DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-17-003 R1

SECTION A. Project Title: Idaho National Laboratory (INL) Research Center (IRC) Diesel Generator and Underground Storage Tank (UST) Removal and Replacement

SECTION B. Project Description and Purpose:

The purpose of this revision is to update project scope. The two emergency diesel generators at Idaho National Laboratory (INL) Research Center (IRC) (IF-602 and IF-603) and the associated Department of Environmental Quality (DEQ) regulated underground diesel storage tanks are being replaced with a single 300 kW diesel generator. The new 300 kW diesel generator will have a sub-base mounted (above ground), double-wall fuel tank with secondary containment mounted under the generator. The fuel tank is above ground and is not regulated by the DEQ.

The DEQ regulated underground diesel storage tanks (600 gallon [DEQ Facility ID # 6-100723/Tank ID # 98IRC00007] and 2500 gallon [DEQ Facility ID # 6-100725/Tank ID # 98IRC00008]) along with associated underground fuel piping located at the Idaho National Laboratory (INL) Research Center (IRC) will be removed. The proposed action would permanently close both underground fuel storage tanks (USTs) as required by the DEQ.

The proposed action would include:

Removal

- Remove the emergency generator and 600 gallon UST and associated underground fuel piping at Idaho Falls (IF)-602
- Remove the emergency generator and 2500 gallon UST and associated underground fuel piping at IF-603
- Empty both USTs of petroleum and remove all liquids, sludge, and dangerous vapors
- Perform separate site assessments for petroleum contamination by collecting and analyzing soil samples at representative locations, using an approved sampling plans when each UST and associated underground piping is removed
- Perform site remediation as necessary, using an approved remediation plan if soil petroleum contamination is identified from sampling analysis
- Backfill UST excavations areas.

Installation

- Install new 300 kW emergency diesel generator with sub-base mounted, double-wall fuel tank at IF-603
- Performance test the new emergency diesel generator at IF-603.

Impacts to cultural and biological resources are not expected. Excavation will occur in previously developed areas and original ground surfaces have been disturbed in the past.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

If mobile sources (equipment) will be used temporarily at the site, they will be required to meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

An APAD will be required to document the exemption from obtaining a permit to construct for the replacement engine.

Fugitive dust may be generated during excavation activities. All reasonable precautions will be taken to control fugitive dust. If control methods are needed, the subcontractor will document the method used in their daily logbooks.

No increase in greenhouse gases is expected.

Discharging to Surface-, Storm-, or Ground Water

The activity has the potential for discharge of petroleum to waters of the United States from a leak, spill, or release during removal of the underground fuel storage tanks and associated equipment.

Disturbing Cultural or Biological Resources

Any potential cultural resources (e.g., objects over 50 years old or historic due to special significance, bones, tools, flint, items of significance to Native Americans and/or others, etc.) 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 carbon steel piping, rags, absorbent pads, and concrete. Sludge from the tanks and waste fuel may also be generated. Fuel removed from the tank will be used where possible or recycled.

The tanks will be emptied of all liquids, dangerous vapor levels, and sludge. Care must be taken when disconnecting the lines between the tank and the dispenser to prevent an unexpected release. If a release from a UST line is discovered during the excavation, contaminated soil waste would be generated.

Suspected asbestos containing waste (e.g., exhaust gaskets) and polychlorinated biphenyl (PCB)-containing waste (e.g., equipment manufactured before 1982) may be generated.

All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, paints, concrete, concrete cure, asphalt, refrigerants, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The Facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

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.

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)).

References: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B2.5 "Facility safety and environmental improvements."

Justification: The proposed activities are consistent with CX B2.5 "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and 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 (such as 40 CFR 265, ''Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities'' and 40 CFR 280, ''Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks''). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)." If the proposed action finds evidence of leakage and contamination, this EC will be revised.

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: 10/23/2018