**FINDING OF NO SIGNIFICANT IMPACT**
**SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT FOR THE SEWERLINE DISPOSITION OF THE KANSAS CITY PLANT, KANSAS CITY, MISSOURI**
**DOE/EA-1947-S1**

**Notice:** National Nuclear Security Administration

**Action:** Finding of No Significant Impact; Supplemental Environmental Assessment for the Sewerline Disposition of the Kansas City Plant, Kansas City, Missouri (DOE/EA-1947-S1)

**Date: February 22, 2019**

## 1) SUMMARY:

The National Nuclear Security Administration (NNSA) issues this Finding of No Significant Impact (FONSI) on its proposed action to remove above ground sections of a 24-inch sewer line that extends north of the Bannister Federal Complex (BFC) from Liberty Drive to 85th Street in Kansas City, Missouri, addressed in the *Supplemental Environmental Assessment for the Sewerline Disposition of the Kansas City Plant, Kansas City, Missouri* (DOE/EA-1947-S1; Supplemental EA). Previously, the NNSA transferred a portion of the BFC to a private developer. This action was reviewed in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. §§ 4321 et seq.; NEPA) by completion of an Environmental Assessment (EA) for the Transfer of the Kansas City Plant (KCP), Kansas City, MO (U.S. Department of Energy [DOE]/EA-1947) which supported a FONSI, issued May 1, 2013. This initial FONSI was updated August 30, 2016, to account for inclusion of all excess Federal property located at the BFC.

Removal of this above ground sewer line was not contemplated in DOE/EA-1947 under an assumption that a subsequent owner would continue to use this sewer line. However, the property transfer did not include this sewer line. Accordingly, it remained to NNSA to dispose of this excess property. The sewer line included both above and below ground facilities. The southern section, closest to the BFC, is above ground and is to be removed. The remaining below ground pipe and manholes, identified in the EA, will remain operational at the request of the Kansas City Water Services Department and not otherwise be affected as part of this Project.

The Supplemental EA provided NNSA with the information needed to make an informed decision regarding the impact to the environment associated with the removal of the sewer line. The Supplemental EA was prepared to provide the following information to decision makers and other document reviewers:

- The purpose and need for agency action;
- A description of the affected environment of the sewer line area;

- An assessment of any additional potential direct and indirect environmental impacts of the amended proposed action and the no-action alternative, specific to sewer line removal and abandonment;
- An assessment of the cumulative impacts of the amended proposed action with past, present, and other reasonably foreseeable actions; and
- A discussion of applicable regulatory requirements related to the potential removal and abandonment of the sewer line.

Based on the findings in the Supplemental EA, the NNSA has determined that the proposed action is not a major Federal action that would significantly affect the quality of the human environment within the meaning of NEPA. Therefore, the preparation of an Environmental Impact Statement (EIS) is not necessary, and NNSA is issuing this FONSI.

**2) FOR FURTHER INFORMATION CONTACT:**

Further information, including an electronic copy of the Supplemental EA and this FONSI will be made available on the following website: https://www.energy.gov/nnsa/national-nuclear-security-administrations-environmental-assessments-and-environmental-impact or https://www.energy.gov/nepa/ea-1947-transfer-kansas-city-plant-kansas-city-mo.

For further information on the NEPA process, other NEPA documents, or to request a hard copy of the Supplemental EA or this FONSI contact:

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**3) SUPPLEMENTARY INFORMATION:**

This Supplemental EA and FONSI reference and expand on the Environmental Assessment (EA) for the Transfer of the Kansas City Plant (KCP), Kansas City, MO (U.S. Department of Energy [DOE]/EA-1947) which supported a FONSI, issued May 1, 2013 as updated August 30, 2016. Those documents should be consulted for further information.

NNSA informed a variety of local, State, and Federal agencies of the amendment to the May 2013 EA via letters on August 1, 2017. The letters informed the recipients of the Supplemental EA that would be required to include the removal and abandonment of the sewer line. The letters requested input from the

agencies on issues or concerns related to land use, aesthetics, water quality, wetlands, and other resources in the area. Comments were requested to be sent by August 31, 2017. Comments received were included in Appendix B of the Supplemental EA.

