

**U.S. Department of Energy
Naval Reactors Laboratory Field Office**

Knolls Laboratory

National Environmental Policy Act (NEPA) Categorical Exclusion (CX)
Determination Summary Form

M-COMPLEX UTILITY REROUTE AND DEMOLITION PROJECT

REFERENCES

10 CFR Part 1021, Department of Energy National Environmental Policy Act
Implementing Procedures, Subpart D, Typical Classes of Actions, Appendix B

PROJECT SCOPE DISCUSSION

The scope of the M-Complex Utility Reroute and Demolition Project at the Knolls Laboratory (Site) in Niskayuna, New York entails characterization, utility reroute, and building demolition. Subsequent to completing this project, soil remediation will occur to allow for future expansion at the Site, which is included within the scope of work for the NEPA determination.

The M-Complex is located at the northeastern edge of the upper level within the secured portion of the Site and consists of three buildings, two single-story modular office buildings (M8 and M9) and a pre-engineered metal storage building (M10).

The modular office buildings M8 and M9 were constructed in the 1980's and 1990's respectively, and are supported by concrete block pedestals and concrete piers with metal strapping along the buildings perimeter, which anchors the building to the pedestals/piers.

The M10 pre-engineered metal building was constructed in 1992 and is supported by reinforced concrete curbs that bear on a perimeter reinforced concrete foundation consisting of frost walls. The curbs are integrally constructed with a reinforced concrete slab-on-grade floor. An exterior metal guardrail exists at the north side of the paved entrance to the overhead door.

Buildings M8, M9, and M10 will be characterized and remediated (as applicable) to allow for demolition. The M-Complex utilities (overhead utility lines and an underground fire water line) will be rerouted to support future expansion at the Site. After utility rerouting is complete, buildings M8, M9, and M10 will be demolished allowing for a soil remediation program to commence.

The soil in the vicinity and beneath building M9 is suspect for legacy radiological contamination and requires remediation. Additionally, characterization for potential chemical contaminants is required under the Site's Hazardous Waste Management

Permit because the area has been designated as a Solid Waste Management Unit (SWMU). Based on characterization results, soil remediation may be required to remove chemical contamination. Environmental remediation actions associated with a SWMU require concurrence from the New York State Department of Environmental Conservation (NYSDEC). Upon receipt of NYSDEC's concurrence that the SWMU remediation actions are complete and no further action is necessary, the SWMU excavation will be back-filled and stabilized. With the completion of these actions, the area where the former M-Complex once stood will be available for future expansion at the Site.

The project does not violate applicable regulatory requirements, require construction or major expansion of waste handling facilities, result in unpermitted releases of hazardous substances, adversely affect historical properties, or environmentally sensitive resources, including wetlands. The project does not involve genetically engineered organisms or species. There are no extraordinary circumstances related to the proposed action. The project has not been segmented to meet the definition of a categorical exclusion and is not connected to other actions with potentially significant and/or cumulative impacts.

CONCLUSION

The M-Complex Utility Reroute and Demolition Project and follow-on soil remediation meet the requirements to be categorically excluded (CX) from additional NEPA documentation under 10 CFR 1021 Subpart D, Appendix B, B1.16, B1.23, B3.1, and B6.1. Specifically, the categorical exclusions that apply are as follows:

B1.16 Asbestos removal

Removal of asbestos-containing materials from buildings in accordance with applicable requirements (such as 40 CFR part 61, "National Emission Standards for Hazardous Air Pollutants"; 40 CFR part 763, "Asbestos"; 29 CFR part 1910, subpart I, "Personal Protective Equipment"; and 29 CFR part 1926, "Safety and Health Regulations for Construction"; and appropriate state and local requirements, including certification of removal contractors and technicians).

B1.23 Site Demolition and disposal of buildings

Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces), provided that there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment.

