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

Bettis Atomic Power Laboratory

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

West Campus Demolition and Site Restoration Project

REFERENCE

10 CFR Part 1021, Department of Energy National Environmental Policy Act Implementation Procedures, Subpart D. Typical Classes of Actions.

PROJECT SCOPE DISCUSSION

The scope of the West Campus (formerly Valley National Gas) Demolition and Site Restoration Project includes modifications to the site to support mobilization and future decommissioning operations by Department of Energy Office of Environmental Management (DOE-EM) at the Naval Nuclear Propulsion Program (NNPP) Bettis Laboratory. The West Campus is an industrial site occupying 20.62 acres of land with approximately 40,000 square feet of industrial building space. The site is zoned by the Borough of West Mifflin for heavy industrial use and was formerly used to produce industrial gases and repackaging for distribution. The area where the Proposed Action will take place is not located within wetlands or floodplains. Stormwater runoff from the property enters the Thompson Run watershed. Matheson Valley Gas was the most recent tenant but vacated the property in February 2022.

Following NNPP acquisition of West Campus in August 2024, minor actions such as securing the site entrance, posting new signs, making minor repairs (e.g., lighting), installing new security cameras, and removing overgrown brush/trees were completed. Additional actions include refurbishing an existing rail siding and rail spur. The scope for DOE-EM includes demolishing building(s) not needed to support DOE-EM operations, constructing a heavy haul road to connect West Campus and the Bettis main site for material and personnel movement, and installing perimeter fencing. Scope of demolition work includes removing legacy structures and utilities, along with associated hazardous materials, from existing, paved industrial footprint. Initial environmental sampling has confirmed that the property contains hazardous material, including asbestos, polychlorinated biphenyl (PCB) materials, cadmium, and lead-based paint. DOE-EM will complete further characterization as needed to support compliant work practices and waste disposal. Applicable sediment and erosion controls best practices will be established during demolition activities. Miscellaneous equipment will be installed as needed to ensure safe operations. DOE-EM may establish and maintain job site trailers or small portable buildings to support execution. DOE-EM will then use West Campus to support future decommissioning operations at the Bettis Laboratory main campus.

The project does not violate applicable regulatory requirements, require construction or major expansion of waste handling facilities, result in unpermitted releases of hazardous substances, or adversely affect 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 Valley National Gas Demolition and Site Restoration Project is categorically excluded from additional NEPA documentation under 10 CFR 1021 Subpart D, Appendix B, B1.3, B1.11, B1.13, B1.15, B1.16, B1.17, B1.23, B1.27, B1.28, B1.33, B1.34, and B3.1. The categorical exclusions that apply are the following:

B1.3 Routine Maintenance

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

(a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
(b) Door and window repair or replacement;
(c) Wall, ceiling, or floor repair or replacement;
(d) Reroofing;
(e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;
(f) Routine replacement of high-efficiency particulate air filters;
(g) Inspection and/or treatment of currently installed utility poles;
(h) Repair of road embankments;
(i) Repair or replacement of fire protection sprinkler systems;
(j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
(k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
(l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
(m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;
(n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);
(o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
(p) Removal of debris.

B1.11 Fencing

Installation of fencing, including, but not limited to border marking, that would not have the potential to significantly impede wildlife population movement (including migration) or surface water flow.

B1.13 Pathways, Short Access Roads, and Rail Lines

Construction, acquisition, and relocation, consistent with applicable right-of-way conditions and approved land use or transportation improvement plans, of pedestrian walkways and trails, bicycle paths, small outdoor fitness areas, and short access roads and rail lines (such as branch and spur lines).

B1.15 Support Buildings

Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of nonnuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of 10 CFR Part 1021.

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).

B1.17 PCB Removal

Removal of polychlorinated biphenyl (PCB)-containing items (including, but not limited to, transformers and capacitors), PCB-containing oils flushed from transformers, PCB-flushing solutions, and PCB containing spill materials from buildings or other aboveground locations in accordance with applicable requirements (such as 40 CFR part 761).

B1.23 Demolition and Disposal of Buildings

Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smokestacks 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.

B1.27 Disconnection of Utilities

Activities that are required for the disconnection of utility services (including, but not limited to, water, steam, telecommunications, and electrical power) after it has been determined that the continued operation of these systems is not needed for safety.

B1.28 Placing a Facility in an Environmentally Safe Condition

Minor activities that are required to place a facility in an environmentally safe condition where there is no proposed use for the facility. These activities would include, but are not limited to, reducing surface contamination, and removing materials, equipment or waste (such as final defueling of a reactor, where there are adequate existing facilities for the treatment, storage, or disposal of the materials, equipment or waste). These activities would not include conditioning, treatment, or processing of spent nuclear fuel, high-level waste, or special nuclear materials.

B1.33 Stormwater Runoff Control

Design, construction, and operation of control practices to reduce stormwater runoff and maintain natural hydrology. Activities include, but are not limited to, those that reduce impervious surfaces (such as vegetative practices and use of porous pavements), best management practices (such as silt fences, straw wattles, and fiber rolls), and use of green infrastructure or other low impact development practices (such as cisterns and green roofs).

B1.34 Lead-Based Paint Containment, Removal, and Disposal

Containment, removal, and disposal of lead-based paint in accordance with applicable requirements (such as provisions relating to the certification of removal contractors and technicians at 40 CFR part 745, "Lead-Based Paint Poisoning Prevention In Certain Residential Structures").

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. 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.

NRLFO Approval: _____ Date: 12/13/2024

D. W. Harper, NEPA Compliance Officer — CX Determination Date