SECTION A. Project Title: Relocatable Storage Units (RSU) Storage Area

SECTION B. Project Description and Purpose:
The purpose of this project is to establish a storage area for Relocatable Storage Units (RSUs). The site area is approximately 13 acres and is shown below, which is located north of the Materials and Fuels Complex (MFC) and just east of the Radioactive Scrap and Waste Facility (MFC-771) in a sagebrush covered area. The North Relocatable Storage Units (RSU) Storage area presently contains an excess of left-over equipment that is not-nor has ever been in use and will be removed. This excess material will be properly disposed of and removed from the proposed RSU site. This site also contains a quantity of trash items such as desks, chairs, cabinets, and shelving units that have been incorrectly placed here. The scope of Utilities and Infrastructure Support (U&IS) work for the area, once cleared of left over equipment and excess material, will be to remove 6” to 12” of soil and replace with ¾ crush/road base and compact to a semi solid surface. Graders, dozers, dump trucks and rollers will be used to prep the area. Archeological monitoring will be provided during grading and levelling given the proximity to protected areas. The removed soil will be transferred to borrow pit areas near MFC or as a last resort transferred to the CFA landfill. Soil moved to borrow pits will be monitored for noxious weeds and managed accordingly. Once the site is appropriately prepped, RSUs from inside MFC will be arranged in organized rows with 4” x 4” dunnage to elevate units off the ground. U&IS will provide site oversight and upkeep after completion and during operation. Jersey barriers will be placed around the storage area to prevent intrusion into the protected area to the North.

SECTION C. Environmental Aspects or Potential Sources of Impact:
Air Emissions
The grading of the area will include mobile equipment including dozers, graders, dump trucks and rollers, which are powered by diesel fuel. As mobile equipment, such equipment is exempted as mobile internal combustion engines per IDAPA 58.01.01.222.02.e.

Project activities has the potential to contribute to air emissions from the operation of fuel burning equipment. If mobile sources (equipment) will be used temporarily, they must meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

Fugitive dust may be generated during proposed work.

Discharging to Surface-, Storm-, or Ground Water
N/A

Disturbing Cultural or Biological Resources
The proposed location of the RSU is outside previously disturbed facility fenced areas/improved grounds and has the potential to disturb Cultural or Biological resources. If there are no permanent ancillary structures planned for this storage area a CRMO built environment review is not required.

Activities will involve vegetation removal and soil disturbance and may require pesticide application conducted on areas with native or naturalized vegetation.

Generating and Managing Waste
The project will remove excess material and trash items (i.e., desks, chairs, cabinets, and shelving) which will be excessed or disposed of to the CFA Landfill Complex. All waste generated will be turned over and managed by Waste Generator Services.

The project will generate large quantities of excess soil which will be transferred to a burrow pit area or to the CFA Landfill Complex. It is estimated that approximately 20,973 cubic yards of soil would be removed.

Releasing Contaminants
Typical construction chemicals such as fuels or lubricants, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

The proposed areas are not located in a CERCLA site, so no Notice of Soil Disturbance is required.

Pesticides may be applied on areas where native or naturalized vegetation has been removed.

Although not anticipated, there is a potential for spills when using fueling equipment. In the event of a spill, notify facility Environmental Manager. If the Environmental Manager cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

Using, Reusing, and Conserving Natural Resources
All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition.

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: 10 CFR 1021, Appendix B to Subpart D, item B1.15 "Support buildings" and B1.24 "Property transfers."

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.15 "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix;"

and item B1.24 “Transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land), provided that under reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) □ Yes ☒ No

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 06/29/2021