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Incoming: 9300922

Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

JAN 12 1993

93-RPB-089

Mr. Roger Willms
Regional Habitat Manager
State of Washington
Department of Fisheries
500 N. Morain, Suite 1200-B
P.O. Box 14
Kennewick, Washington 99336

Dear Mr. Willms:

TRANSMITTAL OF THE CATEGORICAL EXCLUSION FOR REMOVAL OF 100-D AREA VENT
PIPES TO THE STATE OF WASHINGTON DEPARTMENT OF FISHERIES

A Hydraulic Project Application (HPA) was transmitted to your office, under cover letter from Mr. R. D. Izatt, U.S. Department of Energy, Richland Field Office, to Mr. R. Wells, State of Washington Department of Fisheries, "Hydraulic Project Application for Removal of Vent Pipes from the 100-D Area," dated April 23, 1992. Your office requested a copy of the approved National Environmental Policy Act (NEPA) documentation to satisfy the requirements of the State Environmental Policy Act (SEPA). The enclosed Categorical Exclusion is the NEPA documentation approved for this activity.

As the HPA stated, the removal of the vent pipes will occur when the level of the Columbia River is low and the pipes are exposed. As this occurs mainly in the winter, your prompt attention to this matter would be appreciated.

Should you require additional information to satisfy the SEPA process, please contact me or Mr. S. D. Stites of my staff on (509) 376-8566, so that the vent pipes can be removed before this spring.

Sincerely,

James D. Bauer, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:SDS

Enclosure:
NEPA CX Determination

cc w/o encl:
R. H. Engelmann, WHC
G. W. Jackson, WHC
R. W. Oldham, WHC
B. F. Weaver, WHC



9259160D

Enclosure 1

9413096.0513



Department of Energy

Planning Operations Office
P.O. Box 550
Richland, Washington 99362

APR 23 1992

92-RPB-083

Mr. Roger Wells
Kennewick Field Office
State of Washington
Department of Fisheries
500 N. Morain
Kennewick, Washington

Dear Mr. Wells:

HYDRAULIC PROJECT APPLICATION FOR REMOVAL OF VENT PIPES FROM THE 100-D AREA

Please find enclosed a Hydraulic Project Application for removal of vent pipes from the island near the 100-D Area of the Hanford Site. The proposed activity, as described in the permit application, is to remove approximately 40 one-inch diameter vent pipes traversing a small island near the 100-D Area.

The activity will take place when the portion of the island containing the vent pipes is below the level of the Columbia River. Only hand tools will be used in the removal action. A permit application is also being submitted to the U.S. Army Corps of Engineers and a request for exemption from the Shoreline Management Act is being submitted to Benton County. Additionally, a notification to the U.S. Park Service, pursuant to Public Law 100-605 is being made.

Should you have any questions concerning the enclosed application or the proposed activity, please contact me or Mr. S. D. Stites of my staff on (509) 376-8566.

Sincerely,

A handwritten signature in black ink, appearing to read "R. D. Izatt".

R. D. Izatt, Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:SDS

Enclosure:
Hydraulic Project Application

cc w/encl:
P. T. Day, EPA
D. B. Jansen, Ecology
R. E. Lerch, WHC
R. W. Oldham, WHC

Background

Construction of the 100 D Reactor started in 1943, and the reactor operated from 1944 to 1967. The D Reactor was the second reactor built on the Hanford Site. The reactor was cooled with water withdrawn from the Columbia River, which was then discharged back to the river, after a holding period of variable length. The D Reactor was outfitted with two process effluent lines, both 42 inches in diameter, that traversed under the East channel of the Columbia River, crossed an unnamed island, and discharged into the main River (see Figure A.1). The elevation of the effluent lines is greater where they pass through the island, than where they cross under the East channel of the River. At some point in the construction or operation of the reactor, pipes were added to the process effluent lines to allow venting to occur above the surface of the island. These vent pipes were made of approximately 1 inch diameter pipe and extended from one to three feet above the surface of the island and ended in a T arrangement. Figure A.2 is a photograph taken in 1956, while the reactor was operating, where steam can be seen venting through the pipes on the island.

