NEPA COMPLIANCE SURVEY
#322

Project Information			
Project Title:	NORM Storage Facility	**Date:**	1-10-10
DOE Code:	6730.020.0000	**Contractor Code:**	8067-786
Project Lead:	Anthony Bowler		

Project Overview	
1. Brief project description [include anything that could impact the environment]	The facility will be developed to store pipe and tubing that has been sampled for and tested positive for NORMs contamination. Topsoil will be removed from the site and stored adjacent to the location in a signed "topsoil" location and saved for future restoration. The site will be bermed to control runon/runoff. A composite sample of the exposed soil will be tested for TPH, Ba, Se, Ar and SAR. The area will be fenced and gated (locked) to prevent unauthorized intrusion during operation. The stored materials will be covered and the area underneath will be lined to prevent any off site migration of contaminated media. When the area is no longer needed for storage, a composite sample of the site will be analyzed for NORM. A negative result will indicate that the site is eligible for closure. Topsoil will be replaced, then graded to the original topography and reseeded with native plant mix. The design of the facility mitigates any potential for environmental and health liabilities
2. Legal location	T38N, R78W Section 3
3. Duration of the project	Construction is expected to last 1 week. The facility will be utilized until no longer needed for storage and the will be completely restored.
4. Major equipment to be used	Dozer, Reseeding equipment, and Dump trucks

* The decision has been made to erect the NORM facility inside the confines of the existing pipe yard. No cultural resource survey is needed for this facility.

The table below is to be completed by the Project Lead and reviewed by the Environmental Specialist and the DOE NEPA Compliance Officer. NOTE: If Change of Scope occurs, Project Lead must submit a new NEPA Compliance Survey and contact the Technical Assurance Department.

	Impacts Anticipated?			If YES, then complete below
Water Quality	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Does the proposed project present potential for impacts on water resources or water quality?	☒	☐	☐	Berms will be built to keep water that is outside of the area from entering, and water that is inside from leaving. The stored materials will be covered and the area underneath will be lined to prevent any off site migration of contaminated media.
Does the project affect surface water quantity or quality under both normal operations and accident conditions?	☒	☐	☐	Berms will be built to keep water that is outside of the area from entering, and water that is inside from leaving. The stored materials will be covered and the area underneath will be lined to prevent any off site migration of contaminated media.
Does the proposed project affect groundwater quantity or quality under both normal operations and accident conditions?	☐	☒	☐	Berms will be built to keep water that is outside of the area from entering, and water that is inside from leaving. The stored materials will be covered and the area underneath will be lined to prevent any off site migration of contaminated media.
Will the project area include "Waters of the State?"	☐	☒	☐	
Will the project area require a Corps of Engineers permit?	☐	☒	☐	
	Impacts Anticipated?			**If YES, then complete below.**
Geology & Soils	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**

NEPA COMPLIANCE SURVEY
#322

Does the proposed project present potential for impacts related to geology or soils?	☐	☒	☐	
Does the proposed project alter, excavate or otherwise disturb land area consistent with other land use and habitat area?	☒	☐	☐	Area will be reclaimed after use
Is the proposed project likely to impact local seismicity?	☐	☒	☐	
If the project involved disturbance of surface soils, are erosion and storm water control measures addressed?	☒	☐	☐	Berms will be built around the site to keep water that is outside of the area from entering, and water that is inside from leaving.
Air Quality	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Does the proposed action present potential for impacts on ambient air quality under both normal and accident conditions?	☐	☒	☐	NORM materials are expected to remain in a solid state and not enter the local atmosphere
Are potential emissions (gases and/or airborne particulates including dust) outside of the normal scope for oil field operations?	☐	☒	☐	NORM materials are expected to remain in a solid state and not enter the local atmosphere
Does the project present risk to human health and the environment from exposure to radiation and hazardous chemicals in emissions?	☐	☒	☐	Any stored materials will have been tested, assuring low levels of radiation, non hazardous to human health and the environment. NORM materials are expected to remain solid and not enter the local atmosphere
Is the project subject to New Source Performance Standards?	☐	☒	☐	
Is the project subject to National Emissions Standards for Hazardous Air Pollutants?	☐	☒	☐	
Is the project subject to emissions limitations in an Air Quality Control Region?	☐	☒	☐	
	Impacts Anticipated?			**If YES, then complete below.**
Wildlife and Habitat	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Does the proposed action present potential for impacts on wildlife or habitat?	☒	☐	☐	The area will be fenced to prevent unauthorized incursion
Does the project impact state or federally listed threatened and endangered species?	☐	☒	☐	
Human Health Effects	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Does the proposed project present potential for effects on human health? **e.g.: Hanta virus, radiological exposure, or chemical exposure (must provide MSDS)**	☐	☒	☐	Any stored materials will have been tested, assuring low levels of radiation, non hazardous to human health and the environment.

