

# DOE-ID NEPA CX DETERMINATION IDAHO NATIONAL LABORATORY

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CX Posting No.: DOE-ID-ICP-20-015,  
Rev.1

## SECTION A. INTEC - Procure and Install Personnel Modular Units, Rev. 1

## SECTION B. Project Description

Purchase, install and operate two modular office units located within the Idaho Nuclear Technology and Engineering Center (INTEC) Facility. In addition, one inactive comfort station (TR-80) will be reactivated and one existing modular trailer (TR-81) containing a wastewater laboratory will be modified, making improvements to the laboratory. The purpose of the modular office units and comfort stations are to provide additional office space and restroom facilities for INTEC operations, due to COVID-19 distancing requirements.

A five-plex modular office unit located east of TR-79 will provide office space for approximately 30 personnel and two restrooms. A two-plex modular office unit located north of TR-81 will provide office and break room space and two restrooms. Specific actions include:

- Level and grade area for the modular units
- Receive modular office units
- Block, level and anchor the units
- Install skirting, steps, landings, canopies and handrails
- Install connections for electrical, potable water, sewer, and communications
- Slope area around modular units
- Reactivate TR-80 (comfort station)
- Modify TR-81 (comfort station)

## SECTION C. Environmental Aspects / Potential Sources of Impact

**Air Pollutants** – Petroleum-fueled mobile and portable equipment will be used to support project activities. Nonroad engines are not stationary sources and not subject to permitting, but if they remain in the same location and perform the same function longer than 1 year from start-up, they are considered stationary sources and are therefore subject to Air Permitting Analysis Determination analysis for determining potential permitting requirements. Mobile equipment are exempted as mobile internal combustion engines per IDAPA 58.01.01.222.02.e.

Water or applicable dust suppression materials/equipment will be used, as conditions warrant, to control fugitive dust emissions during excavation activities. If necessary, radiological emissions from disturbed, contaminated soils will be estimated and included in the annual NESHAP INL report for radionuclides per 40 CFR 61.94 requirements.

**Asbestos Emissions** - Performing connections to existing water and sewer lines could include equipment and components that contain asbestos-containing material, such as pipe insulation, gaskets, and flanges. The Asbestos Removal Notification Form must be submitted and approved prior to any asbestos removal. However, if abatement of regulated asbestos containing material over the threshold quantities (160 square feet or 260 linear feet or 35 cubic feet) is planned, a renovation/demolition notification to the US Environmental Protection Agency is required at least 10 working days prior to commencement of any demolition or renovation operations.

**Radionuclide Release/Protection of the Public and the Environment** – The soil disturbance actions will be very minimal but could release radionuclides to the environment - the potential is very low. Releases would not exceed as low as reasonably achievable goals as the releases are expected to be far below applicable regulatory standards (e.g., NESHAP) and satisfy the exemption criteria.

**Chemical Use and Storage** – Commercial chemical products will be used to support operation of the restroom trailer. Also, petroleum products will be used in the heavy equipment. Project personnel will use non-hazardous product alternatives or substitutes in place of hazardous chemical products as long as the non-hazardous alternative meets the performance requirement or specifications of the requester. Spill prevention/minimization measures will be applied to all aspects of storage and utilization of chemicals/fuels.

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**Contaminated Sites Disturbance** – Soil disturbances at INTEC require completion of a Notice of Soil Disturbance. Soil disturbance will be coordinated with appropriate personnel.

**Discharges to Wastewater Systems or Groundwater** - This project scope will generate sanitary wastewater. The modular unit sanitary discharge lines will be hard piped into the INTEC sanitary waste systems.

**Drinking Water Contamination** - All plans and specifications associated with connecting the modular unit drinking water lines to the INTEC potable water system will be reviewed by the responsible charge operator, the system engineer, and system manager. If applicable, plans and specifications will be submitted to DEQ for review and approval. Cross connections between the drinking water system and any non-potable systems will be designed and controlled according to the Cross Connection Control Manual, Pacific Northwest Section of the American Water Works Association. Work on the potable water system will be disinfected, flushed, and tested prior to being placed into service.

**Material or Waste Handling and Transportation** - Appropriate methods will be used to prevent leaks and spills during waste handling and transportation.

All applicable waste will 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 recycle content or are non-toxic or less toxic alternatives.

**Waste Generation and Management** - A hazardous waste determination will be performed for all waste streams to identify the appropriate management practices. Waste streams will be evaluated to determine if any of these materials can be recycled or reused and will be evaluated to implement actions for minimizing waste generation.

Industrial waste will be generated and managed through Waste Generator Services and will be disposed of at the INL Landfill Complex. Should low-level waste be generated such as soil, it is anticipated to be disposed at the Idaho CERCLA Disposal Facility.

**Interaction with Wildlife** - If migratory bird nests with birds and/or eggs are discovered, cease work nearby, and notify the facility Project Environmental Lead.

**Managing Property and Materials** - Should trailers, equipment, or chemicals be excessed at the end of the project, all applicable procedures and processes will be followed including opportunities for reuse or recycling.

**Use, Reuse and Recycling of Resources** - Backfill sources will be taken from existing borrow sources within the Idaho National Laboratory (INL). INL borrow sources must be coordinated through appropriate personnel and paperwork.

**SECTION D. Determine the 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.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment 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) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not “connected” nor “related” (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: B1.15, Support buildings and B2.3, Personnel safety and health equipment

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Justification: The modular personnel trailer will provide additional office space and sanitary facilities for INTEC operations, due to social distancing requirements of COVID 19.

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

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on September 23, 2020.