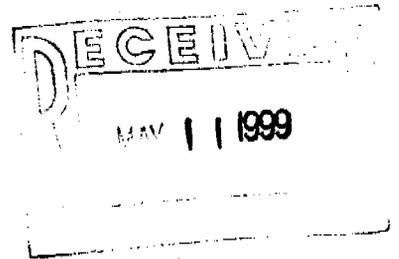




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## INTEROFFICE MEMORANDUM

DATE: May 10, 1999

TO: Lane Butler, K-H, Bldg 130, X5245

FROM: S. M. Nesta, National Environmental Policy Act, T130C, X6386 *S. M. Nesta*

SUBJECT: NEPA DETERMINATION FOR THE SHIPMENT OF TRENCH 1 CLOSURE  
PROJECT WASTE - SMN-063-99

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The subject project was submitted for NEPA determination, I have reviewed the project for the shipment of Trench 1 Closure waste to four facilities. The four facilities analyzed, per your request, were: (1) Perma-Fix Environmental Services in Gainesville, Florida, (2) Waste Control Specialists (WCS) in Andrew, Texas, (3) Materials and energy Corporation (M&EC) in Oak Ridge, Tennessee and, (4) Allied Technical Group (ATG) in Richland, Washington. All four facilities are currently working towards obtaining the permits and licenses required for treating the T-1 waste.

The NEPA Group performed an analysis of this project. There are three basic qualifying conditions that must be met before a project, with the scope such as this, qualifies for a Categorical Exclusion. These conditions pertain to the number of shipments, volume to be shipped, and the receiving facility's capacity. It is my understanding that this project has approximately 130 yd<sup>3</sup> of waste that will require between 6-12 shipments to the receiving site. The volume and number of shipments qualify all four facilities. It was determined that the proposed waste shipments, other than to WCS, did not comprise a "small and incidental to the amount that is already a part of ongoing operations at the receiving site". Hence, only WCS meets the conditions set forth in the CX.

However, as none of the facilities currently have the correct permits and licenses to accept this waste for treatment, I have concluded that the proposed shipments do not meet ESS compliance standards and therefore I cannot approve this project for NEPA compliance. Once these facilities obtain their permits/licenses please resubmit the project for ESS approval and NEPA determination and documentation.

If changes arise that alter the scope of the project, or if you have any questions or need additional information, please contact me at X6386.

cc:  
K. North, K-H  
T. Hopkins, RMRS  
File

R.L. Griffis, RMRS  
T. Greengard, SAIC

**ADMIN RECORD**

BZ-1108-A-00068