

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Materials and Fuels Complex MFC-783 and Central Facilities CF-609 Underground Storage Tank Replacement

SECTION B. Project Description and Purpose:

The purpose of this project is to permanently close and remove four underground fuel storage tanks. Two tanks will be removed at the Materials and Fuels Complex (MFC), a 2,500 gallon unleaded and a 2,500 gallon diesel underground storage tanks (USTs) [Facility ID # 6-120615/Tank ID # 99ANL00011 and 99ANL00012] and replaced with a 5,000 gallon aboveground storage tank (AST) split tank (2,500 gallons for diesel/2,500 gallons for unleaded). The UST removal and AST installation are located to the east of MFC-783. The new MFC tank will be a 10,000 gallon split AST. Aboveground fuel storage tanks are not regulated by the Idaho Department of Environmental Quality.

The project will also permanently close and remove the Central Facilities Area (CFA) 12,000 gallon diesel underground storage tank (UST) [Facility ID # 6-120612/Tank ID # 98CFA00057 and replace with a 10,000 gallon AST at CF-609 and remove the 15,000 gallon UST at CF-608. The 15,000 gallon tank at CF-608 would not be replaced

The MFC unleaded and diesel USTs were installed in October of 1990. Unleaded and diesel fuel are needed for filling INL vehicles and equipment. Industry standards for the life expectancy of an underground storage tank is approximately 30 years. The CFA diesel UST was installed in April of 1995. The UST presently feeds the boilers for the CF-608/609 facilities and an emergency diesel generator in CF-609. The new 10,000 gallon AST would continue to supply diesel to both the boilers and the diesel generator.

The proposed project actions will include:

- Emptying the tanks of petroleum and removal of all liquids, sludge, and dangerous vapors.
- Excavation and removal of UTSs and associated piping (as necessary).
- Backfilling the excavation site.
- Installing a commercially purchased concrete pad and 5,000 gallon aboveground split tank at MFC and installing a concrete pad and 10,000 gallon aboveground split tank at CFA.
- Installing aboveground non-metallic piping to the fuel dispensers at MFC and installing aboveground piping to the boilers and diesel generator at CFA.
- Testing the tank and lines for leaks.
Note: Although the DEQ does not regulate ASTs in Idaho, state rules require that the agency be notified of releases from the AST to the environment according to approved company procedures (ref. LWP-8000/LRD-8000).
- Performing a site assessment for contamination by collecting and analyzing soil samples at representative locations, using an approved sampling plan for the UST.

If soil contamination is found, this EC must be revised to address performing site remediation using an approved remediation plan.

Impacts to cultural and biological resources are unlikely because excavations are located where ground surfaces have been extensively disturbed.

The excavation site is not in the storm water corridor.

Estimated Start Date: May 2017

Estimated Completion Date: September 2017

Estimated Cost: \$200,000

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Fugitive dust may be generated during excavation activities.

No increase in greenhouse gases is expected.

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/tank, rags, absorbent pads (biodiesel), concrete, and asphalt. Sludge from the tanks and waste fuel (unleaded and diesel) may also be generated. Fuel removed from the tanks will be used where possible or recycled.

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The tanks will be emptied of all liquids, dangerous vapor levels, and sludge. 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).

Releasing Contaminants

A release is not expected. 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.

The subcontractor will bring chemicals on site during the project. Although unexpected, spills could occur.

Using, Reusing, and Conserving Natural Resources

Scrap metal will be recycled to the extent practicable.

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 Procedure, Final Rule, " 10 CFR 1020 Appendix B to Subpart D," Categorical Exclusion B2.5 "Facility safety and environmental improvements."

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..."

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: 5/3/2017