

RECORD OF NEPA REVIEW

Title: BH New Cavern Leaching

Description: A new cavern will be developed on the BH site within the site boundary (totally on existing DOE property). The brine from the new BH cavern will be pumped to the existing BH caverns for planned crude oil exchange. The new cavern will have a chimney blanket of crude oil. Transferring the brine to the existing caverns for crude oil displacement will prevent additional VOC emissions at the BH brine pond.

I concur with the accuracy of the above brief descriptive task summary by my signature

Robert J. Mahelit
DM Description Concurrence

3/11/2009
Date

[Signature]
DOE Description Concurrence

3/12/2009
Date

Regulatory Requirements in 10 CFR 1021.410

(1) The proposed action fits within a class of actions that is listed in Appendix A or B of Subpart D.

The proposed action must not:

1. Threaten a violation of statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders.
2. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions.
3. Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and /natural gas products that preexist in the environment such that would be uncontrolled or unpermitted releases; or
4. Adversely affect environmentally sensitive resources.

(2) There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

(3) The proposal is not "connected" (40 CFR 1508.25(a)(1)) to other actions with potentially significant impact and is not related to other proposed actions with cumulatively significant impacts (40 CFR 1508.25(a)(2)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

RECORD OF NEPA REVIEW

Environmental Analysis:

Review Initiation Date: 3/11/09

CA (Clean Air): see Aspects
CW (Clean Water): see Aspects
HW (Hazardous Waste): see Aspects

CS (Control of Toxics): N/A
PP (Pollution Prevention): N/A
MR (Mgmt and Report): NEPA review
Wetlands/ Floodplains: N/A

Aspects:

Job consists of the development of a new cavern at BH.
Aspects/requirements:

- An air permit will not be required for leaching the new BH cavern, because the brine will be sent to the existing BH caverns instead of to the BH brine pond. The crude oil displaced by the brine in the existing caverns will be sold.
- A Waste Management Plan is required and must be submitted to DM Environmental for review and approval prior to the commencement of any physical work that will generate waste at any SPR site.
- RCT permitting may be required if a new anhydrite pond or pit is added for this project.

Determination of NEPA

- NEPA document to be applied: DOE-EIS-0385, Billion Barrel Expansion, December 2006 *
- The Department of Energy has determined that this task is of the administrative nature and is therefore covered under the original Environment Impact Statement, Environmental Assessment, or Supplement Assessment prepared for the operation of the Strategic Petroleum Reserve.
- NEPA review suggests an Environmental Assessment is required. (see attached _____)
- NEPA review suggests an Environmental Impact Statement is required. (see attached _____)
- NEPA review suggests this project is a Categorical Exclusion.

* Development of the new BH cavern is equivalent to the first step in the development of a BH expansion cavern. Section S.3.2 of DOE-EIS-0385 (page S-3) identifies BH as a potential expansion site and references the draft DOE-EIS-0165-D (October 1992) for details on the construction of a new cavern.

Section 2.5 of DOE-EIS-0165-D (pages 2-15 to 2-27) describes the steps for construction of a typical SPR cavern: 1) A pair of wells are drilled into the salt dome. 2) Tubing is suspended down the boreholes of the two wells. 3) Water is pumped down the tubing of the first well, which dissolves (leaches) the salt from the borehole wall. 4) The resulting brine is displaced out through the tubing of the second well and sent to the brine pond for disposal. 5) A blanket of oil is injected into the well to prevent dissolution of salt at the roof of the cavern and to direct cavern growth downward. 6) Leaching continues until the cavern is fully developed.

J. G. [Signature]
DM NEPA Preparer

[Signature]
DM Environmental Concurrence

3/12/09
Date

3/12/09
Date

Based on my review of information conveyed to me and in my possession the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1) I have determined that the proposed action fits within the specified actions, the other regulatory requirements set forth above are met, and the action is hereby excluded from further NEPA review.

