

1001

**FINDING OF NO SIGNIFICANT IMPACT**  
**COMMERCIALIZATION OF THE MOUND PLANT**  
**MIAMISBURG, OHIO**

**Proposed Action:** On November 22, 1993, the U.S. Department of Energy decided to phase out operations at the Mound Plant in Miamisburg, Ohio, with the goal of releasing the site for commercial use. The goal of the Secretary of Energy's Economic Development Initiative is to make Departmental resources available to community partnerships for local business development that supports the President's broader objective of stimulating economic growth. To facilitate implementation of the Secretary's Economic Development Initiative, the Mound Reuse Committee (MRC) was formed. The MRC is the recognized Community Reuse Organization (CRO), and represents a broad cross-section of Mound Plant stakeholders, including the general public, local citizens action groups, State environmental regulatory personnel, local industries, the City of Miamisburg and Mound Plant employees. One objective of the MRC is to redirect the Mound Plant's advanced manufacturing capabilities for defense production to the private sector. The broad concept is to transform the plant into an advanced manufacturing center with the main focus on commercializing products, process development, and identifying other firms interested in commercializing products and other technology.

The Department proposes, therefore, to lease portions of the Mound Plant to commercial enterprises, excluding land associated with the south property. Leasing would be between the Department and a lessee including, but not limited to, Miamisburg Mound Community Improvement Corporation (MMCIC) as the distinct private entity to coordinate administrative

function for the City of Miamisburg. The MMCIC would, in turn, administer its lease with the Department and sublet parcels of the Plant to other potential business enterprises for commercial uses consistent with the "Mound Plant Future Use Plan" and the environmental assessment for the proposed action. Although the MMCIC is a private entity which would act on behalf of the City of Miamisburg, it would operate within the confines of MRC recommendations. The MMCIC would also present any proposals from potential sublessees to the Department for approval before any subleases would take effect.

The Future Use Plan presents a combination of uses, similar to ongoing activities, processes, and operations new to the Plant that would represent a governmental presence and a private industry technology partnership to enable the Plant to become a high technology, self-sustaining manufacturing mall with one or more anchor tenants that would attract other tenants to the facility. Potential operations could be similar to those analyzed in the Mound Plant Alternative described in the June 1993 Nonnuclear Consolidation Environmental Assessment, DOE/EA-0792. In addition to the ongoing activities at the Mound Plant, that alternative considered consolidation of the nonnuclear functions at the Plant from other Departmental sites to include: 1) nonnuclear electrical/mechanical manufacturing functions from the Kansas City, Pinellas, and Rocky Flats Plants, 2) lithium ambient batteries from Los Alamos National Laboratory, and 3) special products, such as nuclear grade steels, safe secure trailers, weapons trainer shop, and metrology capabilities from the Rocky Flats Plant. Leases or subleases for any uses not similar to those outlined above are outside the scope of the proposed action and would be subject to additional National Environmental Policy Act review before the Department's approval of the lease or sublease. Any new construction at the Plant (except for equipment and plant layout rearrangements, renovation activities, and other routine maintenance activities or replacements and upgrades consistent with facilitating

the conversion to commercial use) would also be outside the scope of the proposed action and subject to additional National Environmental Policy Act review.

The Department has prepared an environmental assessment (DOE/EA-1001) that compares impacts of the proposed action with those of 1) not leasing the Plant to commercial enterprises (the "no action" alternative) and 2) limiting leasing activities strictly to non-DOE enterprises that are purely administrative or engage in essentially similar activities in scope and scale to those currently in existence at the Plant. The Department considered, but dismissed as unreasonable, the alternatives of 1) selling the Plant and all associated structures upon completion of environmental restoration activities, 2) demolishing the Plant and all associated structures upon completion of environmental restoration activities, and 3) continuing Departmental or other government-funded operations at the Plant. The first two alternatives were considered unreasonable because they would fail to provide sustained employment opportunities to the community and would result in restoration costs above those identified for the proposed action; the third alternative was considered unreasonable because it would not be consistent with the Department's decision to consolidate and streamline operations as described in the Nonnuclear Consolidation Environmental Assessment and would not support commercialization of the Mound Plant.

**Environmental Impacts:** The proposed action would not impact the small wetland areas that are found on the facility grounds and would not impact the groundwater in terms of usage or potential contamination. A small portion of the south property falls within the 100 year flood plain of the Great Miami River, however, the south property is outside the scope of the environmental assessment. Therefore, no impact on the floodplain would result from the proposed action. The Mound Plant site does not contain any prime or unique farmlands, and

no archaeological sites eligible for the National Register would be affected by the proposed action. Based on the analysis in the environmental assessment, the proposed action would not result in any substantive change in level of service for transportation links or in noise levels in the area of the Plant. Racial minority and low income families do reside in the Miamisburg community, however, Miamisburg is not a racial minority or low income community. The proposed action and alternatives will, therefore, not have any unique effects on these groups.

