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CX Posting No.: DOE-ID-INL-14-036

SECTION A. Project Title: Green Room Mill Replacement Project

SECTION B. Project Description:

The proposed action would replace the Bridgeport mill in the Green Room at the Advanced Test Reactor (ATR) with the Sharp mill that is currently located in building Test Reactor Area (TRA)-653 (south east side) at the ATR Complex. The Sharp mill located in TRA-653 (south west side) would be relocated to the south east side to replace the Sharp mill being moved to the Green Room. The Bridgeport mill would be disposed.

With the equipment door open in the Green Room, the entry way is not wide enough for the mills to be moved. Green Room wall panels would need to be removed to allow relocation of the mills. The 120 volt switch, conduit and gauge would be locked-out and tagged-out and removed to allow removal of the wall panels. The Bridgeport mill currently in the Green Room would be disposed. It is cord connected, but a lock out/tag-out (LO/TO) would need to be applied so the Sharp Mill could be hard wired.

The Sharp mill being moved from TRA-653 to the Green Room requires air to operate the machining deck. A new airline would be run into the Green Room for operation of the Sharp mill and would be fed by an air supply located in TRA-670. This airline near the Green Room would be modified to install isolation valves and approximately 50 feet of new airline. The plant air/instrument airline is painted. There would be a penetration in the Green Room for the new airline and installation of miscellaneous hangers to support it. The green room wall panels are made of sheet metal that appears to be a polished finish (i.e., not painted). The frame of the Green Room is made of carbon steel structural members painted green on which the hangers are expected to be installed.

The Bridgeport mill in TRA-670 is anchored to the floor with post installed concrete anchors. The old anchors would be cut off and abandoned in place. The new mill would be attached to the floor with post-installed concrete anchors. Installing the new anchors would require drilling approximately 4 holes in the floor. The concrete floor in the green room is painted.

Once the Bridgeport mill is moved, a subsurface survey would be performed. A LO/TO would be required to support the installation of the new Mills.

Projected Start Date: January of 2015 Projected End Date: June of 2015 Estimated Cost: Approximately \$50,000

SECTION C. Environmental Aspects or Potential Sources of Impact:

<u>Air Emissions</u>: There is a potential for disturbing regulated asbestos containing material (RACM). If the scope of work specified in the work package identifies an amount of regulated RACM to be removed that equals or exceeds the threshold quantity (260 linear feet on pipes / 160 square feet on other facility components / 35 cubic feet on facility components where the length or area could not be measured previously) specified in 40 CFR 61.145, contact the Asbestos Coordinator and provide the necessary information for completion of a 10-Day Demolition or Renovation Notification.

Disturbing Cultural or Biological Resources: TRA-670 is eligible for nomination to the National Register of Historic Places and removal and/or changes of original features could adversely impact this historic property. Prior to beginning work, obtain cultural/historical resource review by contacting Julie Williams (526-0926). Approval must be demonstrated by written communication from these organizations prior to beginning work, and any instructions contained in the review must be followed.

<u>Generating and Managing Waste</u>: Equipment from TRA-670 would be removed from a contamination area (CA). Typical construction debris could also be generated. All waste would be coordinated with WGS for proper disposition.

Releasing Contaminants: All chemicals would be managed in accordance with laboratory procedures.

Using, Reusing, and Conserving Natural Resources: All materials would be reused and recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, or are non-toxic or less-toxic alternatives. New HVAC equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see http://www.sftool.gov/GreenProcurement/ProductCategory/14) and new building finishes will meet affirmative procurement requirements as appropriate (see https://sftool.gov/green-products/0/building-finishes).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 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 DOE or Executive Orders; (2) require siting and

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construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or 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: 10 CFR 1021, Appendix B to subpart D, item B1.31

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

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: 9/23/2014