NNSA prepared the Supplemental EA and is publishing it along with this FONSI on February 22, 2019. Based on the findings in the Supplemental EA, NNSA has concluded that no information has been made available that is inconsistent with a FONSI.

**4) PURPOSE AND NEED:**

The purpose and need for the Project stated in Chapter 1 of DOE/EA-1947 remained unchanged in the Supplemental EA. The purpose and need for agency action is to reduce NNSA's operational footprint and reduce operational and maintenance costs in an environmentally safe and fiscally responsible manner. The proposed action was to transfer the Kansas City Plant (KCP), in whole or in part, to one or more entities for a use that is different from its current use. NNSA believes the transfer of this property would benefit NNSA and the local economic area. The purpose and need for the Removal and abandonment of this sewer line is a continuation of ensuring transfer of the KCP in an environmentally responsible manner.

**5) DECRIPTION OF PROPOSED ACTION AND ALTERNATIVES:**

**Proposed Action:** DOE/EA-1947 was supplemented to consider the complete removal of the above ground portion of the sewer line and abandonment in place of the underground section of the 24-inch sewer line that extends north of the former BFC from Liberty Drive to the 85th Street in Kansas City, Missouri. While considered in the supplemental EA to DOE/EA-1947, abandonment in place of the underground section of the sewer line outside BFC property is no longer part of this project. Removal of the above ground sewer line may have an impact on the environment and is analyzed in the Supplemental EA.

Complete sewer line removal would include the removal of approximately 900 feet of above ground, 24-inch cast iron pipe, a support trestle comprised of concrete piers of up to 25 feet in height, concrete bridging between the piers upon which the pipe is resting and sealing of the underground pipe at the transition from above to below ground. A concrete wall and supporting wing walls are located at the transition of the above ground to below ground pipeline and will generally remain in place, pending discussions with the adjacent Union Pacific Railroad (UPRR), but would be permanently sealed. The above ground section of sewer line is located in an easement while the below ground section is located within the UPRR right-of-way.

The first activity for removal would be to develop access to the line for demolition equipment and clearing from the recently transferred BFC, following the trestle to MH 40. This access route will require tree clearing, development of temporary access road, and development of access across an unnamed tributary and along the entire length of the above-ground pipeline.

Demolition would occur in three phases:

- clearing and access
- demolition
- restoration

Complete demolition would take approximately one year to complete. Site work would typically include a crew of three to five workers and associated equipment.

Access development would result in disturbance to surface soils. Appropriate erosion control measures would be implemented prior to any earth disturbing activities to protect surface soils and manage stormwater runoff. Cleared material could be mulched to provide ground cover for temporary soil protection and stabilization or removed to a yard waste facility.

Once access is available, demolition equipment including excavation equipment (track hoe or excavator), cranes, pipe cutting and removal, and jackhammering and other concrete removal equipment, would be moved to the site. Pipe would be removed in sections and placed on trucks for removal to recycling or approved disposal sites. Concrete trestle sections between support piers and bridging would also be removed and trucked off-site for appropriate disposal. Concrete support piers would be removed, with structures excavated approximately six feet below ground level, jackhammered off and backfilled. The site would be cleaned of all clearing and demolition debris. Any disturbed areas would be revegetated as directed by permits and agreements for Project demolition and property transfer.

**Action Alternative:** NNSA considered partial removal and abandonment of the sewer line as a potential alternative to complete removal of the sewer line or the no-action alternative. Under the partial removal alternative, the underground section of the sewer line would be abandoned in place as previously discussed. However, the overhead section would only be partially removed. Pipe and some associated hardware would be removed but concrete piers and trestle bridging supporting the pipeline would be left in place. It was determined the impacts associated with only pipe removal would be essentially the same as those occurring from complete pipe removal as Project impacts are primarily a result of activities to

provide equipment access to the pipeline. Once access has been developed, additional impacts from pier removal would be minimal.

Additionally, retention of piers, several over 20 feet tall, create future maintenance and safety issues for which NNSA would retain responsibility or would need to be transferred to the new property owner[1] following KCP transfer. As no real benefits were identified for partial removal and additional, ongoing issues and concerns would be created, this alternative was dropped from further consideration.

