DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-12-025

SECTION A. Project Title: Central Facilities Area (CFA)-696 Gasoline Tank Installation

SECTION B. Project Description:

The two above ground gasoline tanks (04CFA00001, 10CFA00001) located on the east side of CFA-696 do not meet National Fire Protection Association (NFPA) requirements for separation distances (50 ft.) between the tanks and the dispenser. Two options are being considered to resolve the situation:

1. Battelle Energy Alliance, LLC (BEA) would take ownership of an existing 12,000 gallon aboveground storage tank (AST) located near the Radioactive Waste Management Complex (RWMC) and install it on the east side of the existing gasoline ASTs located near CFA-696. This tank was purchased by the Department of Energy (DOE) and has never been used. It is currently not listed in the Idaho National Laboratory (INL) Tank Database. A gravel pad would be constructed to support the tank. Above ground piping would be routed from the existing dispenser and connected to the new tank; no trenching would occur. The new tank is an Underwriter's Laboratory (UL) listed, double-walled steel tank with in-tank monitoring and interstitial leak detection. Electrical modifications would be required and the monitoring probes/sensors would be tied into the existing Veeder-Root and GasBoy systems. The two existing tanks (04CFA00001, 10CFA00001) would be emptied and retained for future use. Standard industrial practices would be used to remove product, residue and flammable/combustible vapors within 90 days of removing the tanks from service.

2. Disconnect the manifold system between the two existing tanks and move tank 10CFA00001 to the east approximately 35 feet so that NFPA separation requirements are met. A gravel pad would be constructed to support the tank, above ground piping would be modified and extended from the dispenser to the new tank location, electrical modifications would be needed. Tank 04CFA00001 would be emptied and retained for future use.

The option that is chosen will be based on performing a tank inspection on the DOE-owned tank.

In addition to the gasoline tanks, two new aboveground tanks will be purchased and placed at the CFA-696 biodiesel fuel island. One tank will either be a 500 gallon or 1000 gallon split tank that will contain product oil and antifreeze. The product oil line that currently serves the island does not meet underground storage tank line requirements (pressurized line without leak detection). The aboveground antifreeze tank that is currently at the fuel island does not adequately keep water out of the tank. The antifreeze tank (propylene glycol) will be emptied and sent to excess property as scrap metal. The new antifreeze tank will contain ethylene glycol as required for the new buses.
The second aboveground tank that will be installed at the biodiesel fuel island will be a 1000 gallon Diesel Exhaust Fluid (DEF) tank. The new buses require this additive (urea and water) and the totes that are currently being used are subject to freezing. The new DEF tank will be a heated tank and will require some electrical installation.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions - Fugitive dust may be generated when constructing the gravel pad. All reasonable precautions would be used to suppress airborne dust caused by the excavation activities. If control methods are needed, the method used must be documented in daily logbooks for compliance with the INL Tier I Air Permit. Tank emissions will be included in the annual Emergency Preparedness Community Right-To-Know Act (EPCRA) 313 reporting. The same gasoline dispenser will be used for the new tank. There will be no tank emissions from the oil, antifreeze, and DEF tanks.

Generating and Managing Waste - The existing gasoline tanks would have all of the fuel removed and would meet Resource Conservation and Recovery Act (RCRA) empty requirements. Fuel from these tanks would be transferred to the new tank when set. The tanks would be staged for future use; 10CFA00001 may be transported to INL Research Center (IRC) for their use. The antifreeze tank currently has storm water and a small amount of propylene glycol in it. The tank will be emptied and the contents disposed of at the direction of WGS. Hazardous waste may be generated in the form of gasoline soaked rags, pigs, or absorbents. Non-hazardous waste in the form of construction debris (scrap conduit, wire, carbon steel piping, packaging, etc.) would be generated. Scrap metal would be separated and accumulated for recycle in existing scrap metal bins. All waste would be characterized and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants - Tank information would be given to both Chemical Management and the INL Tank Inventory point of contact. The new gasoline tank has never contained any product and would not represent a spill hazard when being transported from RWMC to CFA. The existing tanks would be emptied, and care would be taken to prevent any spills during this activity. Spill control equipment would be available. The gasoline tank that would be used at CFA-696 (either new or existing) has both in-tank probe and interstitial sensor monitoring. If it is determined that the 4000 gallon tank (10CFA00001) would be transferred to IRC, it must be included in the IRC Spill Planning Control and Countermeasures Plan (SPCC) prior to installation. The current pressurized underground storage tank line will be disconnected, drained, and capped. Closure of the line will take place when the associated UST is closed in the future.

Using, Reusing, and Conserving Natural Resources - Scrap metal and other recyclable materials would be recycled to the extent practicable.

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SECTION D. Determine the 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.

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 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 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 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: 10/18/2012