



**Environmental Review Form for Argonne  
National Laboratory**

<b>Form:</b>	ANL-985
<b>Version:</b>	4
<b>Your Form ID:</b>	ANL-985-778
<b>Form Status:</b>	Approved
<b>Date:</b>	8/31/2016 4:17:57 PM
<b>Created By:</b>	Sydelko, Thomas G.

**Creator**

Badge:	<b>45884</b>	Name:	<b>Sydelko, Thomas G.</b>
Cost Center:	<b>208</b>	Division:	<b>FMS</b>
Job Title:	<b>Consultant</b>	Employee Type:	<b>Non-Regular Full-Time Non-Exempt</b>
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**General Information**

Project/Activity Title: Underground Storage Tank Program  
ASO NEPA Tracking No.:                      Type of Funding: Operating  
B & R Code:                                  Identifying Number: N/A  
SPP Proposal Number: CRADA Proposal Number:  
Work Project Number: ANL Accounting Number:                      (Item 3a in Field Work Proposal)  
Other (explain):  
List appropriate NEPA Owners:  
Division: FMS NEPA Owner:

**Cost Code**

Task: Center: Project: Activity:

**Description of Proposed Action**

Scope: This site-wide generic categorical exclusion (CX) replaces DOE ASO-CX 237 (Underground Storage Tank Management Program). The program is conducted by the Facilities Management and Services (FMS) Division. The FMS Division provides regulatory support (agency notification, data evaluation, report-preparation, and agency liaison), maintains physical control over USTs, and conducts maintenance and testing of the USTs on a routine basis. The scope of this site-wide categorical exclusion includes the following routine activities: 1. Procuring testing and maintenance services plus creating and retaining the testing and maintenance records, and reporting on USTs as required by RCRA; 2. Conducting the testing and maintenance activities on a schedule that is consistent with regulations; 3. Providing expert technical and regulatory support by FMS Division environmental compliance personnel to FMS Division UST program personnel to inform them of regulatory changes, their implications, and the schedule on which compliance must be achieved; 4. Conducting test and maintenance activities on USTs; 5. Characterizing environmental contamination from leaking USTs; 6. Removing and replacing USTs at the end of their normal life cycle; 7. Cleaning up minor contamination that may result from leaks; 8. Cleaning up incidental contamination that may result from removal and replacement operations. The purpose of the underground storage tank program is to protect the environment by monitoring USTs, maintaining monitoring systems, and maintaining compliance with federal and state regulations. All USTs that are currently installed at Argonne are either double walled or single walled fiberglass with monitoring devices to assess the tanks and piping integrity. This type of installation reduces the risk of environmental contamination and places emphasis on monitoring and record keeping activities. The activities are carried out at Argonne by the FMS Division with the assistance of service contractors who provide specific monitoring and test services. The FMS environmental compliance group provides technical support to the FMS Division, serving as technical experts on regulatory requirements and providing guidance, expert opinion, and the interpretation of regulations. The FMS environmental compliance group maintains cognizance of the UST requirements and schedules required by RCRA and the Illinois State Fire Marshal, the Illinois EPA, and provides regulatory guidance to FMS Division personnel. The FMS environmental compliance group also provides guidance and assists FMS project managers with report preparation during UST removal activities. RESTRICTIONS: The work cannot allow a threatened violation of a permit or requirement, expansion of waste facilities, CERCLA type clean-up that would have an uncontrolled or unpermitted release or adversely affect a sensitive environment such as a wetland, historic structures, objects or archaeological areas. All activities will follow the conditions in 10 CFR 1021, Subpart D, Appendix B "Conditions That Are Integral Elements of the Classes of Actions in Appendix B". The activities described in the generic site-wide categorical exclusion will not take place in such a way as to cause an undue risk of environmental contamination. In the event that a leak is discovered, the specific actions needed to remediate the leak are covered by this site-wide categorical exclusion. Such actions may include the removal of tank contents, the environmental characterization of soil, groundwater, and surface water adjacent to the tank to determine the extent of the contamination, the removal of

contaminated soil, and the removal of the tank with possible replacement. In the event of remediation, verification will be made that the planned activities meet regulatory requirements. This generic site-wide categorical exclusion does not include the installation of USTs at new locations.

## Description of Affected Environment

USTs are at a number of locations at Argonne, generally close to operating facilities. Testing takes place at the tank location but without environmental intrusion. Records are maintained indoors. In the event that a leak is detected, soil adjacent to the tank may be contaminated. The characterization of soil adjacent to a tank that has leaked will cause some disturbance of previously disturbed soil. The removal of a tank that has leaked will cause some disturbance of previously disturbed soil.

