

U.S. Department of Energy
Environmental Management
Consolidated Business Center
Moab UMTRA Project: Queue Waterline Extension
Categorical Exclusion Determination Form

Proposed Action Title: Moab Uranium Mill Tailings Remedial Action (UMTRA) Project: Queue Waterline Extension

Program or Field Office: Grand Junction Field Office

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

Proposed Action Description:

The proposed action is the construction, operation, and maintenance of a waterline extension, connecting the existing water supply source (freshwater pond located at northeastern area of the Moab site) to the Queue area (western operations area of the Moab Site; see Figure 1). The purpose of the Queue waterline extension is to improve operational efficiencies and Project sustainability by installing piping, creating water storage, adding an additional water truck load-out location, and improving the rinse and decontamination system. The proposed action will involve the installation of pipes, valves, and other accessories necessary to deliver water to the Queue.

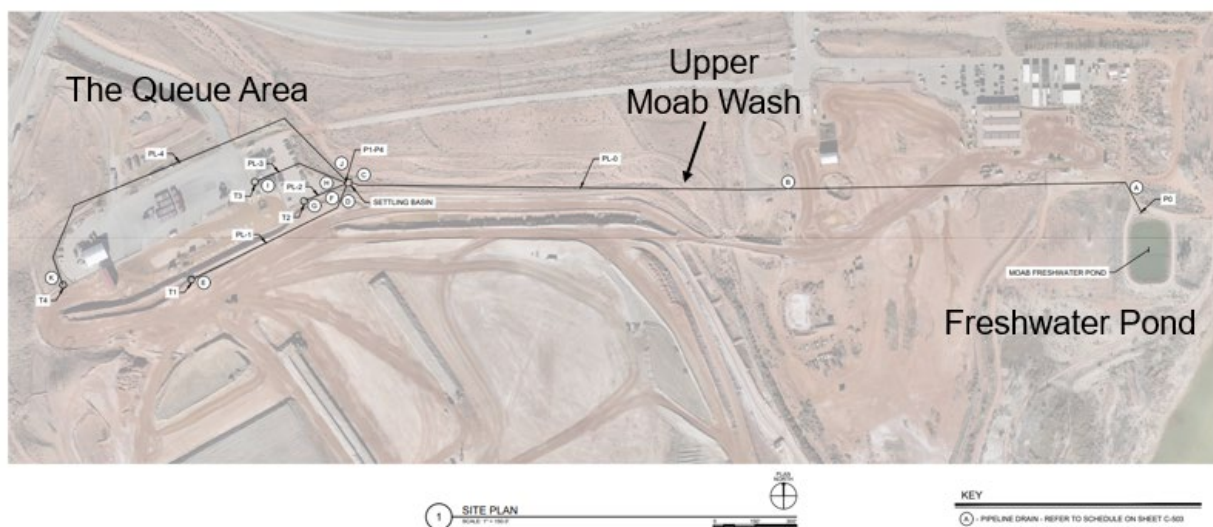


Figure 1. Queue Waterline Extension Project Proposed Action (black line indicates waterline)

Background:

The Moab UMTRA Project began moving the tailings pile from the Moab Site in 2009 to the permanent disposal cell in Crescent Junction (CJ). The estimated volume of the tailings pile was 16 million tons and as of Oct. 2023, over 14 million tons (approximately ~88%) of tailings has been moved. The shape of the tailings pile has changed significantly since removal operations first started.

As the Project is progressing and the footprint is changing, operations will be consolidated in the Queue area. Access to water supply for dust suppression, water storage, and decontamination of the containers used to transport tailings needs to be altered to meet operational demands.

Currently, Colorado River water is pumped in the freshwater pond onsite (under State of Utah water right WR-01-40). The current water load-out station is located northwest of the freshwater pond.

The proposed waterline extension will be ~3000 ft in length from the freshwater pond to the Queue area. The waterline will be installed in a temporary configuration, laid on ground surface along existing roadways and disturbed areas to retain access for maintenance and operational modifications to support anticipated dynamic nature of water needs through site closure. Also, the temporary configuration supports remediation and final status survey of buried and adjacent soils.

