

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Cask Pad for Transport Staging Area at MFC

SECTION B. Project Description and Purpose:

It has been requested that a raised concrete pad be installed in the Transport Staging Area at MFC. The transport staging area supports Intra-INL shipments which cannot be immediately accepted at a receiving facility and may require temporary storage. Only one shipment may be stored in the storage area at any given time. Shipments using this location are expected to be stored for days, but no more than 30 calendar days, before the shipment must be completed. If shipments contain mixed/hazardous waste the shipments will be stored for no more than 10 calendar days. During temporary storage, the container/casks shall remain closed and secured to the transport trailer.

A preliminary Fire Hazards Analysis was performed for the TSA and it was determined a fuel loading control would be necessary due to surrounding storage of heavy equipment in the general vicinity. However, a raised concrete pad has been identified as a solution that would prevent a fuel spill from encroaching the area and engulf the cask, thus eliminating the need for a fuel loading control. The concrete pad will be located approximately 135 ft (41 m) south of MFC-703. The pad dimensions will be 65' L x 12' W and 6 inches thick.



SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The grading of the area will include mobile equipment including front end loaders, bobcats, dump trucks and rollers, which are powered by diesel fuel. As mobile equipment, such equipment is exempted as mobile internal combustion engines per IDAPA 58.01.01.222.02.e.

Project activities has the potential to contribute to air emissions from the operation of fuel burning equipment. If mobile sources (equipment) will be used temporarily, they must meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

Fugitive dust may be generated during proposed work.

Discharging to Surface-, Storm-, or Ground Water

N/A

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Disturbing Cultural or Biological Resources

The proposed location for the concrete pad is located within a previously disturbed area within MFC facility areas/improved grounds. A cultural resource review has been completed for this project (BEA-2022-14). Contact INL CRMO (Nicholas Holmer, 208.526.0760 or nicholas.holmer@inl.gov) for any additional questions.

Generating and Managing Waste

Industrial waste (nonhazardous, nonradioactive) will be generated from the project and will include items such as wood from forms for concrete pad. In addition, some soil may be brought in for leveling. Any additional waste generated during the project will be turned over and managed by Waste Generator Services.

Releasing Contaminants

When chemicals are used during the project there is the potential for spills that could impact the environment (air, water, soil).

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.
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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: 10 CFR 1021, Appendix B to Subpart D, Item B1.15, "Support Buildings".

Justification: B1.15 Support buildings. Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 1/5/2022