**No Action Alternative:** The no-action alternative considered in the Supplemental EA assumes NNSA would abandon the sewer line when it is no longer in use, but it would not be removed. If left in place, the sewer line would experience normal deterioration, creating on-going and future maintenance, safety, and liability responsibilities for either NNSA or the future property owner. As a result, because the no-action alterative would not assist NNSA in meeting the purpose and need for the Project, it was eliminated from further consideration.

## 6) ENVIRONMENTAL CONSEQUENCES OF PROPOSED ACTION:

The following is a summary of the findings of the Supplemental EA in regard to potential impacts of the proposed action on land use; aesthetics; air quality; geology and soils; water resources; biological resources; historical or cultural resources; infrastructure; socioeconomics; waste management; human health and safety; environmental justice; intentional destructive acts; and cumulative impacts.

**Land use:** Removal of the above ground portion of the sewer line and sealing the pipe/manholes to prevent access would result in ground disturbance to approximately 2.92 acres along the sewer line and areas immediately adjacent. Surface disturbance would be limited to the above ground section of line. Approximately 2.92 acres of trees located adjacent to the sewer line will need to be cleared to access and remove the sewer line. Euclid Avenue on the south and Prospect Avenue at the north end could provide access to the line. Additional access would need to be developed through the wooded undeveloped areas along the line for equipment to access all areas of the site. Short, temporary delays in traffic on Euclid and Prospect Avenues may occur when equipment is moving to and from the site prior to and after removal activities have taken place. No long-term adverse impacts to land use are anticipated due to the removal of the sewer line. Following removal activities, the area would be revegetated, the existing easement could be released, and the land available for future, non-utility use. The remaining below ground facilities, identified in the EA further north are to be abandoned in place, with pipe and manholes sealed to prevent access but remain operational and not otherwise be affected as part of this Project.

[1] Anticipated to be the Kansas City Parks Department, which has indicated it would require complete removal of the above-ground facilities as a condition of property transfer.

**Aesthetics:**

a) *Visual:* Views of the sewer line are restricted to the areas immediately surrounding the line due to the raised rail line to the east and lack of public access, wooded area surrounding the pipeline, and limited access points from which to observe the area. A small strip of trees would need to be removed to provide equipment access and to safely remove the sewer line. Tree removal would be minimal compared to the wooded area through which the pipeline is located. This cleared area would be revegetated after removal of the sewer line is complete, reducing contrast with adjacent areas. Due to these factors, removal of the sewer line will not significantly alter or adversely affect the viewshed of the area.

b) *Noise:* The intermittent and temporary noise impacts discussed in DOE/EA-1947 would largely be the same with the addition of the sewer removal project. Sewer line removal activities would temporarily increase noise in the Project area, particularly in the vicinity of the pipeline. It is anticipated that a variety of construction equipment would be used for pipeline removal and produce noise during demolition activities. During removal activities, construction crews would travel to and from the site, resulting in a minimal and temporary increase in traffic noise on surrounding roads. The nearest residence is approximately 500 feet away from the sewer line. Sound levels at this residence may be increased during daylight, working hours but would return to current levels at off-work hours and following completion of demolition. Demolition is anticipated to last up to one year, but would occur in phases with noise levels varying between and within phases. Following completion of demolition, no additional increases in noise from the Project would be experienced.

   It is anticipated that truck traffic associated with the removal of the sewer line would constitute less than 1 percent of the total traffic on Bannister Road and other local roadways. Noise attributable to these trucks to the surrounding areas would be indistinguishable from current ambient levels.

**Air Quality:** The Project would create additional, temporary changes in air emissions, beyond those discussed in DOE/EA-1947. The use of heavy equipment during sewer line removal would generate engine exhaust containing air pollutants associated with diesel combustion. Similar air emissions would be generated from construction workers commuting in their personal vehicles. Emissions from heavy-equipment use would be minimal (only 2 to 3 pieces of equipment operating on site regularly), short-term (during working hours over the demolition period), sporadic, and localized. The quantities of air pollutants produced by vehicles and equipment associated with construction would not be a substantial contribution to the total emissions from mobile sources already operating in the area and would not be expected to adversely affect local air quality. Diesel fumes from construction vehicles will produce sulfur dioxide, which could affect local air quality during certain meteorological conditions. As discussed above, these instances are limited in time and areas of effect.

Removal of the sewer line could generate an increase in dust from disturbed soils and demolition rubble. Earthwork would be restricted to the area immediately surrounding the sewer line and access roads. Increases in dust concentrations could be noticeable on the site and in the immediate vicinity, and ambient concentrations of particulate matter could rise in the short term. However, control measures for lowering dust (i.e., covers and water or chemical dust suppressants) would minimize these emissions. Pipeline demolition would occur outside any identified solid waste

management unit. Dust control measures could be part of any city-issued or other construction permits. Once sewer line removal activities are completed, dust emissions from the Project site would cease.

**Geology and Soils:** Removal of the sewer line would require the use of heavy machinery; such activities would disturb soil in and around the sewer line. However, surface soil at the site consists primarily of fill and reworked material; likely as a result of previous sewer line construction and construction of adjacent rail grade facilities. Undisturbed, native soils are rare or nonexistent. Therefore, there would be little, if any, impacts to native soils. Removal of the sewer line would be limited to the above ground portion of the line. Concrete support piers would be removed to approximately 6 feet below ground surface and covered, resulting in only small areas of shallow excavation. Soil disturbance would be limited to above ground portions of the sewer line. With the use of best management practices for soil erosion control, the demolition activities would have only minimal, temporary disturbance to soils and no disturbance to geologic resources. No excavation of below ground pipe would occur. Activities also would not impact prime farmland since the KCP contains no prime farmlands and all activities would occur on previously disturbed land.

**Water Resources:**

a) *Surface water*: Based on a wetland survey completed for the site, it was determined that the Project appeared to qualify for authorization under Section 404 Nationwide Permit 33 for temporary construction, access, and dewatering, without the need for a formal Pre-Construction Notification. Sewer line demolition would require development of equipment access across a small unnamed tributary crossed by the sewer line. Additionally, one or two of the support piers for the above ground portion of the line are located within this drainage. Equipment would be required to work in the stream to remove these piers to below grade, resulting in disturbance to the streambed. While the streambed substrate is mostly pebble and cobble, any excavation has the potential to disturb silt and other fine materials. Demolition activities for pier removal would likely be conducted when this area of the stream is dry to enable better construction access and reduce potential disturbance to surface waters. NNSA would be required to obtain a permit from the USACE for any work within the stream. Appropriate best management practices will be utilized to protect water quality. After the Project is complete, the stream bed and bank will be returned to pre-existing contours and will be revegetated as appropriate.

Activities that involve land disturbance of more than 1 acre require an application to the MoDNR for a stormwater discharge permit [10 CSR 20-6.200(3)]. It is anticipated that development of equipment access to the line and vegetation clearing would disturb approximately 2.92 acres. The MoDNR can permit such activities under a general permit or require the applicant to apply for an individual operating permit [10 CSR 20-6.200(7)]. In either case, the permit would require the applicant to develop plans and implement measures to keep contaminants and sediment out of runoff to protect the Blue River during land-disturbing actions. In addition, demolition actions would be performed in compliance with the MHWMF Part I Permit. Permitting requirements and the involvement of the MoDNR in oversight of demolition activities would minimize the potential for adverse impacts to surface waters from stormwater runoff.

Water use during demolition would primarily be for dust suppression and workforce needs. Water would likely be trucked to the site, and water use would be minor in comparison with the

quantities currently used at the site and water service capacity. Any water use would be limited to the short, temporary demolition and restoration period. Removal of the sewer line would not significantly change the water use estimates presented in DOE/EA-1947.

b) *Groundwater use*: There would be no adverse impacts to groundwater from demolition activities. Because connections to the municipal water supply already serve the property, there would be no need to develop and use local groundwater for water needs during removal of the sewer line. Demolition activities would typically only involve above ground activities, resulting in only surface disturbance. Removal of support piers below grade would require shallow excavations but only a few feet deep. These would not intercept or impact ground water (estimated to be 15 feet below the ground surface). Following excavations to cut piers below grade, excavations would be backfilled.

