

DIST	
BRETZKE JG	
BURLINGAME A H	
COPP RD	
CROUCHER DW	
DAVIS JG	
EVERED JE	
FERRERA DW	
FERRIS LR	
FRANKO F J	
FRANCIS GE	
GOCOWIN P	
HEALY TJ	
HOEVER EM	
HENS D	
KEELE P R	
KERSH JM	
KIRBY WA	
KIRKBO JA	
LEE E M	
MAJESTIC JE	
MATHEWS TA	
MEURRENS BE	
MORGAN R V	X
NORTH P	
PALMER LA	
POTTER GL	X
PIZZATO V M	
RUCASER W	X
SARRELL BE	
SWANSON EP	
WIEBE JS	
WILKINSON PR	
WILLIAMS RE	
WILSON JM	
YOUNG ER	
ZANE J O	
NESTLA S J	X
FRANO C G	X
MOORE W A	X
GEORGE D	X
GEORGE C R	X
GEORGE W J	X
FEW	X
CORRES CONTROL	X

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September 17, 1991

91-RF-5792

Robert M. Nelson, Jr.  
Manager  
DOE. RFO

Attn: P. M. Powell

SUPPLEMENTAL ANALYSIS FOR THE 881 HILLSIDE ENVIRONMENTAL ASSESSMENT  
(2381-RF-91) - JMK-0577-91

The subject letter requested us to initiate a supplemental analysis for the 881 Hillside EA of January, 1990 (DOE/EA 0413) to determine if, given changes in the proposed action and other events since the EA was prepared, there were any information gaps in the EA sufficient to necessitate changes that document. We conclude that there are not.

We note first that DOE recently confirmed the conclusion of the EA that the French drain is the Proposed Action.

Secondly, construction documents for the French drain include certain changes from the French drain as described in the EA. These changes are:

- Length of the French drain has been decreased from approximately 2100 feet to approximately 1950 feet.
- Alignment of the western end of the French drain has been changed so that it starts at a point about 230 feet south of the point shown in Figure 3-1 of the EA.
- The number of influent tanks has been changed from two 15,000-gallon tanks to four 15,000-gallon tanks.
- The number and size of the effluent tanks has been changed from two 115,000-gallon tanks to three 160,000-gallon tanks.

We believe that these design changes, individually and cumulatively, do not present any increased or qualitatively different impacts to the environment over those described in the EA, and may, in fact, reduce likely impacts. Reduction in the length of the French drain will reduce the area to be disturbed by excavation. Realignment of the western end of the drain will reduce the maximum depth of the excavation from 60 feet to less than 25 feet, again reducing environmental impacts from excavation over those described in the EA. The addition of more and, in the case of effluent tanks, larger tanks, will increase the area that will be disturbed and used for the treatment facility. This increase in disturbed area will be at least offset by the reduction in disturbed area resulting from the shortening and realignment of the drain.

The EA identified no significant impacts from construction or operation of the drain or treatment plant. This conclusion is not changed by the design changes to the Proposed Action. We believe that a

CLASSIFICATION:	
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UNCLASSIFIED	X
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SECRET	

AUTHORIZED CLASSIFIER  
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9/17/91

DATE  
IN REPLY TO LTR NO. 2381-RF-91

PC  
LTR APPROVALS:  
S. N. N.  
EG&G SYSTEMS INITIALS

REVIEWED FOR CLASSIFICATION/CONTROL
BY G. T. Ostroick SD
DATE 8-9-93

R. M. Nelson, Jr.  
September 17, 1991  
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supplemental analysis, beyond that presented in this letter, is not necessitated by events since the EA was published and that the Finding of No Significant Impact should be left undisturbed.

On a second matter related to the OU 1 IRA, certain alignment changes made in the French drain since the EA was prepared appeared to cause the French drain excavation to temporarily destroy a length of the nearby South Interceptor Ditch (SID) and attendant wetlands. If this were the case, construction of the French drain would be a floodplain/wetland action, triggering the requirements of 10 CFR 1022. Consequently, we prepared and transmitted to you a wetlands assessment. As more detailed drawings and more complete information on the French drain and depth and width of the necessary excavation have been prepared, and as actual field surveys of the French drain excavation limits have been completed, it has become clear that construction of the French drain as it is now planned should not affect the SID or its wetlands.

Specifically, according to the recently-completed field survey of the French drain center line and excavation limits, at the point where the French drain and SID come closest to one another (due south of Building 881), the edge of the excavation will be approximately 12 feet from the bank of the SID. This distance should be more than enough to assure that French drain construction activities do not affect the SID. In addition, a construction access road planned for the south side of the French drain excavation will not be built in this area to help ensure the SID is not affected. It is anticipated that wherever the excavations and SID approach one another, construction access to the French drain will be from the north side of the excavation, away from the SID. In addition, contractors bidding on the French drain project have specifically been instructed that the SID is not to be affected by their activity.

On the basis of the preceding information, we conclude that:

- Construction of the French drain will not involve the SID floodplain or wetlands and that 10 CFR 1022 does not apply to this project.
- The original EA and FONSI are still applicable to the proposed action.

If you have any questions or need any further information, please contact Steve Nesta at 273-6076 or Bill Moore at 273-6217.

  
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WAM:bmb

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