Cumulative air impacts from tenant emissions would not exceed the Threshold Limit Values (TLV) for Hazardous Air Pollutants (HAP), both in combination or for any single pollutant, as defined in the Clean Air Act, Section 112 and the Ohio Administrative Code 3745-77-01(w). Emissions of specific chemicals used in new processes may increase current emission levels for those chemicals, but increases would not be allowed to exceed applicable State regulatory standards or permitted limits through lease conditions. No net increases in radiological air emissions over existing emissions would be anticipated from the proposed action. Total radiological air emissions from the Plant in 1993 included 664 curies of tritium,  $1.2 \times 10^{-5}$  curies of plutonium-238,  $4.0 \times 10^{-8}$  curies of plutonium-239,  $6.3 \times 10^{-8}$  curies of uranium-233,234 and  $5.7 \times 10^{-8}$  curies of uranium-238. The Maximum Effective Dose Equivalent (EDE) to individuals in the population was 0.04 mrem for radioactive airborne releases. Therefore, Mound's radiological air emissions in 1993 represented 0.4% of the Environmental Protection Agency (EPA) dose standard of 10 mrem. All leases and subleases would contain restrictive lease conditions to ensure no new radionuclides would be introduced to the site and that potential tenants' air impacts would not exceed the baseline estimates provided in the environmental assessment.

Under conditions of the lease, nonradiological effluent discharges from the proposed action would be limited to levels currently permitted under the discharge standards, as established by the Mound Plant's National Pollutant Discharge Elimination System (NPDES) permit. If the proposed processes are substantially different than ongoing operations, the current wastewater permit may require modification. However, impacts would be not greater than increased stormwater runoff of up to 132 million gallons per year of additional wastewater as stated in the Nonnuclear Consolidation Environmental Assessment. Release levels of radiological liquid effluents would remain at or below current levels (2.5 x 10<sup>-4</sup> curies of plutonium-238, 3.4 curies of tritium, 3.5 x 10<sup>-4</sup> curies of uranium-233,234 and 8.9 x 10<sup>-6</sup> curies of plutonium-239 in 1993). All leases and subleases would contain restrictive lease conditions to ensure compliance with regulatory requirements and to ensure that the proposed uses are within the bounds of the environmental assessment.

Commercial enterprises that lease space at the Plant would be bound through lease agreements to conduct their waste management operations independent of Mound's Hazardous Waste Operating Permit, however, an effort would be made to bring in processes with wastestreams that are compatible with the current permit. Regardless, tenant operations would not exceed the total volumes of waste generated at Mound shown in Table 3-6 of the environmental assessment. The proposed action would allow for employment at the facility of up to 1,500 workers in addition to the anticipated 1,100 workers for ongoing operations associated with environmental restoration and Nuclear Energy Radioisotopic Thermoelectric Generator (RTG) missions.

Environmental impacts from the no action alternative would be limited to those from ongoing environmental restoration activities and Nuclear Energy RTG missions. The no action alternative would retain 900 workers for environmental restoration and 200 workers for ongoing RTG missions at the Plant.

The alternative of limiting leasing activities strictly to non-DOE enterprises which are purely administrative or engage in essentially similar activities in scope and scale to those currently in existence at the Plant would not introduce any new environmental impacts from the established Mound Plant baseline. This alternative would generate an additional 200 workers at the Plant.

**For further information contact:** For further information on the proposed action (including a copy of the environmental assessment) or the National Environmental Policy Act review program concerning proposals at the Mound Plant, please contact:

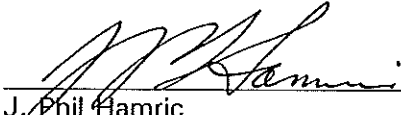
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For general information on the Department's National Environmental Policy Act process, please contact:

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**Finding:** Based on the analysis of impacts in the environmental assessment, the proposed action to lease all or portions of the Mound Plant to commercial enterprises for sublease to other potential business enterprises for commercial uses consistent with the "Mound Plant Future Use Plan" and the environmental assessment for the proposed action would not significantly affect the quality of the human environment within the meaning of the National Environmental Policy Act, 42 U.S.C. 4321, et seq. Therefore, the Department is issuing this finding of no significant impact and an environmental impact statement is not required.

Signed in Miamisburg, Ohio this 27<sup>th</sup> day of October, 1994.

  
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J. Phil Hamric  
Manager, Ohio Field Office