

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: Naval Reactor Facility Parking Lot Underground Storage Tank Permanent Closure and Removal

### SECTION B. Project Description and Purpose:

The proposed action permanently closes the unleaded gasoline and diesel underground fuel storage tanks at the parking lot near the Naval Reactor Facility (NRF). These tanks are regulated by the Idaho Department of Environmental Quality (DEQ) in accordance with the regulatory requirements established in 40 CFR 280.71, "Permanent Closure and Changes-In-Service".

The tanks are both 15,000-gallon; double-walled, fiberglass reinforced plastic tanks with fiberglass reinforced plastic piping. The unleaded gasoline tank is identified under the Idaho DEQ Tank Management Plan facility identification number 6-120616 and INL tank database # 99NRF00002. The diesel tank is identified under the Idaho DEQ Tank Management Plan facility identification number 6-120616 and INL tank database # 99NRF00004. An Idaho DEQ Underground Storage Tank (UST) inspection in September 2020 identified no violations.

Closing the tanks will include removing fuel and sludge from the tank and lines, the concrete pad and associated manhole covers, and the tank top sump and spill bucket; excavating around the tank; cutting and removing the associated fuel lines and electrical conduit and wire; removing the dispensers and associated pad; lifting the tank from the ground; and sampling under the tank, dispenser, and lines as required by regulation. A site assessment will be provided to DEQ for approval of the permanent closure.

### SECTION C. Environmental Aspects or Potential Sources of Impact:

#### Air Emissions

Fugitive dust may be generated during excavation activities.

#### Discharging to Surface-, Storm-, or Ground Water

N/A

#### Disturbing Cultural or Biological Resources

There is the potential of unexpectedly encountering cultural artifacts during the removal of the tank. Any cultural artifacts unexpectedly encountered during the project would result in immediate cessation of work and notification to the Cultural Resources Management Office (CRMO).

#### Generating and Managing Waste

The project will generate waste in the form of the double-walled plastic reinforced tank and piping, rags, absorbent pads (diesel), concrete, and asphalt. Sludge from the tanks and waste diesel fuel may also be generated. Fuel removed from the tanks will be used where possible or recycled. The tanks will be emptied of all liquids, dangerous vapor levels, and sludge (the tank was emptied during temporary closure of the tank, only small amount of fuel remain). Compressed air will be used to blow any residual fuel from the lines before removal. However, if a release from a UST line is discovered during the excavation, fuel contaminated soil waste would be generated. All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

Fuel will be pumped from the tanks and reused/recycled.

#### Releasing Contaminants

Releases are not expected as both tanks have had continuous release detection monitoring. However, if a release is discovered during the excavation, the contractor must take immediate actions to prevent any further release to the environment. Facility operations (Facilities & Site Services [FS&S]) will be responsible for reporting, cleanup, sampling and any corrective action requirements.

When chemicals are used during the project there is the potential for spills that could impact the environment (air, water, soil).

#### Using, Reusing, and Conserving Natural Resources

Fuel will be removed and reused/recycled from these tanks. Materials such as scrap metal conduit will be segregated for recycle as practical.

### SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of Department of Energy (DOE) or Executive Orders; (2)

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require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1)) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

**References:**

National Environmental Policy Act (NEPA) Implementing Procedure, Final Rule, " 10 CFR 1020 Appendix B to Subpart D," Categorical Exclusion B2.5 "Facility safety and environmental improvements" and B6.1 "Cleanup actions"

**Justification:**

Project activities in this EC are consistent with 10 CFR 1021 Appendix B to Subpart D, Categorical Exclusion B2.5 "Facility safety and environmental improvements." "Improvements include, but are not limited to, ...replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements" and

B6.1 "Small-scale, short-term cleanup actions, under RCRA, Atomic Energy Act, or other authorities, less than approximately 10 million dollars in cost (in 2011 dollars), to reduce risk to human health or the environment from the release or threat of release of a hazardous substance other than high-level radioactive waste and spent nuclear fuel, including treatment (such as incineration, encapsulation, physical or chemical separation, and compaction), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the action. These actions include, but are not limited to:

- a. Excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas that are not receiving contaminated surface water or wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination;
- b. Removal of bulk containers (such as drums and barrels) that contain or may contain hazardous substances, pollutants, contaminants, CERCLA-excluded petroleum or natural gas products, or hazardous wastes (designated in 40 CFR part 261 or applicable state requirements), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain;
- c. Removal of an underground storage tank including its associated piping and underlying containment systems in accordance with applicable requirements (such as RCRA, subtitle I; 40 CFR part 265, subpart J; and 40 CFR part 280, subparts F and G) if such action would reduce the likelihood of spillage, leakage, or the spread of, or direct contact with, contamination;
- d. Repair or replacement of leaking containers;
- e. Capping or other containment of contaminated soils or sludges if the capping or containment would not unduly limit future groundwater remediation and if needed to reduce migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products into soil, groundwater, surface water, or air;
- f. Drainage or closing of man-made surface impoundments if needed to maintain the integrity of the structures;
- g. Confinement or perimeter protection using dikes, trenches, ditches, or diversions, or installing underground barriers, if needed to reduce the spread of, or direct contact with, the contamination;
- h. Stabilization, but not expansion, of berms, dikes, impoundments, or caps if needed to maintain integrity of the structures;
- i. Drainage controls (such as run-off or run-on diversion) if needed to reduce offsite migration of hazardous substances, pollutants, contaminants, or CERCLA- excluded petroleum or natural gas products or to prevent precipitation or run-off from other sources from entering the release area from other areas;
- j. Segregation of wastes that may react with one another or form a mixture that could result in adverse environmental impacts;
- k. Use of chemicals and other materials to neutralize the pH of wastes;
- l. Use of chemicals and other materials to retard the spread of the release or to mitigate its effects if the use of such chemicals would reduce the spread of, or direct contact with, the contamination;
- m. Installation and operation of gas ventilation systems in soil to remove methane or petroleum vapors without any toxic or radioactive co-contaminants if appropriate filtration or gas treatment is in place;
- n. Installation of fences, warning signs, or other security or site control precautions if humans or animals have access to the release; and
- o. Provision of an alternative water supply that would not create new water sources if necessary immediately to reduce exposure to contaminated household or industrial use water and continuing until such time as local authorities can satisfy the need for a permanent remedy."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)       Yes     No

Approved by Jason Anderson, DOE-ID NEPA Compliance Officer on: 05/18/2021