Page 1 of 4

CX Posting No.: DOE-ID-INL-25-009

SECTION A. Project Title: CF-696/CF-1607 Underground Storage Tank Closure and Above Ground Tank Installation

SECTION B. Project Description and Purpose:

The proposed action permanently closes seven regulated Underground Storage Tanks (UST) and one non-regulated UST at the Central Facilities Area (CFA). These closures will take place in phases over about four years (2025-2028). The proposed action replaces three of these UST's with Above Ground Tanks (AST) while the others will not be replaced.

Permanent closure of regulated UST's will include:

Thirty-day closure notification to DEQ, emptying all contents of the tanks and piping, removing the concrete pads that sit on top of the tanks, excavating around the tanks and lines, removal of the tanks, vents and lines, sampling under the lines, tanks and sumps, disposing of the tanks and associated equipment. A final closure report will be submitted to DEQ when closures are complete.

The tank locations for the new AST's are outside the INL storm water corridor and do not have potential to discharge to waters of the U.S., therefore SPCC requirements are not applicable. These AST's will be equipped with spill control and level detection and will be installed by a qualified subcontractor. All tank removals and installations will be entered into the INL tank database for tracking purposes.

See below for descriptions of the phases.

Phase I in 2025:

The CFA Big Shop (CF-696) has four regulated USTs located on the northwest side of the building that need to be permanently closed. These UST's consist of three temporarily closed (CCN 243116) product oil tanks (98CFA00296, 98CFA00298, 98CFA00299) and one active used oil tank (98CFA00300). A non-regulated, inactive antifreeze (propylene glycol, 98CFA00295) UST is also in the row of oil tanks and has not been used for more than ten years due to the storm water issue. This antifreeze tank and corresponding line and vent will be removed on the same project. See Figure 1.



Figure 1. CF-696 regulated and unregulated USTs.

CX Posting No.: DOE-ID-INL-25-009

These product oil tanks are no longer being used due to poor storm water drainage in the area. The poor drainage allowed storm water to enter the tanks through various openings/conduit and thus ruined the product oil stored in the tanks. Several measures were taken to try to solve the storm water problem, but they were mostly unsuccessful. Temporary closure consisted of removing all contents, isolating the tanks by disconnecting and capping lines and locking fill pipe lids.

The only active UST in this row of tanks is the used oil UST which will be replaced with an AST at the same location. The AST will be installed during this oil tank closure project and will include placing the AST on a concrete pad and tying the drain line into the existing Big Shop used oil sump.

Tank changes will be entered into the INL tank database for tracking purposes.

Phase II (design 2025, construction 2026)

CF-1607 gasoline UST (98CFA00304) will be permanently closed and replaced with an AST (See Figure 2.). The current UST is 30 years old and recently had a release from its piping which led to a costly clean up. The new AST will be placed on a concrete pad and lines will be run to the existing dispensers. The tank will be equipped with spill control and level detection and will be installed by a qualified subcontractor. Tank changes will be entered into the INL tank database for tracking purposes.



Figure 2. Location of UST 98CFA00304

Phase III (estimated 2026-2028)

CF-696 also has two 15,000-gallon diesel UST's (98CFA00301, 98CFA00302) located on the east side of the Big Shop which provide fuel to the fleet. These UST's are also reaching their end of life (30 years old) and need to be replaced with AST's in the same location (See Figure 3). The AST's will be installed by a qualified subcontractor, will sit on concrete pads, be equipped with spill control and level detection, and lines will be tied into the existing dispensers. Tank changes will be entered into the INL tank database for tracking purposes. These UST closures and AST installations will be a separate project but are included in this ERP/ECP for NEPA purposes.

Page 3 of 4



Figure 3. Location of CF-696 15,000-gallon diesel UST's (98CFA00301, 98CFA00302)

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Above ground gasoline and fuel tanks will have some evaporative loss during operations.

Discharging to Surface-, Storm-, or Ground Water

The new oil and fuel above ground tanks are outside the INL storm water corridor and do not have potential to discharge to waters of the U.S., therefore SPCC plans are not required.

Disturbing Cultural or Biological Resources

Cultural: Cultural: A Section 106 review was completed under CRMO project number (BEA-25-043) and resulted in No Historic Properties Affected. See Project Specific Instructions.

Generating and Managing Waste

NA

Releasing Contaminants

There is a potential for petroleum product spills from tanks, including spills from fuel dispensers. Underground Storage Tanks that are being closed may require soil cleanup if closure soil samples indicate contamination.

Using, Reusing, and Conserving Natural Resources

NA

Environmental Justice

NA

CX Posting No.: DOE-ID-INL-25-009

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: B2.5 "Facility safety and environmental improvements"

Justification: Based on the purpose and need and description of the proposed action and potential environmental impacts, the proposed action fits within the class of actions that is listed in Appendix B CX B2.5. There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (10 CFR 1021.410(b)(2)). The proposed action has not been segmented to meet the definition of a categorical exclusion (10 CFR 1021.410(b)(3)). This proposal is not connected to other actions with potentially significant impacts, is not related to other actions with individually insignificant but cumulatively significant impacts, and is not precluded by 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement (10 CFR 1021.410(b)(3)).

Authorizing the proposed action will not (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE and/or Executive orders; (2) require siting of new facilities or expansion of existing facilities; (3) disturb hazardous substances, pollutants, or contaminants; (4) adversely affect environmentally sensitive resources; or (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

B2.5 Facility safety and environmental improvements. Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and 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 (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel).

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)

Approved by Robert Douglas Herzog, DOE-ID NEPA Compliance Officer on: 4/21/2025