



## NEPA Categorical Exclusion Determination Form

**Program or Field Office:** U.S. Department of Energy (DOE) Office of Legacy Management (LM)

**Project Title:** Routine Activities at Grants, New Mexico, Calibration Model Facility

**Location:** Grants, New Mexico

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### Proposed Action or Project Description:

LM proposes to maintain ongoing facility use operations by LM and stakeholders performing routine inspections, site visits and tours, and routine maintenance activities. The unstaffed radiation calibration facility provides distributed sources of radium, thorium, and potassium and consists of 12 pads and borehole models used as standards to calibrate equipment. The facility is located approximately 6 miles northwest of Grants in Cibola County, New Mexico. Proposed actions could occur at any location and at any time within the site, which is approximately 1 acre, sparsely vegetated, secured by a perimeter fence, and undeveloped other than the calibration features. Proposed activities would include:

- Continuing operation of the radiation detector calibration facility, which allows LM and other stakeholders access to, and use of, the facilities to calibrate equipment or conduct other scientific studies.
- Performing administrative actions such as preparing documents and communications, completing project management tasks, holding meetings with stakeholders, and potentially awarding subcontracts for technical service support.
- Renewing DOE's grant with the U.S. Bureau of Land Management, the site property owner, to allow DOE to have and use the calibration models at the facility.
- Conducting site inspections, site visits, and site tours. Inspections would be performed by LM and the LM support (LMS) contractor at least annually to visually inspect the site and its features and to perform assessments for information-gathering or sharing purposes. Non-ground-intrusive tasks, such as visual monitoring and measuring features could occur as part of these activities. Stakeholders, including regulatory agencies, and other interested parties could also participate in or perform these activities.
- Performing routine maintenance activities, including maintaining and repairing existing borehole and surface pad calibration models; replacing or repairing, repainting, or installing new signage, site markers, and survey and boundary monuments; performing vegetation management by hand or with fuel-powered equipment; maintaining and repairing existing fencing; sweeping and clearing of pads or pit covers; performing land surveying; making minor repairs to minor ground erosion features using hand-powered tools only; repainting the pads, borehole covers, and model identification numbers; placing or removing t-posts, survey markers, and flagging pins; replacing and maintaining locks; removing sand build-ups from along fence lines or around the calibration models using a hand-powered shovel only and dispersing excavated sand to the ground surface; removing nonhazardous solid waste from the site; driving vehicles onsite to support field activities; and performing non-ground-intrusive monitoring to obtain information to support future site operations, projects, or scientific studies.

Limitations and conditions of these routine activities include limiting placement of t-posts, fence or sign posts, markers, or digging into the ground to previously disturbed locations using only hand-powered tools; having an LMS pesticide applicator perform herbicide application activities, if needed, using established application practices and procedures; walking or assessing areas to be mowed or where vegetation would be trimmed or removed prior to the action (avoiding work in that area if active bird nests are present); stopping work in the immediate area of any encounters with suspected cultural resources and immediately reporting the encounter to the environmental compliance point of contact (EC POC); managing nonhazardous solid waste material through reuse, recycling, and composting when possible; consulting with the site's EC POC with any waste management questions and to provide waste tracking data; contacting the EC POC prior to bringing any chemicals or nonroutine radiological material onto or off of the site; and adhering to an approved fueling plan or procedure for onsite fueling of equipment or vehicles. Grubbing of vegetation, use of powered tools and equipment for performing ground-disturbing activities, generation or management of hazardous waste or radiologic waste, and installation of new fence lines are specifically excluded.

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### Categorical Exclusion(s) Applied:

- A1 Routine DOE Business Actions
- A9 Information Gathering, Analysis, and Dissemination
- B1.3 Routine Maintenance
- B1.24 Property Transfers
- B3.1 Site Characterization and Environmental Monitoring



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For the complete DOE National Environmental Policy Act (NEPA) regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of Title 10 *Code of Federal Regulations* Section 1021 (10 CFR 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

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.

- ☒ 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 (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized by the LM Director per DOE Policy 451.1), I have determined that the proposed action fits within the specified classes 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 Signature and  
Determination Date

Joyce E. Chavez

Digitally signed by Joyce E. Chavez  
Date: 2022.07.12 09:39:42 -06'00'