A recent surveillance of the Hanford Reach revealed that the vent pipes are radioactively contaminated and efforts are underway to remove the vent pipes. The contamination is affixed to the interior of the vent pipes and poses little threat to individuals on the Columbia River, provided they do not come into direct contact with the interior of the vent pipes. The main process effluent lines will be left in place until final disposition is determined in accordance with the Hanford Federal Facility Agreement and Consent Order signed by the State of Washington Department of Ecology, the U.S. Environmental Protection Agency, and the U.S. Department of Energy. The portion of the island where the process effluent lines traverse is below the high water mark of the Columbia River. This activity is, therefore, subject to the U.S. Army Corps of Engineers (COE) requirements for activities taking place in Navigable Waters of the United States, in addition to Washington State Department of Fisheries requirements for Hydraulic Projects.

Activity Planned

Removal of the vent pipes is anticipated to occur over a period of less than one week (currently planned for 2 days) while the water level is below the island surface. This will serve to essentially eliminate the impact to the River from the planned activities. Approximately 6 to 12 inches of cobbles, rubble, and sediment will be excavated at each vent pipe to allow the vent pipes to be cut off and capped. The holes will be filled with the excavated material (see Figure A.3). All excavation and filling will be performed with hand tools. Prior to backfilling, the fill material will be surveyed to

assure that the materials are not radioactively contaminated. Preliminary surveys of the site have indicated that the excavated material will not be contaminated with radioactivity. In the event that the excavated material is contaminated, however, the holes will be filled with uncontaminated cobble from other nearby portions of the island. Fill material will not be brought to the island from other portions of the Hanford Site. The pipes will be placed in appropriate containers for contaminated equipment (i.e., Department of Transportation approved 55 gallon drums, double bagged) and removed from the island to be dispositioned at an existing Hanford Site facility. Any contaminated excavated material will also be placed in appropriate containers and removed from the island.

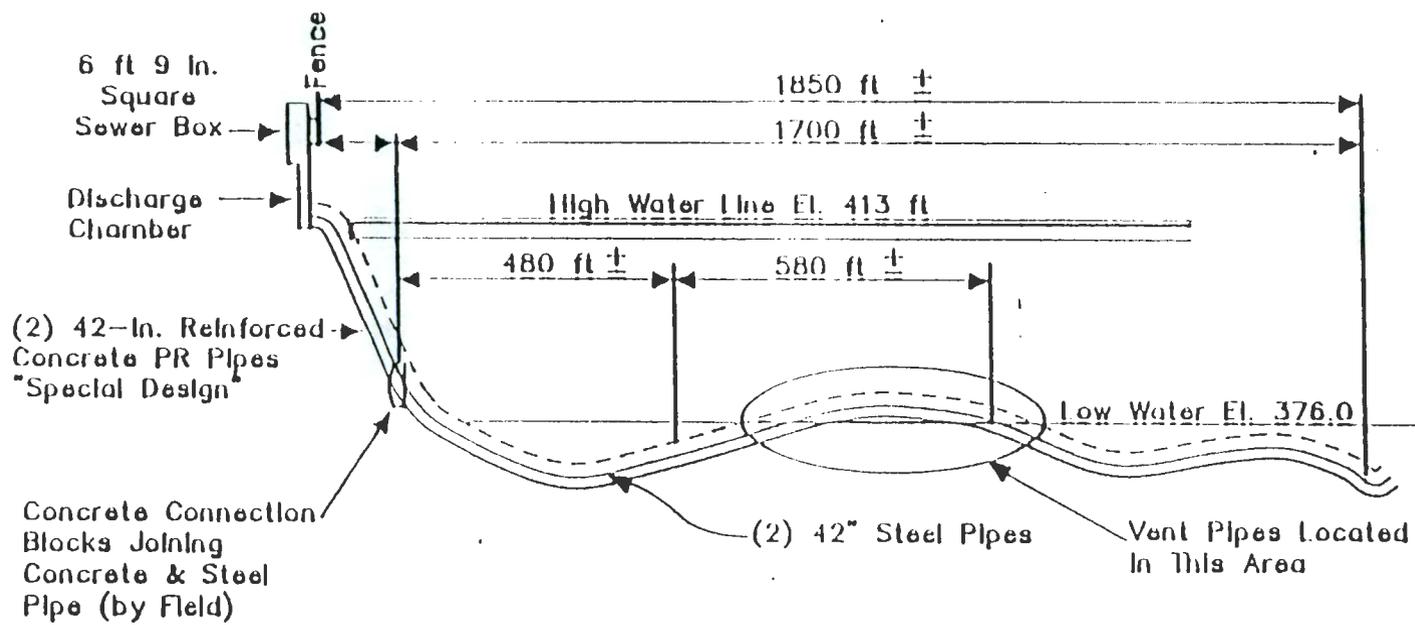
The planned activities correspond to the activities described in Nationwide Permits 18 and 19 (excavation and filling of less than 10 cubic yards of material). However, Nationwide Permits are not valid for rivers designated as Wild and Scenic, or official study rivers (33 Code of Federal Regulations 330.5 (b) (7)). The Columbia River between the edge of the pool of McNary Dam and Priest Rapids Dam (the Hanford Reach) is under study pursuant to Public Law 100-605, Hanford Reach Comprehensive Study. Consequently, an individual permit application has been submitted to the COE.

