTAIN A HARD COPY PRINT-OUT FROM THE CONTRACTOR OR APPROPRIATELY SCALE ALL MEASUREMENTS FROM THE BAR-SCALES PROVIDED.
- INDEPENDENT LINE LOCATIONS, "BLIND SEARCHES" SHALL BE PERFORMED IN ALL AREAS PRIOR TO ANY INTRUSIVE WORK BEING PERFORMED. EXCEPTION TO LINE LOCATION REQUIREMENTS WILL BE PROVIDED IN WRITING BY THE CONTRACTOR.

PRELIMINARY

THIS WORK SHALL BE PERFORMED IN ACCORDANCE WITH THESE PLANS AND THE ATTACHED TASK SPECIFIC STATEMENT OF WORK, DOCUMENT NO. S11XXX AND B0A STATEMENT OF WORK, RFP XXX, DOCUMENT NO. S0XXXXXX.

U.S. DEPARTMENT OF ENERGY		Work Performed by	
GRAND JUNCTION, COLORADO		S.M. Stoller Corporation	
FERNALD PRESERVE		MAIN DRAINAGE CORRIDOR WATER CONTROL	
DESIGNED BY	J. GONZALES	DATE	5/19/14
CHECKED BY	J. GONZALES	DATE	5/19/14
PROJECT NO.	S11XXX-RXX-T01-D+		
TITLE SHEET		1 of 3	