Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

July 12, 2002

Mr. C. Thomas Bennett
Kentucky Department of
Fish and Wildlife Resources
#1 Game Farm Road
Frankfort, KY 40601

Dear Mr. Bennett:

ENVIRONMENTAL IMPACT STATEMENT CONVERTING DUF6 STORED AT PADUCAH GASEOUS DIFFUSION PLANT, MCCRACKEN COUNTY, KENTUCKY

The U.S. Department of Energy (DOE), Depleted Uranium Hexafluoride (DUF6) Management Program, is preparing an Environmental Impact Statement (EIS) concerning its plans to convert DUF6 stored at the Paducah Gaseous Diffusion Plant (PGDP), located in McCracken County, Kentucky. The DOE prepared a Programmatic EIS for Alternative Strategies for the Long-Term Management and Use of DUF6 in 1999. This new EIS will evaluate the construction and operation of a facility to convert the DUF6 stored at the PGDP to a more stable chemical form. If the Paducah location is selected, the conversion facility would be located either within or immediately outside the existing PGDP boundary. The conversion products would subsequently be used or disposed elsewhere. I have enclosed maps showing the location of the PGDP and potential construction sites. If the Paducah location is not selected for the conversion facility, the DUF6 materials at Paducah would be shipped to the Portsmouth Gaseous Diffusion Plant in Portsmouth, Ohio.

We would appreciate receiving information on any state-protected species that may inhabit or visit the PGDP vicinity and could possibly be affected by construction or operation of a conversion facility. As part of the analysis of ecological impacts we will assess potential impacts to species listed by the state of Kentucky as endangered, threatened, or candidate species. A list of these species and their residency status at PGDP or in the vicinity would be useful for the analysis.

Thank you in advance for your assistance. If you need further information regarding this request, please do not hesitate to call me at (865) 576-0938 or call Mr. Robert Van Lonkhuyzen at Argonne National Laboratory at (630) 252-5973.

Sincerely,

James L. Elmore

James L. Elmore, Ph.D.
Alternate NEPA Compliance Officer

Enclosure

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Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

July 12, 2002

Mr. Donald Dott
Kentucky State Nature
Preserves Commission
801 Schenkel Lane
Frankfort, KY 40601

Dear Mr. Dott:

ENVIRONMENTAL IMPACT STATEMENT CONVERTING DUF6 STORED AT PADUCAH GASEOUS DIFFUSION PLANT, MCCRACKEN COUNTY, KENTUCKY

The U.S. Department of Energy (DOE), Depleted Uranium Hexafluoride (DUF6) Management Program, is preparing an Environmental Impact Statement (EIS) concerning its plans to convert DUF6 stored at the Paducah Gaseous Diffusion Plant (PGDP), located in McCracken County, Kentucky. The DOE prepared a Programmatic EIS for Alternative Strategies for the Long-Term Management and Use of DUF6 in 1999. This new EIS will evaluate the construction and operation of a facility to convert the DUF6 stored at the PGDP to a more stable chemical form. If the Paducah location is selected, the conversion facility would be located either within or immediately outside the existing PGDP boundary. The conversion products would subsequently be used or disposed elsewhere. I have enclosed maps showing the location of the PGDP and potential construction sites. If the Paducah location is not selected, the DUF6 materials at PGDP would be shipped to the Portsmouth Gaseous Diffusion Plant in Portsmouth, Ohio for conversion.

We would appreciate receiving information on any state-protected species that may inhabit or visit the PGDP vicinity and could possibly be affected by construction or operation of a conversion facility. As part of the analysis of ecological impacts we will assess potential impacts to species listed by the state of Kentucky as endangered, threatened, or candidate species. A list of these species and their residency status at PGDP or in the vicinity would be useful for the analysis.

Thank you in advance for your assistance. If you need further information regarding this request, please do not hesitate to call me at (865) 576-0938 or call Mr. Robert Van Lonkhuyzen at Argonne National Laboratory at (630) 252-5973.

