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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

October 25, 1990

90-RF-6475



000032183

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: R. J. Schassburger

NCC RECOMMENDATION FOR OU 2 SITE PREPARATION

Attached is the Environmental Checklist and NEPA Compliance Committee (NCC) review form for site preparation for Operable Unit 2 (OU 2). Please review the logic used in arriving at the recommendation, since this is an atypical situation. EG&G plans to begin work on the site preparation October 29, 1990, unless otherwise instructed by RFO.

Please contact Laura Frick, extension 4643, if further information is required.

[Signature]
R. M. Keran

Associate General Manager
Environmental Restoration and Waste Management

KCL:img

Orig. and 1cc - R. M. Nelson, Jr.

Attachments:
As Stated

cc:
G. A. Anderson
K. S. Lewis

DIST.	
ALLHOFF, F.H.	
BRA D.B.	X
BRI H.	
BRE J.C.	
BURLINGAME, A.H.	
BROUCHER, D.W.	
DAVIS, J.G.	
EVERED, J.E.	X
FERRERA, D.W.	
FERRIS, L.R.	
FRANCIS, G.E.	
GOODWIN, R.	
HEALY, T.J.	
KERSH, J.M.	X
KIRBY, W.A.	
MAJESTIC, J.R.	
MELLEN, J.B.	
MORGAN, R.V.	X
PARNELL, R.F.	
POTTER, G.I.	X
RHOADES, J.L.	X
SAFFELL, B.F.	
SANFORD, T.H.	
SHANNON, W.M.	
VAN LEUVEN, D.B.	
WARNER, B.P.	
YOUNG, E.R.	
STEINHAUER, H.	
ELLIOTT, G.D.	
DLATY, P.	
BAKER, F.B.	
BETCHER, D.H.	
CARNIVAL, G.J.	
FERRIER, D.R.	
GILLISON, W.R.	
HALBEISEN, L.P.	
HAP, L.K.	
HOL, I.R.B.	
KLAM, N.R.L.	
KREIG, D.M.	
LOUDENBERG, G.E.	
NAIMON, E.R.	
RICHARDELLA, R.F.	
TURNER, H.I.	
VELASQUEZ, R.N.	
WILSON, J.M.	
FRICK, L.T.O.	X
SHAIN, D.I.	X
CORRES CONTROL	X X
RECMTS MONT	
ERWM TRACKING	X

CLASSIFICATION:

UCNI	X	X
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER

SIGNATURE
[Signature]

DATE 10/23/90

IN REPLY TO LTR NO.

PC
LT.
LTOF
JEE
ORIG & TYPIST INITIALS
KCL:IMG

**PART 1506—OTHER REQUIREMENTS
OF NEPA**

Sec.

- 1506.1 Limitations on actions during NEPA process.
- 1506.2 Elimination of duplication with State and local procedures.
- 1506.3 Adoption.
- 1506.4 Combining documents.
- 1506.5 Agency responsibility.
- 1506.6 Public involvement.
- 1506.7 Further guidance.
- 1506.8 Proposals for legislation.
- 1506.9 Filing requirements.
- 1506.10 Timing of agency action.
- 1506.11 Emergencies.
- 1506.12 Effective date.

AUTHORITY: NEPA, the Environmental Quality Improvement Act of 1970, as amended (42 U.S.C. 4371 *et seq.*), sec. 309 of the Clean Air Act, as amended (42 U.S.C. 7609), and E.O. 11514 (Mar. 5, 1970, as amended by E.O. 11991, May 24, 1977).

SOURCE: 43 FR 56000, Nov. 29, 1978, unless otherwise noted.

§ 1506.1 Limitations on actions during NEPA process.

(a) Until an agency issues a record of decision as provided in § 1505.2 (except as provided in paragraph (c) of this section), no action concerning the proposal shall be taken which would:

- (1) Have an adverse environmental impact; or
- (2) Limit the choice of reasonable alternatives.

(b) If any agency is considering an application from a non-Federal entity, and is aware that the applicant is about to take an action within the agency's jurisdiction that would meet either of the criteria in paragraph (a) of this section, then the agency shall promptly notify the applicant that the agency will take appropriate action to insure that the objectives and procedures of NEPA are achieved.

