

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

SECTION A. Project Title: Materials and Fuels Complex Underground and Aboveground Storage Tank Replacement

SECTION B. Project Description:

The purpose of this project is to permanently close and remove the Materials and Fuels Complex (MFC) 4,000 gallon bio-diesel underground storage tank (UST) [Site ID# 7230/Facility ID # 6-120614/Tank ID # 99ANL00013] and remove the 1,000 gallon E-85 aboveground storage tank (AST) [Site ID# 7230/Facility ID# 6-120614/Tank ID# 05MFC00035] and replace the two tanks with a 10,000 gallon aboveground storage tank (AST) split tank (5,000 gallons for bio-diesel/5,000 gallons for E-85). The 4,000 gallon bio-diesel UST and the 1,000 gallon E-85 AST are located in the parking lot area near building MFC-701.

Background: 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 two violations to MFC's cathodic protection system for the 4,000 gallon biodiesel tank. The two violations are: (1) failure to install a properly designed cathodic protection system for a metal tank and (2) failure to ensure proper operation of cathodic protection system within six (6) months of installation and every (3) years thereafter. The cathodic protection system was designed by an Argonne National Laboratory (presently Idaho National Laboratory) professional engineer and installed by Argonne National Laboratory-West. DEQ did not accept the INL's determination that the professional engineer had the expertise to design and install the tank's cathodic protection system. This determination was not accepted because the INL professional engineer was not considered a corrosion expert and did not have specific certification (e.g., National Association of Corrosion Engineers [NACE]). During the follow up compliance conference associated with this inspection, Battelle Energy Alliance, LLC (BEA) agreed to resolve these field violations. To resolve the DEQ violations, BEA has chosen to replace the existing 4000 gallon biodiesel UST with an AST.

Replacing the 4,000 gallon bio-diesel UST and the 1,000 gallon E-85 AST with a 10,000 AST split tank will serve two purposes:

- 1) Resolve the two DEQ cathodic protection system violations and
- 2) Add needed capacity to supply the present E-85 vehicle demand.

The proposed project actions will include:

- Emptying the tanks of petroleum and removal of all liquids, sludge, and dangerous vapors.
- Excavation and removal of both tanks.
- Performing a site assessment for contamination by collecting and analyzing soil samples at representative locations, using an approved sampling plan for the UST.
- Performing site remediation, if soil contamination, using an approved remediation plan.
- Installing a commercially purchased pad and 10,000 gallon aboveground split tank.
- Installing non-metallic piping to the fuel dispensers.
- Testing the tank and lines for leaks.
- Backfilling the excavation.

Note: Although the DEQ does not regulate ASTs in Idaho, state rules require that the agency be notified of releases from the AST to the environment according to approved company procedures (ref. LWP-8000/LRD-8000).

Impacts to cultural and biological resources are unlikely because excavations are located in an existing parking lot and original ground surfaces have been extensively disturbed.

The excavation site is not in the storm water corridor.

Remediation activities are not included in the scope of this Environmental Checklist. If remediation is required, this EC will be revised.

Estimated Start Date: July 2012

Estimated Completion Date: September 2012

Estimated 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 Environmental Support & Services 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/tank, rags, absorbent pads (biodiesel), concrete, and asphalt. Sludge from the tanks and waste fuel (biodiesel and E-85) may also be generated. Fuel removed from the tanks will be used where possible or recycled.

The tank will be emptied of all liquids, dangerous vapor levels, and sludge. The line from the tank is a safe suction line with the lines sloped so that the contents of the pipe will drain back into the storage tank when the suction is released, 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. All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

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Releasing Contaminants - The piping associated with the UST is aboveground and is safe suction, therefore a release is not expected. However, if a release is discovered during the excavation, the contractor must take immediate actions to prevent any further release to the environment. Facility operations (Facilities & Site Services [FS&S]) will be responsible for reporting, cleanup, sampling and any corrective action requirements. The new tank will be a 10,000 split AST which is not regulated by the Idaho Department of Environmental Quality. The new AST will be connected to the existing fuel dispenser.

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.

Using, Reusing, and Conserving Natural Resources - Scrap metal will be recycled to the extent practicable.

SECTION D. 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

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.

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: 6/7/2012