

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Keeler Substation Septic System Retirement

**Project Manager:** Dino Zeppetella, TEP-CSB-2

**Location:** Hillsboro, Washington County, OR

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.27 Disconnection of utilities, and B2.5 Facility safety and environmental improvements

**Description of the Proposed Action:** BPA proposes to decommission the septic system at Keeler Substation and connect the facility to the public sewer system.

The septic system consists of two tanks and two drainfields—one for the administration building and maintenance building and one for the control house. To retire the septic system, BPA would abandon the drainfields in place, suction out the tanks' contents and dispose of the contents at a suitable location. The tanks would be filled with gravel or sand per Oregon Administrative Rules (OAR), and left in place. To complete this work, BPA would also excavate the septic line and tank junctions, install sewage ejector kits, and backfill the excavation areas with the native soil.

To connect the facility to the public sewer system, BPA would install a total of about 2,000 feet of 2-inch-diameter sewer force main and install a sewer manhole for access to the connection with the public sewer system. The sewer force main would be directionally drilled to a depth of about 36 inches for approximately 520 feet inside the substation fence and the main would be trenched at a depth of about 48 inches for approximately 1,500 feet outside the substation fence.

**Findings:** In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

- (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- (3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Michael J. O'Connell

Michael J. O'Connell

Environmental Protection Specialist

Concur:

/s/ Stacy L. Mason

Stacy L. Mason

NEPA Compliance Officer

Date: February 12, 2016

Attachment(s): Environmental Checklist

# Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** Keeler Substation Septic System Retirement

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## Project Site Description

The project would take place on BPA fee-owned property at the Keeler substation in Hillsboro, Washington County, Oregon. Approximately 165 feet from State Highway 26, the substation is in a highly suburbanized and industrial area. Non-native grasses comprise the maintained lawn around the substation buildings and a mixture of native and non-native plant species comprises the open fields outside the substation. The nearest waterbody is Rock Creek at about 0.5 miles to the east. A review of National Wetland Inventory (NWI) wetland locations shows no wetlands in or adjacent to the project area. The site of the septic tanks is in the landscaped administration complex area at the maintenance building and the control house. The sewer main installation would begin at the buildings, head west, and then exit the fenced yard traversing the exterior perimeter of the BPA property to the northeast where the sewer main would connect to the public sewer system. There is a high probability for soil contaminants like petroleum and PCB in the project area, and there would be biohazardous substances in the septic facilities and at the public sewer system connection point.

## Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. <b>Historic and Cultural Resources</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> BPA has performed multiple cultural resource surveys within the APE of this undertaking over the last five years. These previous surveys consisted of intensive pedestrian surveys augmented by the excavation of shovel test probes. These previous surveys showed that no cultural resources are located within the APE and due to the disturbed nature of the subsurface soils caused by previous construction activities there is no potential for the existence of intact or significant sub-surface cultural deposits. The Cowlitz and Grande Ronde Tribes were consulted as well during the previous planning and indicated they had no concerns with work proceeding in this area. BPA has determined that this undertaking has no potential to impact historic properties.</p> <p><u>Mitigation:</u></p> <ul style="list-style-type: none"><li>✓ Potential discoveries of archeological materials shall be treated with the 'inadvertent discovery' guidelines: Stop work, contact BPA ECT lead and BPA ECC archeologist for further notifications, and: ensure integrity of site and materials until further instructions.</li></ul>		

2. <b>Geology and Soils</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><u>Explanation:</u> The ground inside the substation fence has been previously disturbed during construction activities. There would be temporary damage to the soil to a depth of approximately 48 inches in the sewer trenching and boring route. Erosion and sedimentation from trenching and bore-hole digging would be mitigated by standard construction Best Management Practices (BMP's). Geological resources would not be affected. The below-surface work avoids much disturbance by leaving the underground tanks to decommission in place.</p> <p><u>Mitigation:</u></p> <ul style="list-style-type: none"><li>✓ Soil excavated for should first be used as backfill material if tests are negative for PCB and total petroleum hydrocarbons (TPH). Soil would be re-used or disposed of properly pending the results.</li></ul>		

3. **Plants** (including federal/state special-status species)

Explanation: There are only non-native grasses comprising the maintained lawn around the buildings and a mixture of native and non-native vegetation in the open fields outside the substation. Reseeding with appropriate native mixtures in the fields and sodding, or in-kind seeding around the tank excavations, would be done to repair any damage at the site.

