



**U.S. Department of Energy
Office of Nuclear Energy
National Environmental Policy Act
Determination**

NEPA Identification: DOE-ID-INL-26-021

Proposed Action Title: Site Inspection for Per- and Polyfluoroalkyl Substances

(PFAS) Location(s) (City/County/State):

Proposed Action Description:

The purpose of this site inspection (SI) is determined whether (per – and polyfluoroalkyl substances) PFAS have been release to the environmental media at the identified areas of interest (AOI) and to collect the information needed to support future CERCLA decisions, including whether additional investigations or response actions are warranted. A subcontractor will be conducting the CERCLA site inspections for the Idaho National Laboratory (INL). INL will provide project oversight and support through designated personnel throughout this project.

The SI field investigation will be completed during two field mobilizations. Mobilization #1, planned for late summer/fall 2026, will focus on readily accessible sampling locations, while Mobilization #2, planned for 2027, will target the remaining areas that require additional coordination, such as potential unexploded ordnance (UXO) areas. A field activities completion report and a data usability assessment will be prepared after each mobilization to document completed work and verify that the project data quality objectives are being met. The breakdown of this can be seen in Table 1 as identified by the waste area group (WAG).

Soil, surface water, and sediment samples will be collected to evaluate potential PFAS impacts at the site. Soil borings will be advanced using a hollow-stem auger (or equivalent) to the bedrock interface or a maximum depth of 10 feet below ground surface (bgs). In areas where soft-dig methods are appropriate, soil samples may be collected to depths of up to 5 feet bgs using a hand auger. Up to two soil samples will be collected from each boring: one surface sample, generally from the 0- to 2-foot bgs interval, and one subsurface sample from the bedrock interface or a maximum depth of 10 feet bgs, whichever is shallower. Sample intervals may be adjusted in the field based on soil conditions, observed lithology, or the presence of fill material from previous excavations to ensure native soils are sampled. In areas with asphalt or concrete, sampling will begin immediately below the pavement. The AOIs details and maps can be seen in Table 2 and in the Appendix.

An experienced field geologist will continuously log soil conditions during drilling in accordance with the technical guidance instruction (TGI) for Soil Description. Field logs will document soil depth, recovery, texture, moisture, color, and evidence of disturbance to help refine sample intervals and confirm representative sampling. Following drilling, drill cuttings will be containerized in 55-gallon drums, soil borings will be abandoned with bentonite chips, and disturbed surfaces will be restored to match existing conditions, including patching asphalt or concrete where necessary.

Surface water and sediment samples will be collected from active onsite ponds in accordance with the TGI for Sediment, Surface Water, and Stormwater Sample Collection for PFAS Analysis. When both media are present, surface water will be collected first from a single location by dipping the sample container into the water without entering the pond. A co-located sediment sample will then be collected from the 0- to 0.5-foot interval to minimize sediment disturbance. Sediment characteristics will be documented on digital field forms. Because of the arid conditions at INL, surface water may not be present at all locations. In these cases, only a sediment sample will be collected. Surface water and sediment sampling will not be conducted during or immediately following rainfall to ensure samples are representative of typical site conditions.

Investigation-derived waste (IDW) generated in CERCLA sites during soil, surface water, or sediment sampling will be managed in accordance with BEA requirements and federal and state regulatory standards and following the TGI for Investigation-Derived Waste Handling and Storage. IDW generated outside of CERCLA sites will be returned to origin.



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Table 1. Summary of work to be done at specific locations.

BEA Facility/ID	Number of AOIs	AOIs in Mobilization #1	AOIs in Mobilization #2
TAN (WAG 1)	1	0	1
ATR (WAG2)	3	2	1
CFA (WAG 4)	8	5	3
CITRC/ARA (WAG 5)	1	1	0
MFC (WAG 9)	8	0	8
Outside of Facilities (WAG 10)	3	1	2



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Table 2. Sampling locations and description of work.

Area	Site/AOI	Planned Actives
TAN (WAG 1)	Fire Station No. 3 (TAN-687)	Advance up to 3 soil borings in drainage areas at the front of the fire station.
TRA (WAG 2)	Former AFFF Tank Suppression System and Storage (TRA-719A-C and TRA-619/TRA-633)	Advance up to 4 soil borings around the former AFFF suppression system. Surface soil samples may be adjusted to the first native soil (approximately 2–3 ft bgs) where demolition fill is present.
	Incident Response Team (IRT) Training Area	Advance up to 3 soil borings near the fire hydrant and grassy area south of TRA-662.
	Cold Waste Pond (TRA-702)	Collect 2 surface water samples (if water is present) and 2 co-located sediment samples from the lowest areas of the ponds where sediment accumulates.
CFA (WAG 4)	Wastewater Disposal Pivot (CFA-789)	Advance up to 4 soil borings within the inner irrigation area of the pivot system.
	Current Sewage Treatment Plant (CFA-786, CFA-787, CFA-788)	Collect 3 surface water samples and 3 co-located sediment samples (one from each treatment pond).
	Motor Pool Pond (CFA-05)	Advance up to 4 soil borings in the former evaporation pond and drainage areas, including the former discharge location.
	Maintenance Support Building (Former Fire Station No. 1; CFA-666)	Advance up to 3 soil borings around the former fire station, targeting the former bay door area. Surface soil samples may be adjusted to the first native soil (approximately 2–3 ft bgs) where demolition fill is present.
	Diesel Tank Spill Area (near CFA-688)	Advance up to 3 soil borings within the known AFFF release area. Surface soil samples will be adjusted to account for previous soil excavations.
	Fire Training Facility (CFA-1614)	Advance up to 4 soil borings around the training area, targeting historical AFFF application areas and adjacent drainage features.
	Fire Station No. 1 (CFA-1611)	Advance up to 2 soil borings in drainage areas near the front bay doors.
	Old CFA Fire Department Training Area	Advance up to 5 soil borings around the perimeter of previously excavated areas and nearby drainage features. Surface soil samples may be adjusted where fill material is present.
CITRC/ARA (WAG 5)	Homeland Security Test Bed (PBF-632)	Advance up to 3 soil borings around the perimeter, targeting historical surface drainage pathways associated with the known AFFF release. No surface water or sediment sampling is planned because the pond has been drained.
MFC (WAG 9)	Fire Station No. 2 (MFC-725)	Advance up to 3 soil borings around the front and back of the fire station, targeting drainage areas and historical AFFF use locations.