## Potential Environmental Effects

- Attach explanation for each "yes" response near bottom of form.
- **See Instructions for Completing Environmental Review Form.**

Section A (Complete For All Projects)		Yes	No	Explanation
1.	Project evaluated for Pollution Prevention and Waste Minimization opportunities and details provided under items 2, 4, 6, 7, 8, 16, and 20 below, as applicable	<input checked="" type="radio"/>	<input type="radio"/>	Waste Minimization opportunities and details provided under items 2, 4, 6, 7, 8, 16, and 20 below, as applicable.
2.	Air Pollutant Emissions	<input checked="" type="radio"/>	<input type="radio"/>	Leaking USTs will be fixed as soon as possible to minimize the amount of air emissions.
3.	Noise	<input type="radio"/>	<input checked="" type="radio"/>	
4.	Chemical/Oil Storage/Use	<input checked="" type="radio"/>	<input type="radio"/>	Leaking USTs will be emptied as soon as possible to minimize the amount of material that could be released to the environment. This material would be managed through the Argonne Nuclear and Waste Management (NWM) Division or through a licensed contractor and could include reuse/recycle or disposal.
5.	Pesticide Use	<input type="radio"/>	<input checked="" type="radio"/>	
6.	<b>Toxic Substances Control Act (TSCA) Substances</b>			
6a.	Polychlorinated Biphenyls (PCBs)	<input type="radio"/>	<input checked="" type="radio"/>	
6b.	Asbestos or Asbestos Containing Materials	<input type="radio"/>	<input checked="" type="radio"/>	
6c.	Other TSCA Regulated Substances	<input type="radio"/>	<input checked="" type="radio"/>	
6d.	Import or Export of Chemical Substances	<input type="radio"/>	<input checked="" type="radio"/>	
7.	Biohazards	<input type="radio"/>	<input checked="" type="radio"/>	
8.	Effluent/Wastewater (If yes, see question #12 and contact Peter Lynch (FMS-SEP) at 2-4582 or lynch@anl.gov)	<input type="radio"/>	<input checked="" type="radio"/>	
9.	<b>Waste Management</b>			
9a.	Construction or Demolition Waste	<input type="radio"/>	<input checked="" type="radio"/>	
9b.	Hazardous Waste	<input checked="" type="radio"/>	<input type="radio"/>	Characterization and remediation of contaminated soil around a leaking tank may result in a special waste. The amount would depend on the nature of the leak. Volumes up to several cubic yards might be involved. Contaminated soil will be managed in accordance with the Illinois EPA special waste requirements.
9c.	Radioactive Mixed Waste	<input type="radio"/>	<input checked="" type="radio"/>	
9d.	Radioactive Waste	<input type="radio"/>	<input checked="" type="radio"/>	
9e.	Asbestos Waste	<input type="radio"/>	<input checked="" type="radio"/>	
9f.	Biological Waste	<input type="radio"/>	<input checked="" type="radio"/>	
9g.	No Path to Disposal Waste	<input type="radio"/>	<input checked="" type="radio"/>	
9h.	Nano-material Waste	<input type="radio"/>	<input checked="" type="radio"/>	

10.	Radiation	<input type="radio"/>	<input checked="" type="radio"/>	
11.	Threatened Violation of ES&H Regulations or Permit Requirement	<input type="radio"/>	<input checked="" type="radio"/>	
12.	New or Modified Federal or State Permits	<input checked="" type="radio"/>	<input type="radio"/>	Installation, modification and removal require a permit from the Illinois Fire Marshall. Leaking USTs require notification to the Illinois Emergency Management Agency.
13.	Siting, Construction, or Major Modification of Facility to Recover, Treat, Store, or Dispose of Waste	<input type="radio"/>	<input checked="" type="radio"/>	
14.	Public Controversy	<input type="radio"/>	<input checked="" type="radio"/>	
15.	Historic Structures and Objects	<input type="radio"/>	<input checked="" type="radio"/>	
16.	Disturbance of Pre-existing Contamination	<input checked="" type="radio"/>	<input type="radio"/>	A leaking tank could contaminate the soil. Remediation would disturb the contamination. The remediation would stop the spread of contamination. The soil disturbance that occurred during remediation would be carried out in such a way as to avoid the release of the contamination to the environment.
17.	Energy Efficiency, Resource Conserving, and Sustainable Design Features	<input type="radio"/>	<input checked="" type="radio"/>	
<b>Section B (For Projects that Occur Outdoors)</b>		<b>Yes</b>	<b>No</b>	
18.	Threatened or Endangered Species, Critical Habitats, and/or other Protected Species	<input type="radio"/>	<input checked="" type="radio"/>	
19.	Wetlands	<input type="radio"/>	<input checked="" type="radio"/>	
20.	Floodplain	<input type="radio"/>	<input checked="" type="radio"/>	
21.	Landscaping	<input type="radio"/>	<input checked="" type="radio"/>	
22.	Navigable Air Space	<input type="radio"/>	<input checked="" type="radio"/>	
23.	Clearing or Excavation	<input checked="" type="radio"/>	<input type="radio"/>	Excavation is required to remove a UST and there may be remediation in the area of that leakage is found. Visible contamination would be excavated and then soil and groundwater sampling performed according to the remediation plan from the regulators until no further action was required.
24.	Archaeological Resources	<input type="radio"/>	<input checked="" type="radio"/>	
25.	Underground Injection	<input type="radio"/>	<input checked="" type="radio"/>	
26.	Underground Storage Tanks	<input checked="" type="radio"/>	<input type="radio"/>	USTs are the subject of this ERF. Remedial actions in the event of a leak may involve the removal and replacement of a tank.
27.	Public Utilities or Services	<input type="radio"/>	<input checked="" type="radio"/>	
28.	Depletion of a Non-Renewable Resource	<input type="radio"/>	<input checked="" type="radio"/>	
<b>Section C (For Projects Outside of ANL)</b>		<b>Yes</b>	<b>No</b>	
29.	Prime, Unique, or Locally Important Farmland	<input type="radio"/>	<input type="radio"/>	
30.	Special Sources of Groundwater (such as sole source aquifer)	<input type="radio"/>	<input type="radio"/>	
31.	Coastal Zones	<input type="radio"/>	<input type="radio"/>	
32.	Areas with Special National Designations (such as National Forests, Parks, or Trails)	<input type="radio"/>	<input type="radio"/>	
33.	Action of a State Agency in a State with NEPA-type Law	<input type="radio"/>	<input type="radio"/>	
34.	Class I Air Quality Control Region	<input type="radio"/>	<input type="radio"/>	