c) *Floodplains and wetlands*: The sewer line area is within the floodplain of the unnamed tributary north of the sewer line. NNSA expects that the existing BFC flood protection system would remain in place and be maintained during demolition activities. However, these facilities provide minimal if any protection to the demolition area. Care would need to be taken during demolition to monitor rainfall and water levels and remove or secure equipment and materials in the event of a flooding episode. Demolition of the sewer line would remove material from within the floodplain in the form of concrete support piers and cleared trees (which may be replaced). No additional fill or excavation within the floodplain is anticipated resulting in a likely net increase, albeit minimal, in the floodplain storage volume. Removal of above ground piers would also reduce obstruction to flood flows and flood debris that could accumulate around piers, impeding water flow during flood events. Following completion of demolition, the floodplain would experience these beneficial impacts. Any adverse impacts associated with demolition from equipment and material in the floodplain would be removed.

One stream is crossed by the sewer line, extending under the adjacent railroad bed through a concrete box culvert, eventually draining into the Blue River. There are no wetlands that would be affected by demolition. There are, however, several jurisdictional wetlands associated with stormwater or snowmelt drainage patterns on GSA property along the northern and northeastern boundaries of the BFC, and possibly other areas near the former landfill that would need to be protected against stormwater runoff from disturbed areas during construction. Any land-disturbing actions that could potentially result in runoff carrying eroded soil or other material to these wetlands would be subject to MoDNR stormwater discharge permitting requirements and the associated controls to protect down-gradient areas.

**Biological Resources:** Removal of the sewer line will potentially require approximately 2.92 acres of tree clearing to enable equipment access to the site and for safe demolition of the facilities. The tree survey completed for the Kansas City Parks Department identified tree species in the area to help the Kansas City Parks Department determine which trees to protect during Project execution. Where possible, trees that could become a valuable part of future forest areas could be identified and a tree protection zone could then be established to protect these trees during Project execution. Prior to construction, a plan for tree clearing and restoration would be developed and concurred with by the Kansas City Parks Department.

Based on the protected species habitat assessment completed for the sewer line area and mitigation measures to be taken (i.e. seasonal tree clearing, clearing and restoration plan), it is

anticipated that removal of the sewer line would not adversely impact flora and fauna or any of the Federally or state-listed threatened and endangered species.

**Cultural resources:**

a) *Historic-age non-archaeological resources*: The sewer line was likely associated with wastewater disposal at the NRHP-listed BFC/KCP and includes a cast iron pipe and associated concrete supports that range in height along the length of the resource. The pipe is clearly visible on 1948, 1962, 1969, and 1970 aerial photographs (NETR var.), confirming possible associations with World War II-era operations at the facility. The resource was not included in the 2011 NRHP nomination for the property and was not evaluated in previous historic documentation efforts associated with the decommissioning of the facility.

Though the resource dates to the period of significance for the facility, it was not associated with wartime or subsequent industrial production efforts under NRHP Criterion A, nor does it exhibit distinctive design characteristics under NRHP Criterion C. Additionally, there is no evidence that it was designed by Albert Kahn, the master architect associated with the facility. Furthermore, the existing wastewater treatment building connected to the resource (Building #98; Millstein and Warfield, 2011) was constructed in 1988 and does not contribute to the NRHP district. As intensive documentation of the historically significant buildings and structures associated with the BFC was conducted to mitigate its transfer, and this resource was not identified during those thorough research and documentation efforts (Millstein and Warfield, 2011 and 2012), it does not appear to contribute to the NRHP district or to qualify for individual NRHP inclusion. There are no other buildings or structures immediately adjacent to the resource that would be directly or otherwise adversely impacted by removal of the structure. The SHPO concurred that the sewer line was not eligible for NRHP inclusion and did not contribute to the NRHP-listed BFC in response to a SHPO consultation memorandum. As a result, no further consideration of impacts to non-archaeological historic resources is anticipated under Section 106 is anticipated in connection with the proposed Project.

b) *Archaeological resources:* The proposed Project crosses alluvial landforms in Blue River valley and spans an unnamed tributary to the Blue River. Though surveys were conducted as part of the original Project, review of information available on the MoDNR Archaeology Viewer indicated the proposed approximately 2.9-acre direct area of potential effects (APE) had not been surveyed for archaeological resources. The APE for the project was assessed as having a potential for surface and deeply buried cultural resources.

