

EMCBC/SLA

Environmental Checklist

Project/Activity Title:	NEPA ID Number: Rev. #:0 Date:
Contractor Project Manager:	Phone:
Contractor NEPA Coordinator:	Phone:
DOE EMCBC NEPA Compliance Officer:	Phone:

A: BRIEF PROJECT/ACTIVITY DESCRIPTION: (Attach detailed description or Statement of Work, if necessary)

B. SOURCES OF IMPACTS: Would the proposed action involve, generate, or result in changes to any of the following?

	YES	NO		YES	NO
1. Air emissions	<input type="checkbox"/>	<input type="checkbox"/>	12. Water Use/Diversion	<input type="checkbox"/>	<input type="checkbox"/>
2. Liquid effluents	<input type="checkbox"/>	<input type="checkbox"/>	13. Water Treatment	<input type="checkbox"/>	<input type="checkbox"/>
3. Solid waste	<input type="checkbox"/>	<input type="checkbox"/>	14. Waterway modification	<input type="checkbox"/>	<input type="checkbox"/>
4. Radioactive waste/soil	<input type="checkbox"/>	<input type="checkbox"/>	15. Radiation/toxic chemical exposures	<input type="checkbox"/>	<input type="checkbox"/>
5. Hazardous waste	<input type="checkbox"/>	<input type="checkbox"/>	16. Pesticide/herbicide use	<input type="checkbox"/>	<input type="checkbox"/>
6. Mixed waste	<input type="checkbox"/>	<input type="checkbox"/>	17. High energy source/explosives	<input type="checkbox"/>	<input type="checkbox"/>
7. Chemical storage/use	<input type="checkbox"/>	<input type="checkbox"/>	18. Transportation	<input type="checkbox"/>	<input type="checkbox"/>
8. Petroleum storage/use	<input type="checkbox"/>	<input type="checkbox"/>	19. Noise levels	<input type="checkbox"/>	<input type="checkbox"/>
9. Asbestos	<input type="checkbox"/>	<input type="checkbox"/>	20. Workforce adjustment	<input type="checkbox"/>	<input type="checkbox"/>
10. Utilities	<input type="checkbox"/>	<input type="checkbox"/>	21. OTHER: _____	<input type="checkbox"/>	<input type="checkbox"/>
11. Clearing or excavation	<input type="checkbox"/>	<input type="checkbox"/>	22. OTHER: _____	<input type="checkbox"/>	<input type="checkbox"/>

Explanation and Qualification of specific "YES" responses:

Number **Explanation**

C. EVALUATION CRITERIA:

	YES	NO
1. (10 CFR 1021.410 [b] [1]) Does the proposed action fit within a class of actions listed in Appendix A or B to Subpart D of 10 CFR 1021?	<input type="checkbox"/>	<input type="checkbox"/>
2. (10 CFR 1021.410 [b] [2]) Are there any extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal? Extraordinary circumstances are unique situations presented by specific proposals, such as scientific controversy about the environmental effects of the proposal; uncertain effects or effects involving unique or unknown risks; or unresolved conflicts concerning alternative uses of available resources within the meaning of Section 102 (2) (E) of NEPA.	<input type="checkbox"/>	<input type="checkbox"/>

