



Department of Energy
National Nuclear Security Administration
Pantex Site Office
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NEPA Compliance Officer Rationale

Pantex Site Office
Proj. No. D&D-10-001-C
NEPA ID No. PXP-10-0001
Amendment No. 10-010

Decontamination & Demolition of Residential and Farm Structures

Application of DOE NEPA Procedure: Categorical Exclusions B1.23 and B6.1(c), Applicable to Facility Operations (10 CFR Part 1021, Subpart D, Appendix B), apply to the proposed activities. Therefore, neither an Environmental Assessment nor an Environmental Impact Statement is necessary for the activities described in Amendment No. 10-010 of NEPA Review Form (NRF) PXP-10-0001.

Rationale: The U.S. Department of Energy (DOE), National Nuclear Security Administration (NNSA), recently acquired 1,526 acres of land to allow access for environmental monitoring and implementation of institutional controls. This property contains two homesteads - the former Cockrell place and the former Poteet place - located approximately 2 miles north of Highway 60 and 3 miles east of the Pantex main gate. The homesteads, approximately ½ mile apart, have been vacant for several years and have severely deteriorated.

The scope of the original project involved demolishing these two residential homesteads and associated support structures. The scope of a previous amendment, No. 10-008, included removal of trees and bushes at the former Poteet homestead. Amendment No. 10-010 addresses the removal of an abandoned underground storage tank (UST) and the abandonment and plugging of a domestic well at the former Poteet property. The procedures to be followed are:

- A. Once the necessary Texas Commission on Environmental Quality reporting requirements have been met and the size of the tank has been determined, the tank would be emptied of all regulated substances, sludge, or residue and purged of all residual vapors in accordance with industry standards and regulatory requirements. All substances removed would be identified and appropriate waste streams would be set up to dispose of the substances. A site assessment would also be performed to determine if there had been any release of regulated substances. Once these activities have been completed, the tank would be removed and the void would be backfilled, in accordance with Title 30 of the Texas Administrative Code (TAC), Chapter 334. Finally, a report would be prepared in accordance with 30 TAC 334, detailing the assessment and abandonment of the tank.
- B. Once equipment is removed from the domestic well and the depth measured, one of two plugging options would be performed: 1) If the well is to the perched aquifer depth of approximately 280 feet (or shallower), the casing would be removed two feet below

ground surface and the well would be filled with a cement grout mixture to the top of the casing. 2) If the well is deeper than the perched aquifer (i.e., an Ogallala well), the well would require perforation with high explosive (HE) charges downhole across the perched aquifer zone. The perforations would be pressure grouted, the casing would be removed two feet below ground surface, and then the well would be cement grouted to the top of the casing. The well would be plugged in accordance with 16 TAC 76. All activities would comply with existing State of Texas and Pantex Plant requirements pertaining to the planned activity.

More in-depth discussions can be found in Pantex NEPA review forms PXP-10-0001 and Amendment 10-010, which are hereby incorporated by reference.

Removal of the UST is categorically excluded by B6.1(c), which applies to:

“Removal of an underground storage tank including its associated piping and underlying containment systems in compliance with RCRA”

Abandonment and plugging of the domestic well falls under Categorical Exclusion B1.23, which refers to cases of:

“Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces).”

Based upon the information in the NEPA review forms referenced above, the activities as described do not present any extraordinary circumstances of a unique or uncertain nature.¹ They would not²:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/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;
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; or
4. adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B.(4)).

¹ See 10 CFR § 1021.410(b)(2)and(3)for full text of regulation.

² See 10 CFR Part 1021 Subpart D Appendix B (B(1)through(4)).

Therefore, this proposal meets the conditions that are integral elements of the class of actions in Appendix B, and application of Categorical Exclusions B1.23 and B6.1(c) is appropriate.

If changes are made to the project scope, or if the scope is expanded to encompass other actions, NEPA requirements will need to be reassessed at that time.

Signature: 

Jim Barrows

Title: NEPA Compliance Officer

Date: 16 June 2010