The Missouri SHPO concurred that the APE had a moderate to high potential to contain cultural materials. An archaeological survey of the proposed APE was conducted on August 2, 2017. Archaeologists conducted pedestrian survey of the APE supplemented with shovel testing at 15 to 20 meter intervals. While there is potential for deeply buried cultural materials in APE, no deep testing measures were deemed necessary because the Project does not involve deep impacts. No artifacts, features, or archaeological sites were identified during the survey. A report summarizing the survey and its findings was submitted to the Missouri SHPO on August 7, 2017.

**Infrastructure:**

a) *Utilities*: Removal of the sewer line will require minimal electricity, gas, and water. Removal would occur during demolition and renovation of the overall site following completion of the transfer. Demolition would take approximately one year during which time utility impacts from electricity and water use would decrease significantly compared to current conditions. Demolition activities would be self-sufficient and would not connect to existing utilities, using generators and other systems to meet the minimal construction needs for power, water, and sewer. Construction personnel would use portable restrooms. All utility systems feeding the sewer line have been disconnected and blocked.

Removal of the existing sewer line on the old BFC would require construction of a new and upgraded line to provide connection to the existing Kansas City sewer system and would be the responsibility of the new property owner. At this time, the location of any such new facilities has not been identified or designed. Any new connection developed would be consistent with the requirements of Kansas City for sanitary sewer connection. Facilities developed would be designed to accommodate the anticipated volume of effluent from the transferred KCP. Additional facility construction would require a variety of permits and approvals for construction. The new or temporary sewer line and connection would need to be in-place prior to decommissioning and demolition of the existing sewer line.

NNSA would coordinate demolition activities with KCPL for access and demolition activities within the electricity transmission right-of-way. Clearance would be maintained between electric lines and demolition equipment for safe removal of the line. Coordination with KCPL for work around existing electricity transmission lines would protect existing utility systems and provide for continued, uninterrupted service. Demolition activities would have no impacts on utilities.

b) *Transportation*: Demolition would take approximately one year. NNSA estimates there would be an average of 5 to 10 trucks per day traveling to and from the site and hauling debris away from the sewer line area, in addition to trips by demolition crew personnel. This represents a minimal increase in trucks and vehicles per day over current traffic levels. Movement of workers and equipment to and from the site would be minimal compared to current conditions because the demolition workforce would be small in comparison to the workforce and traffic on local roadways. Movement of material and equipment to the from the site would use local roads appropriate for this type of traffic. Demolition traffic would not contribute to accelerated deterioration of local roadways. Demolition activities would not impact regional and local traffic flow or transportation infrastructure.

**Socioeconomics:** Demolition would take approximately one year and would require a typical work crew of 3 to 5 workers. These jobs would easily come from within the existing labor force and local contracting capacity. While the demolition would create employment opportunities, it would not create any additional positions for permanent or temporary employment. Demolition of the sewer line would have no additional impact on the socioeconomics of the area or region beyond those discussed in DOE/EA-1947.

**Waste Management:** Removal of the sewer line would take approximately one year and generate perhaps 100 truckloads of waste, depending on how the sewer line cast iron pipe and concrete trestle material is demolished and recovered. Sampling of pipeline material did not indicate any

hazardous levels of any contaminants. As a result, demolition material would likely be recycled or disposed of in sanitary or special material landfills. No hazardous waste is anticipated to be encountered or generated for disposal during demolition, but if this does occur, it will be disposed of in accordance with applicable regulations.

