

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Idaho National Laboratory (INL) Research Center E-85 Fuel Station Removal

SECTION B. Project Description and Purpose:

The E-85 fueling station (15,000 gallon E-85 underground storage tank [UST] [DEQ Facility ID # 6-120611/Tank ID # 98IRC00006] and associated fueling equipment and piping) located at the Idaho National Laboratory (INL) Research Center (IRC) has reached the end of its useful life and replacement would not be cost efficient. The proposed action would permanently close and remove the E-85 fueling station. E-85 would be available to the INL fleet at Conrad/Bischoff in Idaho Falls, so no increase in greenhouse gases is expected.

The proposed action would include:

- Removing the fuel island, fuel dispenser, card reader, and lighting pole
- Emptying the tank of petroleum and removing all liquids, sludge, and dangerous vapors
- Excavating and removing the UST
- Performing a site assessment for contamination by collecting and analyzing soil samples at representative locations, using an approved sampling plan for the UST
- Performing site remediation using an approved remediation plan if soil contamination is identified
- Backfilling the excavation.

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

Estimated Start Date: September 15, 2015

Estimated Completion Date: October 2015

Estimated Cost: \$80,000

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.

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. Battelle Energy Alliance, LLC (BEA) Environmental Support & Services will use this documentation for compliance records associated with the INL Tier I Air Permit.

E-85 would be available to the INL fleet at Conrad/Bischoff in Idaho Falls and at locations already located on the INL Site, so 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 E-85 fuel, sludge, tank, 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 (E-85) may also be generated. Fuel removed from the tank will be used where possible or recycled.

The tank will be emptied of all liquids, dangerous vapor levels, and sludge. The line from the tank to the dispenser is a pressurized line. 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.

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

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Releasing Contaminants

The piping associated with the UST tank to the dispenser is a pressurized line. Care must be taken when disconnecting the lines between the tank and the dispenser to prevent unexpected releases. However, if a release occurs or 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. Chemicals will be entered into the Comply Plus Chemical Management System by the Construction Chemical Coordinator.

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 fuel dispenser and card reader will be kept for reuse. The light pole will be sent to excess, and the lamp will be dispositioned through WGS.

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 to Subpart D, B5.22 "Alternative fuel vehicle fueling stations."

Justification: The proposed action is consistent with categorical exclusion B5.22 "The installation, modification, operation, and removal of alternative fuel vehicle fueling stations (such as for compressed natural gas, hydrogen, ethanol and other commercially available biofuels) on the site of a current or former fueling station, or within a previously disturbed or developed area within the boundaries of a facility managed by the owners of a vehicle fleet. Covered actions would be in accordance with applicable requirements (such as local land use and zoning requirements) in the proposed project area and would incorporate appropriate control technologies and best management practices."

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: 9/16/2015