4. **Wildlife** (including federal/state special-status species and habitats)

Explanation: There would be no disturbance or harm to any species of concern or threatened and endangered species. The work site is confined to a high traffic and significantly disturbed zone on, and immediately adjacent to, the developed substation land uses.

5. **Water Bodies, Floodplains, and Fish** (including federal/state special-status species and ESUs)

Explanation: New ground disturbance would be limited to the areas around the buildings required for machinery movement and the sewer line trench in various locations along the mapped route. Directional boring would be used for about one-quarter of the total length of the installation. Standard BMP's would be utilized to limit erosion of soil from the site. With proper implementation of standard BMP's, there would not be measurable transport of soil from the site to receiving waterbodies. By professionally decommissioning the underground septic tanks, and transporting wastewater to the municipal system for treatment, there may be a benefit to stormwater management by reducing the potential for leaks or other failures in an unmanaged zone.

Mitigation:

- ✓ Septic tanks would be pumped by a licensed sewage disposal service to remove all septage and the tanks would be filled with sand or gravel per Oregon Administrative Rule 340-071-0185.
- ✓ The stormwater filter strips (compost-amended soil), installed per City of Hillsboro to treat future surface water flows to the substation's perimeter drainage ditch would need to be restored to original condition after sewer line installation.
- ✓ Bare aboveground soil would need to be placed on an impermeable barrier (e.g., Visqueen) and likewise covered to prevent runoff.
- ✓ Excess bentonite slurry used in the drilling process would need to be removed from the site by the drilling contractor.

6. **Wetlands**

Explanation: No wetlands would be disturbed and any potential sediment or stormwater runoff would be minimized with the BMPs described for erosion control to Water Bodies, Floodplains, and Fish.

7. **Groundwater and Aquifers**

Explanation: By professionally decommissioning the underground septic tanks, and transporting wastewater to the municipal system for treatment, there could be a benefit to groundwater by reducing the potential for leaks or other failures from aging tanks.

8. **Land Use and Specially Designated Areas**

Explanation: All work would occur on BPA fee-owned property within substation/administrative complex fencing and in maintained fields external to the fence. The project area has been previously disturbed for construction of substation and associated access roads and transmission line corridors. The overall land use in the project area would not change.

9. **Visual Quality**



Explanation: The decommissioning of the septic system and the connection to the public sewer system would not adversely impact visual quality. The disruption to the soil would be temporary, and new vegetative growth would obscure the project footprint.

10. **Air Quality**



Explanation: There could be some soil dust formation and loss to the air, but this would likely be minimal because of the relatively high water content of the soil during the planned time (mid-February) of construction. Vehicle and machinery emissions would present a localized and temporary decrease in air quality, though the quantity of emissions generated would be consistent with emissions associated with the surrounding industrialized setting.

11. **Noise**



Explanation: There would be temporary, intermittent noise from construction activities during daylight hours. Noise generated would be consistent with the noise generated from surrounding land uses.

12. **Human Health and Safety**



Explanation: There is a possibility for contaminants like PCB and TPH in the soils in and around the substation, and for contact with biohazardous materials in the septic systems.

Mitigation:

- ✓ Trained and experienced workers in the potential septic system biohazards would contain and mitigate these during the decommissioning and would ensure that there would be containment of soil on site while the testing for PCB and TPH takes places. Abatement and disposal would be conducted in accordance to State of Oregon and OSHA regulations.

### **Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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.

Explanation, if necessary: The expected disturbance of soil contaminants like PCB and TPH is a standard effect associated with projects in substations and adjacent land. The project area would be well-defined, and the contracted construction project manager would be an Oregon Certified Erosion and Sediment Control Lead (CESCL) knowledgeable of the standard procedures to limit movement of contaminated soils from the excavation and storage areas.

- 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 of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation, if necessary:

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### **Landowner Notification, Involvement, or Coordination**

Description: All access and work is proposed for BPA fee-owned land inside the substation fence and in an area outside the fence buffered by large open fields on BPA land; therefore, it is not necessary to contact neighboring landowners.

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Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Michael J. O'Connell  
Michael J. O'Connell, ECT-4

Date: February 12, 2016