to the area. Cleaning up this area would result in the destruction of riparian habitat and would be very costly because it would be necessary to construct a temporary bridge across the Dolores River. Furthermore, without the cleanup, the long-term health impacts to individuals and the general public residing in the vicinity of the area would be negligible. If this application of supplemental standards were approved by the NRC and the state of Colorado, the contamination in this area would not be cleaned up.

The remedial action would require the use of earthen and rock materials. Earthen materials would be obtained from the Disappointment Valley borrow site on BLM-administered land that is used primarily for livestock grazing. This borrow site is approximately 7 road miles east of the Slick Rock processing sites and 4.4 road miles southeast of the Burro Canyon disposal site. Approximately 65 acres would be temporarily disturbed at the Disappointment Valley borrow site, and the borrow site would be restored in accordance with the Free Use Permit issued by the BLM. Rock materials would be obtained from the Dolores River borrow site, which is on privately owned land that is used for pasture and growing hay. This borrow site is just north of the Dolores River, midway between the Slick Rock processing sites. Approximately 25 acres would be temporarily disturbed at the Dolores River borrow site and would be restored in accordance with the land use agreement negotiated between the DOE and the land owner.

The contaminated materials and borrow materials would be transported by truck between the processing, disposal, and borrow sites along County Roads S8 and 10R, State Highway 141, and a new 0.5-mile haul road from State Highway 141 to the Burro Canyon disposal site. Approximately 0.25 mile of County Road S8 crosses the southern portion of the Union Carbide processing site and would be temporarily relocated approximately 400 feet south, to allow cleanup of the processing site. Most of the land crossed by County Roads S8, S9, and 10R and the new haul road is administered by the BLM, and the use of these roads for the proposed remedial action would be authorized by rights-ofway issued by the BLM.

Remedial action is scheduled to take 19 months with two winter shutdown periods of 5 months each (mid-November to mid-April). It is estimated that the remedial action would require an average work force of 100 workers and would cost \$7.5 million.

Environmental Impacts

The EA for the Slick Rock UMTRA Project sites assesses the environmental impacts that may result from the proposed remedial action and proposes mitigative measures that would reduce the severity of the impacts. This FONSI is based on the information and analyses in the EA, which are summarized below.

Supplemental Standards

The proposed remedial action includes the application of supplemental standards to one area east of the Dolores River opposite the Union Carbide processing site. If this application of supplemental standards were approved by the NRC and state of Colorado, this area would not be cleaned up. Additional areas at and adjacent to the Slick Rock processing sites may be considered for the application of supplemental standards.

Air Quality

The proposed action would have temporary minimal impacts to air quality. None of the impacts are expected to violate air quality regulations. The most important air pollutant created by the remedial action would be uncontrolled fugitive dust. Much of the fugitive dust would be produced along County Roads S8, S9, and 10R and the haul road to the Burro Canyon disposal site. An Air Pollution Emissions Notice and Emission Permit would be obtained from the state of Colorado prior to the beginning of the remedial action.

This permit would require the implementation of a dust control plan that would include measures such as covering haul trucks, treating haul roads and disturbed areas with water or chemical additives, limiting speeds on unpaved haul roads, and stopping work during windy periods. A monitoring plan to ensure that air quality standards are not exceeded would be developed by the remedial action contractor and must be approved by the state of Colorado and San Miguel County before any ground-disturbing activities are initiated.

Health Effects Related to Radiation

The proposed action would have a long-term positive impact on health by controlling and stabilizing the source of radiation. It is estimated that the proposed 19-month remedial action would result in 0.0004 total excess health effects for the general public. No action at the processing sites would result in an estimated total of 0.0001 excess health effects for the general public during the same 19 months;

however, the increased risk of excess health effects would continue for thousands of years without remedial action. It is estimated that 5 years of no action at the processing sites would result in 0.0003 excess health effects for the general public. In addition, continued dispersion or unauthorized removal and use of the contaminated materials could result in greater excess health effects than those estimated for no action. The 19 months of remedial action would result in a calculated total of 0.0015 excess health effects for remedial action workers. Environmental monitoring would be performed at the processing and disposal sites and radiological control measures would be implemented to ensure that the public health is adequately and appropriately protected in accordance with DOE Order 5400.5, Radiological Protection of the Public and the Environment. Radiological exposures of remedial action workers would be controlled in accordance with DOE Order 5480.11, Radiation Protection for Occupational Workers. Operational measures that include wetting the work area, covering haul trucks, or temporarily stopping work during high winds would be implemented to reduce airborne radioactive particulate matter concentrations to below harmful levels.

Surface Water

No adverse impacts to surface water quality would occur. Cleanup of contaminated materials at the Slick Rock processing sites would result in surface disturbance; surface water runoff from disturbed areas could be contaminated. In addition, contaminated wastewater would be generated by activities such as equipment washing. The remedial action design includes the construction of drainage and erosion controls, including lined wastewater retention ponds and silt fences or berms, to prevent the discharge of contaminated water from the sites. Appropriate drainage and erosion controls would also be used at the disposal and borrow sites to prevent or minimize erosion and any associated surface water impacts. Excavation of the North Continent site would be scheduled for the dry summer months to reduce the impact caused by precipitation and runoff. The DOE would comply with all applicable state of Colorado storm water regulations. After remedial action, surface water runoff would not cause erosion of the disposal cell and transport contaminants into local surface waters because erosion-control features such as limiting the topslope of the disposal cell and the placement of rock erosion