Environmental Impacts and Mitigation

The environmental impacts of the planned activities are very minimal. Excavation will be limited to that necessary to provide adequate access to the vent pipes to cut off the pipes below the island surface. The vent pipes, as they now exist, are a potential public and navigational hazard. In addition, because the portion of the island on which the vent pipes are located is below the high water level, the area cannot be posted (with Radiation Postings) effectively; removing the pipes is the preferred solution.

Work will not take place until the water level is below the level of the area of the island that will be excavated. This is the most significant mitigative measure that will be taken and will also allow the activity to be performed in a reasonable manner. In addition, the vent pipes and contaminated excavated material (if any) will be removed from the island when the work has been completed. These two measures will virtually assure that no contaminated material will be permitted to enter the Columbia River.

Figure A.1



Cross Section of 100-D Process Effluent Pipeline.
 (River Discharge to the Left of the Drawing.)

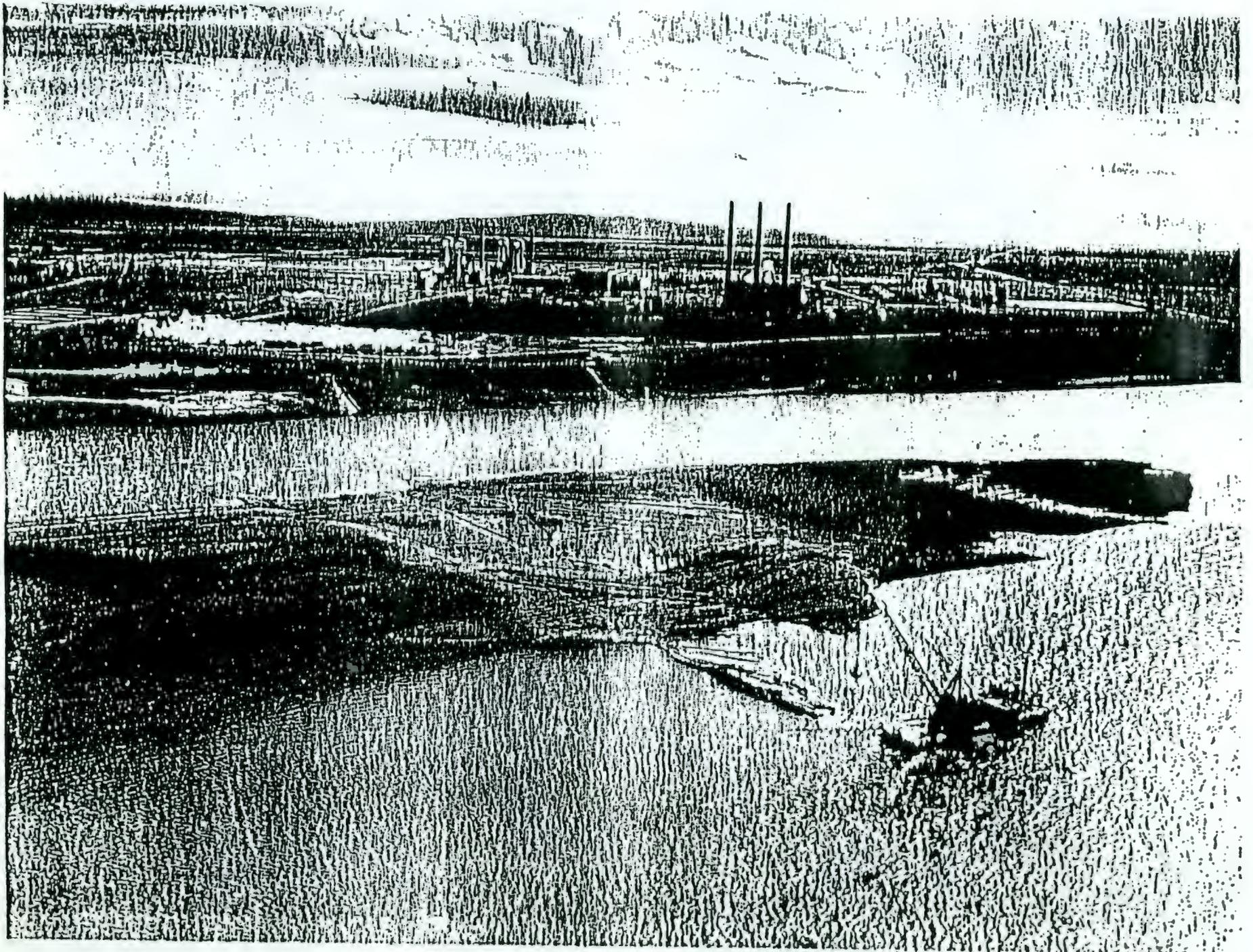
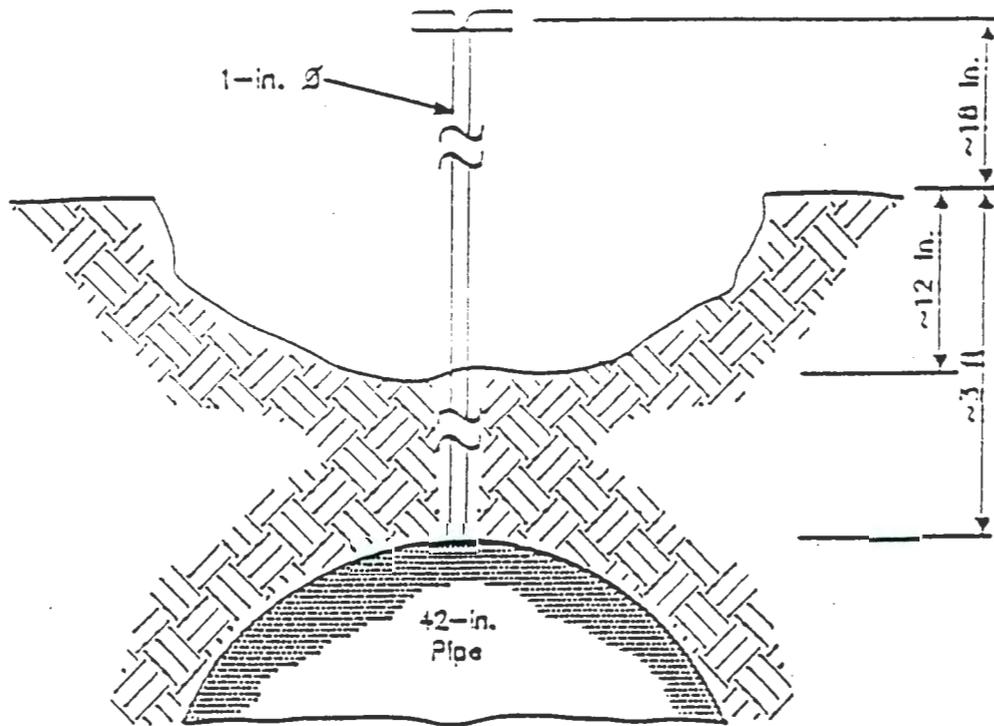
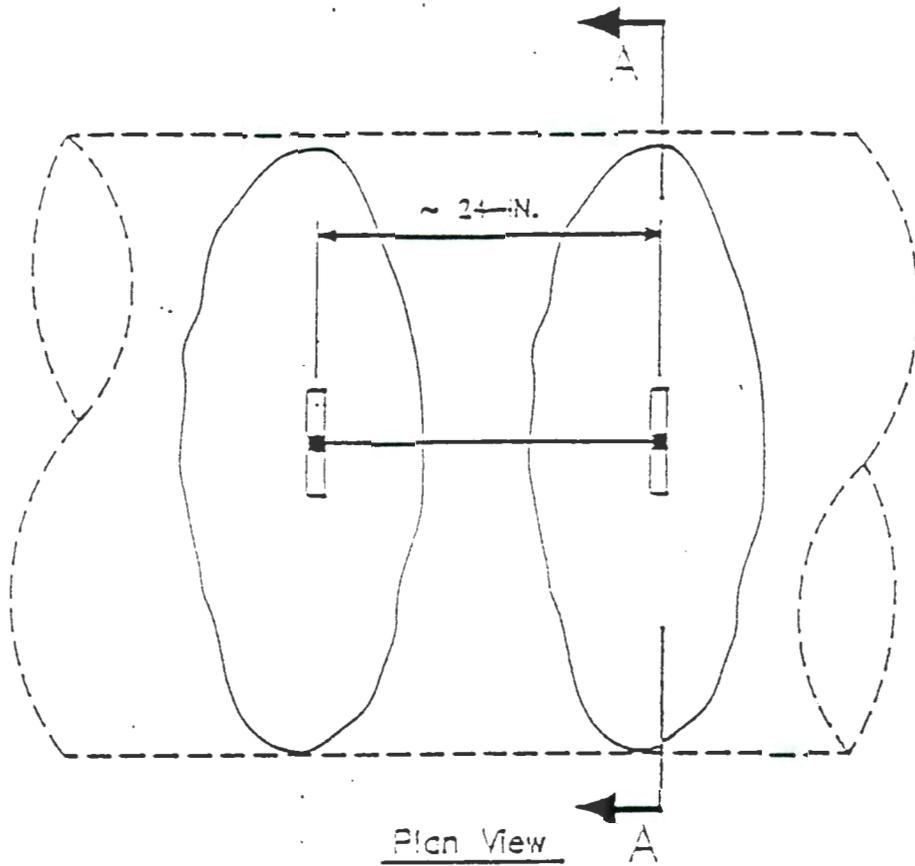