### Categorical Exclusion

Underground Storage Tank Program

**ANL NEPA Reviewer Use Only**

- My approval is the final approval necessary
- This form requires additional approval from DOE

**To be Completed by DOE/ASO**

Section D	Yes	No
Are there any extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal?	<input type="radio"/>	<input checked="" type="radio"/>
Is the project connected to other actions with potentially significant impacts or related to other proposed action with cumulatively significant impacts?	<input type="radio"/>	<input checked="" type="radio"/>
If yes, is a categorical exclusion determination precluded by 40 CFR 1506.1 or 10 CFR 1021.211?	<input type="radio"/>	<input type="radio"/>
Can the project or activity be categorically excluded from preparation of an Environment Assessment or Environmental Impact Statement under Subpart D of the DOE NEPA Regulations?	<input checked="" type="radio"/>	<input type="radio"/>
If yes, indicate the class or classes of action from Appendix A or B of Subpart D under which the project may be excluded: Appendix B B 1.3 Routine maintenance, B 3.1 Site characterization and environmental monitoring, and B 6.1 (c) Removal of an underground storage tank.		
If no, indicate the NEPA recommendation and class(es) of action from Appendix C or D to Subpart D to Part 1021 of 10 CFR.		

**Attachments**

**File Description:** DOE-ASO CX 237 (Underground Storage Tank Program) [View Attachment](#)

**Comments**

This generic site wide CX approval is tracked under ASO-CX-333. It replaces the generic site wide CX which was approved before in February 2009 and was tracked as ASO-CX-237.

**Add Approver**

Approver Name	Approver Badge	Reason	Delete
Barrett, Gregory	43962	Underground Storage Tank Subject Matter Expert	

**Notifications**

The approval notification email will be copied to the people listed below.

Badge	Name	Division	Delete
220875	Ptak, Jill S.	FMS	

**ASO-CX Number****ASO-CX- 333**

Comments:

This generic site wide CX will be tracked as ASO-CX-333.

**Approval**

<u>Approver</u>	<u>Action</u>	<u>Date Routed</u>	<u>Action Date</u>	<u>Approval Reason / Comments</u>	<u>Approval Type</u>
Sydelko, Thomas G.	APPROVED	2016-09-07	2016-09-07 16:24:43.0	Creator :	PRIMARY
Sydelko, Thomas G.	APPROVED	2016-09-07	2016-09-07 16:24:43.0	Allows access to the form :	PRIMARY
Sydelko, Thomas G.	APPROVED	2016-09-07	2016-09-07 16:24:43.0	Project Manager :	PRIMARY

Barrett, Gregory	APPROVED	2016-09-07	2016-09-07 16:26:07.0	Underground Storage Tank Subject Matter Expert :	PRIMARY
Matton, Philip B.	APPROVED	2016-09-07	2016-09-12 15:39:09.0	NEPA Owner Approval for Argonne Environmental Review :	PRIMARY
Kosky, Karen M.	APPROVED	2016-09-12	2016-09-13 14:59:47.0	ANL NEPA Reviewer :	PRIMARY
Hellman, Karen B.	APPROVED	2016-09-13	2016-09-16 11:06:51.0	ANL-985 Review and Approval :	PRIMARY
Stine, Gail Y.	APPROVED	2016-09-16	2016-09-20 08:50:33.0	ANL-985 Review and Approval :	PRIMARY
Kearns, Paul K.	APPROVED	2016-09-20	2016-09-20 13:09:04.0	ANL-985 ANL COO Review and Approval :	PRIMARY
Joshi, Kaushik N.	APPROVED	2016-09-20	2016-09-27 13:17:32.0	ANL-985 DOE-ASO Review and Approval : <b>This is generic site wide CX, is being tracked as ASO-CX-333</b>	PRIMARY
Siebach, Peter R.	APPROVED	2016-09-27	2016-09-27 17:50:40.0	ANL-985 DOE NEPA Compliance Officer Review and Approval :	PRIMARY

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