

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

**SECTION A. Project Title:** Interim Storage Area for Interim Storage Containers (ISCs) at the Radioactive Scrap and Waste Facility (RSWF)

**SECTION B. Project Description:**

Currently, dedicated space is unavailable for above-grade storage of Interim Storage Containers (ISCs) containing 55-gal drums of remote handled transuranic waste (RH-TRU). In the past this waste was packaged in specially constructed liners and placed into the RSWF. When ready for transfer this waste would then be removed from RSWF and transferred to CH2M-WG Idaho, LLC (CWI) where it was sorted and repackaged for shipment to Waste Isolation Pilot Plant (WIPP). The construction of this new interim storage area is needed to eliminate special packaging and placement into RSWF in order to reduce costs and exposure associated with repackaging activities. The interim storage pad will be placed across the road from the RSWF Staging Area in a previously disturbed area (see figure 1). While these improvements are being completed the existing RSWF Staging Area will be used to store the ISC's. This work is not related to the Resource Conservation and Recovery Act (RCRA) Temporary Storage Facility at the RSWF. This pad is only proposed for storage of waste that is to be disposed at WIPP.

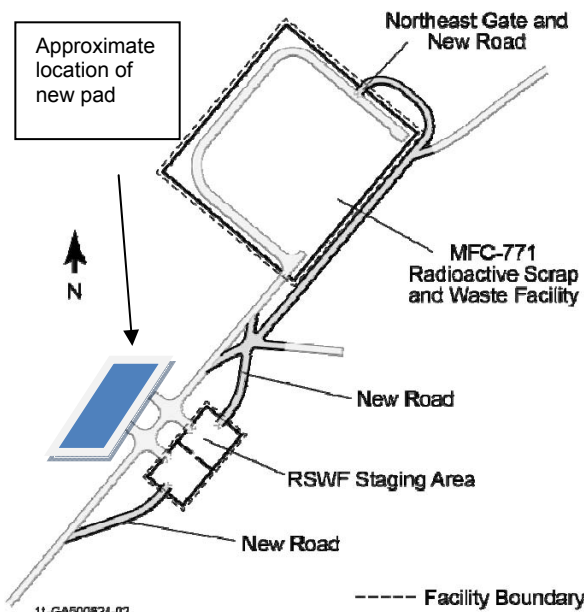


Figure 1. Location of ISC staging area

This work will involve clearing and leveling approximately 20,000 square feet of soil in a previously disturbed area north of the existing RSWF Staging Area at the Materials and Fuels Complex (MFC). This will entail the removal of 6 inches of existing pit run/soil sub-base and grade to match existing surface. Once the existing materials have been removed, subcontractor would replace with 3 inches to 6

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inches of clean ¾-in. gravel base and 4 inches of new asphalt pavement. Borrow material will be obtained from the Lincoln Boulevard Borrow Source.

After completion of clearing and asphaltting of the area, a 200-ft by 100-ft fence will be installed around asphalt pavement. Once construction is complete, the area will be used to store up to 144 ISCs. The area will be used to store ISCs containing waste that is currently on-site and waste that is expected to be generated from ongoing and future operations. It is expected that several drums will be generated each year, though exact quantities are unknown. The ISCs will be stored on the waste pad at RSWF for a limited time until they can be shipped to INTEC for processing and eventual disposal at the Waste Isolation Pilot Plant (WIPP).

Future waste is anticipated to be RH mixed TRU, storage of which is contingent on permit approval, and if it is proposed for storage at the proposed location, this environmental checklist will be revised.

### **SECTION C. Environmental Aspects or Potential Sources of Impact:**

**Air Emissions** - The only air emission associated with this project will be during the pad construction when potential fugitive dust emissions will be generated during grading and leveling. Standard dust suppression techniques will be employed to keep emission as low as possible. No radiological emissions are expected since all of the RH-TRU waste is in sealed containers.

**Disturbing Cultural or Biological Resources** - Since this is a previously disturbed area no cultural or biological resources are expected to be disturbed. However, if objects of potential archaeological or historical significance (e.g., arrowheads, flints, bones, etc.) are encountered, personnel will discontinue activities in the area and contact the Cultural Resource Management office (Brenda Pace, 526-0916).

**Generating and Managing Waste** - Waste that will be stored on the new pad will be from existing operations. This waste is characterized, stored, and disposed at the direction of Waste Generator Services (WGS) and according to laboratory procedures. The amounts of waste that will be generated is expected to be consistent with past operations. Pollution prevention will be implemented where economically practical to reduce the volume of waste generated.

**Using, Reusing, and Conserving Natural Resources** - All materials will be reused and recycled where economically practical. All applicable waste will be diverted from disposal in the landfill where conditions allow. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, or are non-toxic or less-toxic alternatives. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <http://www.sftool.gov/GreenProcurement/ProductCategory/14>).

**SECTION D. Determine the Recommended 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.

For projects checked above as "CX" (Categorical Exclusion) 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 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 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 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:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, "10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B6.6 "Modification of facilities for storing, packaging, and repacking waste."

**Justification:** The proposed action will protect against a potential uncontrolled release of contamination to the aquifer and is consistent with 10 CFR 1021, Appendix B to Subpart D, item B6.6 "Modification (excluding increases in capacity) of an existing structure used for storing, packaging, or repacking waste other than high-level radioactive waste or spent nuclear fuel, to handle the same class of waste as currently handled at the structure."

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: 8/16/2013