

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

SECTION A. Project Title: Underground Storage Tank (UST) Steel Line Replacements

SECTION B. Project Description:

The Idaho Department of Environmental Quality (DEQ) performed an inspection of Idaho National Laboratory's (INL's) USTs in September of 2011. Inspection results indicated field violations for failing to install and maintain cathodic protection systems for steel lines associated with seven underground storage tanks. DEQ did not accept the INL's "corrosion expert" determination that the installation sites soils were not corrosive enough to cause a release due to corrosion during the lines operating life. This determination was not accepted because the INL corrosion experts did not have specific National Association of Corrosion Engineers (NACE) certifications.

During the follow up compliance conference associated with this inspection, Battelle Energy Alliance, LLC, (BEA) agreed to resolve these field violations by September 30, 2012. Various options were evaluated and the final decision was to replace the existing underground steel lines with nonmetallic lines.

The proposed project will replace existing underground steel lines of eight underground storage tanks with double walled, nonmetallic, safe suction lines. These tanks are located at four different sites including Central Facilities Area (CFA), Advanced Test Reactor (ATR) Complex, Naval Reactor Area (NRF) (outside perimeter fence), and Test Area North (TAN) (outside perimeter fence). The USTs' lines that will be replaced include: 98CFA00296, 98CFA00298, 98CFA00299, 98CFA00300 (no inspection violations), 98TRA00499, 98TRA00500, 99NRF00004, and 98TAN00650. A subcontractor will perform the work which will include:

- Excavation to the existing steel lines (approximately 3 feet deep, length of lines various from approximately 15 feet to 50 feet).
- Cutting concrete fuel island slabs, oil tank slab, and CFA-696 floor.
- Removing the existing steel lines.
- Placing the appropriate bedding material.
- Installing new nonmetallic, safe suction piping from the tanks to the dispensers.
- Installing dispenser sumps and sump sensors (if applicable).
- Testing the lines and sumps for leaks.
- Backfilling the excavation.
- Pouring new concrete where the existing concrete slabs were cut.

Cultural and Biological reviews will not be required because all excavations are in previously disturbed areas. None of the excavations are in the storm water corridor.

Estimated Start Date: April, 2012

Estimated Completion Date: September, 2012

Approximate Cost: \$250,000

SECTION C. Environmental Aspects / Potential Sources of Impact:

Air Emissions - 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. BEA ES&S will use this documentation for compliance records associated with the INL Tier I Air Permit.

Generating and Managing Waste - The project will generate waste in the form of carbon steel piping, rags, absorbent pads (biodiesel, oil, gasoline), scrap nonmetallic line, asphalt and concrete. All of the lines that are to be replaced are safe suction lines, therefore a release is not expected. However, if a release from a UST line is discovered during the excavation, diesel, oil, or gasoline contaminated soil waste would be generated. Scrap metal will be recycled to the extent practicable. All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants - The underground piping associated with the USTs are carbon steel lines that are wrapped in a dielectric tape material. The corrosive expert evaluation INL previously completed was not accepted by DEQ, therefore the piping will need to be replaced. All the lines that will be replaced are safe suction, therefore a release is not expected. However, if a release is discovered during the excavation, facility operations (F&SS) will be responsible for reporting, cleanup, sampling and any corrective action requirements. The new piping will be double walled, nonmetallic and will meet the requirements of safe suction piping. Safe suction piping does not require release detection during operation. Fuel dispensers will not be replaced as part of this project.

The subcontractor will bring chemicals on site during the project. A chemical inventory list with associated MSDS's will be submitted to BEA in the vendor data system for approval prior to use. Chemicals will be entered into the Comply Plus Chemical Management System by the Construction Chemical Coordinator.

SECTION D. Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the level 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. .

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

Page 2 of 2

CX Posting No.: DOE-ID-INL-12-002

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 Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 2/22/2012