(c) While work on a required program environmental impact statement is in progress and the action is not covered by an existing program statement, agencies shall not undertake in the interim any major Federal action covered by the program which may significantly affect the quality of the human environment unless such action:

(1) Is justified independently of the program;

(2) Is itself accompanied by an adequate environmental impact statement; and

(3) Will not prejudice the ultimate decision on the program. Interim action prejudices the ultimate decision on the program when it tends to determine subsequent development or limit alternatives.

(d) This section does not preclude development by applicants of plans or designs or performance of other work necessary to support an application for Federal, State or local permits or assistance. Nothing in this section shall preclude Rural Electrification Administration approval of minimal expenditures not affecting the environment (e.g. long leadtime equipment and purchase options) made by non-governmental entities seeking loan guarantees from the Administration.

§ 1506.2 Elimination of duplication with State and local procedures.

(a) Agencies authorized by law to cooperate with State agencies of statewide jurisdiction pursuant to section 102(2)(D) of the Act may do so.

(b) Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and State and local requirements, unless the agencies are specifically barred from doing so by some other law. Except for cases covered by paragraph (a) of this section, such cooperation shall to the fullest extent possible include:

- (1) Joint planning processes.
- (2) Joint environmental research and studies.
- (3) Joint public hearings (except where otherwise provided by statute).
- (4) Joint environmental assessments.

(c) Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and comparable State and local requirements, unless the agencies are specifically barred from doing so by some other law. Except for cases covered by paragraph (a) of this section, such cooperation shall to the fullest extent possible include joint environmental impact statements. In

EG&G ROCKY FLATS
NEPA COMPLIANCE COMMITTEE
ENVIRONMENTAL CHECKLIST REVIEW FOR

Project/Activity EC Date: September 17, 1990

Project/Activity Name : Interim Surface Water Treatment Facility (OU2)

Authorization or EJO # : 986447 Project PA: B. Bruninga

Initiating Line Manager : G. Anderson

NEPA Compliance Committee Review (Sign & date applicable space):

	No ADM or Further Nepa Documentation Required	ADM Required
NEPA :	<u>R. Gordon 10/17/90</u>	_____
Fac. Proj. Mgmt. :	<u>G. David Elliott 10/16/90</u>	_____
Legal Department :	<u>G. Anderson</u>	_____
Safety Analysis :	<u>Carl Ewert 10/16/90</u>	_____

Comments:

The action is to prepare the OU2 site for CERCLA remediation under the Interagency Agreement. Site preparation will require construction of an access road, trailer pad, trailer tie-down points, and power poles. The site preparation is for a removal action under CERCLA which does not threaten a violation of statute or regulation, does not require construction or expansion of waste disposal, treatment or recovery facilities, and does not adversely affect environmentally sensitive areas.

NCC Recommendation: No ADM or further NEPA documentation.

_____ ADM required; other NEPA documentation may be required by DOE pending their review of the ADM.

NEPA Mgr. Approval/Date: R. Gordon for LJO Frick 10/17

Copies to: Project Administrator/Initiating Line Manager
NCC Committee Chairman
DOE-RFO

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Interim Surface Water Treatment Facility (986447)

The following information provides further explanation of the NCC recommendation on the OU2 site preparation. The action is to prepare the OU2 site for CERCLA remediation under the Interagency Agreement. Site preparation will require construction of an access road, trailer pad, trailer tie-down points, and power pole installation. The remediation at OU2 may be the subject of an Environmental Assessment (EA).

Per 1506.1(a), until DOE issues their decision as a result of the NEPA process, no action may be taken on the proposal which would have an adverse environmental impact or limit the choice of reasonable alternatives, except as provided in 1506.1(c). Information relevant to these sections of the CEQ regulations follows:

- o The site preparation is for a removal action under CERCLA. The site preparation does not threaten a violation of statute or regulation, does not require construction or expansion of waste disposal, treatment, or recovery facilities, and does not adversely affect environmentally sensitive areas. It therefore does not appear to be a major Federal action, and would not be precluded by 1506.1(c).
- o The site is located near the existing Sewage Treatment plant, in an area that is already developed, and is not in an environmentally sensitive area. Therefore, the action is not precluded by 1506.1(a)(1).
- o Any reasonable alternative selected for remediation will require site preparation, so the action does not prejudice DOE's future decision on the OU2 remediation, and is not precluded by 1506.1(a)(2).