Figure A.2

Photograph taken 3/8/56, during construction of DR outfall, showing venting of 100-D Process Effluent Pipeline



Detail A-A

ADK\121490-C

100-D Island Vent Pipes
Figure A.3

9475096.0519



HYDRAULIC PROJECT APPLICATION



DEPARTMENT OF WILDLIFE

(R.C.W. 75.20.100)
(R.C.W. 75.20.103)

DEPARTMENT OF FISHERIES

500 Capitol Way North
Olympia, Washington 98504
(206) 753-5897

General Admin. Bldg.
Olympia, Washington 98504
(206) 753-6650

PLEASE PRINT OR TYPE

DO NOT WRITE IN SHADED AREA

<input type="checkbox"/> 101 LAST NAME Bracken		<input type="checkbox"/> 102 FIRST E. A.		<input type="checkbox"/> 103 CONTACT PHONE(S) (509) 376-7277		<input type="checkbox"/> 104 CONTROL NUMBER	
<input type="checkbox"/> 105 STREET OR RURAL ROUTE P.O. Box 550, U.S. Department of Energy Field Office, Richland						<input type="checkbox"/> 106 WYRIA	
<input type="checkbox"/> 107 CITY Richland			<input type="checkbox"/> 108 STATE WA			<input type="checkbox"/> 109 ZIP 99352	
<input type="checkbox"/> 110 WATER Columbia River				<input type="checkbox"/> 111 TRIBUTARY TO			
<input type="checkbox"/> 112 QUARTER SECTION NE		<input type="checkbox"/> 113 SECTION 15		<input type="checkbox"/> 114 TOWNSHIP 14N		<input type="checkbox"/> 115 RANGE (E-W) 26E	
						<input type="checkbox"/> 116 COUNTY Benton	
<input type="checkbox"/> 117 TYPE OF PROJECT Removal of Vent Pipes							

DESCRIPTION OF WORK, METHOD, AND EQUIPMENT

Details of the proposed activity are included in Attachment A. This attachment was originally prepared for the U.S. Army Corps of Engineers' Permit Application. The activity is proposed for a small island off of the 100-D Area of the Hanford Site.

PROPOSED STARTING DATE

PROPOSED FINISHING DATE

When documentation is complete and water is low. Approximately one week from start.

201 SEPA AGENCY DATE OF DETERMINATION

202 OTHER PERMITS U.S. Army Corps of Engineers' Section 404

IT IS UNDERSTOOD THAT NO WORK WILL BE STARTED UNTIL A SIGNED APPROVAL IS RECEIVED

SIGNATURE

DATE

TIME LIMITATIONS

9413096.0520

92591600

Enclosure 2

1230-9601146

CATEGORICAL EXCLUSION FOR
REMOVAL OF 100-D AREA VENT PIPES FROM THE COLUMBIA RIVER,
HANFORD SITE, RICHLAND, WASHINGTON

Proposed Action

The U.S. Department of Energy (DOE) Richland Field Office (RL) proposes to remove 40 vent pipes which protrude above the ground surface on 100-D Island.

