

DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

SECTION A. Project Title: MFC Sewage Lagoon Closure

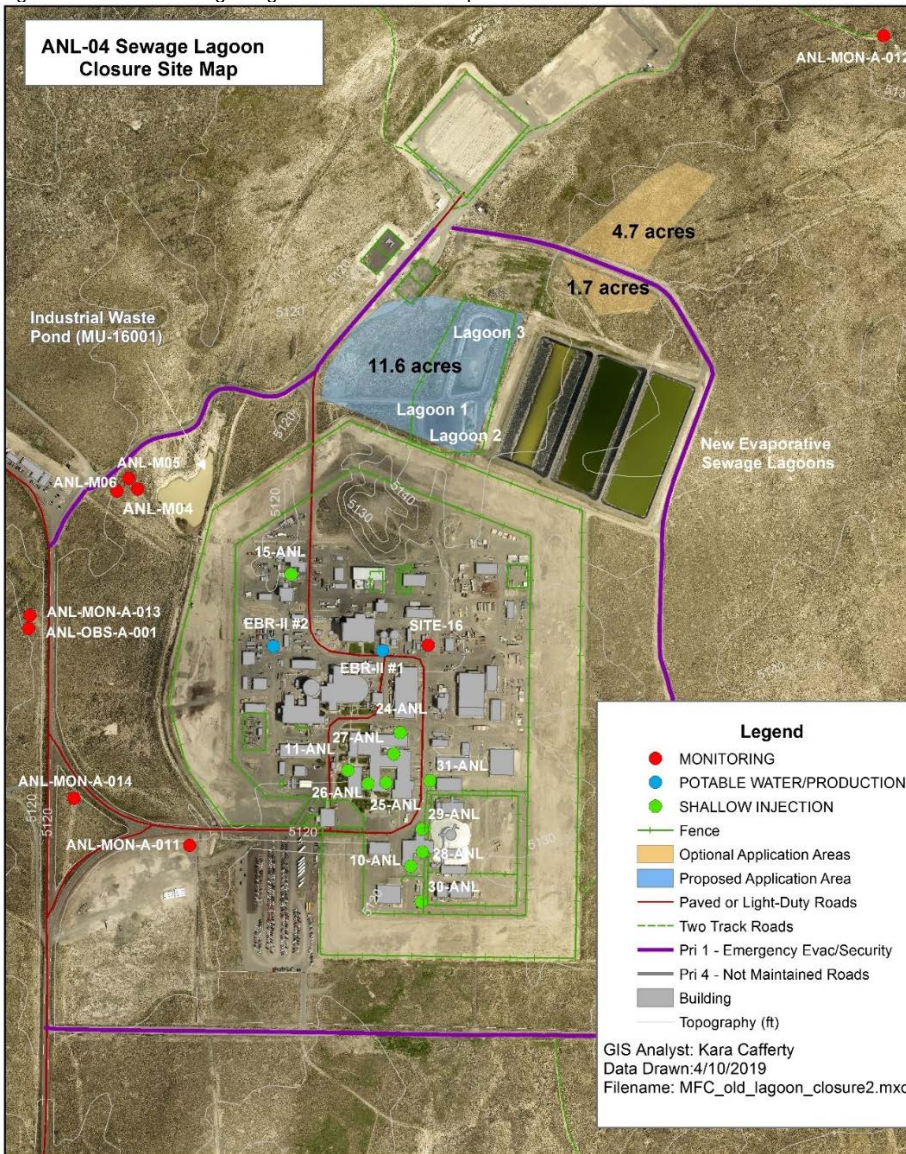
SECTION B. Project Description and Purpose:

In 2012, the Materials and Fuels Complex (MFC) sewage lagoons were removed from service and replaced by three new lined evaporative lagoons. The inactive lagoons need to be closed in accordance with IDAPA 58.01.16, "Wastewater Rules" and biosolids managed under IDAPA 58.01.16 and 40 CFR 503 "Standards for the Use or Disposal of Sewage Sludge." Idaho National Laboratory (INL) submitted a closure plan (CCN 244645) to the Idaho Department of Environmental quality (IDEQ) and received approval of the plan on June 6, 2019 (CCN 244907). The scope of the proposed action covers elements of the approved closure plan.

The proposed action includes the following activities:

1. Cut, cap, and remove piping
2. Remove the biosolids from lagoons 1 and 3 (see Figure 1)
3. Stage the biosolids near the lagoons
4. Remove and dispose of synthetic liner
5. Rip and grade the bentonite liner using heavy equipment
6. Level and smooth the lagoon area (including berms)
7. Spread biosolids evenly over the application areas
8. Disk the biosolids into the soil (avoid disking in non-lagoon spreading areas to protect vegetation)
9. Plant native seed in disked locations (about 4.5 acres).

Figure 1. ANL-04 Sewage Lagoon Closure Site Map



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The U.S. Environmental Protection Agency's (EPA's) Part 503 rule contains requirements for the management of biosolids generated during the process of treating municipal wastewater. The final sample results show the biosolids in lagoons 1 and 3 meet the Part 503 Class A requirements (metals and pathogens). Class A designation means the biosolids meet EPA guidelines for land application with no restrictions.

Because of the low volume (if any) of biosolids in lagoon 2, IDEQ agreed no biosolid removal and/or disposal was required. The other applicable activities for closing the lagoons will be followed for lagoon 2.

After completion, INL will submit a notification to DEQ in accordance with the closure plan and the IDEQ approval letter.

To assist revegetation efforts and reduce the potential for noxious weeds, the area may require supplemental water and requires managing noxious weeds according to PLN-611.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to create fugitive dust and contribute to air emissions from operating fuel burning equipment and using heavy equipment.

Disturbing Cultural or Biological Resources

The proposed action has the potential to disturb cultural and historical resources. Activities involve vegetation removal and soil disturbance and may require pesticide application on areas with native or naturalized vegetation.

Disturbance of the area may impact migratory birds and bird nests on the INL Site.

Generating and Managing Waste

The project activities will generate industrial (non-hazardous, non-radioactive) wastes such as sewage pipe, concrete, scrap metal, and synthetic liner material. Soil and biosolid characterization was completed during Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) evaluations and closure activities. Potential waste materials will be evaluated for waste minimization prior to generation, and industrial waste generated during proposed activities will be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

Releasing Contaminants

INL evaluated the MFC sewage ponds under CERCLA and determined 1) there was not an unacceptable risk to human health or the environment and 2) that no remedial action was warranted for the ANL-04 Sewage Lagoons.

It is possible that pesticides and fertilizers may be used during revegetation efforts.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility PEL. If the PEL cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition.

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) 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)).

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References: 10 CFR 1021, Appendix B to subpart D, items B1.26, "Small water treatment facilities"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B1.26, "Siting, construction, expansion, modification, replacement, operation, and decommissioning of small (total capacity less than approximately 250,000 gallons per day) wastewater and surface water treatment facilities whose liquid discharges are externally regulated, and small potable water and sewage treatment facilities."

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

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 10/01/2019