

# Categorical Exclusion Determination

Bonneville Power Administration

Department of Energy



**Proposed Action:** Keeler Substation Administration Building Demolition and Road Repair

**Project No.:** P01200

**Project Manager:** Janice Grounds, TEP-CSB-2

**Location:** Washington County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.23, Demolition and disposal of buildings and B1.3, Routine maintenance

**Description of the Proposed Action:** The Keeler substation administration building was constructed in 1961. It has not been utilized since 1995 when the Keeler District of BPA's transmission system was absorbed by the Chemawa and Ross Districts. Since that time, the building has been abandoned in-place, receiving no maintenance. Although structurally sound and water-tight, extensive refurbishment would be required for the building to be utilized in the future. Refurbishment would include, at a minimum, upgrades to plumbing, electrical, mechanical, roof, siding, windows, and paint. Its condition, and the fact that the building poses an environmental hazard due to building materials containing lead, asbestos, and polychlorinated biphenyls (PCBs), makes safe demolition the preferred plan for the site. Additionally, the entrance road to the substation would be resurfaced, requiring removal of the existing surface to varying extents and re-paving of the area; and a graveled circulation area of the substation would be rehabilitated with new gravel. All work for the project would be inside the substation fence.

Demolition activities would include complete removal of the twenty foot-by-sixty foot building and the four-inch-thick concrete slab on which it sits. All work would occur within the areas previously disturbed by the building's and the substation's initial construction. Existing gravel of the building's yard would be cleared away to access existing utility lines. The foundation concrete slab would be removed by breaking it up with machinery and hauling the material to an approved waste facility. To convert the building grounds to vehicular parking and turnaround, the fronting curb at the entrance road edge would be removed and disposed of properly. The entire building area footprint would be leveled to about six inches below surface and compacted. Compacted aggregate rock would be used to level the site to ground level.

Most of the building's below-ground utilities would be decommissioned in-place. While there are no "live" or existing utilities to this building, any remaining infrastructure such as pipes, conduit, etc., would be removed to a distance of about five feet from the building footprint. However, there would be as much excavation as needed to safely and fully access the utilities for the decommissioning process while avoiding damage to yard utilities in active service. Qualified electrical workers would cut, repair, and install ground mat copper bypasses. After demolition and utility capping, the site would be prepared and graveled as described above for the grassed area.

Asphalt on the existing entrance road from the entrance gate, past the administration building to the maintenance shed would be repaired or replaced. Where replacement is needed – about 17,000 square

feet – there would be twelve inches of excavation to prepare new subgrade. Recycled asphalt may serve as base material if it meets quality standards. In areas where pavement would be repaired – about 3,300 square feet – about two inches of existing road would be ground away and replaced with hot mix asphalt concrete.

In instances where demolished or excavated soil or asphalt material could not be reliably re-used, the waste would be disposed of properly.

**Findings:** In accordance with Section 1021.410(b) of the Department of Energy’s (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

- (1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- (2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- (3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Michael J. O’Connell  
Michael J. O’Connell  
Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel  
Sarah T. Biegel  
NEPA Compliance Officer

Date: April 20, 2018

Attachment(s): Environmental Checklist

## Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

**Proposed Action:** Keeler Substation Administration Building Demolition

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### Project Site Description

The project would take place on BPA fee-owned property in the Keeler Substation in Hillsboro, Washington County, Oregon. The substation is located 165 feet from State Highway 26 in a highly suburbanized and industrial area. The site of the old administration building is in the paved and landscaped administration complex area. The building is accessed directly from the paved entrance road and is surrounded by gravel and maintained lawns.

### Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
<p><b>1. Historic and Cultural Resources</b></p> <p><u>Explanation:</u> Due to the disturbed nature of the subsurface soils caused by previous construction activities, there is no potential for the existence of intact or significant sub-surface cultural deposits. The Grande Ronde Tribes did not respond to initiation and determinations for this project, but were consulted during previous planning in the substation vicinity and indicated they had no concerns with work proceeding in this area.</p> <p>The Keeler Substation was evaluated and determined to be not eligible as a historic property. This, and the likelihood of there being no cultural deposits in the area of potential effect (APE), support the conclusion that the project would have no effect on historic properties. The Oregon State Historic Preservation Office (SHPO) concurred with the APE on 5/29/2015, and on 1/4/2016, with the determination that the project would not have the potential to cause effects to historic properties per 36 CFR 800.3(a).</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>2. Geology and Soils</b></p> <p><u>Explanation:</u> There is gravel, maintained lawn, and a paved access road around the building. The building dismantling and removal would displace some soil for the utility excavation. Damage to the soil would be temporary, mitigated by standard demolition and construction Best Management Practices (BMPs), and restored after the utilities are safely capped. Geological resources would not be affected since the utilities' installations previously disturbed the soil profile around the building.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>3. Plants</b> (including federal/state special-status species)</p> <p><u>Explanation:</u> There is about one tenth of an acre of maintained lawn to the rear of the building; the remainder of the perimeter is surrounded by gravel. There is no anticipated work on the lawn, though this would be reseeded appropriately if there is incidental damage.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>4. Wildlife</b> (including federal/state special-status species and habitats)</p> <p><u>Explanation:</u> There would be no disturbance or harm to any species of concern or threatened and endangered species. The work site is confined to a high-traffic and significantly disturbed zone on the developed substation</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

grounds.

5. **Water Bodies, Floodplains, and Fish**  
(including federal/state special-status species and ESUs)

Explanation: New ground disturbance would be limited to the areas around the building required for machinery movement and the utility lines' decommissioning. Silt fencing and other standard BMPs would be utilized to limit erosion of soil from the site. In the long term, the runoff from the project site should be improved by a slight increase in permeability with the building removal, and an increase in the runoff quality with elimination of hazardous external building materials.

BMPs:

- ✓ Cover stockpiled, excavated soil and maintain disturbed areas to minimize runoff.
- ✓ Test excavated soil for PCB and total petroleum hydrocarbons (TPH) and use for backfill or dispose of properly pending the results.
- ✓ Install new catchbasin inserts at the start of work, and new inserts at completion of project.

6. **Wetlands**

Explanation: No wetlands would be disturbed by the project, and any potential runoff of compromised quality would be minimized with the BMPs that would be used for erosion control and soil protection.

7. **Groundwater and Aquifers**

Explanation: There are hazardous materials such as asbestos, PCBs, and lead present in the building. The materials would be removed from the site in a manner that would prevent them from impacting groundwater or aquifers. Standard demolition and construction BMPs would be employed to avoid and mitigate adverse impacts to infiltration, and the potential for fuel and other machinery fluids from reaching groundwater or aquifers.

8. **Land Use and Specially Designated Areas**

Explanation: All work is planned for BPA fee-owned property within substation/administrative complex fencing. The project area has been previously disturbed for construction of the substation and associated access roads and transmission line corridors.

9. **Visual Quality**

Explanation: The removal of the building would not adversely impact visual quality. There is a possibility of some improvement in visuals of the area after demolition because of the deterioration and disuse of the building as it currently sits.

10. **Air Quality**

Explanation: There would be typical amounts of dust and vehicle emissions during construction activities. Such impacts would be minimal due to the nature of the surrounding industrialized setting. Transport of potentially harmful dust from hazardous building materials would be contained using demolition BMPs.

11. **Noise**

Explanation: There would be temporary, intermittent noise from construction activities during daylight hours that would not be inconsistent with the surrounding area. Operational noise would be in compliance with BPA's audible noise policy.

12. **Human Health and Safety**



Explanation: Testing of building materials has shown the presence of asbestos, PCBs, and lead. There could also be mercury in any remaining fluorescent light bulbs.

BMPs:

- ✓ Trained and experienced workers in the abatement of the hazardous materials present would contain and mitigate these during the demolition and removal process. Abatement would be conducted in accordance with State of Oregon and Occupational Safety and Health Administration (OSHA) regulations.
- ✓ Install barriers, enclosures, negative air machines, and other abatement structures needed for work.

**Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation, if necessary:

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation, if necessary:

- 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.

Explanation, if necessary:

- 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 of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation, if necessary:

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**Landowner Notification, Involvement, or Coordination**

Description: The BPA-owned building and its grounds are located inside the secured BPA-owned substation, and no need was found to coordinate, involve, or notify other landowners. The City of Hillsboro has been consulted for stormwater management questions as pertains to the potential impact of the project on BPA's stormwater permit.

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Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Michael J. O'Connell  
Michael J. O'Connell, ECT-4

Date: April 20, 2018