3. (10 CFR 1021.410 [b] [3]) Is the proposal "connected" (40 CFR 1508.25 [a] [1]) to other actions with potentially significant impacts; or is it **related** to other proposed actions with cumulatively significant impacts (40 CFR 1508.25 [a] [2]); or is it precluded by 40 CFR 1506.1 or 10 CFR 1021.211?
4. (10 CFR 1021, Appendix B to Subpart D, B[1] through B [4][vii]) For a proposed action to be categorically excluded, certain **integral elements** must be included. For example, would the proposed action:
- Threaten a violation of applicable statutory, regulatory or permit requirements for ES&H, including requirements of DOE Orders?
 - Require siting, construction or major expansion of waste storage, disposal, recovery or treatment facilities?
 - NOTE:** proposed action may include categorically excluded facilities.
 - 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?
 - Adversely affect environmentally sensitive resources including, but not limited to: structures of historic, archaeological or architectural significance; threatened or endangered species, or migratory birds, amphibians, floodplains or wetlands; wildlife refuges, prime agricultural lands or special sources of water (e.g., sole-source aquifer)? **NOTE:** A "No" response indicates that all reviews and discussions supporting the Agency's determination that the proposed action would not have an adverse effect on the resource will be completed before the proposed action is allowed to proceed.
5. Additional impacts that should be considered during the NEPA evaluation of the proposed action include the following six items. Would the action:
- a. Take place in an area of previous or ongoing disturbance?
 - b. Require any federal, state or local permits, approvals, Etc.?
 - c. Create hazardous, radioactive or mixed waste for which no disposal is available?
 - d. Impact a RCRA-regulated unit or facility?
 - e. Force a low-income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength (i.e., an issue of "Environmental Justice")?
 - f. [for those actions that would involve air emissions] be located within an air pollutant *non-attainment* or *maintenance area* for any of the Criteria pollutants?
 - NOTE:** If "Yes," then additional analysis may be required to determine if emissions would be above *de minimus* thresholds and/or if emissions would be regionally significant. Pending completion of this analysis, requirements stated in 40 CFR 93.158 may be imposed before the proposed action could proceed.

U.S. Department of Energy
Environmental Management
Consolidated Business Center
Moab UMTRA Project: Site Investigations to Support
Groundwater Compliance Action Plan
Categorical Exclusion Determination Form

Proposed Action Title: Moab Uranium Mill Tailings Remedial Action (UMTRA) Project:
Groundwater Studies

Program or Field Office: Grand Junction Field Office

Location(s) (City/County/State): Moab, Utah

Proposed Action Description:

The proposed actions are site investigations to support the Groundwater Compliance Action Plan (GCAP) at the Moab UMTRA Project. The work will be completed by subcontractors with Remedial Action Contractors (RAC) oversight. The following groundwater investigations will occur at the Moab site:

1. **Secondary source:** Drilling into the subsurface in the Controlled Area and the Contamination Area. Groundwater and soil samples will be collected for analytical laboratory column and batch reactor tests. Additional potable water may be trucked in to assist with drilling operations. The results are critical for groundwater modeling, will indicate how much contamination is contained within the aquifer solid phase, and how best to proceed forward.
2. **Soil gas investigation:** Using a probe to collect soil gas samples from 1 m depth in the Controlled Area and the Contamination Area for analytical analysis. The results will indicate the presence of secondary contaminant sources.

Background:

The GCAP for the Moab UMTRA Project will propose the final plan to comply with the groundwater standards in 40 CFR 192. Groundwater personnel have been focusing their efforts on compiling data that will be used in effort to determine the best strategy for the GCAP including surface water and groundwater contamination, critical habitat protection on the

Colorado River, the current status of the interim action system, re-evaluating past investigations and assessments, and updating the groundwater flow modeling efforts.

More site investigations to support GCAP may occur through the end of Fiscal Year 2024 (FY24). The final GCAP is scheduled to be completed in FY27 and will require approval from the Nuclear Regulatory Commission.

Procedures:

- Integrated Work Plan Job Safety Analysis (MB-IWP/JSA) 003 *Facility and Ground Maintenance.*
- MB-IWP/JSA 062 *Soil Gas Sampling.*
- MB-IWP/JSA 073 *Well Development, Modification, and Abandonment.*
- MB-IWP/JSA 074 *Groundwater and Surface Water Sampling, Preservation, Shipment and Transportation.*
- Environmental Aspects Checklists associated with these IWPs.
- Radiological Work Permit (RWP)-23-101-0 *Operations Ground Work MOAB.*
- *Moab UMTRA Project Excavation and Trenching Procedure (DOE-EM/GJ1609).*
- *Moab UMTRA Project Moab Fugitive Dust Control Plan (DOE-EM/GJ2072).*
- *Moab UMTRA Project Health and Safety Plan (DOE-EM/GJ1038).*
- *Moab UMTRA Project Hearing Protection and Conservation (DOE-EM/GJ1617).*
- *Moab UMTRA Project Radiation Protection Program (DOE-EM/GJ610).*
- *Moab UMTRA Project Moab Stormwater Pollution Prevention Plan (DOE-EM/GJRAC1475).*
- *Moab UMTRA Project Waste Management Plan (DOE-EM/GJ1633).*

Resource Areas Evaluated:

Soils

The secondary source cores may reach a depth of 70 ft below ground surface in the Contamination Area, an area of previous and ongoing disturbance. Soil and groundwater samples will be collected and column tests will be performed in a lab. Open bore holes will be mitigated by filling and sealing with bentonite clay.