Sincerely,

James L. Elmore, Ph.D.
Alternate NEPA Compliance Officer

Enclosure

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Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

July 12, 2002

Mr. David Snyder
Archaeology Reviews Manager
Resource Protection and Review
Ohio State Historic Preservation Office
567 East Hudson Street
Columbus, Ohio 432-11-1030

Dear Mr. Snyder,

The U.S. Department of Energy (DOE), Depleted Uranium Hexafluoride (DUF6) Management Program, is preparing an Environmental Impact Statement (EIS) concerning its plans to convert DUF6 stored at the Portsmouth Gaseous Diffusion Plant (PORTS), located in Pike County, Ohio, the Paducah Gaseous Diffusion Plant (PGDP), located in McCracken County, Kentucky, and the East Tennessee Technology Park (ETTP), located at Oak Ridge Tennessee. Locations at the PGDP and PORTS are being considered for the conversion facility. In 1999, the DOE prepared a Programmatic EIS for Alternative Strategies for the Long-Term Management and Use of DUF_6. The current site specific EIS will evaluate the construction and operation of a facility to convert the stored DUF_6 to a more stable chemical form. The Notice of Intent to prepare the EIS was published on September 18, 2001 in the Federal Register. Public scoping for the DUF_6 EIS took place between September 18, 2001 and January 11, 2001 and included meetings and written and electronic correspondence. The proposed conversion facility would be located within the existing PORTS site boundary. The conversion products would subsequently be used or disposed elsewhere. I have included maps showing the location of the PORTS and potential construction sites.

We have determined, in accordance with §800.3 of the Advisory Council on Historic Preservation's (Council) revised regulations for the protection of historic properties, that DOE's proposed action for the conversion of DUF_6 is: (1) an undertaking, as defined in 36 CFR §800.16(y); and (2) is a type of activity that has the potential to cause effects on historic properties. In accordance with §800.8(c) of the Council's regulations, we are notifying you, and the Council by copy of this letter, that we intend to use the process and documentation required to comply with the National Environmental Policy Act (NEPA) to comply with Section 106 of the NHPA for this undertaking. In using the NEPA process in lieu of the procedures set forth in §800.3 through §800.6 of the Council's regulations (i.e., the Section 106 process), we will ensure the standards set forth in §800.8(c)(1) through §800.8(c)(5) are met.

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Mr. David Snyder 2

Thank you for your attention to our notification of initiation of consultation. If you have any questions or need additional information on this matter, please contact either me at (865) 576-0273 (hartmangs@oro.doe.gov) or Kristi Wiehle at (740) 897-5020.

Sincerely,

Gary S. Hartman

Gary S. Hartman
DOE ORO Cultural Resources
Management Coordinator

Enclosures

cc w/enclosures:
Skip Gosling, HR-76, HQ/FORS
Tom McCulloch, Advisory Council
Kristi Wiehle, PORTS Site Office

Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

July 12, 2002

Mr. David L. Morgan
SHPO, Executive Director
Kentucky Heritage Council
300 Washington Street
Frankfort, KY 40601

Dear Mr. Morgan;

The U.S. Department of Energy (DOE), Depleted Uranium Hexafluoride (DUF_6) Management Program, is preparing an Environmental Impact Statement (EIS) concerning its plans to convert DUF_6 stored at the Portsmouth Gaseous Diffusion Plant (PORTS), located in Pike County, Ohio, the Paducah Gaseous Diffusion Plant (PGDP), located in McCracken County Kentucky, and the East Tennessee Technology Park (ETTP), located at Oak Ridge, Tennessee. Locations at the PGDP and the PORTS are being considered for the conversion facility. In 1999, the DOE prepared a Programmatic EIS for Alternative Strategies for the Long-Term Management and Use of DUF_6. The current site specific EIS will evaluate the construction and operation of a facility to convert the stored DUF_6 to a more stable chemical form. The Notice of Intent to prepare the EIS was published on September 18, 2001 in the Federal Register. Public scoping for the DUF_6 EIS took place between September 18, 2001 and January 11, 2001 and included meetings and written and electronic correspondence. The proposed conversion facility at the PDGP would be located within the existing PDGP site boundary. The conversion products would subsequently be used or disposed elsewhere. I have included maps showing the location of the PDGP and potential construction sites.

We have determined, in accordance with §800.3 of the Advisory Council on Historic Preservation's (Council) revised regulations for the protection of historic properties, that DOE's proposed action for the conversion of DUF_6 is: (1) an undertaking, as defined in 36 CFR §800.16(y); and (2) is a type of activity that has the potential to cause effects on historic properties. In accordance with §800.8(c) of the Council's regulations, we are notifying you, and the Council by copy of this letter, that we intend to use the process and documentation required to comply with the National Environmental Policy Act (NEPA) to comply with Section 106 of the NHPA for this undertaking. In using the NEPA process in lieu of the procedures set forth in §800.3 through §800.6 of the Council's regulations (i.e., the Section 106 process), we will ensure the standards set forth in §800.8(c)(1) through §800.8(c)(5) are met.