Location of Action

100-D Island, near 100-D Area of the Hanford Site, Richland, Washington

Description of Proposed Action

The proposed action would remove 40 1-inch diameter vent pipes which protrude 1 to 3 feet above the ground surface on 100-D Island in the Columbia River near 100-D Area. This action would be necessary to eliminate a potential navigation and public exposure hazard. These pipes were installed to vent two 42-inch diameter process effluent pipes serving the 100-D reactor which was shut down in 1967. The vent pipes would be removed by excavating below ground level in the immediate vicinity of each vent pipe, cutting and capping pipe, and backfilling the hole. Excavation would be done with hand tools to minimize disturbance. Radiological surveys indicate that the materials to be excavated are uncontaminated, and that the vent pipes themselves have only unsmearable contamination, however, excavated materials would be surveyed, and any materials found contaminated would be removed and replaced with uncontaminated cobbles from elsewhere on the island for backfilling. The vent pipes and any contaminated material encountered would be properly packaged and transported to existing Hanford Site radioactive waste facilities for disposal. The proposed action would be performed during seasonal low water level when the island is exposed. No cultural resources nor endangered species have been identified on the island.

Because these activities would take place on an island within the Hanford Reach, the National Park Service of the Department of the Interior was notified pursuant to P. L. 100-605. A Floodplain/Wetlands Assessment addressing this action was reviewed, and a Statement of Findings was published in the Federal Register (FR) on July 23, 1992.

Categorical Exclusion (CX) to be applied

The following CX is listed in the DOE National Environmental Policy Act (NEPA) Implementing Procedures, 10 CFR 1021, Subpart D, which was published in the Friday, April 24, 1992, FR (57 FR 15151):

B6.1 Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory

exemptions from those cost and time limits (National Contingency Plan, 40 CFR part 300)...."

This CX is appropriate because the action would not have a significant effect on the human environment, and meets the conditions for the CX: it does not have extraordinary circumstances; it is not connected to other actions with potentially significant impacts; it is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211; it does not threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, or health, including DOE Orders; it does not require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities; it does not disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum or natural gas products that preexist in the environment causing uncontrolled or unpermitted releases; it does not adversely impact environmentally sensitive resources such as historic properties, cultural resources, threatened or endangered species, and floodplains and wetlands; it meets the CERCLA time and cost limitations identified in the *National Contingency Plan*, 40 CFR part 300. Documentation for the project indicating satisfaction of the conditions of this CX will be retained by RL.

I have reviewed the documentation and do not object to the use of this CX.

Signature: Paul F. X. Dunigan Jr.
Paul F. X. Dunigan, Jr.
RL NEPA Compliance Officer

Compliance Action

I have determined that the proposed action meets the requirements for the CXs referenced above. Therefore, I have determined that the proposed action may be categorically excluded from further National Environmental Policy Act (NEPA) review and documentation.

Signature: John B. Wagoner, Manager 9/11/92
Richland Field Office Date

EH-25 has reviewed this determination* and has no objection.

Signature: _____ _____
Carol M. Borgstrom, Director Date
Office of NEPA Oversight, EH-25

* Removal of 100-D Area Vent Pipes From The Columbia River

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. D. Bauer, RL (C. E. Sowa, WHC)	R. Willms, Fisheries	Incoming:9300922 XRef:9259160D

Subject: TRANSMITTAL OF THE CATEGORICAL EXCLUSION FOR REMOVAL OF 100-D AREA VENT PIPES TO THE STATE OF WASHINGTON DEPARTMENT OF FISHERIES

INTERNAL DISTRIBUTION

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		C. K. DiSibio	B3-15	
		R. H. Engelmann	H6-26	
		K. A. Gano	X0-21	
		G. W. Jackson, Assignee	H6-20	
		A. D. Krug	H6-02	
		R. J. Landon	H6-22	
		P. J. Mackey	B3-15	
		H. E. McGuire, Level 1	B3-63	
		J. J. Luke	H6-25	
		R. W. Oldham	H6-25	
		C. E. Sowa	H6-25	
		B. F. Weaver	T3-11	
		B. W. Wyrick	H6-29	
		EDMC	H6-08	
		CES/File/LB	H6-25	