The soil gas investigation will have probes placed in soil to a depth of 1 m. This will have minimal impact on the soil as no soil is moved or disturbed other than the probe. Any holes remaining, if any, will be filled with native surrounding soil.

No significant impacts to soil will be associated with this project.

Air Quality

The secondary source investigation will use one piece of heavy equipment (i.e., drill). The air emissions will be minimal and will be comparable to normal site operations.

The *Moab UMTRA Project Moab Site Fugitive Dust Control Plan* will be followed to minimize fugitive dust and particulates during waterline construction. Air quality will also be monitored through the perimeter air monitoring stations and reported in the *Moab UMTRA Project Annual Site Environmental Report (ASER)*.

No significant impacts to air quality will be associated with this project.

Ground Water

Groundwater samples will be collected during the secondary source investigation. Although all of these investigations involve groundwater, no significant impact to groundwater will occur with the investigations. .

Surface Water

The *Moab UMTRA Project Stormwater Pollution Prevention Plan (SWPPP)* will be followed, and Best Management Practices (BMPs) implemented. The State of Utah water rights usage of the Colorado River is not expected to be used in this project.

No significant impacts to surface water will occur with the investigations.

Floodplains

These activities will be mitigated by conducting investigations during the Colorado River baseflow. No significant impacts to floodplains will occur with the investigations.

Aquatic Ecology

Investigations will occur in the subsurface. No significant impacts to aquatic ecology will occur with the investigations.

Terrestrial Ecology

Various probes will be used in the investigations. However, no significant impacts to terrestrial ecology will occur with the investigations.

Noise and Vibration

Noise and vibration associated with the drilling rig will not be above normal operations. Hazards will be mitigated through the IWP and the *Moab UMTRA Project Hearing Protection and Conservation* procedure. No significant impacts to noise and vibration will occur with the investigations.

Infrastructure

Utility lines will be located before any subsurface drilling occurs (> 6 inches). Hazards will be mitigated through the IWP and the *Moab UMTRA Project Excavation and Trenching Procedure*. No significant impacts to infrastructure will occur with the investigations.

Human Health

Due to investigations occurring in the Contamination Area, workers will be trained to *Moab UMTRA Health and Safety Plan*, the *Moab UMTRA Project Radiation Protection Program*, and the Radiological Work Permit (RWP). These investigations will not expose workers beyond normal operations. No significant impacts to human health will occur with the investigations.

Waste Management

Laboratories analyzing samples will be approved through the Project accreditation process before the investigations begin. Waste generated by laboratories will be disposed of properly following applicable waste regulations. Any waste produced while onsite during these investigations will follow the *Moab UMTRA Project Waste Management Plan*. No significant impacts to waste management will occur with the investigations.

References

- *Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah, Final Environmental Impact Statement*. July 2005.
- *Record of Decision for the Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah*. 6450-01-P. Department of Energy.
- *Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah, Final Environmental Impact Statement. Appendix F, Floodplain and Wetlands Assessment and Floodplain Statement of Findings for Remedial Action at the Moab Site*. July 2005.
- *Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah, Final Environmental Impact Statement. Appendix A, Biological Assessment/Screening Level Risk Assessment/Biological Opinion*. July 2005.

Categorical Exclusion(s) Applied:

B3.1 Site Characterization and Environmental Monitoring.

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)

All questions were answered with a “concur,” allowing the NEPA Compliance Officer (NCO) to document that the proposed project has been reviewed and a final NEPA determination will be concluded.

Concur: 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.

Concur: There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

Concur: 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, I have determined that the proposed action fits within the specified classes of actions, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

9/20/2023

X Pete Yerace

Pete Yerace
DOE EMCBC NCO
Signed by: PETE YERACE