

United States Government

memorandum

EC5991

DATE: JUL 15 1991

REPLY TO: EM-453 (A. Rampertaap, 3-8191)

ATTN OF: Categorical Exclusion Determination - Field Activities for Geologic and Ecologic Characterization (RFO/CX-017-91), Rocky Flats Plant, Golden, Colorado

SUBJECT: Frazer Lockhart, RF

The Division of Southwestern Area Programs reviewed the proposed action and concurred with the recommendation of the Rocky Flats Office (RFO) that the described field activities for Geologic and Ecologic characterization at RFO be categorically excluded from further National Environmental Policy Act (NEPA) documentation under Section D of the Department of Energy NEPA Guidelines, as amended. Subsequent review by EM-22 identified three concerns:

- Some actions will occur in wetland areas, but no basis for the statement that the actions will not adversely affect environmentally sensitive areas is provided. Also, there is no indication that the site has complied with 10 CFR 1022.
- Some actions may be occurring in the 100-year floodplain; if so, the site must comply with 10 CFR 1022.
- Plugging and abandonment of wells was not interpreted to be "site characterization" activity. A NEPA "removal action" was thought to be more appropriate.

In order to satisfy these concerns without delaying the bulk of the activities identified in the RFO/CX-017-91 document, the following actions were taken. The document was changed to state that activities occurring in floodplains/wetlands are not part of this Categorical Exclusion (CX) and will be addressed in a separate CX with the appropriate assessment and public notice of intent to conduct the activities. Also, well plugging and abandonment activities were removed from this CX. Rocky Flats is directed to prepare separate CXs to cover the activities removed from this CX and to comply with the provisions of 10 CFR 1022, as appropriate.

If you have any questions regarding this memorandum, please contact Autar Rampertaap of my staff at FTS 233-8191.

John S. [Signature]

Raymond I. Greenberg
Chief
Decontamination and Decommissioning Branch
Division of Southwestern Area Programs
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cc:
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REVIEWED FOR CLASSIFICATION/ENI
By [Signature]
Date 7/15/91

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