B3.1 Site characterization and environmental monitoring

Site characterization and environmental monitoring (including, but not limited to, siting, construction, modification, operation, and dismantlement and removal or otherwise

proper closure (such as of a well) of characterization and monitoring devices, and siting, construction, and associated operation of a small-scale laboratory building or renovation of a room in an existing building for sample analysis). Such activities would be designed in conformance with applicable requirements and use best management practices to limit the potential effects of any resultant ground disturbance. Covered activities include, but are not limited to, site characterization and environmental monitoring under CERCLA and RCRA. (This class of actions excludes activities in aquatic environments. See B3.16 of this appendix for such activities.) Specific activities include, but are not limited to:

(a) Geological, geophysical (such as gravity, magnetic, electrical, seismic, radar, and temperature gradient), geochemical, and engineering surveys and mapping, and the establishment of survey marks. Seismic techniques would not include large-scale reflection or refraction testing;

(b) Installation and operation of field instruments (such as stream-gauging stations or flow-measuring devices, telemetry systems, geochemical monitoring tools, and geophysical exploration tools);

(c) Drilling of wells for sampling or monitoring of groundwater or the vadose (unsaturated) zone, well logging, and installation of water-level recording devices in wells;

(d) Aquifer and underground reservoir response testing;

(e) Installation and operation of ambient air monitoring equipment;

(f) Sampling and characterization of water, soil, rock, or contaminants (such as drilling using truck- or mobile-scale equipment, and modification, use, and plugging of boreholes);

(g) Sampling and characterization of water effluents, air emissions, or solid waste streams;

(h) Installation and operation of meteorological towers and associated activities (such as assessment of potential wind energy resources);

(i) Sampling of flora or fauna; and

(j) Archeological, historic, and cultural resource identification in compliance with 36 CFR part 800 and 43 CFR part 7.

B6.1 Cleanup actions

Small-scale, short-term cleanup actions, under RCRA, Atomic Energy Act, or other authorities, less than approximately 10 million dollars in cost (in 2011 dollars), to reduce

risk to human health or the environment from the release or threat of release of a hazardous substance other than high-level radioactive waste and spent nuclear fuel, including treatment (such as incineration, encapsulation, physical or chemical separation, and compaction), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the action. These actions include, but are not limited to:

(a) Excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas that are not receiving contaminated surface water or wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination;

(b) Removal of bulk containers (such as drums and barrels) that contain or may contain hazardous substances, pollutants, contaminants, CERCLA-excluded petroleum or natural gas products, or hazardous wastes (designated in 40 CFR part 261 or applicable state requirements), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain;

(c) Removal of an underground storage tank including its associated piping and underlying containment systems in accordance with applicable requirements (such as RCRA, subtitle I; 40 CFR part 265, subpart J; and 40 CFR part 280, subparts F and G) if such action would reduce the likelihood of spillage, leakage, or the spread of, or direct contact with, contamination;

(d) Repair or replacement of leaking containers;

(e) Capping or other containment of contaminated soils or sludges if the capping or containment would not unduly limit 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;

(f) Drainage or closing of man-made surface impoundments if needed to maintain the integrity of the structures;

(g) Confinement or perimeter protection using dikes, trenches, ditches, or diversions, or installing underground barriers, if needed to reduce the spread of, or direct contact with, the contamination;

(h) Stabilization, but not expansion, of berms, dikes, impoundments, or caps if needed to maintain integrity of the structures;

(i) Drainage controls (such as 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;

(j) Segregation of wastes that may react with one another or form a mixture that could result in adverse environmental impacts;

(k) Use of chemicals and other materials to neutralize the pH of wastes;

(l) Use of chemicals and other materials to retard the spread of the release or to mitigate its effects if the use of such chemicals would reduce the spread of, or direct contact with, the contamination;

(m) Installation and operation of gas ventilation systems in soil to remove methane or petroleum vapors without any toxic or radioactive co-contaminants if appropriate filtration or gas treatment is in place;

(n) Installation of fences, warning signs, or other security or site control precautions if humans or animals have access to the release; and

(o) Provision of an alternative water supply that would not create new water sources if necessary immediately to reduce exposure to contaminated household or industrial use water and continuing until such time as local authorities can satisfy the need for a permanent remedy.

NRLFO Approval: 
D. A. Delwiche

Date: 8-25-2017
CX Determination Date