### DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-21-084

SECTION A. Project Title: MFC-721 TREAT Office Building Septic Tank Rehabilitation

### **SECTION B. Project Description and Purpose:**

The project would install a new septic system (septic tank and drain field) at the MFC-721 Transient Reactor Test (TREAT) office building. See figure below. The system would replace a 1,000-gallon septic tank and seepage system with a two compartment 2,500-gallon septic tank.

The 4" pipe that runs from MCF-721 to the south side of the road (Harrison Boulevard) is not anticipated to be replaced, However, this piping will be inspected for deficiencies. If the inspection identifies deficiencies with the piping, then the piping will be replaced.

The 4" pipe that runs from the south side of Harrison Boulevard to the new 2,500-gallon tank will be replaced.

The drain field will be extended. This extension may intrude into previously undisturbed soil. Areas of soil that have not been previously disturbed will require a cultural resource review of the area before the area is disturbed.

The existing 1,000-gallon septic tank will be backfilled in place after being pumped.

Constructing the septic system and installing a new septic tank requires an 'Installation Permit' and a licensed installer. INL would use a licensed subcontractor to perform this work.

The "Individual/Subsurface Sewage & Cleaning of Septic Tanks Rules" (IDAPA 58.01.03) establish minimum standards for the design, construction, siting, and use of individual and subsurface sewage disposal systems. These rules also establish requirements for obtaining an installation permit and an installer's registration permit and septic tank abandonment. See project specific instructions for septic tank abandonment.



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#### Air Emissions

Activities addressed have the potential to contribute to air emissions through the operation of fuel burning equipment and the use of maintenance 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 will likely be generated during proposed work.

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

N/A

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

The extension of the drain field may intrude into previously undisturbed soil. Areas of soil that have not been previously disturbed will require a cultural resource review of the area before the area is disturbed. The area will also require a nesting bird survey from April 1 to October 1. Revegetation with native seed may be required on areas where soil is disturbed south of Harrison Boulevard). Contact Colby Kramer @ 208-227-9031 for revegetation determination and a nesting bird survey.

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

The project activities will generate industrial (non-hazardous, non-radioactive) wastes such as scrap metal, plastic, concrete, and packaging material. Potential waste materials will be evaluated for waste minimization prior to generation, and industrial waste generated during proposed activities will be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

All solid waste will be managed by WGS using approved laboratory procedures.

#### Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, concrete, concrete cure, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment.

### 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: 10 CFR 1021, Appendix B to Subpart D. item B2.5 "Facility satety and environmental improvements" and B1.26 "Small water treatment facilities."

**Justification:** The proposed activity is 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 part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal

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Facilities" and 40 CFR part 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).

And CX B1.26: Siting, construction, expansion, modification, replacement, operation, and decommissioning of small (total capacity less than approximately 250,000 gallons per day) wastewater and surface water treatment facilities whose liquid discharges are externally regulated, and small potable water and sewage treatment facilities.

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

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 07/08/2021