

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Ross Complex Laboratories and Garage Upgrade Project (*Update to previous CX issued on February 27, 2023*)

**Project No.:** P04526

**Project Manager:** Ryan Everett, TEPF-CSB-2

**Location:** Clark County, Washington

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

**Description of the Proposed Action:** The Bonneville Power Administration (BPA) proposes to relocate the calibration, metrology, and chemistry laboratories from the aging South Ampere Building (Z-991), into a new, consolidated Calibration-Chemistry Laboratory, to increase worker safety, modernize assets, and combine workspaces to increase efficiency. Additionally, BPA proposes to update the interior of the Mangan High Voltage Laboratory (Z-686), and renovate an existing vehicle and equipment storage garage (Surveyor Garage, Z-1346) to improve workspaces for multiple workgroups, and consolidate functional workplace needs. This CX has been updated to account for the relocation of excess soils within the Ross Complex, as described further below.

The Calibration-Chemistry Laboratory would be a new two-story, 7,500-square-foot building, constructed between the South Ampere Building and the Mangan High Voltage Laboratory on BPA's Ross Complex. A concrete foundation would be constructed on the existing asphalt vehicle parking area between the two buildings, and pre-fabricated building sections and panels would be assembled onsite. An HVAC system, insulation, and ventilation system, including up to 10 chemistry fume hoods with roof-mounted fans, would be installed on the new Calibration-Chemistry Laboratory.

Adjacent to the new Calibration-Chemistry Laboratory, a new 730-square-foot recreational vehicle style covered structure would be constructed to provide a weather-protected parking space for BPA's calibration trailer. A new box container, to be used as a chemistry storage area with separate ventilation, would also be installed in the adjacent laboratory. An existing chemical waste container would be permanently relocated to a new location nearby to accommodate the new box container's installation.

The Mangan High Voltage Laboratory building (including the soils laboratory and soils garage located within Mangan), would be remodeled and updated to accommodate shifting staffing and equipment storage needs. Existing equipment, including an environmental chamber, would be moved from the Mangan High Voltage Laboratory to the Surveyor Garage, and new equipment, including a new environmental chamber/oven, would be installed in an existing open-space area of the Mangan High Voltage Laboratory.

The existing PCB Laboratory Annex Modular facility (Z-1334) would be retired due to exceeding its useful life and overall deterioration, and transported to an approved facility for proper disposal. The chemistry laboratory functions and some equipment in the PCB Laboratory Annex Modular facility would migrate to the new Calibration-Chemistry Laboratory.

Supporting infrastructure on the Ross Complex (i.e., water lines, sewer lines, station service power, and communications fiber optic cable) would be removed, improved, modified, or newly installed on the Ross Complex in the local area to support the new Calibration-Chemistry Laboratory facility.

Additionally, BPA proposes to remodel and repurpose a vehicle and equipment storage garage (Surveyor Garage) located in the Cold Creek Yard portion of the Ross Complex to create a functional workshop area, workstations, and garage space for BPA surveyors to store and charge their equipment. Up to four new overhead garage doors may be installed on the existing building, and up to two entry doors may be installed or reconfigured on the building.

To accommodate the Surveyor Garage's new purposes, about 450 linear feet of new fiber optic cable and communications lines would be installed in the Cold Creek Yard. The installation would be within a trench (about 3 feet deep and 3 feet wide) within existing gravel access road areas between the Surveyor Garage and an existing communications vault near structure 1/2 of the Ross-Lexington No 1 transmission line. Fiber optic cable would also be installed between this existing vault and the Ross Maintenance Headquarters building via existing underground conduit.

New electrical station service would be installed between an existing public utility junction box (located adjacent to structure 1/2 of the Ross-Carborundum No 1 transmission line) and a new service transformer, to be installed just west of the Surveyor Garage. The service would be installed parallel to an existing gravel access road via a new trench up to 3 feet deep, 3 feet wide, and about 600 feet long.

A new pervious-surface pedestrian walkway, up to 250 feet long and up to 4 feet wide, would be installed between the Ross Maintenance Headquarters building and the Surveyor Garage. The pedestrian path would be installed in an area currently maintained as a grass lawn.

Excavated soils would be used on site as much as possible, including the relocation of up to 1,000 cubic yards of soil to a grass-lawn area located between the ABC Parking Lot and the Paul D. Johnson Substation. When this excess soil is combined with about 30,000 cubic yards of soil from the Vancouver Control Center Project, a grass lawn area about 2.9 acres in size (125,000 square feet; roughly 200 feet wide by 650 feet long) would be covered. The site would be graded and compacted to create a flat surface area. A fabric barrier and crushed gravel aggregate would be applied to the area to create a temporary parking lot (Parking Lot D) with up to 250 vehicle stalls to support personnel working on the Vancouver Control Center construction project. Upon construction completion, the gravel parking lot would be revegetated.

Excess soils and demolished material from construction activities would be disposed of off-site, according to all applicable local, state, and Federal regulations.

**Findings:** 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/ Sarah T. Biegel

Sarah T. Biegel  
NEPA Compliance Officer

02/20/2024

Date

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.

**Proposed Action:** Ross Complex Laboratories and Garage Upgrade Projects (*Update to previous CX issued on February 27, 2023*)

## **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, Technical Services Building, Ross Maintenance Headquarters in the Cold Creek Yard, 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 corridor connects the creeks and their floodplains to freshwater-forested shrub wetlands located along both sides of Interstate 5 and Highway 99. A perimeter chain link security fence surrounds the Ross Complex, and railroad tracks run through the east-west riparian corridor. The work areas associated with the proposed action are comprised of asphalt roadways, vehicle parking lots, existing buildings, graveled roadway, and yard areas, and grass lawns.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No with Conditions

**Explanation:** On October 19, 2022, the BPA archaeologist issued a Section 106 consultation memorandum. The memorandum states that BPA determined the implementation of the proposed undertaking does not have the potential to cause effects on historic properties, assuming such historic properties were present.

On February 9, 2024, the BPA archaeologist and historian determined that soil relocation from the Vancouver Control Center's site and creation of a new gravel parking lot would have no potential to cause effect to historic properties and issued a memorandum documenting the determination. The memorandum was updated on February 20, 2024, to include the excess soils from the Ross Complex Laboratories and Garage Upgrade Projects being added to the Parking Lot D area.

#### **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

Explanation: Up to 2 acres of existing concrete, asphalt, and graveled areas would be disturbed, and up to 1,100-square feet of grass lawn area would be disturbed as a result of the proposed action. 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.

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

Potential for Significance: No

Explanation: No special-status plant species or suitable habitat for special-status plant species are present within the project area. Up to 1,100 square feet of low-quality, regularly mowed and maintained grass lawn habitat would be disturbed as a result of the proposed project. Therefore, the proposed action would have no effect on special-status plant species or habitat.

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

Potential for Significance: No

Explanation: Up to 1,100 square feet of low-quality, regularly mowed and maintained 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 Ross Complex where human activity is frequent, any generalist wildlife species present are likely already used to human presence and noise. No special-status wildlife species or suitable habitat is present within 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: No water bodies, floodplains, or special-status fish species are present within the project area. During construction, BMPs would prevent indirect impacts to off-site waterbodies, floodplains, and special-status fish and fish habitat. Therefore, the proposed action would not impact water bodies, floodplains, fish, or fish habitat.

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

Explanation: 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

Explanation: The project would develop some previously-paved areas and partially vegetated areas within a previously developed site complex. The structure replacements, renovations, and upgrades to the site are consistent with the surrounding land uses within the Ross Complex.

## 9. Visual Quality

Potential for Significance: No

Explanation: Construction of a new two-story tall Calibration-Chemistry Laboratory and removal of some existing structures would result in a small, but perceptible change in the appearance of the overall Ross Complex relative to the current site conditions. However, new Calibration-Chemistry Laboratory facility, as well as the modifications to the Surveyor Garage and other support buildings, would not be visible from properties outside of the Ross Complex.

## 10. Air Quality

Potential for Significance: No

Explanation: A new ventilation system, including 10 chemistry fume hoods to replace 8 existing fume hoods, may increase the overall quantity of solvents emitted. However, the additional amount of emissions that the additional fume hoods would release, would be *de minimus*. BPA's Ross Complex emissions are reported to the Southwest Clean Air Agency (SWCAA), with whom BPA holds a general Air Permit, as delegated from Washington State Department of Ecology and the Environmental Protection Agency (EPA).

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 7 AM to 7 PM). Construction-related noise would not likely 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: Building materials containing toxic substances, such as asbestos and polychlorinated biphenyls (PCBs), may be encountered during project activities. However, 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.

BPA staff and contract personnel are briefed on the chemicals used in the laboratories, have Materials Safety Data Sheets available to them, wear personal protective equipment, and are trained in proper handling, security during transportation, and storage.

Laboratory supplies, fragile glass wear and equipment, and potentially volatile, hazardous, and toxic chemicals and solvents would be transported up to 200 feet from the existing laboratory facilities to the new Calibration-Chemistry Laboratory and to chemical waste storage containers and boxes nearby.

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:

- Trained BPA Hazmat staff and contractor personnel would be onsite to monitor proper handling and transportation of hazardous and toxic materials during project activities.
- The fume hoods in the chemistry laboratories would be inspected annually to ensure they are functioning properly, to reduce the risk of inadvertent inhalation during fume hood use.
- If encountered during project activities, wastes contaminated with polychlorinated biphenyls (PCBs) and other chemicals regulated under the Toxic Substances Control Act (TSCA), as implemented by the State of Washington's Department of Ecology, would be transported and 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: While a new 7,500-square foot, two story Calibration-Chemistry Laboratory building would be constructed, it would be a consolidated, functional replacement for facilities that would be removed as a result of this project. The net spatial expansion of the chemical treatment laboratory and other laboratories would not constitute a major expansion.

**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: Potentially volatile, hazardous, and toxic chemicals would be transported from the existing laboratory facilities to the new Calibration-Chemistry Laboratory and other storage locations. The new building and storage facilities would be designed to account for proper storage and separation requirements as evaluated by current codes and regulations to minimize the risk of uncontrolled or unpermitted chemical interactions and releases.

Additionally, BPA chemists and contractors would be trained in proper fume hood and chemical use prior to working with the materials and equipment to minimize the risk of uncontrolled or unpermitted releases into the atmosphere.

**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

Description: The proposed action would occur on BPA fee-owned property. Therefore, no landowner notification, involvement, or coordination would be required.

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  
Becky Hill, ECT-4  
Environmental Protection Specialist

02/20/2024  
Date