

**DOE-ID NEPA CX DETERMINATION
IDAHO NATIONAL LABORATORY**

SECTION A. Project Title: INTEC - Fuel Island Underground Storage Tank Removal and Emergency Generator Underground Storage Tank Upgrade

SECTION B. Project Description

To ensure compliance to the final rule change (IDAPA 58.01.07 and 40 CFR Part 280) by October 13, 2018, the proposed project will permanently close the CPP-2720 Fuel Island USTs per IDAPA 58.01.07 and 40 CFR Part 280 Subpart G and upgrade the UST monitoring system at CPP-1684 to comply with applicable rules for continuous leak detection monitoring. The USTs are located at the Idaho Nuclear Technology and Engineering Center (INTEC) at the Idaho National Laboratory.

Fuel Island USTs Removal:

The CPP-2720 Fuel Island is approximately 100 feet north of CPP-1617. The CPP-2720 Fuel Island has two USTs: one unleaded gasoline tank (VES-SAA-153) and one diesel tank (VES-SAA-152). The USTs have been in service since 1993. The current use of CPP-2720 is limited due to the primary use of fuel delivery trucks to meet INTEC vehicle fuel needs. With the limited use, upgrading the Fuel Island and associated USTs is not warranted. Upon closure of the USTs and removal of all Fuel Island components, compliance to IDAPA 58.01.07 and 40 CFR 280 will no longer be required.

Specifications:

- Remove and properly dispose of the UST contents (fuels, sludges, etc.)
- Prepare USTs for temporary closure per 40 CFR Part 280
- Submit notifications for permanent closure per IDAPA 58.01.07 and 40 CFR Part 280 Subpart G
- Prepare a site assessment sampling plan and submit to the Idaho Department of Environmental Quality (DEQ)
- Remove and dispose of the Fuel Island structures and equipment (i.e. pumps, concrete pad, vent piping, etc.)
- Excavate, remove, and dispose of the USTs
- Perform a site assessment by collecting and analyzing soil samples at representative locations following the DEQ approved site assessment sampling plan
- Perform site remediation if warranted (site remediation may include but not be limited to, the excavation, removal, and disposal of petroleum-contaminated soils)
- Submit site assessment report to DEQ

The UST excavation area will be converted into a retention basin to improve stormwater drainage of the surrounding area. This will include, but not be limited to the following actions: grade the surrounding area to drain towards the retention basin, excavate drainage ditches, and add clean fill from an outside source.

Emergency Generator UST:

The emergency generator UST (VES-WCS-106) provides fuel to the three INTEC emergency power generators located at CPP-1684 and has no vehicle dispensing equipment. This UST has been in service since 1999 and is in good condition. The emergency generator diesel UST is deferred from release detection under the current 40 CFR 280.10(d) regulation. However, starting October 13, 2018, this UST will require continuous monitoring for leak detection. The UST monitoring system will be upgraded to be operational no later than October 13, 2018 to comply with the UST release detection regulations per 40 CFR 280 Subpart D.

The monitoring system will be upgraded to support continuous leak detection monitoring using a service provider. The upgrades include: Ethernet card installation, monitoring probes updates, mobile hotspot purchase and activation, and a service provider subscription.

SECTION C. Environmental Aspects / Potential Sources of Impact

1. Air Pollutants - Fugitive dust emissions may be generated from excavation, grading, transport, and other soil disturbance activities. All fugitive dust emissions will be controlled.

Mobile equipment includes excavators and transport vehicles, which are powered by diesel and unleaded fuels. Mobile equipment is considered mobile internal combustion engines per IDAPA 58.01.01.222.02.e and is exempt from State of Idaho air permitting requirements.

Radionuclide Emissions – Soils excavated during the removal of the Fuel Island USTs, as well as soils disturbed during retention basin grading and excavation of drainage ditches, will be screened for the potential presence of radionuclides. While no radiological contamination is expected, the results of soil gamma screening analyses will be used to determine if reporting of fugitive radionuclide emissions from these activities is warranted.

3. Radionuclide Release/Protection of the Public and the Environment – The UST removal and retention basin excavation could release radionuclides to the environment however, the potential is very low. Releases would not exceed as low as reasonably achievable goals as the releases will likely be far below applicable regulatory standards (e.g., NESHAPS) and satisfy the exemption.

Project activities will be monitored by radiological personnel.

4. Chemical Use and Storage - Chemicals may include those used to prepare the removed USTs for transport, removal of chemicals from Fuel Island equipment prior to removal, site assessment sample collection, preparation of Veeder Root panel for upgrade, etc. As applicable, project personnel will use non-hazardous chemical substitutes in place of hazardous chemicals as long as the non-hazardous substitutes meet the requirements/specifications of the project. Spill prevention/minimization measures will be employed during storage and chemical use.

