

**WETLANDS ASSESSMENT
FOR THE UNDERGROUND LINE AND SOILS REMOVAL PROJECT
AT THE MIAMISBURG CLOSURE PROJECT**

May 26, 2004

1.0 Project Description

The Miamisburg Closure Project (MCP) is a U. S. Department of Energy (DOE) owned, contractor-operated facility located in southwestern Ohio. The MCP is located in the community of Miamisburg, Ohio, approximately ten (10) miles southwest of Dayton, Ohio. The subject of this wetlands assessment is the removal of radioactively contaminated underground waste lines and associated soils. Removal of the contaminated lines and soil is one of many environmental restoration projects DOE is conducting pursuant to the requirements of the Comprehensive Environmental Response, Compensation & Liability Act (CERCLA). The soil removal may include an existing, isolated wetland. The entire wetland area would be impacted and is less than one-tenth (1/10) of an acre (0.007 acre or 305 square feet).

The wetland area affected by this environmental restoration project, as well as other wetlands on the MCP site, was delineated in DOE's August 1999 report entitled *Delineation of Federal Wetlands and Other Waters of the U.S., Miamisburg Environmental Management Project*. This report was prepared in accordance with the 1987 U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual, and the USACE concurred on DOE's delineation report in September 1999.

Wetlands are categorized as level 1, 2, or 3. Category 1 wetlands are those that support minimal wetland functions. All MCP wetlands are Category 1. The wetlands were categorized according to the Rapid Assessment Method, Version 4.0. Wetlands that receive a score of 0-12 are considered Category 1. The wetland ("A") to be impacted by this removal action received a score of 2. The delineation concluded that wetland A may be fed by foundation drainage from structures upslope. If not impacted, the wetland would likely have disappeared eventually due to lack of water after these structures were demolished as part of the continuing mission of the MCP.

CH2M HILL will publish a Notice of Proposed Wetland Action in a local newspaper to provide interested parties an opportunity to comment on the proposed action (i.e., removal of radioactively-contaminated underground lines and soils located in an wetland, as part of the DOE's environmental restoration program under CERCLA). After publishing the Notice of Proposed Wetland Action, the DOE will allow 15 calendar days for public comment prior to implementing the proposed action. If DOE proceeds with the proposed action after the public review period has ended, best management practices will be utilized to avoid or minimize potential harm to the surrounding environment (e.g., including, but not limited to, minimum grading requirements, runoff controls, and design and construction constraints).

Negotiations with the Ohio Environmental Protection Agency (OEPA) will be made to determine the appropriate compensatory measures to be taken to mitigate the adverse effects of the proposed action on the 0.007 acre wetland, including constructing a replacement wetland.

A map is attached which shows the location of the environmental restoration project area with respect to the wetland.

2.0 Wetlands Impacts

The proposed action will result in negative, long-term and direct impacts from the excavation and filling of an isolated wetland of 0.007 acres in size. This is not an ecologically-sensitive area, and is a hydrologically isolated wetland with no significant wildlife habitat or use. Elimination of this wetland will not affect any threatened or endangered species.

2.1 Positive and Negative Effects

The positive effects are that the mission of the Miamisburg Closure Project (environmental remediation and transfer of property to community reuse organization) will continue and any residual contamination will be at levels that are protective of human health and the environment. The negative effect is that the wetland will be destroyed.

2.2 Direct and Indirect Effects

The indirect effect is that the environment and human health will be protected. The direct effect is that the wetland will be destroyed.

2.3 Long and Short-Term Effects

The long-term effect is that the environment and human health will be protected. The short-term effect is that the wetland will be destroyed.

3.0 Alternatives

The alternatives considered for the proposed action included no action, an alternative site, and in situ treatment.

3.1 Alternative 1 – No Action

This alternative was not selected, because DOE is required to remediate the entire MCP site consistent with all CERCLA requirements. All remedial actions must ensure that any residual contamination is at levels that are protective of human health and the environment, consistent with the intended future use (i.e., industrial/commercial) of the entire MCP site. Therefore, the no action alternative of leaving the radioactively-contaminated underground lines and soils in place, in lieu of disturbing the isolated 0.007 acre wetland, was dismissed from further consideration.

3.2 Alternative 2 – Removal of soils at a different site

This alternative is not applicable, since the radioactively-contaminated underground lines and soils lie within the 0.007 acre wetland, and CERCLA requires those contaminated lines and soils to be remediated to levels that are protective of human health & the environment, consistent with the intended future use (i.e., industrial/commercial) of the entire MCP site.

3.3 Alternative 3 – In situ treatment of contaminated soils in wetland

This alternative was not selected because the technology does not exist to perform in situ treatment in an economically feasible manner and in a way that would not also negatively impact the wetland.

4.0 References

Delineation of Federal Wetlands and Other Waters of the U.S., Miamisburg Environmental Management Project, U.S. Department of Energy, Babcock & Wilcox of Ohio, Montgomery County, Ohio, August 1999.

UGLs Removal Plan, CH2MHILL Mound Inc., January 2004

Attachment 1
Location of Wetland "A" and Underground Lines Project
Miamisburg Closure Project
Miamisburg, Ohio

