Categorical Exclusion Determination

Bonneville Power Administration Department of Energy



Proposed Action: Renovation and Expansion of the Hazardous and Toxic Materials Handling

Building

Project No.: P04489

Project Manager: David McAfee, TEPF-CSB-2

Location: Clark County, Washington

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021): B1.15 Support

buildings, B4.6 Additions and Modifications to Transmission Facilities

<u>Description of the Proposed Action:</u> Bonneville Power Administration proposes to renovate and expand the Hazardous and Toxic Materials Handling Building (HMB) located at the J.D. Ross Substation complex. The improvements to the building would meet BPA's goal of accommodating compatible workgroups within an existing BPA facility instead of developing new facilities.

To expand the HMB, BPA contractors would construct a new 2,700-square-foot addition (to be used as a trailer service and repair area) on the northeastern corner of the existing, 36,000-square-foot, multi-story building. The expansion would include installation of a new concrete slab with a blind sump well, footings and grade beam, structural steel frames, insulated metal panel cladding, and an insulated metal panel roof.

New stormwater drains and new catch basins would be installed and connected to the existing stormwater drainage system. Contractors would install new vaults near the building; install and reroute utilities, plumbing, and communications lines underground via trenching along the northern, eastern, and southern sides of the HMB. Trenching would be up to 500 linear feet long in total and up to 6 feet deep and up to 5 feet wide.

Contractors would install a new 3,000-gallon aboveground water storage tank and associated pump, install a new 4,000-gallon aboveground mineral oil tank and associated aboveground dual-containment fuel lines, and install a new enclosed vacuum pump and associated underground piping. New equipment storage racks would also be installed alongside the building. Connections for a mobile degasser unit would also be installed.

New vehicle charging stations would be installed at HMB's parking lot and connected to new electrical conduit and wiring that would be spliced into existing station service lines. Contractors would extend the length of two existing parking spaces, and restripe the asphalt parking lot to reconfigure parking spaces and traffic patterns, while not increasing the total number of available parking spaces at HMB. About 1,400 square feet of grass lawn would be replaced with asphalt that would serve as an approach driveway for trailers to access to the new service bay, and revegetate disturbed areas not converted to asphalt.

The renovate the HMB's interior, BPA contractors would demolish existing walls, construct new walls to improve work space areas, install new stairs and perimeter windows, remodel restrooms, locker rooms, offices, breakrooms and other areas with new fixtures and furnishings. New and upgraded electrical and security panels would be installed, as well as telecommunications equipment, HVAC ductwork, fire suppression sprinkler system, exhaust fans, and interior lighting systems. Up to two new ovens, associated concrete footings, a new bridge crane, and a new gantry crane would be installed inside the building. Modifications to the existing oil tank piping and pumps would be performed.

<u>Findings:</u> In accordance with Section 1021.410(b) of the Department of Energy's (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

- 1) fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
- 2) does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
- 3) has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ Becky Hill

Becky Hill

Environmental Protection Specialist

Concur:

/s/ Katey C. Grange May 25, 2022

Katey C. Grange Date

NEPA Compliance Officer

Attachment(s): Environmental Checklist

Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

<u>Proposed Action:</u> Renovation and Expansion of the Hazardous and Toxic Materials Handling Building

Project Site Description

The project site is located on BPA fee-owned property within BPA's Ross Complex located in Vancouver, Washington. The Ross Complex consists of the Ross Substation, Ross Maintenance Headquarters, and other BPA support facilities. The complex is surrounded by residential neighborhoods on the north, east, and south, while Highway 99 and Interstate-5 are located about 250 feet and 500 feet, respectively, on the west side of the complex. The complex is split north-south by a riparian corridor associated with Cold Canyon Creek and Burnt Bridge Creek, which are designated freshwater critical habitat for Lower Columbia River coho salmon. This east-west riparian corridor connects the creeks and their floodplains to freshwater-forested shrub wetlands located along both sides of Interstate-5 and Highway 99. These wetlands are located about 3,000 feet west of the HMB, which is located to the north of the Ross Substation. A perimeter chain link fence surrounds the Ross Complex, and railroad tracks and the previously mentioned riparian corridor are located about 75 feet north of the HMB. The work areas associated with the expansion of HMB are comprised of asphalt roadways and vehicle parking lots, sidewalks, and some grass lawn areas.

Evaluation of Potential Impacts to Environmental Resources

1. Historic and Cultural Resources

Potential for Significance: No with Conditions

Explanation: The BPA historian and archaeologist reviewed the proposed action and determined that the undertaking is a type of activity that does not have the potential to cause effects on historic properties, assuming such historic properties were present. The historian issued a memo documenting this determination on August 9, 2021.

Notes:

 An Inadvertent Discovery Plan, with contact information for the BPA cultural resources lead, would be supplied to the construction contractor prior to commencing construction work. Should cultural resources be discovered during project activities, then all project work in the area must stop, and the cultural resources lead must be notified immediately.

2. Geology and Soils

Potential for Significance: No with Conditions

<u>Explanation</u>: The proposed action would result in approximately 0.2 acre (7,700 square feet) of ground disturbance in asphalt paved areas and approximately 2,300 square feet of previously disturbed lawn grass vegetation in a small free-standing island. Ground disturbing activities include excavating a foundation for the building expansion, installing

underground utilities, and stormwater infrastructure. Best management practices (BMPs) would be implemented to prevent the migration of sediment off-site.