Mr. David L. Morgan 2

Thank you for your attention to our notification of initiation of consultation. If you have any questions or need additional information on this matter, please contact either me at (865) 576-0273 (hartmangs@oro.doe.gov) or Kristi Wiehle at (740) 897-5020.

Sincerely,

Gary S. Hartman

Gary S. Hartman
DOE ORO Cultural Resources
Management Coordinator

Enclosures

cc w/enclosures:
Skip Gosling, HR-76, HQ/FORS
Tom McCulloch, Advisory Council
David Tidwell, Paducah Site Office

Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

July 12, 2002

Dr. Lee A. Barclay, PhD
Field Supervisor
U.S. Fish and Wildlife Service
446 Neal Street
Cookeville, TN 38501

Dear Dr. Barclay:

ENVIRONMENTAL IMPACT STATEMENT CONVERTING DUF6 STORED AT EAST TENNESSEE TECHNOLOGY PARK, OAK RIDGE RESERVATION, ROANE COUNTY, TENNESSEE; PADUCAH GASEOUS DIFFUSION PLANT, MCCRACKEN COUNTY, KENTUCKY AND PORTSMOUTH GASEOUS DIFFUSION PLANT IN PORTSMOUTH, OHIO

The U.S. Department of Energy (DOE), Depleted Uranium Hexafluoride (DUF6) Management Program, is preparing an Environmental Impact Statement (EIS) concerning its plans to convert DUF6 stored at the East Tennessee Technology Park (ETTP), located on the Oak Ridge Reservation in Roane County, Tennessee, as well as the Paducah Gaseous Diffusion Plant (PGDP), located in McCracken County, Kentucky, and the Portsmouth Gaseous Diffusion Plant in Portsmouth, Ohio. The DOE prepared a Programmatic EIS for Alternative Strategies for the Long-Term Management and Use of DUF6 in 1999. This new EIS will evaluate the construction and operation of a facility at Paducah and/or Portsmouth, to convert the DUF6 to a more stable chemical form. If the Paducah site is selected, the conversion facility would be located either within or immediately outside the existing PGDP boundary. The conversion products would subsequently be used or disposed elsewhere. I have enclosed maps showing the location of the PGDP and potential construction sites.

The DUF6 cylinders stored at the ETTP would be shipped to Portsmouth or Paducah. The only activities envisioned under the proposed action at ETTP are the continued storage of the cylinders until they are transported offsite and the cylinder preparations for offsite shipment. The cylinder preparation activities considered include placement of some cylinders in protective overpacks or transferring their contents into new or compliant cylinders. No construction related to DUF6 cylinder preparation and shipment is currently planned for ETTP. However, if the decision to construct a cylinder transfer facility is made, a separate environmental review would be conducted.

We would appreciate receiving information on any federally-protected species that may inhabit or visit the ETTP or PGDP vicinity and could possibly be affected by the proposed action. As part of the analysis of ecological impacts we will assess potential impacts to federally-listed

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Dr. Lee A. Barclay, PhD 2

endangered, threatened, and candidate species and critical habitat. A list of these species and their residency status at ETTP or PGDP or in the vicinity, or critical habitat, would be useful for the analysis.

Thank you in advance for your assistance. If you need further information regarding this request, please do not hesitate to call me at (865) 576-0938 or call Mr. Robert Van Lonkhuyzen at Argonne National Laboratory at (630) 252-5973.

Sincerely,

James L. Elmore

James L. Elmore, PhD
Alternate NEPA Compliance Officer

Enclosure

RESPONSES TO U.S. DEPARTMENT OF ENERGY LETTERS TO STATE AGENCIES AND NATIVE AMERICAN GROUPS

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
6950 Americana Parkway, Suite H
Reynoldsburg, Ohio 43068-4127

September 23, 2002

OFFICIAL FILE COPY
AMESQ
Log No.
Date Received OCT 9 2002
File Code

James L. Elmore, Ph.D.
Department of Energy
Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, TN 37831

Dear Dr. Elmore:

This responds to your letter of July 12, 2002 regarding Federally listed endangered or threatened species that may occur in the vicinity of the Portsmouth Gaseous Diffusion Plant (PORTS) located in Pike County, Ohio.

