ENVIRONMENTAL CHECKLIST IDAHO NATIONAL LABORATORY

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SECTION A. Project Title: Maintenance and Modification of Well TRA-08

SECTION B. Project Description:

TRA-08, a groundwater monitoring well located approximately 1.5 miles south of the ATR Complex was drilled and constructed in 1990. The well is currently used as a groundwater monitoring compliance point for the ATR Complex Cold Waste Pond Industrial Wastewater Reuse Permit (IWRP). It is also used for CERCLA groundwater monitoring by CWI. Over the life of the well, corrosion of the carbon steel casing has resulted in an accumulation of rust flakes in the bottom of the well thus adversely affecting the efficiency of the well. In addition, the water level in the well has dropped from a depth of approximately 477 ft below ground surface at the time the well was installed, to a depth of approximately 492 ft in 2009. The combination of the rust buildup on the bottom of the well and the falling water table has rendered the well essentially useless as a groundwater sampling location.

The purpose of the proposed modification to well TRA-08 is to refurbish and improve the well such that it is capable of providing groundwater samples in accordance with the groundwater monitoring program at the INL. The proposed action would provide corrective and preventative maintenance that would prevent or minimize future maintenance needs and/or prevent impairment of well TRA-08 as a groundwater sampling location.

The refurbishment will include deepening the well from 501 feet to approximately 530 feet below ground surface, replacing the dedicated pump that CWI had previously removed from the well with a new pump, and replacing the casings and screens. The subcontractor services will include materials, labor, equipment, and the supervision necessary to perform well TRA-08 modification activities.

The work will be executed by a CWI subcontractor who is a State of Idaho licensed well driller licensed in accordance with the requirements identified in IDAPA 37.03.09.

The proposed action is expected to begin March 2010 and be completed during April 2010. Project cost is estimated to be approximately \$59,800 with approximately 66% of the cost paid by BEA and approximately 34% paid by CWI.

SECTION C. Environmental Aspects / Potential Sources of Impact:

Air Emissions — Fugitive air emissions may be generated from drilling activities and operating equipment and tools.

Disturbing Cultural/Biological Resources — The area around the TRA-08 well was previously disturbed during the initial well drilling activities. Vegetation at the work location may be mowed, as necessary to support the work. Surface soil disturbance is not anticipated. The well is located near an established road and a new road will not be created.

Generating and Managing Waste — Consistent with CWI's CERCLA waste management approach, all generated hazardous waste will be managed as CERCLA waste in compliance with the substantive requirements of IDAPA. This waste stream includes the purge/development water. This waste will be disposed of at the Idaho CERCLA Disposal Facility and the waste water will be disposed of at the Idaho CERCLA Disposal Facility Evaporation Pond, provided the waste meets the waste acceptance criteria (WAC) for that facility. Waste that fails to meet the WAC will be sent to a RCRA-permitted treatment, storage, and disposal facility for appropriate treatment or disposal, as applicable. All generated industrial waste will be disposed of at the INL Landfill Complex.

SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

Note: For Categorical Exclusion (CXs) the proposed action must not: 1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References:

- 10 CFR 1021 Appendix B to Subpart D. B1.3 "Routine Maintenance Activities, corrective, preventative 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."
- 10 CFR 1021 Appendix B to Subpart D.B3.1(c) Site Characterization/environmental Monitoring including ...modification ... of monitoring devices... Specific activities include but are not limited to:...(c) Drilling of wells for ...monitoring.

Justification:

- The Routine Maintenance CX applies to this work because it includes corrective and preventative activities which would preserve the monitoring well in a
 condition suitable for its designated purpose.
- The Environmental Monitoring CX applies to this work because it includes the drilling of wells and the modification of monitoring devices.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) \Box Yes \boxtimes No

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on 3/31/2010