Demolition wastes would be managed consistent with guidance in MoDNR technical bulletin "Managing Construction and Demolition Waste." Per the MoDNR, all the waste generated from the demolition of the structures must be recycled, reused, or taken for proper disposal at a permitted landfill or transfer station. The waste must not be stockpiled at an alternate site for separation at a later time. Should any asbestos-containing or other contaminated material be identified and determined to be non-friable, which would not require a registered asbestos contractor for removal, it would be taken to a permitted landfill or transfer station for disposal. The landfill or transfer station would require prior notification before disposal. No waste may be buried onsite except for certified clean fill. Certified clean fill includes uncontaminated soil, rock, sand, gravel, asphaltic concrete and unpainted concrete, cinder blocks, and brick. Clean fill must not contain protruding metals or demolition debris. In regard to managing any nonhazardous contaminated soil excavated at the site, the soil must be properly disposed of at a permitted facility or they could consider making a proposal to beneficially reuse the soil (solid waste) per 10 CSR 80-2.020(9)(B). Any soil deemed hazardous waste would fall under the oversight of MoDNR's Hazardous Waste Program. However, no soil contamination concerns have been identified in the demolition area.

If it is determined that any hazardous waste would be generated from demolition, it would likely be disposed at a hazardous waste landfill. Any such material recovered and requiring disposal would be insignificant compared with the more than 2 million tons of waste that was managed in hazardous waste landfills or surface impoundments across the United States in 2009 (EPA, 2010).

Nonhazardous waste would be disposed of at a local permitted sanitary landfill such as the Johnson County [Kansas] Landfill or, if available, a local landfill permitted solely for construction-type debris. No adverse impacts are anticipated as a result of demolition activities.

**Human Health and Safety:** Demolition and removal of the sewer line would take approximately 12 months and require a typical crew of three to five workers. NNSA assessed potential occupational impacts during the removal of the sewer line based on a 12-month demolition timeframe. Sewer line demolition activities would result in less than one total recordable case and less than one day away, restricted, or transferred cases based on these Bureau of Labor Statistics, the limited work force, and short duration of construction.

No hazardous waste is anticipated to be encountered or generated by sewer line demolition. Any hazardous waste would be handled in compliance with applicable regulatory requirements, permit restriction, and best management practices. These measures would minimize hazards for worker safety. A National Emission Standards for Hazardous Air Pollutants Notification of Demolition would need to be filed with the City of Kansas City, Missouri, prior to any demolition activities. Demolition waste would typically include paint, sealants, and coatings residue (chips and scrapings) and demolition debris (concrete, metal/steel). Testing of materials for sewer line demolition did not identify any human health concerns.

**Environmental Justice:** Under the Proposed Action, NNSA would remove the above ground portion of the 24-inch sewer line. During demolition, remediation, or construction-related activities, NNSA anticipates that environmental, health, and occupational safety impacts would be minimal,

temporary, and confined to the KCP property. Therefore, there would not be disproportionately high and adverse human health effects or environmental impacts to minority or low-income populations.

**Intentional Destructive Acts:** After review of the types of facilities that could be constructed by a new owner of the property, it was determined that the likelihood of such acts for the proposed action would be low because the types of operations and potential hazards would be similar to many other facilities. It is possible that random acts of theft or vandalism could happen as in any other location. However, the act of removing the sewer line would not offer any particularly attractive targets of opportunity for terrorists or saboteurs to inflict adverse impacts to human life, health, or safety. Removal of the above ground portion of the sewer line would remove the opportunity for future sabotage or vandalism to these facilities.

**Cumulatively significant impacts:** NNSA evaluated cumulative impacts associated with the relocation of NNSA to the new Kansas City National Security Campus (KCNSC); the new GSA lease spaces; the transfer of GSA property at the BFC; and new sewer line construction. Considering these past, present, and reasonably foreseeable future actions, NNSA determined that the removal of the sewer line would create minimal additional environmental impacts. The potential impacts represent a small percentage of the overall Project impact. Therefore, it was determined that the removal of the sewer line would not contribute significantly to cumulative impacts in the Project area.

**7) DETERMINATION:**

In accordance with NEPA and DOE NEPA implementing regulations (10 CFR Part 1021); and based on the findings in the Supplemental EA, NNSA finds that the removal of a 24-inch sewer line at the BFC is not a major Federal action significantly affecting the quality of the human environment within the meaning of the NEPA. Therefore, the preparation of an EIS is not required and NNSA is issuing this FONSI for the proposed action.

Issued at the Kansas City Plant, this 22nd day of February 2019

Mark Holecek
Field Office Manager