K. Balise
Approved by
DOE NEPA Compliance Officer

3/20/09
Date

LIST OF ENVIRONMENTAL SUBMITTALS

Contract Number: Multiple Description: BH New Cavern Leaching

#.	(1) (X) APPLIES	SPEC. PARAGRAPH	DESCRIPTION OF SUBMITTAL	(2) SUBMITTAL DEADLINE	(3) Electronic COPIES TO CMTR	REMARKS OR NOTES
1	X	3.0	Submit a letter to M&O contractor to confirm that M&O contractor has received all permits	Prior to mobilization	1	Ensures permits are in place prior to work. CMTR will provide a copy to the Site ES&H Manager for confirmation.
2		4.4	Proof of EPA approved certification of personnel and equipment for CFC refrigerant and Halon recovery	Prior to commencement of work	1	
3		4.4	Service records for appliances containing at least 50 pounds of refrigerant.	After servicing.	1	CMTR will provide documentation to Site ES&H Manager. Records must be maintained on site for at least 3 years.
4		5.2	List of products and their current MSDSs to be approved for site use (submitted to CMTR)	10 working days in advance of need, or prior to use of a product for emergency contracts	1	Contractor must keep MSDSs at workplace. List will be modified as needed. CMTR will provide copies to the Site ES&H Manager. The site ES&H Manager will provide to the NOLA Chemical Management Specialist those MSDSs for products not listed in the Qualified Products List for review and approval.
5	X	6.2	Hazardous material handling and transportation training documentation	Prior to handling hazardous material	1	CMTR will provide documentation to Site ES&H Manager.
6		6.6	Copy of commercial pesticide applicator's license	Prior to initial application	1	CMTR will provide copy of license to Site ES&H Manager.
7	X	6.7	Copies of driver's licenses for drivers that will transport hazardous material	Prior to commencement of work	1	Copies will be provided to the CMTR prior to transporting throughout contract period.
8	X	6.8	Contamination (Spill) Report	End of work day of occurrence	1	CMTR will provide copy to site Control Room Operator
9	X	6.9	Contractor's Chemical Inventory	Every 3 months, or at contract end, if sooner	1	Completed inventory will be provided to CMTR.
10	X	7.2	Approved waste management plan	Prior to commencement of work	1	CMTR will provide copies to Site ES&H Manager and NOLA Waste Mgmt. Specialist for review/approval. Review of the plan by M&O contractor may require up to 5 working days.

(1) Submittals applicable to this contract are marked with an "X."

(2) Submit information on or before submittal deadline.

(3) Electronically transmit to Construction Management Technical Representative (CMTR) on site

LIST OF ENVIRONMENTAL SUBMITTALS (cont.)

Contract Number: Multiple Description: BH New Cavern Leaching

#.	(1) (X) APPLIES	SPEC. PARAGRAPH	DESCRIPTION OF SUBMITTAL	(2) SUBMITTAL DEADLINE	(3) COPIES TO CMTR	REMARKS OR NOTES
11	X	7.2.4	Lab and QA/QC results of waste characterization	10 working days after sampling	3	CMTR will provide copies to Site ES&H Manager and NOLA Waste Mgmt Specialist. Include lab test and QA/QC results with the waste determination. CMTR will provide copies to Site ES&H Manager and NOLA Waste Mgmt Specialist for review and concurrence. Approved determinations become part of the waste management plan. CMTR will provide a copy to Site ES&H Manager immediately upon receipt.
12	X	7.2.5	Waste determinations for approval	Prior to disposal	3	
13	X	7.2.7	SPR Weekly Waste Inspection Report	End of month or end of contract if sooner	2	CMTR will provide a copy to site ES&H Manager immediately upon receipt.
14	X	7.2.7	Monthly Waste Inventory Report	End of month or end of contract if sooner	2	CMTR will provide a copy to site ES&H Manager immediately upon receipt.
15	X	7.2.9	Requested waste disposers, transporters, and recyclers not on the SPR qualified list	60 calendar days prior to need for disposers and 10 days for transporters	3	CMTR will provide copies to the Site ES&H Manager and the NOLA Waste Mgmt Specialist for investigation and concurrence. Submittal does not guarantee approval by M&O contractor
16	X	7.2.10	Copies of waste shipping papers	Immediately after signing	1	CMTR will provide a copy to the ES&H Manager for records.
17	X	7.2.11	Request for approval of disposal location for temporary sanitary facility waste	Prior to delivery of sanitary facilities	3	CMTR will provide information to Site ES&H Manager and NOLA Waste Mgmt. Specialist for concurrence.
18	X	7.2.12	Request for permission to discharge waters	Prior to discharge	2	CMTR will provide requests to Site ES&H Manager. Some discharges may require permits. Check on these prior to work.
19		7.2.12	Request for permission to discharge hydrostatic test water	30 days prior to intent to discharge	2	Applies only for pipe testing where discharge is made to ground. CMTR will provide request to Site ES&H Manager.
20		5.5	Affirmative Procurement Report (when quantities are estimated, i.e., not verifiable)	At contract completion	2	Contractor shall complete Attachment 2. CMTR will provide an electronic copy of report to M&O Contractor Pollution Prevention Specialist.
21		5.5	Affirmative Procurement Report (when quantities are verifiable)	At contract completion	2	Contractor shall complete Attachment 3. CMTR will provide an electronic copy of report to ES&H Pollution Prevention Specialist.

(1) Submittals applicable to this contract are marked with an "X."

(2) Submit information on or before submittal deadline.

(3) Transmit an electronic copy to Construction Management Technical Representative (CMTR) on site.

See next page for signature approvals.

Contract Number: Multiple **Description:** BH Brining Cavern

This submittal register was developed and reviewed for applicability by:

J. G. 7/2/09

Date: 3/12/09

M&O Contractor Environmental Department

Date: _____

Concurrence by AGSC Construction Manager