## U.S. Department of Energy Office of Legacy Management National Environmental Policy Act Environmental Checklist

Project/Activity: Replace drain line at the Tuba City, AZ, Disposal Site

#### A. Brief Project/Activity Description

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) proposes to replace a drain line that carries waste liquid from a groundwater treatment system to an evaporation pond within the disposal site boundary. The drain line is not functioning as intended or as needed. The Tuba City Disposal Site is located on land owned by the Navajo Nation and held in trust by the Bureau of Indian Affairs. It is located approximately 6 miles northeast of the town of Tuba City, AZ.

Approximately 215 linear feet of 6-inch (in.) diameter plastic drainpipe would be removed and replaced with new 6-in. diameter polyvinyl chloride (PVC) drain line. In two locations, concrete sidewalks would also be removed. To remove the existing drain line, an average 42-in. deep and 24-in. wide trench would be hand or machine excavated, and the existing drain line would be removed, scanned for contamination, and stored in a designated area until it could be brought to the Grand Junction, CO, Disposal Site. The concrete sidewalks would be replaced once activities were completed, and disturbed areas would be graded to former conditions.

Work would be done in the previously disturbed operations area of the site. No radiation-contaminated soils are present in the trench; however, it is known that the pipe has leaked at joints and resulted in calcium sulfate deposits in the soils. Calcium sulfate is a common salt found in soils.

The work is expected to take 3 to 4 weeks and would require a work crew of 2 to 4 individuals.

#### **B.** Environmental Concerns

Evaluate the following elements and indicate by checking "yes" or "no" if any phase of the project/activity would result in a change or impact that is subject to regulatory permits, controls, or plans or that would require additional evaluation. If the "yes" column is checked, provide a brief explanation below and attach sheets with additional detail as necessary or appropriate.

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Element	Yes	No	Element	Yes	No
Air emissions/air quality	$\boxtimes$		Exposure/impacts to public or workers		$\boxtimes$
Noise	$\boxtimes$		Need for public awareness/involvement		$\boxtimes$
Solid waste generation	$\boxtimes$		Transportation/traffic control required		$\boxtimes$
Mixed waste management		$\boxtimes$	Access to/use of DOE property	$\boxtimes$	
Chemical storage on site		$\boxtimes$	Visual resources impacted		$\boxtimes$
Pesticide/herbicide use		$\boxtimes$	Cultural/archaeological resources present		$\boxtimes$
Toxic substances management		$\boxtimes$	Wetland/floodplain impacted		$\boxtimes$
Regulated quantities of petroleum used or stored on site		$\boxtimes$	Protected species present: federal, state, or tribe listed		$\boxtimes$
Radioactive materials/soils		$\boxtimes$	Migratory birds breeding or nesting		$\boxtimes$
Surface (ground) disturbance	$\boxtimes$		Wild/scenic rivers impacted		$\boxtimes$
Surface water use/contamination		$\boxtimes$	Prime/unique farmlands present		$\boxtimes$
Surface water quality		$\boxtimes$	Groundwater use/contamination		$\boxtimes$
Groundwater quality affected			Other considerations		$\boxtimes$

## C. Explanation and Qualification of All "Yes" Responses

Air emissions/air quality: The use of heavy equipment may result in minor amounts of fugitive dust. If necessary, water would be used to control fugitive dust.

<u>Noise</u>: The use of heavy equipment to excavate the trench would result in elevated noise levels during the estimated 3-4 week period of operation.

Solid waste generation: The removed pipe would be stored on site and brought to the Grand Junction Disposal Site when the site is open and accepting waste materials. It is anticipated that the disposal cell would be open to accept waste materials in 2010. It is not anticipated that the pipe would be contaminated but that it would be perceived as contaminated.

<u>Surface (ground disturbance)</u>: Trenching activities would result in surface disturbance in areas previously highly disturbed. Less than 0.5 acre would be affected by these actions. After completion of the work, all disturbed areas would be returned to prior surface conditions.

Access to/use of DOE property: DOE has an access agreement with the Navajo Nation to perform remediation on the site. The drain line is part of the water treatment plant and therefore part of the remediation. The Navajo Nation would be contacted prior to commencing work.

#### D. Eligibility/Conditions

The proposed action fits within a class of actions listed in Appendix A or B to Subpart D of Title 10 Code of Federal Regulations Part 1021 (10 CFR 1021); DOE has determined that these classes of actions do not individually or cumulatively have a significant effect on the human environment (see 10 CFR 1021.410). There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposed action, and the proposed action is not "connected" to other actions with potentially significant impacts. Finally, the action is not related to other proposed actions with cumulatively significant impacts and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

### E. Recommendation

The proposed action to replace a drain line would be considered a routine maintenance activity and categorically excluded from further environmental evaluation under 10 CFR 1021, Appendix B to Subpart D, B1.3, Categorical exclusions applicable to facility operation, "Routine maintenance activities, corrective (that is repair), preventive, and predictive, are required to maintain and preserve structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose."

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	Meets Criteria	Does Not Mee	et Criteria	Unsure			
The relev	F. NEPA Determination The scope of actions proposed under Section A of this Environmental Checklist, and the information relevant to the potential for environmental impacts in Section B have been reviewed, and the following has been determined:						
$\boxtimes$	The proposed actions meet the	criteria for categori	cal exclusion.				
	The proposed actions do not meet the criteria for categorical exclusion; therefore, I recommend that the LM NEPA Planning Board be convened based on my recommendation (see attached rationale) to complete:						
	an Interim Action		an Environmental	Assessment			
	an Environmental Impact S	tatement	a Supplemental Ar	nalysis			

## Concurrences

Project/Activity: Replace drain line at the Tuba City, AZ, Disposal Site

LM Site Name Tuba City, AZ Disposal Site	LM Site Program UMTRCA Title I Site	
Contractor NEPA Coordinator Sandy Beranich	Signature Sandy Berowick	Date 5-5-2010
Contractor Site Lead  Carl Jacobson	Signature Coll Jacob	Date 5/5/10
LM Site Manager Richard Bush	Signature LABEL	<b>Date</b> 5/8/10
LM NEPA Compliance Officer Richard Bush	Signature full Bul	<b>Date</b> 5/8/10

# Distribution upon signature:

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- C. Jacobson, Stoller Site Lead
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