



Department of Energy  
National Nuclear Security Administration  
Pantex Site Office  
P. O. Box 30030  
Amarillo, TX 79120



## NEPA Compliance Officer Rationale

Pantex Site Office

Proj. No.: ESH-11-009-C

NEPA ID No.: PXP-11-0006

### Environmental Restoration & Waste Mgt. Activities, FY 2012-2013

**Application of DOE NEPA Procedure:** The Categorical Exclusions B6.1 and B6.2, Applicable to Facility Operations (10 CFR Part 1021, Subpart D, Appendix B), apply to project number ESH-11-009-C.

**Rationale:** The U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA), Pantex Site Office, proposes Environmental Restoration & Waste Management Activities for Fiscal Years 2012 and 2013 under project number ESH-11-009-C. These activities could include:

- Remedial actions, including design, construction, and operation of corrective measures (e.g., landfill covers and soil remediation activities);
- Accelerated soil cleanups;
- Integration of cleanup actions conducted in accordance with Resource Conservation and Recovery Act (RCRA) corrective action requirements, with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requirements and as applicable, requirements of NEPA;
- Lining of ditches with geosynthetic materials (e.g., reinforced polypropylene) to prevent downward migration of surface water and residual contamination through ditches and to the groundwater;
- Control and management of Solid Waste Management Units (SWMUs); and
- Installation of fences, warning signs, or other site control precautions.

The overall ER Program focuses on characterization, evaluation for risk assessment (RA), and RA of various areas at the Pantex Plant (i.e., Solid Waste Management Units (SWMUs), areas of concern [AOC], groundwater, release sites, etc.).

Based upon the information in sections A, B, and C of NEPA Review Form PXP-11-0006, which is hereby incorporated by reference, this proposal for Environmental Restoration & Waste Management Activities in Fiscal Years 2012 and 2013 does not present any extraordinary

circumstances of a unique or uncertain nature. It is not connected to other actions with potentially or cumulatively significant impacts.<sup>1</sup> It would not<sup>2</sup>:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;
2. require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions;
3. disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or
4. adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B.(4)).

Therefore, this proposal meets the conditions that are the integral elements of the classes of actions to which application of Categorical Exclusions B6.1 and B6.2 is appropriate:

B6.1, “Small-scale, short-term cleanup actions under RCRA... or other authorities less than approximately 5 million dollars in cost and 5 years duration .... These actions include, but are not limited to:

- (a) “Excavation or consolidation of contaminated soils...that are not receiving contaminated surface water or wastewater....”
- (b) “Removal of bulk containers that may contain hazardous substances...;”
- (c) “Removal of underground storage tanks;
- (d) “Repair or replacement of leaking containers;”
- (e) “Capping or other containment of contaminated soils or sludges...;”
- (f) “Drainage or closing of man-made surface impoundments;”
- (g) “Confinement or perimeter protection...;”
- (h) “Stabilization, but not expansion, of berms, dikes, ...;”
- (i) “Drainage controls;”
- (l) “Use of chemicals and other materials to retard the spread of the release;”
- (n) “Installation of fences, warning signs, or other security or site control precautions....”

B6.2 “Siting, construction and operation of temporary (generally less than 2 years) pilot-scale waste collection and treatment facilities.... if the action: (1) Supports remedial investigations/corrective measure studies....”

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<sup>1</sup> See 10 CFR § 1021.410(b)(2)and(3)for full text of regulation.

<sup>2</sup> See 10 CFR Part 1021 Subpart D Appendix B (B(1)through(4)).

If changes are made to the scope of action as described in PXP-11-0006, or if the scope is expanded to encompass other actions, NEPA requirements for the action will need to be reassessed at that time.

Signature: 

Jim Barrows

Title: NEPA Compliance Officer

Date: 23 August 2011