DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-20-063

SECTION A. Project Title: Routine Maintenance

SECTION B. Project Description and Purpose:

Background

Idaho National Laboratory's (INL's) mission is to discover, demonstrate and secure innovative nuclear energy solutions, other clean energy options, and critical infrastructure. INL activities include nuclear energy and homeland security research, development, and demonstration. Battelle Energy Alliance, LLC, manages and operates INL. Most INL Site buildings and structures are located within developed areas that are typically less than a few square miles and separated from each other by miles of undeveloped land. The U.S. Department of Energy (DOE) controls all land within the INL Site. In addition to INL Site facilities, INL manages and operates leased and DOE-owned laboratories and administrative offices in Idaho Falls.

Purpose and Need

INL needs to manage facilities and property in a safe, secure, cost-effective, and sustainable manner to ensure assets are available, utilized, and in a suitable condition to support efficient mission execution. INL must sustain assets by completing maintenance and repair activities to assure mission readiness, operational safety, worker health, environmental protection and compliance, security, and property preservation to cost-effectively meet program missions. The scope of this environmental checklist (EC) includes Site-wide routine maintenance activities at all INL facilities through Calendar Year 2021 as discussed below.

Type and Scope of Activities

The proposed action involves performing preventive, predictive, and corrective maintenance (i.e., repair) on a routine basis to verify that INL facilities, processes, systems and equipment are maintained in a condition suitable for their intended use. This environmental checklist (EC) will be renewed annually. A separate checklist will be prepared if a proposed action falls outside of this scope.

Routine maintenance activities are an integral and necessary part of day-to-day INL operations. DOE has categorically excluded the broad range of activities that routine maintenance encompasses as a single class of actions under 10 CFR Part 1021 Subpart D, Appendix B item B1.3 "Routine maintenance." Maintenance activities are defined in DOE Order 430.1C as "Work required to preserve property in a condition suitable for its designated purpose including inspection, adjustment, lubrication, cleaning, and selective part replacement of components. It includes preventive and predictive maintenance [adapted from 41 CFR 102-71.20]."

Routine maintenance activities covered under DOE Categorical Exclusion (CX) B1.3 fall into the following four general categories:

> *Maintenance*—Corrective (that is, repair), preventive, and predictive maintenance required to maintain buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Corrective maintenance involves repairing and restoring equipment or components that have failed or are malfunctioning and are not performing their intended function. Predictive maintenance involves periodic monitoring and diagnosis to forecast component degradation so that "as-needed" planned maintenance can be performed prior to equipment failure. Preventive Maintenance (PM) involves periodic and planned actions taken to maintain a piece of equipment within design operating conditions, maintain its service life (i.e., normal operating life), and is performed prior to equipment failure or to prevent equipment failure.
>
> Repair is the act of restoring failed or malfunctioning component, equipment, system, or a facility to its intended function or design condition and includes replacing parts, components, and assemblies. Repair does not include activities directed towards expanding the capacity of an asset or otherwise upgrading it to serve needs different from, or significantly greater than, its current use (DOE Order 430.1B).
>
> *Custodial Services*—Activities to preserve facility appearance, working conditions, and sanitation (e.g., cleaning, window washing, lawn mowing, mowing along established roads and around the perimeter of facilities to reduce wildland fire risk and risk of noxious weeds, brush removal, trash collection, and snow removal). This ECP only covers mowing previously mowed areas (i.e., areas that have been mowed within the last year) to maintain defensible space around facilities and along INL Site roads. Mowing areas that have not been mowed within the previous year or that have never been mowed requires preparation of a separate ECP and biological and cultural resource review.
>
> *Replacement In-Kind*—Replacement in-kind is a one-for-one change-out, repair or replacement that is in kind and is not a substantial upgrade or improvement. In-kind replacement includes installing new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life (i.e., normal operating life), design capacity or function of the facility or equipment. Outmoded components are not necessarily broken, worn out, or otherwise dysfunctional, but they do not meet current needs or expectations due to age. Components that may no longer be available or feasible to purchase may be fabricated in facility machine shops.

