

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Replace Tank TK-5175 in Materials and Fuels Complex (MFC)-765 Truck Lock

SECTION B. Project Description and Purpose:

The Fuel Conditioning Facility (FCF), building MFC-765, truck lock 3000-gallon industrial wastewater tank (TK-5175), located in the southwest corner of the truck lock, has degraded and there is potential for water seepage into the tank from water infiltration from the surface. There is no evidence the tank leaks. Monthly inspections of the tank have occurred for the last year and a half, and the volume of wastewater in the tank has not fluctuated in that time. The tank is no longer fit for use and needs to be replaced. The tank collected industrial wastewater from air conditioning units, floor drains, utility sinks, etc. The tank has been taken out of service, and the industrial wastewater is collected in temporary drums and transferred to the Radioactive Liquid Waste Treatment Facility as needed. The industrial wastewater is potentially radioactively contaminated because sump water is collected in a Radioactive Buffer Area (RBA). The pump (P-5175) from the tank transfers the industrial wastewater from TK-5175 to the Radioactive Liquid Waste Treatment Facility (RLWTF). Manholes in the 6-inch concrete floor provide access to TK-5175.

The proposed action would empty tank TK-5175, fill it with self-consolidating grout, and replace it with an above-ground 1000-gallon polyethylene water tank. The tank, manhole, and associated drain piping would be grouted up to the floor. The new tank would sit directly over the grouted tank and manholes. Secondary containment would be provided for the new above-ground tank; however, secondary containment is not required to contain 100% of the volume of the new tank. Secondary containment would consist of a 20-inch deep, 600-gallon polyethylene tray. The proposed action includes replacing P-5175 and associated piping with a new pump for transferring wastewater from the new above-ground tank to the RLWTF. The new pump would provide the same flow rate and head capacity as the old pump. Piping would be rerouted to the new above-ground tank.

Metal plates covering the manholes would be removed and disposed.

The new above-ground tank will be connected to the potable water line at valve (HV-5539) to provide water for pH control.

The new above-ground tank would weigh over 8,000 lbs when filled to capacity. The concrete floor has been evaluated, and the new tank would not exceed slab capacity.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

There is no asbestos insulation covering the piping associated with tank TK-5175. Asbestos removal or disturbance is not expected.

Air emissions from the use of fuel burning equipment and decontamination operations are possible.

Disturbing Cultural or Biological Resources

MFC-765 is eligible for nomination to the National Register of Historic Places and is considered a Category 2 historic property. Removal and/or changes of original features may adversely impact this historic property; however, the project activities as described are exempt (Idaho National Laboratory Cultural Resource Management Office. Idaho National Laboratory Cultural Resource Management Plan. DOE/ID10997, revision 6, Idaho Falls, Idaho: U.S. Department of Energy, Idaho Operations Office, 2016; pg 51, Table 2, Exemptions 2 and 5). As such, the project may proceed as described without further cultural resource review.

Generating and Managing Waste

Proposed activities have the potential to generate mixed waste from removal and disposal of piping and metal plates. Yellow pipes potentially contain chromium, and red painted metal potentially contains lead. The old piping and pump (P-5175) are potentially radioactively contaminated. Industrial wastewater contained in tank (TK-5175) is also potentially radioactively contaminated.

If sludge is discovered at the bottom of the tank, the sludge will be characterized to determine whether or not it is hazardous. If it is hazardous, the project will work with WGS for proper disposal.

Releasing Contaminants

There is the potential to release small amounts of contaminants to the environment. Although not anticipated, chemical use has a potential for small spills.

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.

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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: 10 CFR 1021, Appendix B, B6.3 "Improvements to environmental control systems."

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B6.3 "Improvements to environmental monitoring and control systems of an existing building or structure (such as changes to scrubbers in air quality control systems or ion-exchange devices and other filtration processes in water treatment systems), provided that during subsequent operations (1) Any substance collected by environmental control systems would be recycled, released, or disposed of within existing permitted facilities and (2) there are applicable statutory or regulatory requirements or permit conditions for disposal, release, or recycling of any hazardous substances or CERCLA-excluded petroleum or natural gas products that are collected or released in increased quantity or that were previously collected or released."

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

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 5/9/2016