



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



Program or Field Office: Office of Legacy Management (LM)

Project Title and I.D. No.: Vapor Intrusion Mitigation Pilot Study and Potential Full-Scale Sub-Slab Depressurization System Design/Build for Building 100 at the Pinellas County, Florida, Site in Largo, Florida, LM 07-14

Location: Largo, Florida

Proposed Action or Project Description: LM is proposing to hire a subcontractor to perform a vapor intrusion mitigation pilot study and, if warranted, design and implement a full-scale sub-slab depressurization system for Building 100 at the Pinellas site. Remediation efforts at the Pinellas site are conducted in accordance with Resource Conservation and Recovery Act regulations. Past activities at Building 100 have resulted in a known plume of volatile organic compounds beneath a portion of the building. Contaminant vapors associated with the plume have the potential to migrate upward into the building, which could create a human health hazard. The vapor intrusion mitigation pilot test would provide more information about the contamination levels immediately below the building. Approximately 1,100 tenant employees occupy the 11-acre building, but only certain areas of the building would be affected by this proposed action. The pilot test would be performed at selected locations in the building where the highest concentrations of groundwater contaminants have been detected. Multiple, small interior floor-to-slab penetrations ranging from 1 to 4 inches in diameter and reaching a depth of 1 to 2 inches below the slab would be made in several areas throughout the building. Air would be monitored during testing. Upon completion of testing, all floor slab penetrations would be temporarily or permanently sealed to prevent vapors from entering the building. A full-scale system would have permanent floor-to-ceiling piping to redirect the vapors to the exterior of the building, similar to a radon mitigation system. An estimated 30 square feet of interior floor space would be affected for both the pilot study and the full-scale system combined. All work would be completed during weekends to minimize employee disturbance. This action would be considered an exposure management effort permissible under the existing Hazardous Solid Waste Amendments permit and would require Florida Department of Environmental Protection review and approval prior to implementation.

Categorical Exclusion(s) Applied:

- B3.1 Site characterization and environmental monitoring
- B6.1 Cleanup actions
- B6.2 Waste collection, treatment, stabilization, and containment facilities

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.

Tracy A. Rebeiro

07/10/14

NEPA Compliance Officer:

Date Determined: