

DRAFT
ENVIRONMENTAL ASSESSMENT
FOR OBTAINING AMENDMENT TO NUCLEAR REGULATORY COMMISSION (NRC)
LICENSE
FOR MISSION WORK INVOLVING DEPLETED URANIUM (DU) ARMOR

ANNISTON ARMY DEPOT
ANNISTON, AL 36201

December, 2012

Prepared by Anniston Army Depot

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I. PURPOSE AND NEED

The National Environmental Policy Act (NEPA), Section 102(2)(c), requires all agencies of the Federal Government to include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on (1) the environmental impact of the proposed action; (2) any adverse environmental effects which cannot be avoided should the proposal be implemented; (3) alternatives to the proposed action; (4) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; and (5) any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.

The purpose of this Environmental Assessment (EA) is to evaluate the direct, indirect, and cumulative impacts to natural resources, cultural resources and the environment if Anniston Army Depot (ANAD) obtains an amendment to its current Nuclear Regulatory Commission (NRC) license to include mission work involving DU armor. ANAD currently has a NRC License for mission work pertaining to DU which does not cover the removal of DU armor.

II. DESCRIPTION OF THE PROPOSED ACTIONS

ANAD is located approximately 10 miles west of Anniston, Calhoun County, Alabama, north of U.S. Highway 78 and west of County Highway 109. Calhoun County is located approximately 55 miles east of Birmingham, Alabama and approximately 98 miles west of Atlanta, Georgia. The total area of the site is approximately 15,300 acres. ANAD was established in 1940. The installation was originally used as an ammunition storage depot, then in the 1950's it was designated as a facility for the overhaul and repair of combat vehicles. In the 1960's it became a site for maintenance and storage of chemical munitions. Currently, ANAD continues its role in munitions storage and maintenance of military vehicles.

An EA was finalized in August, 2010, and ANAD received NRC License SUB-1602 on May 23, 2011, to perform mission work pertaining to DU with the potential for some removable contamination. For the current project, ANAD proposes to make application to the NRC for a license amendment to include the removal of DU armor in an existing facility that is currently licensed by the NRC for mission work involving DU inside the Nichols Industrial Complex (NIC). The current NRC license does not provide for the removal of DU armor. The proposed facility was constructed in 2004 with the capabilities of

performing this type of operation. The facility has a High Efficiency Particulate Air (HEPA) filter system with local HEPA vacuums with adjustable nozzles. The ventilation system has a computerized air make-up system with a negative air flow. The proposed process would involve the removal of DU contamination and armor, which would be containerized and stored at a facility inside the NIC while awaiting either Department of Energy (DOE) or Department of the Army (DA) disposition. DU contaminated water could be encountered with this mission, which would be managed by absorbing the water with oil dry or comparable material, then containerizing the material for disposition. Calibrated radiac instrumentation for monitoring radiological conditions will be maintained in the mission facility. The construction of the facility, with its negative pressure ventilation and extensive HEPA filtration system, is designed to eliminate the potential release of contamination into the environment. Any contamination events would be managed in the current licensed facility, with no expected environmental impacts to unrestricted areas.

III. ALTERNATIVES CONSIDERED

1. **Take No Action.** ANAD is the major military combat vehicle repair facility for the Department of Defense. It is considered imperative for ANAD to apply to the NRC for an amendment to the current license so that this mission work can be accomplished on this installation. Without this capability, ANAD would not be able to perform the mission work and another suitable location would have to be found. This would greatly affect ANAD and the U.S. Army's ability to support the U.S. military and its national security goals and objectives.
2. **Proceed With Proposed Action.** This project allows for the safe removal of DU contamination and armor without contamination managed within the current licensed facility. It is a necessary operation for accomplishment of the overall mission. With this license amendment, ANAD would be able to perform this critical mission on post and continue to support the U.S. military and national security goals and objectives.

Americans with Disabilities Act (ADA) requirements would be incorporated into these projects. These projects have been coordinated with the installation physical security plan, and all physical security measures would be included. All required antiterrorism protection measures would be included. Alternative methods of meeting these requirements have been explored during project development. This project is the only feasible option to meet the requirements. Sustainable principles would be integrated into the design, development, and construction of these projects in accordance with Executive Order (EO) 13123 and other applicable laws and EO's.

3. **Alternative Action.** There is no other alternative action considered. No other location on or off the installation is considered suitable for this project.

IV. AFFECTED ENVIRONMENT

The mission work pertaining to the removal of DU contamination and armor will be conducted in a closed facility within the Nichols Industrial Complex. It is currently licensed by the NRC to be conducted within the boundaries of ANAD.

The location of the facility is within a heavy industrial area. The area is fully developed and there are no known cultural resources, endangered and threatened species, or candidate species within or near the proposed location.

V. ENVIRONMENTAL IMPACT OF ALTERNATIVES

1. If the proposed mission work is not allowed, then there would be no negative impacts to the environment.
2. If the proposed mission work is allowed, then there will be some minimal impacts to the environment. However, there should not be any long term direct, indirect, or cumulative negative impacts on the environment.
3. No other alternative actions are considered feasible.

VI. ENVIRONMENTAL IMPACTS OF PROPOSED ACTION

a. Air Quality

The mission work pertaining to the removal of DU contamination and armor where some contamination could be encountered and removed poses no impact to the air quality of ANAD and the surrounding communities. The facility is enclosed, and has the properly filtered ventilation system installed to capture any DU contamination, thus preventing the release DU contamination into the atmosphere. The HEPA filtration system would capture any contamination. Potential high levels of carbon monoxide and hydrogen can occur during work on the system, but these gases would be mitigated with the facility ventilation system, by inert gases used in the process, proper handling procedures and appropriate Personal Protective Equipment (PPE) being worn by the workers in the facility.

b. Surface Water Quality

No negative impact on surface water quality is expected due to the proposed project. The project will be inside a closed facility not in direct contact with any waters of the U.S. In addition, ANAD has and exercises an extensive Spill Prevention Countermeasure and Control (SPCC) plan.

c. Wastewater

DU contaminated water could be produced by this project, but the water will be absorbed with oil dry or comparable material. This would be the only industrial wastewater generated as a result of the proposed project. Contaminated water should not be a normal occurrence. Any absorbed contaminated water encountered with the current or proposed project will be containerized and properly stored, awaiting disposition.

d. Groundwater

No groundwater contamination is expected as a result of the proposed project. There are no Solid Waste Management Units (SWMUs) or groundwater wells located at the proposed project site. The proposed project site is not subject to the Installation Restoration Program (IRP).

e. Domestic Sewage

The proposed project will not have any impact on the Sewage Treatment Plant (STP) located at ANAD. There should be no additional domestic sewage generated from the proposed project.

f. Waste Management

Wastes that would be generated as a result of this project include waste from the removal of DU contamination and armor. It would be containerized and maintained at a facility inside of the Nichols Industrial Complex awaiting either DOE or DA disposition. There are no other Solid or Hazardous waste impacts with the proposed project.

g. Noise

Noise sources at the project site include the normal industrial noises expected with this type operation. No increased noise impacts are anticipated for the proposed project.

h. Safety

The facility is highly secured and access is restricted to employees with proper clearance and training. Work methods would include local exhaust systems and monitoring for contaminants during the process. The facility operates under negative pressure with HEPA filtration systems to capture any particulate contaminants that could escape the local exhaust. Any contamination events would be managed in the current licensed facility, with no expected environmental impact to unrestricted areas. In the event of any liquid contamination, the area is easily decontaminated with painted walls, and a sealed concrete floor with a ½ inch steel plate directly under the work station. The facility has no floor drains, so there is no opportunity for liquid waste to enter any waste water streams. Any liquid contamination would be absorbed with oil dry or comparable material then containerized and stored at a facility inside the NIC awaiting disposition. There would be regular monitoring of the facility for potential contamination, and there is an onsite radiochemistry laboratory for rapid analysis. Monthly radiological surveys to include swipes and radiac instrumentation will be performed. Initial air sampling will be performed to determine the required PPE and procedures. Also, air sampling will be performed during unusual events, as required and every six (6) months as is done with other heavy metals. The installation safety program has achieved the OSHA 18001 Safety and Health Management system certification and the Radiation Safety Program receives an annual evaluation by external agencies.

i. Threatened and Endangered Species

There are no known endangered, threatened, or candidate species in or near the proposed project facility. The only currently identified threatened or endangered species inside ANAD boundaries is the Tennessee Yellow Eyed Grass. This grass is located in the Ammunition Storage Area on the outskirts of the burning ground area and has not been found in the Nichols Industrial Complex where this project would occur.

j. Archaeological Remains and Historical Sites

No identified historical or archaeological sites within the boundaries of ANAD would be affected by the proposed project. The sites are all located in areas remote from the location of the project. The State

Historic Preservation Officer (SHPO) has concurred with the Installation Cultural Resource Management Plan (ICRMP) for management of these resources. Five resources have been identified at ANAD, which are considered for listing on the National Register of Historic Places. These resources are:

1. Field Site 1: A cave located within the Southwest corner of ANAD.
2. Bynum Cemetery: A cemetery associated with the community of Bynum, which was absorbed by construction of ANAD.
3. Burns Cemetery: A cemetery located within Igloo Area A which is probably associated with an extended family or community.
4. Wilbanks Cemetery: A cemetery located in the Northwest corner of ANAD. This resource is associated with archeological remains of a church and several residences.
5. Wilbanks Community Complex: This complex is associated with the Wilbanks Cemetery. It is composed of two historic house sites and a historic church site. Terracing is present, indicating a historic landscape worthy of preservation.

The facility that will be utilized for the proposed project has not been identified as being a historic or cultural site by SHPO and the ICRMP. Concurrence with our Cultural Resource Management Plan by SHPO agrees that no historic/cultural resources are known to be in the proposed project facility.

k. Short and Long Term Effects on Wetlands

There are no wetlands located on or adjacent to the facility that will be impacted by the proposed project.

l. Transportation

There would be no impacts to transportation by the proposed project.

m. Socioeconomics

ANAD and the surrounding communities could reap long-term economic benefits through the implementation of the proposed project.

n. Environmental Justice

EO 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", requires federal agencies to make environmental justice a part of their mission and address adverse human health or environmental effects resulting from their activities. The goal is to ensure that activities that affect human health and the environment do not discriminate against minority or low-income populations and that no one bears an unfair burden from such activities.

The proposed project site is located within the Nichols Industrial Complex of ANAD and is currently licensed by the NRC to perform mission work pertaining to DU with the potential for some removable contamination. This project will be conducted within the installation boundaries and will not impact the surrounding community. The primary use of the adjacent ANAD property is heavy industrial and not agricultural or residential.

VII. CONCLUSION

Based upon the assessment made of the long and short-term direct, indirect, and cumulative impacts of the proposed project and after consideration of alternatives, including the no action alternative, it is believed that the mission work pertaining to the removal of DU contamination and armor will have no significant environmental impact. As a result of this finding, it is recommended that a Finding of No Significant Impact (FNSI) be published.

Persons and Agencies Contacted

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Anniston Army Depot

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Safety Officer
Anniston Army Depot

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Security Specialist
Anniston Army Depot

Anthony Phillips
Health Physicist/Radiation Safety Officer
Anniston Army Depot

Brian Anderson
Project Engineer
Anniston Army Depot

Karen Lapajenko McGuire
TACOM LCMC Radiation Safety Program Manager
TACOM LCMC Warren

References

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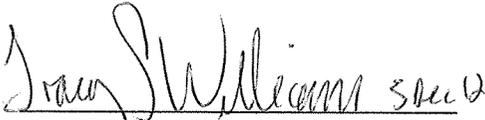
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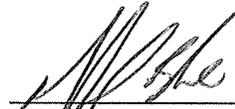
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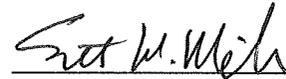
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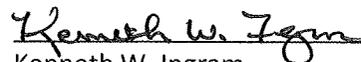
CONCURRENCE:


Tracy L. Williams Date
Chief, Environmental Management
And Restoration Division

 18 Dec 12
Michael C. Burke Date
Deputy to the Commander

 12/5/12
Shelby L. Starling Date
Legal Office

 12/5/12
Scott W. Miller Date
Safety Officer

 12/4/12
Kenneth W. Ingram Date
Installation NEPA POC

FINDING OF NO SIGNIFICANT IMPACT
FOR OBTAINING AMENDMENT TO NUCLEAR REGULATORY COMMISSION (NRC)
LICENSE
FOR MISSION WORK INVOLVING DEPLETED URANIUM (DU) ARMOR

An Environmental Assessment (EA) was finalized in August, 2010, and Anniston Army Depot (ANAD) received Nuclear Regulatory Commission (NRC) license SUB-1602 on May 23, 2011, to perform mission work pertaining to Depleted Uranium (DU) with the potential for some removable contamination. ANAD is proposing to apply to the NRC for an amendment to its current NRC license to include mission work pertaining to the removal of DU armor in an existing facility that is located inside of the Nichols Industrial Complex (NIC) at ANAD, which is currently licensed by the NRC for mission work with the potential for some removable DU. The proposed facility was constructed in 2004 with the capabilities of performing this type of operation. The process involves the removal of DU contamination and armor, which would be containerized and stored at a facility inside the NIC awaiting either Department of Energy (DOE) or Department of the Army (DA) disposition. The construction of the facility, with its negative pressure ventilation and extensive HEPA filtration system, is designed to eliminate the potential release of any particulate contamination into the environment. In the event of any liquid contamination, the area is easily decontaminated with painted walls and a sealed concrete floor that has no drains, with oil dry or other comparable absorbent material, then containerized awaiting disposition. Any contamination events would be managed in the current licensed facility, with no expected environmental impacts to any un-restricted areas. Potential high levels of Carbon Monoxide and Hydrogen can occur from the system being worked on, but these gases will be mitigated with the facility ventilation, inert gases used in the process, handling procedures, and appropriate Personal Protective Equipment (PPE) being utilized by the workers in the facility.

ANAD is the major combat vehicle repair facility for the Department of Defense (DoD). It is considered imperative for ANAD to apply to the NRC for the license so that this mission work can be performed on this installation. Without this capability, it would greatly affect ANAD and the U.S. Army's ability to support the U.S. military and its national security goals and objectives.

Based upon the assessment made of the long and short term direct, indirect, and cumulative environmental impacts of the proposed project and after consideration of alternatives including the no action alternative, the environmental consequences of this project are considered not to be significant. Americans with Disabilities Act (ADA) requirements would be incorporated into this project. This project has been coordinated with the installation physical security plan, and all physical security measures would be included. All required antiterrorism protection measures would be included. Alternative methods of meeting these requirements have been explored during project development. This project is the only feasible option to meet the requirements. Sustainable principles will be integrated into this project in accordance with Executive Order (EO) 13123 and other applicable laws and EO's.

EO 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", requires federal agencies to make environmental justice a part of their mission and address adverse human health or environmental effects resulting from their activities. The goal is to

ensure that activities that affect human health and the environment do not discriminate against minority or low-income populations and that no one bears an unfair burden from such activities. The proposed project would be located within the Nichols Industrial Complex of ANAD. The project will be restricted to the installation boundaries and will not impact the surrounding community. The primary use of the adjacent ANAD property is heavy industrial.

All applicable documentation relating to this proposed action is on file and may be reviewed by interested parties at the ANAD Strategic Communications Office or online at www.anad.army.mil. Public comments on the Draft FNSI and EA will be accepted for 30 days from the date this Finding of No Significant Impact is published. Written comments and inquiries pertaining to the Draft FONSI and EA should be directed to Ken Ingram, Installation NEPA POC, Anniston Army Depot, 7 Frankford Ave. DRK, Anniston, AL 36201, (256) 235-7943, kenneth.w.ingram12.civ@mail.mil.

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