U.S. Department of Energy Environmental Management Consolidated Business Center

Moab UMTRA Project: Truck Escape Ramp Improvement Categorical Exclusion Determination Narrative Form

Proposed Action Title: Moab Uranium Mill Tailings Remedial Action (UMTRA) Project: Truck Escape Ramp Improvement

Program or Field Office: Grand Junction Field Office

Location(s) (City/County/State): Moab UMTRA Project site. Moab, Grand County, Utah

Proposed Action Description:

Engineering calculations indicate that a fully loaded haul truck that experiences a loss of brakes would enter the existing haul road escape ramp at a speed of 59 miles per hour. At this speed, the haul truck would not come to complete stop prior to the end of the escape ramp. The proposed action includes haul road modifications and the addition of a deceleration ramp to add a safety factor to daily operations. See attached drawings.

Background:

The Department of Energy Environmental Management (DOE/EM) Moab UMTRA Project began moving a uranium tailings pile from the Moab Site in 2009, principally by train to a permanent disposal cell in Crescent Junction, Utah. A haul road consisting of a loop from the lower tailings pile to the rail bench accommodates 156 heavy duty haul truck/trailer combinations 4 days per week, year-round. The total volume of material transported on this road is approximately 1 million tons per year. The goal of the project is construction of a deceleration ramp and modifications to the existing escape ramp to ensure the system can safely stop a loaded haul truck in the event of mechanical failure to the braking system. The Moab UMTRA Project Haul Road Assessment (Tetra Tech Project No 117-9091001, July 2022) contracted by DOE concluded that the current escape ramp is not adequate to safely stop a loaded haul truck.

The proposed deceleration ramp will consist of a footprint that is approximately 12' wide x 300' long x 18" to 24" deep. This configuration will accommodate the width of a haul truck. The design will minimize the impact to the adjacent hillside and eliminate the need for excavation and stabilization of the slope above the ramp. Stormwater east (uphill) from the existing roadway is currently managed in a drainage ditch adjacent to the roadway. The area where the new

portion of the escape ramp will be constructed will impact approximately 660 feet of the ditch. A 12" perforated pipe will be installed to accommodate stormwater and drainage into existing drainage ditch (DD-013 in our Moab UMTRA SWPPP (DOE-EM/GJ1475)). In addition, the deceleration ramp will be constructed utilizing aggregate that will allow water to infiltrate to the drainage pipe. The footprint of the ramp will be excavated, along with material to accommodate the drainage system. Excess material will be utilized to construct a berm between the two ramps to ensure an out-of-control truck will not veer off the outside curve of the road before entering the existing ramp.

Resource Areas Evaluated:

Soils

Soils, rock, and asphalt road will be disturbed during construction down to 12". The design minimizes the impact to the adjacent hillside and eliminates the need for excavation and stabilization of the slope above the ramp. There are no significant impacts to soil.

Air Quality

Emissions from construction equipment will be minimal relative to ongoing remediation. No significant impacts to air quality will be associated with this project. All emissions will be minimized and mitigated by thorough adherence with the Moab UMTRA Project's Moab Site Fugitive Dust Plan (DOE-EM/GJ2072). There are no significant impacts to air quality.

Surface Water

New drainage will be added to the Moab UMTRA SWPPP (DOE-EM/GJ1475) for inspection and maintenance. No significant impacts to surface water will occur with this project.

Human Health

Work will be conducted under existing Moab UMTRA Project Health & Safety Plan (DOE-EMGJ1038) and Integrated Work Plan (MB-IWP-JSA-003). There are no significant impacts to human health from this project.

Cultural Resources

A cultural inventory of the Moab site has been conducted, and no resources were found in the area of construction. The Moab Project Cultural Management Plan (GJO-2002-390-TAC; GJO-MOA 1.24) will be followed and work will be stopped if cultural resources are found. No significant impacts to cultural resources will occur during this project.

Infrastructure

The Moab UMTRA Excavation and Trenching Procedure (DOE-EM/GJ1609) will the followed. No significant impacts will affect infrastructure.

Categorical Exclusion(s) Applied:

B1.13 Pathways, short access roads, and rail lines

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.

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.





Office of Environmental Management U.S. Department of Energy

Categorical Exclusion Determination Form

Moab Uranium Mill Tailings Remedial Action (UMTRA) Project: Truck Escape Ramp Improvement
Program or Field Office: Grand Junction Field Office
Location(s) (City/County/State): Moab UMTRA Project site. Moab, Grand County, Utah
Proposed Action Description:
Engineering calculations indicate that a fully loaded haul truck that experiences a loss of brakes would enter the existing haul road escape ramp at a speed of 59 miles per hour. At this speed, the haul truck would not come to complete stop prior to the end of the escape ramp. The proposed action includes haul road modifications and the addition of a deceleration ramp to add a safety factor to daily operations. The proposed action consists of construction of a deceleration ramp adjacent to an existing haul road and minor improvements to the existing haul road escape ramp. See attached drawings.
Categorical Exclusion(s) Applied:
B1.13 – Pathways, short access roads, and rail lines
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) The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. The classes of actions listed below include the following conditions as integral elements of the classes of actions. 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 ar 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.
There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. 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, is not related to other actions with individually insignificant but cumulatively significant impacts, and is not precluded by limitations on actions during preparation of an environmental impact statement.
Based on my review of the proposed action, I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review. NEPA Compliance Officer: Date Determined: