DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-16-108

SECTION A.	Project Title:	670-M-42 and 670-M-43 Diesel Fuel Strainer Removal and Bypass

The proposed action is the removal and bypass of diesel fuel oil strainers on diesel generator engines 670-M-42 and 670-M-43. Diesel fuel oil strainer parts are no longer available for these units. Hoses, fittings, and tubing need to be replaced to bypass the diesel oil strainers. The strainer on unit 670-M-43 allows air to enter the fuel system causing a drop in fuel oil pressure and will be the first strainer bypassed. The strainer is no longer necessary because of the low amount of sulfur in today's fuel compared to the 1960's. The strainer for unit 670-M-42 is currently operable and is planned to be removed and bypassed at a future date to support equipment reliability.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The proposed action would not change emissions of regulated pollutants.

Disturbing Cultural or Biological Resources

SECTION B. Project Description and Purpose:

Test Reactor Area (TRA)-670 is eligible for nomination to the National Register of Historic Places and is considered a Category 1 historic property. Removal and/or changes of original features may adversely impact this historic property; however, the project activities as described are exempt (Idaho National Laboratory Cultural Resource Management Office. Idaho National Laboratory Cultural Resource Management Plan. DOE/ID-10997, revision 5, Idaho Falls, Idaho, U.S. Department of Energy, Idaho Operations Office, 2013, pg 53, Table 2, Exemption 2). As such, the project may proceed - as described - without further cultural resource review.

Generating and Managing Waste

This work is expected to generate industrial waste in the form of used rags, wipes, PPE, etc. Materials painted prior to 1982 which are removed for disposal will be managed as PCB Bulk Product waste. Sludge found in the filters (if any) will be characterized and managed appropriately as will any wastes contaminated with diesel fuel. All Solid Waste will be managed by WGS.

Releasing Contaminants

All chemicals typically used in construction and maintenance, if used, will be managed in accordance with laboratory procedures.

Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition.

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)).

References: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B2.2 "Building and Equipment Instrumentation."

Justification: The proposed activities are consistent with CX B2.2 "Installation of, or improvements to, building and equipment instrumentation (including but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguard and security equipment."

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

\[\subseteq \text{Yes} \subseteq \text{No} \]

Annroved by	lack Dennerschmidt	DOF-ID NFPA Complian	nce Officer on: 9/26/201