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States Government

Department of Energy

Rocky Flats Office

Memorandum

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DATE

ACTION	DIST.	LTR	ENC
BENJAMIN, A.			
BERMAN, H.S.			
BRADY, J.A.			
BRANCH, D.B.			
CARNIVAL, G.J.			
COPP, R.D.			
CORDOVA, R.C.			
DAVIS, J.G.			
EVERED, J.E.			
FERRERA, D.W.			
GOODWIN, R.			
HANNI, B.J.			
HEALY, T.J.			
HILBIG, J.G.			
IDEKER, E.H.			
KERSH, J.M.	X	X	
KIRBY, W.A.			
KRIEG, D.			
KUESTER, A.W.			
LEE, E.M.	X	X	
MARX, G.E.			
MORGAN, R.V.			
PIZZUTO, V.M.			
POTTER, G.L.			
SANDLIN, N.B.			
SATTERWHITE, D.G.			
SCHUBERT, A.L.			
SHEPLER, R.L.			
SULLIVAN, M.T.			
SWANSON, E.R.			
T. MAN, K.G.			
NSON, R.B.			
WILSON, J.M.			
ZANE, J.O.			
Nesta	X	X	
Knudsen	X	X	

SEP 09 1992

ES&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

ERD:PMP:10313

Section D Categorical Exclusion (RFO/CX033-92) Determination

C. M. Borgstrom, Director, Office of NEPA Oversight, EH-25, HQ

A copy of RFO/CX033-92, OU3 Remedial Action Land Weed Control and Revegetation, is attached for your review.

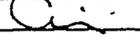

Terry A. Vaeth
Manager

Attachment

- cc w/Attachment:
- R. Scott, EM-20
- A. Rampertaap, EM-453
- J. Ciocco, EM-453
- S. Nesta, EG&G
- T. Knudsen, EG&G

CORRES. CONTROL	x	x
TRAFFIC		

Reviewed for Addressee
Corres. Control RFP

9-10-92 

DATE BY

Ltr. #

SECTION D
CATEGORICAL EXCLUSION (CX) DETERMINATION RFO/CX033-92

Proposed Action: OU3 Remedial Action Lands Weed Control and Revegetation

Location: East of Rocky Flats Plant, Golden, CO

Proposed by: U.S. Department of Energy, Rocky Flats Office

Description of the Proposed Action:

Rocky Flats proposes to control weeds and re-establish native vegetation in the Jefferson County Remedial Action Lands which are within Operable Unit 3 of the Rocky Flats Plant (see Figure 1). The proposed action is part of an ongoing court-ordered remediation program that resulted from a 1975 lawsuit filed by private landowners against Rocky Flats Plant.. The land to be revegetated is 350 acres of Jefferson County open space land which was contaminated by wind dispersion of low levels of plutonium from the RFP. The court-ordered remediation required plowing the contaminated areas to dilute the plutonium concentrations in surface soils and other measures to control erosion and re-establish vegetation on the plowed area.

In order to control or eradicate weed species, EPA-approved herbicides would be applied with a tractor-drawn sprayer at the manufacturer's recommended rate of application to the Remedial Action Lands. Herbicides would be applied in the fall after desirable plant species have matured sufficiently to not be affected, in the spring before desirable species emerge, and at other times as needed to control persistent broadleaf infestations. Selective applications of herbicides would be made to specific hard to control species with a hand sprayer. Spraying would be conducted on days where wind velocity is under 15 mph to avoid wind drift of herbicides outside the Remedial Action Lands. A twenty foot wide buffer zone of unsprayed area would be maintained along drainages and around wetland areas. The success of the herbicide program would be evaluated on an annual basis to determine whether subsequent applications of more herbicides would be required.

The revegetation program would include mechanical mowing to control weed growth and to provide mulch for soil cover. The area would be harrowed for seedbed preparation, and broadcast seeded at the rate of 20 to 30 pounds per acre. Hay mulch would be distributed as needed over the reseeded area. The Soil Conservation Service has recommended the following seed mixture for the revegetation program:

- Grasses to replace introduced species are big and little bluestem, sand dropseed, Indian ricegrass, needleandthread grass, green needlegrass, buffalo grass, switchgrass, alkali sacaton, and Canby bluegrass.
- Forb species recommended are yarrow, penstemon, blue flax, purple coneflower, scarlet globe mallow, lupine, purple prairie clover, and sunflower.
- Shrub seeds for low areas and drainages - suggested species are winterfat, rubber rabbitbrush, American cherry or plum, skunkbrush, snowberry, and wild rose.

Field operations to be conducted on the Remedial Action Lands would follow the *Health and*

Safety Plan for Field Operations and the *Plan for Prevention of Contaminant Dispersal*, (PPCD) Interim Final (DOE 1991). Fugitive dust would be kept to a minimum in adherence to the interim PPCD. As a precautionary measure, tractor operations would be performed at a reduced speed and restricted to days of wind speed of 15 mph or less to avoid disturbance to the soil and resuspension of dust. Atmospheric resuspension of particulates would be monitored to ensure the adequacy of dust control measures.

All activities associated with the revegetation and herbicide programs would occur outside of the RFP boundary. The activities would be conducted outside floodplains and wetlands, and no other environmentally sensitive resources would be affected. The total time required to complete the proposed action would be from two to five years, depending on the success of the program.

