## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-16-121

### SECTION A. Project Title: Research and Education Campus (REC) Escalator and Elevator Modernization

## SECTION B. Project Description and Purpose:

Several facilities maintained by Idaho National Laboratory (INL) at the Research and Education Campus (REC) in Idaho Falls house aging elevators and escalators that require upgrade, modification, repair, and/or replacement for continued safe operation. The proposed action would remove, install, modify, assemble, replace, and/or alter escalators and elevators and associated systems and components, as necessary, to allow for continued use. Associated systems and components include doors, steps, controls, motors, drums, cables, gears, belts, and other components required for operation. Activities would be performed at various times and facilities as determined by schedule and funding.

#### SECTION C. Environmental Aspects or Potential Sources of Impact:

#### Air Emissions

Work may result in the disturbance or removal of asbestos (e.g., floor tile, dry wall, fire doors, caulk, insulation, etc.).

#### Discharging to Surface-, Storm-, or Ground Water

Liquids (e.g., lubricants, hydraulic fluid, etc.) and chemical use have the potential for discharge via floor drains and/or proximity to the exterior of the building.

#### **Disturbing Cultural or Biological Resources**

Although unexpected, impacts to cultural resources could occur if original components are altered in some facilities.

#### **Generating and Managing Waste**

Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, paper, plastics, building and equipment components, insulation, wiring, and other metals.

Hazardous wastes have the potential to be generated during work on systems containing hazardous substances, or through the use of hazardous chemicals. Hazardous metal containing wastes (e.g., electronics, brass, paints, etc.) may also be generated. Although not expected, metallic lead may be encountered (e.g., shielded walls or cables, counter-weights, etc.).

Asbestos waste may be generated if performing work on materials such as insulation, gaskets, ceilings, walls, or flooring.

Potential polychlorinated biphenyl (PCB)-containing waste may be generated during work on pre-1982 components such as hydraulic systems, painted surfaces, capacitors, ballasts, and other electrical equipment.

#### **Releasing Contaminants**

Chemicals have the potential for small air emissions as a result of normal use. Although not expected, spills may occur.

#### Using, Reusing, and Conserving Natural Resources

Appropriate materials would be reused/recycled where economically practicable. Applicable waste would be diverted from disposal in the landfill where conditions allow.

# SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For Categorical Exclusions (CXs), the proposed action must not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, or similar requirements of Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

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**References:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B2.5 "Facility safety and environmental improvements."

Justification: The proposed activities are consistent with CX B2.5 "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 12/13/2016