Fuel removed from the tanks will be used where possible or disposed.

5. Contaminated Sites Disturbance - The excavation of the Fuel Island USTs and subsequent conversion to a retention basin will disturb soil. Soil disturbances at INTEC require the completion of a Notice of Soil Disturbance. Soil disturbance will be coordinated with appropriate personnel.

7. Discharge to Wastewater Systems or Groundwater - There is a potential for discharge of petroleum products to the surface or groundwater during project activities. However, spill prevention/minimization measures will be employed during removal activities (i.e. secondary containment, absorbent pads, etc.) thereby any potential discharge to a wastewater system or groundwater is highly unlikely.

Modifications to the area around the CPP-2720 Fuel Island will include construction of a retention basin and improvements to the drainage of the surrounding area to manage stormwater run-off. The drainage area is approximately five feet deep and constructed using native soil and gravel, allowing storm water to infiltrate into the subsurface. Because its largest surface dimension is greater than five feet, the drainage area is not classified as a shallow injection well.

The retention basin and drainage areas are located outside the CERCLA-designated recharge control zone. The retention basin will be designed to drain stormwater that ponds on the road north of the CPP-1617. Storm water drainage from the nearby waste storage areas will still drain to their designated areas. The stormwater run-off will be evaluated to ensure contaminant concentrations meet the screening release levels.

9. Waste Generation and Management - Hazardous waste generated during the proposed project may include but not be limited to liquids and/or sludge emptied from the USTs, waste fuel, the removed USTs, soil that is impacted from an unexpected discharge or discovered during excavation and any PCB-containing waste (i.e. equipment manufactured before 1982). All hazardous waste will be stored, treated, and/or disposed in compliance with applicable RCRA regulations at an EPA permitted treatment, storage, and disposal facility in accordance with the facility's waste acceptance criteria.

Although not expected, activities performed inside a contaminated area may result in some radioactive waste. The waste may include anti-contamination clothing, radiation enclosures and barriers, contaminated materials and components, and contaminated absorbent. This waste will be treated and/or disposed of through one of the contracted RCRA TSD Facilities.

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Construction debris (i.e. concrete, wiring, clean carbon steel piping and pumps, etc.) will be recycled when possible. If it cannot be recycled then it can be disposed of as nonhazardous, nonradioactive waste at the INL Landfill Complex.

10. Material or Waste Handling and Transportation - A hazardous waste determination will be performed per MCP-1390 for all waste streams to develop the appropriate management practices. Waste streams will be evaluated to determine if any of the materials can be recycled or reused and to implement actions for minimizing waste entering the landfill.

12. Managing Property and Materials - Equipment and materials will be recycled or reused when practical.

13. PCB Contamination – Although very unlikely, PCB-containing waste (i.e. equipment manufactured before 1982) may be generated. If suspect PCB contaminated or containing waste is discovered during processing of wastes subject to the proposed action, the applicability of the TSCA/PCB regulation needs to be determined. If suspect PCB liquid is spilled, refer to applicable procedures and subject matter experts.

PCB waste will be managed as described in Aspect #9 above.

15. Storage of Hazardous/Radioactive Materials or Waste in Tanks –The proposed action will be implemented to comply with new underground storage tank rules. Two Fuel Island USTs will be removed and the Emergency Generator UST monitoring system will be upgraded for continuous leak detection to ensure compliance. The DEQ must be contacted prior to tank removal.

16. Use, Reuse and Recycling of Resources - INL borrow sources may be used to provide backfill (soil and gravel). Backfill taken from INL borrow sources must be coordinated through the BEA Road and Grounds Manager and completion of required documentation.

17. Work within area Subject to Flooding – The CPP-2707 Fuel Island is located within the Big Lost River 100-year floodplain. Activities in CPP-1684 are outside of the Big Lost River 100-year floodplain.

The work described is not expected to have a significant impact on the 100-year floodplain discussed above as the work is not expected to disrupt floodplain dimensions, elevations, flow volumes, or velocities of the Big Lost River. If the hypothetical flood were to occur, access to the work areas may be temporarily interrupted. All actions would be taken to ensure that any petroleum product is not released into waters of the United States. Work can resume after floodwaters subside as access allows.

SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not “connected” nor “related” (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: B2.5, Safety and environmental improvements of a facility, replacement/upgrade of facility components and B1.6, Installation/modification of retention tanks, small basins to control runoff, spills

Justification: The UST removal and UST monitoring system upgrade actions will ensure compliance with new regulations to address safety and environmental improvements. The proposed retention basin will improve the stormwater drainage. The modifications do not extend the life or the capacity of INTEC. The action will not result in significant effect to the human environment.

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

Approved by Teresa Perkins, DOE-ID ESD Director and Acting NEPA Compliance Officer on June 20, 2018.