Notes:

- Test soils for hazardous materials, which if found, would be disposed of off-site according to local, state, and federal regulations.
- Implement a BPA-approved Erosion and Sediment Control Plan (ESCP) that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved revegetation plan as soon as practicable after disturbance.

3. Plants (including Federal/state special-status species and habitats)

Potential for Significance: No

<u>Explanation</u>: No special-status plant species or suitable habitat for special-status plant species are present within or near the project area. About 2,300 square feet of low-quality, regularly mowed grass lawn habitat surrounded by curbs and asphalt parking surfaces, would be disturbed as a result of the proposed project. Therefore, the proposed action would have no effect on special-status plant species.

4. Wildlife (including Federal/state special-status species and habitats)

Potential for Significance: No

Explanation: About 2,300 square feet of low-quality, regularly mowed grass lawn habitat, would be disturbed as a result of the proposed project. Minor and temporary disturbance of wildlife could occur from elevated noise during construction. Because the work would be occurring adjacent to a currently operating substation and within the overall complex, any wildlife present are likely used to human presence and noise. No special-status wildlife species or suitable habitat is present within or near the project area. Therefore, the proposed action would have no effect on special-status wildlife species or habitats.

5. Water Bodies, Floodplains, and Fish (including Federal/state special-status species, ESUs, and habitats)

Potential for Significance: No with Conditions

Explanation: The proposed action includes installation of new and modification of existing stormwater management infrastructure, which would be built in accordance with all applicable local, state, and federal regulations. No water bodies or special-status fish species are present within the project area, and the project area is not located within a floodplain. During construction, BMPs would prevent indirect impacts to off-site waterbodies, floodplains, and special-status fish. Therefore, the proposed action would not impact water bodies, floodplains, or fish.

Notes:

- Implement a BPA-approved ESCP that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved Stormwater Pollution Prevention Plan (SWPPP) during construction.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

6. Wetlands

Potential for Significance: No with Conditions

Explanation: No wetlands are present within the project area. BMPs would prevent direct impacts to off-site wetlands. Therefore, the proposed action would not impact wetlands.

Notes:

- Implement a BPA-approved ESCP that is guided by Washington Department of Ecology's Stormwater Management Manual for Western Washington.
- Implement a BPA-approved SWPPP during construction.
- Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

7. Groundwater and Aquifers

Potential for Significance: No with Conditions

<u>Explanation</u>: Ground disturbance is unlikely to reach depths to groundwater and no new wells or other uses of groundwater or aquifers are proposed. BMPs would prevent impacts from unintended spills to groundwater or aquifers. Therefore, the proposed action would not impact groundwater or aquifers.

Notes:

• Maintain an oil/fuel spill kit on-site during construction to address containment, cleanup, and disposal in the event of a spill.

8. Land Use and Specially-Designated Areas

Potential for Significance: No

<u>Explanation</u>: The renovation and expansion of HMB would be consistent with and would not change the land use of the Ross Complex.

9. Visual Quality

Potential for Significance: No

Explanation: While the 2,700-square foot expansion of the HMB would be two stories tall, it would not significantly change the perceptible appearance of the overall Ross Complex relative to the existing facilities. The HMB renovation and expansion would not be visible from properties outside of the Ross Complex, and would not significantly change the visual quality of the area.

10. Air Quality

Potential for Significance: No

Explanation: Construction activities would result in a minor and temporary increase in dust and vehicle emissions in the local area. BMPs, such as turning off vehicles when not in use, would be implemented to limit the amount of emissions released in the local area.

11. Noise

Potential for Significance: No

Explanation: During construction, use of vehicles and equipment and general construction activities would create noise above current ambient conditions. However, noise impacts would be temporary and intermittent and would only occur during typical working hours (approximately 7am to 7pm). Construction-related noise would not be audible from

residential properties surrounding the Ross Complex. There would be no long-term change in ambient noise following completion of the project.

12. Human Health and Safety

Potential for Significance: No with Conditions

Explanation: Construction would be completed by qualified professionals who would follow all applicable safety requirements as detailed in their BPA-accepted site-specific safety plan, in accordance with BPA Contractor Safety and Health Requirements for Prime and Subcontractors, and any additional state, local, or authority having jurisdiction requirements. The safety plan would be maintained on-site during construction and updated, as needed. The general public and non-construction related workers would not have access to the construction area while work is ongoing unless they first attend a mandatory training or are escorted by a trained construction worker. Work areas would be secured when construction crews are not present. Therefore, the proposed action would not be expected to impact human health and safety.

Notes:

- Hazardous and toxic materials handled during the renovation and potentially relocated to different areas of the HMB during the remodel, would remain within the permitting areas of the building regulated by the Environmental Protection Agency's Resource Conservation Recovery Act (RCRA).
- BPA Hazmat personnel would be onsite during construction to monitor proper handling of hazardous and toxic materials.
- Wastes contaminated with polychlorinated biphenyls (PCBs) regulated under the Toxic Substances Control Act (TSCA), as implemented by the State of Washington's Department of Ecology, would be disposed of per the TSCA regulations.

Evaluation of Other Integral Elements

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.

Explanation: N/A

Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.

Explanation: N/A

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.

Explanation: N/A

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 of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.

Explanation: N/A

Landowner Notification, Involvement, or Coordination

<u>Description</u>: BPA's real property services team is coordinating with Clark County and the railroad company, which use the land, located directly north of the HMB. BPA is also coordinating with Washington's Department of Ecology RCRA permit coordinator regarding the proposed activities in the RCRA permitted area.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ Becky Hill May 25, 2022

Becky Hill, ECT-4 Date

Environmental Protection Specialist