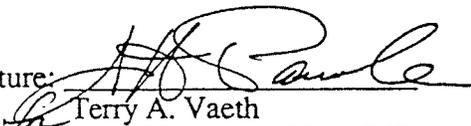
Categorical Exclusion to be applied:

B1.3 Routine maintenance activities and custodial services for buildings, structures, infrastructures (e.g., roads), and equipment, during which operations may be suspended and resumed. Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (that is, repair), preventive, and predictive (as defined in DOE Order 4330.4, "Maintenance Management"), are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that the replacement is in kind and is not a substantial upgrade or improvement. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to: (k) Erosion control and soil stabilization measures (such as reseeding and revegetation). (10 CFR 1021, Appendix B to Subpart D)

DOE NEPA REGULATIONS SECTION D
CATEGORICAL EXCLUSION DETERMINATION - RFO/CX033-92
OU3 Remedial Action Lands Weed Control and Revegetation

I have determined that the proposed action meets the requirements for a categorical exclusion as defined in the Section D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: 9/9/92

Signature: 
Title: Terry A. Vaeth
Manager, Rocky Flats Office

Project Sponsor:
Date: 9/4/92

Signature: 
Title: Frazer Lockhart
Director, Environmental
Restoration Division

I have reviewed this determination and find that a categorical exclusion is the appropriate level of NEPA documentation.

Date: September 3, 1992

Signature: 
Title: Patricia M. Powell
NEPA Compliance Officer

ADS number: none (DP)

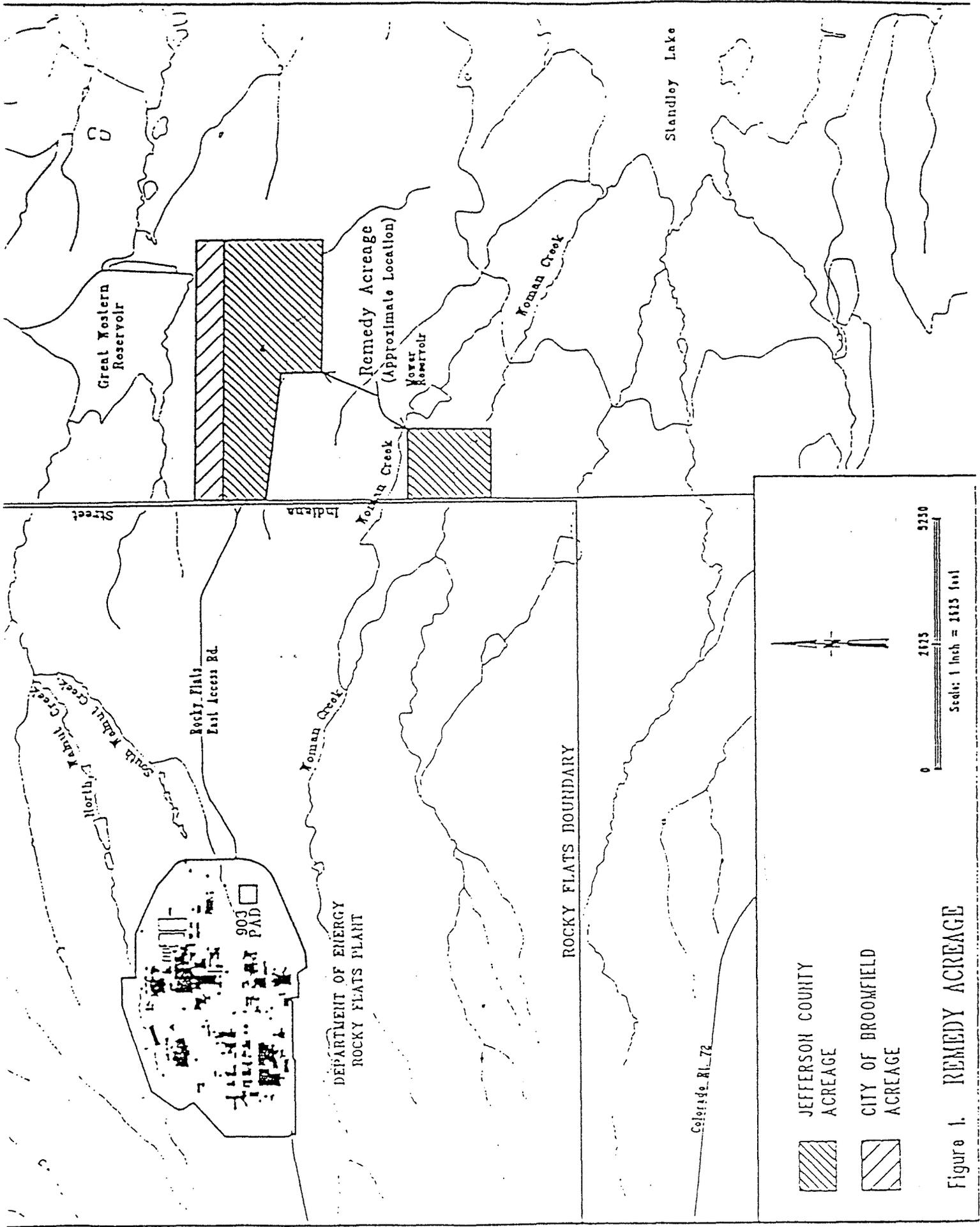


Figure 1. REMEDIATION ACREAGE