ENDANGERED SPECIES COMMENTS:

The proposed project lies within the range of the Indiana bat (*Myotis sodalis*), a Federally listed endangered species. Summer habitat requirements for the Indiana bat are not well defined, but the following are thought to be of importance:
1. Dead trees and snags (especially those with exfoliating bark), split tree trunk and/or branches, or cavities which may be used as maternity roosts;
2. Live trees (such as shagbark hickory) which have exfoliating bark;
3. Stream corridors, riparian areas, and upland woodlots which provide forage sites.

We recommend that if potential bat roost trees with the above characteristics are encountered in the project area, they should be saved wherever possible. If they must be cut, they should not be cut between April 15 and September 15.

If desirable trees are present and if the above time restriction is unacceptable, mist net or other surveys should be conducted to determine if bats are present. Any survey should be designed and conducted in coordination with the endangered species coordinator for this office, Ms. Angela Boyer (614-469-6923 ext. 22). The survey should be conducted in June or July, the period when peak bat populations could be expected.

The project lies within the range of the timber rattlesnake, a large shy rattlesnake that is declining throughout its national range. No Federal listing status has been assigned to this species. Instead, the U.S. Fish and Wildlife Service has initiated a pre-listing Conservation Action Plan to support state and local conservation efforts. Your proactive

efforts to conserve this species now may help avoid the need to list the species under the Endangered Species Act in the future. The timber rattlesnake is protected throughout much of its range and listed as endangered by the State of Ohio. Due to their rarity and reclusive nature, we encourage early project coordination to avoid potential impacts to timber rattlesnakes and their habitat.

In Ohio, the timber rattlesnake is restricted to the un-glaciated Allegheny Plateau and utilizes the specific habitat types, depending upon season. Winters are spent in dens usually associated with high, dry ridges. These dens may face any direction, but southeast to southwest are most common. Such dens usually consist of narrow crevices in the bedrock. Rocks may or may not be present on the surface. From these dens, timber rattlesnakes radiate throughout the surrounding hills and move distances as great as 4.5 miles. In the fall, timber rattlesnakes return to the same den. Intensive efforts to transplant timber rattlesnakes have not been successful. Thus protection of the winter dens is critical to the survival of this species. Some project management ideas include the following:

1) At a minimum, project evaluations should contain delineations of timber rattlesnake habitat within project boundaries. Descriptions should indicate the quality and quantity of timber rattlesnake habitat (den sites, basking sites, and foraging area, etc.) that may be affected by the project.

2) In cases where timber rattlesnakes are known to occur or where potential habitat is rated moderate to high, timber rattlesnake surveys may be necessary. If surveys are to be conducted, it may be helpful to inquire about timber rattlesnake sightings with local resource agency personnel or reliable local residents. In addition, local herpetologists may have knowledge of historical populations as well as precise knowledge of the habits, and the specific local types of habitats that may contain timber rattlesnakes. Surveys should be performed during the periods of spring emergence from dens (usually a short period in April or May) and throughout the active season until October. The species is often easiest to locate during the summer months when pregnant females seek open areas in early morning, especially after cool evenings.

3) In portions of projects where timber rattlesnakes will be affected, clearing and construction activities should occur at distances greater than 100 feet from known dens. Most importantly, tops of ridges and areas of exposed rock should be avoided.

4) In areas where timber rattlesnake dens are known or likely to exist, maintenance activities (mowing, cutting, burning, etc.) should be conducted from November 1 to March 1, when timber rattlesnakes are hibernating.

Two divisions of the Ohio Department of Natural Resources, the Division of Wildlife (614-265-6300) and the Division of Natural Areas and Preserves (614-265-6472), maintain lists of plants and animals of concern to the State of Ohio. If you have not already done so, you may wish to contact each of these agencies to obtain site-specific information about species of state concern.

If you have questions or we may be of further assistance in this matter please contact Mr. Bill Kurey of this office at 614-469-6923 ext. 14.

Sincerely,

Mary Knapp

Mary Knapp, Ph.D.
Supervisor

cc: R. Sanders, ODOW