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	MFC Fitness Center (Former Fire Station; MFC-759)	Advance up to 4 soil borings around the building, targeting areas where historical AFFF activities likely occurred while avoiding recently disturbed soils.
	Historical Fuel Tank Training Area	Advance up to 4 soil borings around the perimeter of the former fire training area.
	Sodium Component Storage Building and Alcohol Pad (MFC-770B and MFC-793A)	Advance up to 4 soil borings around the alcohol pad and at least 1 soil boring in front of the sodium storage building.
	Industrial Waste Pond and System (ANL-01)	Collect up to 2 surface water samples and 2 co-located sediment samples from the pond, including one at the interceptor canal discharge and one at an accessible pond location.
	ANL Sewage Lagoons (ANL-04)	Advance up to 3 soil borings within the former sewage lagoon area. Surface soil samples will be adjusted to native soil where previous excavations occurred.
	Burn Pits #1, #2, and #3 (ANL-05)	Advance up to 3 soil borings, with one boring centered in each former burn pit.
	Interceptor Canal (ANL-09)	Advance up to 4 soil borings along the western interceptor canal. No surface water sampling is planned because the canal is typically dry.
Outside Facilities (WAG 10)	Underpass Fire Area	Advance up to 2 soil borings near the vehicle crash response area where AFFF was used. Surface soil samples may be adjusted to account for previous soil excavations.
	Naval Ordnance Test Facility (ORD-02)	Advance up to 3 soil borings near the firing range in areas with the highest potential for PFAS releases from munitions.
	Mass Detonation Area (ORD-13)	Advance up to 5 soil borings, including locations around the largest detonation crater and within three smaller craters. No surface water or sediment sampling is planned.



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Environmental Aspects and Impacts:

Air Emissions

N/A

Discharging to Surface, Storm, or Ground Water

N/A

Disturbing Cultural or Biological Resources

There is the potential for this work to impact vegetation and for project personnel to interact with various wildlife species. A Biological Resource Review will be arranged within two weeks prior to the initiation of any activities that might disturb soil or vegetation and again following completion of project activities. A nesting bird survey is included with the Biological Resource Review for actions occurring between April 1 - October 1 per compliance with the Migratory Bird Treaty Act. Bat surveys are also included with the Biological Resource Review in accordance with the INL Bat Protection Plan.

CULTURAL: A Section 106 review was completed under CRMO project number (BEA-26-058) and resulted in No Historic Properties Affected. [optional] Please refer to Holds Points and Project Specific Instructions.

Generating and Managing Waste

At INL facilities, activities may generate industrial, hazardous, radioactive, and mixed waste. The BEA Waste Management Program's (WMP) Waste Generation Services (WGS) subcontractor assists projects in characterizing and managing waste. WGS brokers handling and shipping of hazardous and radioactive waste.

Releasing Contaminants

When chemicals are used during the project there is the potential for spills that could impact the environment (air, water, soil).

Using, Reusing, and Conserving Natural Resources

N/A

References:

B3.1 "Site characterization and environmental monitoring"

For Categorical Exclusion Determinations:

The proposal fits within the classes of actions listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures and satisfies the conditions that are integral elements of the classes of actions therein. The proposal does not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, 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 facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Appendix B.



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There is no extraordinary circumstance related to the proposal that is likely to cause a reasonably foreseeable significant adverse effect or for which DOE does not know the environmental effect. Extraordinary circumstances are unique situations presented by specific proposals, including, but not limited to, scientific controversy about the environmental effects of the proposal; uncertain effects or effects involving unique or unknown risks; and unresolved conflicts concerning alternative uses of available resources.

The proposal has not been segmented to meet the definition of a categorical exclusion. Segmentation can occur when a proposal is broken down into small parts in order to avoid the appearance of significance of the total action. However, segmentation does not include proposals that are developed and potentially implemented over multiple phases where each phase results in a decision whether to proceed to the subsequent phase.

Based on my review of the proposed action, I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer

Signed by: Robert Douglas Herzog, NEPA

Compliance Officer Date Signed: 9/1/2026