NOTE: The original design was initiated in FY22 during the transition task order of the new DOE End State Contract. After negotiations of the life cycle baseline (LCB) and award of the closure task order beginning in FY24 the Remediation Action Contractor (RAC) determined that a temporary waterline placed on grade (as opposed to a buried line) better supported the means and methods to meet closure milestones. Also, a similar waterline was found to be safe and effective during cell construction at the Crescent Junction site. Concurrent during this period the EPA issued a new rule for determining the nexus of waters of the United States (WOTUS) such that an ephemeral system like the Moab Wash were no longer regulated as WOTUS, so a Section 404 permit issued by the U.S. Army Corp of Engineers is not needed.

Procedures:

- Integrated Work Plan / Job Safety Analysis (IWP/JSA) 003 *Facility and Grounds Maintenance*.
- Environmental Aspects Checklist associated with IWP-003.
- *Moab UMTRA Health and Safety Plan* (DOE-EM/GJ1038)
- *Moab UMTRA Project Waste Management Plan* (DOE-EM/GJ1633)
- *Moab UMTRA Project Moab Fugitive Dust Control Plan* (DOE-EM/GJ2072)
- *Moab UMTRA Project Moab Stormwater Pollution Prevention Plan* (DOE-EM/GJRAC1475)

Resource Areas Evaluated:

Soils

Only road base material will be disturbed to bury the line at the freshwater pond. The water line will be above grade in all other areas.

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

Air Quality

During physical construction, impacts to air quality will be minimal. After construction, this project will aid in the reduction of dust by providing faster water truck turnaround times during dust suppression and minimize the amount of travel needed, thereby reducing GHG emissions from the trucks to deliver the water. The waterline extension involves fewer pieces of equipment compared to other routine operations. Emissions from equipment operation are related to work, but not more than normal equipment operation.

The *Moab UMTRA Project Moab Site Fugitive Dust Control Plan* will be followed to minimize fugitive dust and particulates, particularly during waterline construction, if necessary. 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 action.

Surface Water

Construction across the Moab Wash will be atop existing culverted road crossing to minimize environmental impacts.

The *Moab UMTRA Project Stormwater Pollution Prevention Plan (SWPPP)* will be followed, and Best Management Practices (BMPs) implemented. It should be noted that the current water supply is located on the east side of the Moab Wash. As remediation of the Moab site enters late stages of cleanup, the middle section of the Moab Wash may also undergo remedial activity. This task adds water loadout on both sides of the wash so that the water supply for dust suppression and decontamination is not hindered during these future upcoming remedial activities.

No significant impacts to surface water will be associated with this action.

Floodplains

The Project's review found the action to comply with the requirements 10 CFR Part 1022.

No significant impacts to floodplains will be associated with this action.

Terrestrial Ecology

Little to no impact beyond normal operations given the absence of vegetation along the corridor of the proposed action that is along existing roadways and disturbed areas. The corridor to be impacted was inspected by Project staff who confirmed the absence of vegetation or critical habitat within the corridor.

No significant impacts to terrestrial ecology will be associated with this action.

Noise and Vibration

Impacts from noise and vibration would be little to no impact beyond normal Project construction. Hearing conservation procedures will be followed for workers, as applicable during.

No significant impacts from noise and vibration will be associated with this action.

Infrastructure and Resource Requirements

All infrastructure impacts are temporary and will last only as long as project construction and operations are ongoing. The waterline would benefit resource requirements as the purpose of the project is improving operational and water usage efficiencies.

No significant impacts to infrastructure and resources will be associated with this action.

Waste Management

Waste from the proposed action will be minimal, mostly from HDPE pipe material. HDPE sections will be fused together to create the ongoing pipe and reused, when possible, in this or other projects onsite. The *Moab UMTRA Project Waste Management Plan* will be followed.

No significant impacts to waste management will be associated with this action.

Human Health

Impacts to Human Health during this proposed action are much less than routine Project operations. Workers will be monitored under existing Moab UMTRA Project radiological and Health & Safety work plans and procedures. The public is not allowed onsite and is not at risk.

No significant impacts on human health will be associated with this action.

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.

Categorical Exclusion(s) Applied:

B5.4 Repair or replacement of pipelines

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.

5/27/2024

X Pete Yerace

Pete Yerace
EMCBC NCO
Signed by: PETE YERACE

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.

