



**U.S. Department of Energy  
Office of Legacy Management  
Categorical Exclusion Determination Form**



**Program or Field Office:** Office of Legacy Management

**Project Title and I.D. No.:** Remove and reuse/recycle sulfuric acid from an onsite tank at the Uranium Mill Tailings Radiation Control Act Title I, Tuba City, Arizona, Disposal Site. LM 16-15.

**Location:** Tuba City, Arizona

**Proposed Action or Project Description:**

Treatment of contaminated groundwater associated with the Tuba City disposal site was discontinued in early 2015 and the Tuba City Water Treatment system was placed on "Safe Standby". Unused sulfuric acid, which was available for use in the treatment process, needs to be removed from the site.

A stainless steel storage tank contains approximately 1,500 gallons of unused 93 weight percent sulfuric acid. DOE proposes to contract with a qualified vendor to remove the sulfuric acid and associated sludge. After the acid is removed, the vendor would use uncontaminated groundwater with a suitable amendment (e.g., sodium hydroxide) to neutralize any remaining acid (e.g., potentially present in piping) and sludge expected to be present in the tank. The uncontaminated groundwater would be obtained from extraction wells on the Tuba City site. Due to the newness of the tank and low level of use, it is believed that only a small volume (approximately 5 gallons) of sludge and waste would need to be neutralized before removal from the tank. All neutralized materials would be piped through the existing pipeline treatment system to the onsite evaporation pond. The process tank is nominally 8 feet in diameter and 9.9 feet tall. The empty tank would remain in place on site.

DOE must disposition the unused sulfuric acid off site and proposes to have a vendor remove and transport the acid to an approved receiving company for reuse or recycling. The final disposition is dependent on the quality and grade of the removed acid, which would be determined at the point of acceptance. At the time of this writing, an approved receiving facility has not been identified.

Management of the sulfuric acid would be in accordance with a work plan approved by DOE and in accordance with the Material Safety Data Sheets for sulfuric acid. In the event of a spill, the vendor would be required to follow DOE spill requirements that are defined in the *Tuba City Spill Prevention and Response Procedure*.

**Categorical Exclusion(s) Applied:** B 1.28 Placing a facility in an environmentally safe condition

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of 10 CFR Part 1021.

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D

To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would 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, Subpart D, 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, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), 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:**

**Date Determined:**