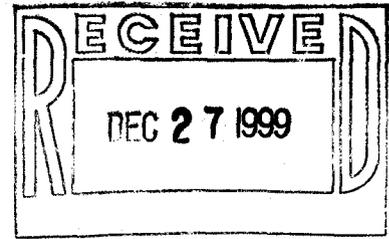


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INTEROFFICE MEMORANDUM

DATE: December 21, 1999

TO: C. Kennedy, K-H, Bldg 130, X7543

FROM: S. M. Nesta, K-H/ESS, T130C, X6386 *S.M. Nesta*

SUBJECT: NEPA DETERMINATION FOR 904 PAD TENTS 8 AND 9 MODIFICATIONS - SMN-164-99

I have reviewed the project to modify Tents 8 and 9 located on the 904 Pad. It is my understanding that the project includes the addition of two doors and gates, as well as a concrete or asphalt drive, all located on the south side of the tents. I also understand that the tents are currently used to store crates and drums of low level waste.

The following environmental compliance issue is noted for this project:

The proposed modifications should include an inspection of the berm currently surrounding the 904 Pad, ensuring that it is in satisfactory condition. Throughout construction and the new operations, stormwater collected within the bermed area must be managed in accordance with the Control and Disposition of Incidental Waters procedure (I-C91-EPR-SW.01. The primary Surface Water point of contact regarding this program is Sue Barker (x3114).

No other environmental compliance issues are noted for this project.

With regard to the NEPA documentation for the project, I recommend that the project be categorically excluded from further NEPA documentation requirements. Attached is a copy of the draft Categorical Exclusion (CX) Determination for the project. Please review the project description portion of the draft CX Determination for accuracy and completeness. Pending any changes you request, this document should be transmitted to RFFO's NEPA Compliance Officer (John Morris) with a request for a final NEPA determination on the project. To maintain tracking of NEPA projects, please copy me on your transmittal to RFFO, at which time we will forward an electronic copy of the CX to Mr. Morris for his use.

If changes arise that alter the scope of the project, please contact me so that we can review the changes for NEPA compliance. Please do not hesitate to contact me at X6386 if you have any questions or need additional information.

cc:

Karan North, K-H
Ted Hopkins, RMRS

Sue Barker, RMRS
file



DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

- SAFE AND COMPLIANT CLOSURE -

ADMIN RECORD

IA-A-001519

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DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX00-99

Proposed Action: 904 Pad Tents 8 and 9 Modifications

Location: Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the Proposed Action:

The Rocky Flats Field Office (RFFO) proposes modifications to the existing Tents 8 and 9 located at the 904 Pad. The proposed modification includes the installation of two new vehicle access doors and gates on the south end of the existing tents. Additionally, concrete or asphalt drives will be added to the south end. These additions will allow trucks access to Tents 8 and 9 for loading and shipping purposes. There will be no changes to the class of wastes stored within Tents 8 and 9. These tents are not being used for the storage/handling of high-level radioactive wastes or spent nuclear fuels.

Categorical Exclusion to be Applied:

B6.6 Modifications (excluding increases in capacity) of an existing structure used for storing, packaging, or repacking waste other than high-level radioactive waste or spent nuclear fuel, to handle the same class of waste as currently handled at that structure.

Justification:

The project is a modification to an existing structure and does not involve increases in capacity. The modifications include: the addition of two doors and two gates and a concrete or asphalt drive, all of which will be located on the south end of the tents. The tents are currently being used for the storage of low-level radioactive waste. Changes will not be made regarding the class of waste to be stored within Tents 8 and 9. The wastes stored do not include high-level radioactive waste or spent nuclear fuels.

In addition, in accordance with 10 CFR 1021.410(b), the project (a) fits within the class of actions listed in Appendix B of Subpart D of 10 CFR 1021, (b) exhibits no extraordinary circumstances that may affect the significance of its environmental effects, and (c) is not "connected" (per 40 CFR 1508.25[a][1]) to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts (per 40 CFR 1508.25[a][2]), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Further, in accordance with 10 CFR 1021, Subpart D, Appendix B, the project would not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders,