

U.S. Department of Energy Categorical Exclusion Determination Form

Non-Comprehensive Environmental Response, Compensation, and Liability Act Facility and Structure **Proposed Action Title:** Demolition and General Site Clean-up at the East Tennessee Technology Park (CX-K25-564)

Program or Field Office: Environmental Management - Oak Ridge

Location(s) (City/County/State): Oak Ridge, Tennessee

Proposed Action Description:

The U.S. Department of Energy (DOE) proposes to demolish non-Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) facilities and structures remaining at the East Tennessee Technology Park (ETTP) and conduct a general site cleanup in order to allow for a private sector industrial complex and national park.

ETTP is the former K-25 Gaseous Diffusion Plant built in the early 1940s as part of the Manhattan Project for the development of the atomic bomb. Its purpose was the enrichment of the uranium-235 isotope used to fuel the first atomic bomb and subsequent atomic weapons and nuclear energy production. Enrichment of uranium operations continued through 1985, when the plant was shut down and environmental restoration activities commenced in order to cleanup legacy waste sites. These efforts eventually lead to the demolition and removal of former enrichment process, operational support, and ancillary buildings. Most of this cleanup is being completed under CERCLA, and the National Environmental Policy Act documentation was included as part of the CERCLA documentation.

The proposed action would be to remove the remaining facilities and structures (including, but not limited to, sprinkler vault houses, conex and sealand storage boxes, electrical transformers and substations, trailers, Rubb Tents, portals, storage tanks, communication towers, pump houses, and small buildings) that do not fall under the existing CERCLA Decision Documents and conduct general site clean-up activities. The facilities and structures would be dispositioned through several avenues including movement to a non-ETTP location for continued use, returned to vendor, property sales, or demolished and recycled or disposed. The general site cleanup would include, but not be limited to, removal of remaining storage tanks, fences, debris piles, bollards, fire hydrants, concrete slabs, stanchions, asphalt, and disposition excess equipment to make brownfield space available for future industrialization.

The proposed action would be completed by a DOE contractor and include: (1) removing and dispositioning materials and equipment from the structures; (2) removing and dispositioning all known hazardous materials; (3) disconnecting utility services; (4) demolishing the buildings by conventional methods (e.g., shears, grapples, and front-end loaders); and (5) removing debris from the site for recycle or disposal. In the event that regulated materials are discovered during the course of demolition or if it proves infeasible to remove all regulated material prior to demolition, the proposed action would include the proper segregation and disposal of any such materials in accordance with existing DOE contractor procedures prior to disposal of the remaining debris as recycle material or sanitary/industrial waste. At the conclusion of demolition and waste removal, disturbed soil areas would be stabilized utilizing best management practices described in the Tennessee Erosion & Sediment Control Handbook.

A Notification of Demolition and/or Asbestos Renovation would be submitted to the Tennessee Division of Air Pollution Control for any applicable asbestos renovation or structure demolition.

Appropriate spill prevention, spill response materials, and stormwater pollution controls would be installed and inspected prior to beginning demolition activities. Water spray would be utilized to control airborne dust emissions, and runoff would be monitored and regulated to prevent uncontrolled non-stormwater discharges to storm drains and/or waters of the state.

In the event a specific project disturbs an acre or more through demolition, a Notice of Intent for Construction Activity and a sitespecific Storm Water Pollution Prevention Plan would be developed and submitted to the Tennessee Division of Water Resources.

All excavation would be done in compliance with the Tennessee Underground Utility Damage Prevention Act. An excavation/penetration permit would be obtained prior to performing any excavating work. Excavation activities would be limited to the minimum amount necessary to accomplish the goals of the proposed action. All demolition operations in the vicinity of existing utilities would be performed with great care to prevent damage to these utilities. Prior to demolition activities, excavators would verify the location of any marked utilities.

The proposed action would generate a variety of recyclable material and demolition waste which may include, but not limited to: (1) asbestos containing materials including insulation, floor tile, mastic, and transit. Asbestos-containing material wastes would be disposed of under the special waste provisions of the Oak Ridge Reservation Centralized Landfill; (2) limited quantities of universal wastes and hazardous wastes may remain in place until demolition, and the wastes would be segregated and recycled or disposed, as appropriate, through existing DOE contractor waste management systems; (3) any radiological contaminated materials which could not be accessed prior to demolition would be removed and managed in accordance with existing procedures; (4) materials with painted surfaces would be characterized for potential lead and/or polychlorinated biphenyl content prior to demolition to confirm that resulting waste streams would meet waste acceptance criteria for the receiving facility; and (5) all nonhazardous and nonradioactive waste material that is not appropriate for recycling actions would be disposed at an approved sanitary landfill site. The DOE contractor involvement in the disposal of hazardous waste would include characterizing, packaging, and certifying the waste to ensure that it meets the acceptance requirements of the receiving organization. The facilities would undergo characterization, and a waste management plan would be developed prior to demolition activities.

This action falls under the Memorandum of Agreement between the DOE Oak Ridge Operations Office and the Tennessee State Historic Preservation Office pursuant to Title 36, Code of Federal Regulations (CFR), Part 800.6(b)(l)(iv), regarding the demolition of 108 buildings/structures at ETTP (formerly the K-25 Site) on the Oak Ridge Reservation, Roane County, Tennessee.

All structures are located within the K-25 Main Plant Historic District. Buildings K-795-A, -B, -C, and -D Sprinkler Valve Houses contributed to the Historic District and are considered historical buildings. These buildings are covered for demolition by the previously mentioned Memorandum of Agreement.

The remaining buildings and structures are not eligible for inclusion in the National Register of Historic Places and, therefore, do not require further National Historic Preservation Act, Section 106, consultation.

Categorical Exclusion(s) Applied:

- B1.16 Asbestos removal
- B1.23 Demolition and disposal of buildings
- B1.27 Disconnection of utilities

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of Title 10, CFR, Part 1021.

Regulatory Requirements in Title 10, CFR, Part 1021.410(b): (see full text in regulation)

The proposal fits within a class of actions that is listed in Appendix A or B to Title 10, CFR, Part 1021, Subpart D.

To fit within the classes of actions listed in Title 10, CFR, Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE 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 or facilities; (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; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of Title 10, CFR, Part 1021, Subpart D, Appendix B; and (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of Title 10, CFR, Part 1021, Subpart D, Appendix B.

- There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.
- The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts [Title 40, CFR, Part 1508.25(a)(1)], is not related to other actions with individually insignificant but cumulatively significant impacts [Title 40, CFR, Part 1508.27(b)(7)], and is not precluded by Title 40, CFR, Part 1506.1, or Title 10, CFR, Part 1021.211, concerning limitations on actions during preparation of an environmental impact statement.

The above description accurately describes the proposed action, which reflects the requirements of the Categorical Exclusion cited above. Therefore, I recommend that the proposed action be categorically excluded from further National Environmental Policy Act (NEPA) review and documentation.

NEPA Compliance Officer:

Michael Rigas

Oak Ridge Office of Environmental Management

Oak Ridge Office of Environmental Management

Date Determined: 6 5 18

Based on my review of the proposed action, as Field Office Manager (as delegated March 15, 2018, under DOE Policy 451.1), I have determined that the proposed action fits within the specified classes of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

Field Office Manager:

Date Determ

Date Determined: 4/6/18