



NEPA Compliance Officer Rationale
Office of Acquisition and Project Management
APM 15-001

Application of DOE NEPA Procedure: Categorical Exclusions B3.1, Site characterization and environmental monitoring (10 CFR Part 1021, Subpart D, Appendix B).

Rationale: The proposed action in the attached checklist (APM 15-001, Nye County Preemptive Review and Community-Based Groundwater Sampling Program) describes development and implementation of a groundwater monitoring program involving Nye County's collaboration in a sampling and analysis of groundwater collected from existing wells in support of the Underground Test Area (UGTA) Activity at the Nevada National Nuclear Security Site (NNSA). The program would include sampling of 10 wells the first year and 20 wells each year, to be selected during the first phase of the program. The associated DOE grant would provide funding for a total of 5 years beginning in FY 2015. The proposed activities do not include installation of monitoring wells or other ground-disturbing activities.

A more in depth discussion can be found in Attachment 1 of this checklist, which is hereby incorporated by reference. The class of actions included in Categorical Exclusion B1.15 includes:

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...

This proposal fits within the parameters of Categorical Exclusions B3.1.

Based upon the information provided to me, discussions with the project specialists, and my knowledge, this proposal does not present any extraordinary circumstances of a unique or uncertain nature. It is not connected to other actions with potentially or cumulatively significant impacts.¹

¹ See 10 CFR § 1021.410(b)(2)and(3)for full text of regulation.



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Supported by the information provided by the project engineers and my knowledge of this activity, the proposal would not²:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/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;
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; or
4. adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B.(4)).

Therefore, this proposal meets the conditions that are the Integral Elements of the Class of Actions and application of Categorical Exclusion B3.1 is appropriate.

If changes are made to the scope of action as described in the checklist, or if the scope is expanded to encompass other actions, NEPA requirements for the action will need to be reassessed at that time.

**John E.
Weckerle**

Digitally signed by John E. Weckerle
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ou=department of energy,
ou=Energy IT Services, ou=DOE
Common Operating Environment,
ou=People, cn=John E. Weckerle
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John E. Weckerle
NEPA Compliance Officer
June 2, 2015

² See 10 CFR Part 1021 Subpart D Appendix B (B(1)through(4)).