NEPA COMPLIANCE SURVEY
#322

Transportation	Yes	No	NA	If the anticipated impact might be unacceptable, recommend mitigation measures:
Does the proposed project involve transportation of radiological sources or hazardous materials (including explosives)?	☐	☒	☐	
Waste Management and Waste Minimization	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Are pollution prevention and waste minimization practices needed in the proposed project?	☒	☐	☐	The facility will be bermed and fenced to control runon/runoff and unauthorized entry
Does project plan establish procedures in compliance with local, state and/or federal laws and guidelines affecting the generation, transportation, treatment, storage or disposal of hazardous and other wastes?	☐	☒	☐	
	Impacts Anticipated?			**If YES, then complete below.**
Cultural Impact	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Is there potential for impact on cultural (historic) resources?	~~☒~~	~~☒~~	☐	~~A cultural resource study will be performed before any construction is authorized.~~
Community Impact	**Yes**	**No**	**NA**	**If the anticipated impact might be unacceptable, recommend mitigation measures:**
Will the proposed project introduce significantly adverse auditory, visual, or other impact?	☐	☒	☐	
Will the proposed project adversely affect the community's use of public land/resources?	☐	☒	☐	
Will the proposed project adversely affect the community's access to private land?	☐	☒	☐	

NOTE: Topography Map and Wetlands Map are required to be attached. Attach applicable SOPs for Risk Assessment Level 2 & 3 and specific test procedures.

Are environmental permits required? If YES, list below:	Yes ☒	No ☐
WOGCC		

Section below to be reviewed by Environmental Specialist and DOE NCO.

Adequate Mitigation Measures Provided?				Adequate Mitigation Measures Provided?	
	Yes	No		Yes	No
Water Quality Impacts	☒	☐	Transportation Impacts	☒	☐
Air Quality Impacts	☒	☐	Waste Management Impacts	☒	☐
Wildlife and Habitat Impacts	☒	☐	Cultural Impacts	☒	☐
Geology and Soils Impacts	☒	☐	Community Impact	☒	☐
Human Health Impacts	☒	☐	**Categorical Exclusion**	☒	☐

Approvals

A cultural resource survey is not needed for this facility because it is being built inside the existing pipe yard.

NEPA COMPLIANCE SURVEY
#322

Comments and Conditions:	B1.30 Transfer actions, in which the predominant activity is transportation, and in which the amount and type of materials, equipment or waste to be moved is small and incidental to the amount of such materials, equipment, or waste that is already a part of ongoing operations at the receiving site. Such transfers are not regularly scheduled as part of ongoing routine operations B6.1 Small-scale, short-term cleanup actions, under RCRA, Atomic Energy Act, or other authorities, less than approximately 5 million dollars in cost and 5 years duration, to reduce risk to human health or the environment from the release or threat of release of a hazardous substance ... including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the action (e) Capping or other containment of contaminated soils or sludges if the capping or containment would not affect future groundwater remediation and if needed to reduce migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products into soil, groundwater, surface water, or air; (i) Drainage controls (for example, run-off or run-on diversion) if needed to reduce offsite migration of hazardous substances, pollutants contaminants, or CERCLA-excluded petroleum or natural gas products or to prevent precipitation or run-off from other sources from entering the release area from other areas; (n) Installation of fences, warning signs, or other security or site control precautions if humans or animals have access to the release
Contractor ESS&H	Stephen C. Ames Anne Thurant — Date 01/13/2011 3/22/2011
Comments and Conditions:	
	The action(s) listed in this NEPA Compliance Survey are classes of actions (categorical exclusions) that DOE has determined do not individually or cumulatively have a significant effect on the human environment. The activity fits within a class of actions that is listed in appendix A or B to 10 CFR Part 1021. Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1A), I have determined that the proposed action fits within the specified class of actions, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review. Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1A), I have determined that the proposed action fits within the specified class of actions, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.
DOE NEPA Compliance Officer	CXS B1.30 & B6.1 Michael J Taylor — Date 2/4/11

Michael J Taylor 3/22/11

NEPA COMPLIANCE SURVEY
#322

NPR-3 / Proposed NORM Facility

NORM facility inside pipe yard : approx: 300' x 300'

Michael J Taylor 3/22/11