ROCKY FLATS PLANT

NATIONAL ENVIRONMENTAL POLICY ACT DOCUMENTATION

ENVIRONMENTAL CHECKLIST

1. Date: 9/17/90
2. Activity/Project Name: INTERIM SURFACE WATER TREATMENT FACILITY (REMEDIAL ACTION) -
3. Authorization or EJO #: 986447 4. Project PA: B. Bruminger 002
5. Initiating Line Manager: G. Anderson
6. Project/Activity Description (Include justification, location with figures and maps if appropriate, schedule, cost, etc. Use additional pages if necessary):

SEE ATTACHMENT FOR FTU SITE ACTIVITIES PROPOSED FOR FALL, 1990.

Checklist*

- | | YES | NO | UNKNOWN |
|---|------------|----|---|
| 7. Is the project/activity a budget line item? | | | <u>unknown</u> |
| 8. Will the project/activity require or potentially require an application for permit or permit modification under:
a. the Clean Air Act
b. the Clean Water Act
c. RCRA? | | | <u>unknown</u>
<u>no, per Bob Fiewig</u>
<u>unknown</u> |
| 9. Does this project involve remedial action under CERCLA? | <u>yes</u> | | |

NOTE: BECAUSE THIS IS A CERCLA-DRIVEN PROJECT, NORMAL PROCEDURES ALLOW EXEMPTION FROM OTHER PERMITTING REQUIREMENTS.

"Reviewed For Classification/UCM
By George H. Schlock
Date 9/18/90"

ROCKY FLATS PLANT

NATIONAL ENVIRONMENTAL POLICY ACT NEPA DOCUMENTATION

ENVIRONMENTAL CHECKLIST (CONTINUED)

Checklist*

YES NO UNKNOWN

10. Is the project/activity
a. new or
b. modification, rather than a direct replacement?
(New or modified activities will generally have more impact than a direct replacement.) yes
11. Will the project/activity result in, or have the potential to result in, long-term changes to the environment, (e.g., constructing a building, erecting above-ground power lines, development of new waste ponds or landfills)? yes
12. Will the project/activity result in changes and/or disturbances of the following existing factors:
- a. noise level no
 - b. air emissions no
 - c. liquid effluents no
 - d. solid waste no
 - e. radioactive waste (including contaminated soil) no
 - f. (chemically) hazardous waste no
 - g. mixed waste (radioactive & hazardous) no
 - h. chemical or petroleum product storage no
 - i. water use (withdrawal of ground water or diversion or withdrawal of surface water) yes
 - j. drinking water system no
 - k. sewage disposal system no
 - l. soil movement outside facility fences yes
 - m. site clearing, excavation, or other alterations yes

EC Prepared by: D.L. SHEAR Date: 9/17/90
Remediation
Organization : Programs Bldg: T130B Extension: 5976

*Clarification of any of these answers may be provided in the Project/Activity Description.

NEPA ENVIRONMENTAL CHECKLIST RESPONSES

6. Project/Activity Description:

Three (3) trailers are to be located near the present Sewage Treatment Plant, on the south bank of S. Walnut Creek, for use in the Interagency Agreement specified Interim Surface Water Treatment Facility (see attached map). A granular activated carbon (GAC) unit is to be installed on or before February 8, 1991, pending results of the public review and Finding Of No Significant Impact. Additional units, determined by a parallel treatability study, will be interfaced with the GAC, in order to complete the Field Treatability Unit (FTU).

The FTU will treat organic compounds, suspended solids, and radionuclides from discharge of S. Walnut Creek. Two (2) collection stations (a seep at SW 59 and a combination of SW 60/61, respectively) will be required for transport of the influent surface water to the FTU. The influent will be treated and monitored, and discharged further downstream.

It is desired to perform the following FTU site preparation activities during the fall, 1990 weather, prior to the February, 1991 construction date:

- 1) Construction of an access road and trailer pads with an aggregate base.
- 2) Drilling and construction of concrete trailer tie downs, approximately 3 ft deep and 16 inches in diameter.
- 3) Drilling and installation of power poles.

11. Long Term Changes to the Environment:

Potential long term changes to the environment may be derived from the above-ground power poles and trailer anchors. The trailers will be a temporary working facility.

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