Routine maintenance does not include modernization activities. Modernization encompasses activities that keep facilities relevant and updated in an environment of changing standards and missions and includes activities that improve quality, increase capacity, extend an asset's useful life, or enhance an asset's value. Further, routine maintenance does not include modifications (i.e., any change, addition, or alteration) to an area, facility, structure, system or component that alters the appearance, environmental impact, design basis, or expected design life (for example building color, drainage, habitat preservation, flow rates, seismic strengths, delta pressures, control parameters, program sequence, load carrying capacity, response time, fire suppression/detection capabilities, shielding, criticality spacing, corrosion resistance)).

In accordance with the limitations on routine maintenance imposed by 10 CFR Part 1021, none of the activities addressed in this EC include the following:

- Actions that are part of, or in support of, a larger project that requires either an Environmental Assessment (EA) or an Environmental Impact Statement (EIS)
- Actions that change the scope or mission of a facility
- Actions that cause a significant increase in environmental impacts of a facility
- Actions at EBR-I beyond normal custodial work
- Actions that require a permit or permit modification
- Actions for which a separate categorical exclusion is specified in 10 CFR 1021, Appendix B to Subpart D
- Actions with extraordinary circumstances that affect any sensitive area or natural resources (cultural and historic resources, federally-listed threatened or endangered (T&E) species or their habitat, federally-proposed or candidate species and their habitat, state-listed or state-proposed T&E species, and other federally-protected species such as Bald and Golden eagles and birds protected under the Migratory Bird Treaty Act (MBTA), floodplains and wetlands, areas having a special designation (e.g., national landmarks), special sources of water (such as sole source aquifers), and involve genetically engineered organisms, synthetic biology, noxious weeds and invasive species)
- Activities that disturb 1) sagebrush anywhere on the INL Site outside of fenced facility boundaries, 2) native vegetation within the Sage-Grouse Conservation Area (SGCA), Sagebrush Steppe Ecosystem Reserve, or the area between Specific Manufacturing Capability (SMC) and Test Area North (TAN), 3) soil in the INL storm water corridor, or 4) disturb vegetation or soils in the CITRC area (including previously disturbed areas at CITRC) require project specific ECs
- Activities that generate TRU, HLW, GTCC or any waste with no path for disposition
- A substantial upgrade or improvement that would significantly extend the useful life of a facility.
- Activities authorized by Nationwide Permit (NWP) #3 that remove accumulated sediments and debris outside the immediate vicinity of existing structures (e.g., bridges, culverted road crossings, water intake structures, etc.).

Description of Proposed General Maintenance Activities and Processes

The following lists give examples of the areas, facilities, processes, systems and types of equipment that routinely require maintenance at INL. The lists include activities that are foreseeably necessary to accomplish a maintenance action, custodial service, replacement in-kind, or minor modification (e.g., the excavation that is necessary to access an underground utility line that requires repair, or communication lines to facilitate equipment access).

Areas and Processes Requiring Maintenance

The facilities, processes and/or systems requiring maintenance include, but are not limited to, the following:

- Compressed Air and Other Compressed Gas Systems
- Heating, Ventilation, and Air Conditioning Systems
- Power Distribution Systems
- Communication and Alarm Systems
- Potable/Raw Water System
- Industrial Water System
- Cold Wastewater System
- Warm Wastewater System
- Sewage Water System
- Storm Water Management System
- Other Facility Utility Systems (Air, Electrical, Gas, Water)
- Fire Detection and Suppression Systems
- Waste Management (Recyclables, Industrial, Hazardous, Mixed Hazardous, and Radioactive)
- Chemical Management
- Fuel Receiving, Dispensing, and Bulk Storage
- Environmental Monitoring, Surveillance, and Sampling Systems
- Radiation Monitoring, Surveillance, and Sampling Systems
- Security Surveillance Systems

Other Equipment and Systems:

- Machining, Fabrication, and Other Shop Equipment
- Vehicle and Heavy Equipment
- Laboratory Equipment
- Medical Equipment

General Maintenance Activities

Maintenance personnel perform and inspections (both visual and remote) to support budgeting and scheduling, maintenance planning, regulatory compliance, and improving plant safety. Operations at INL also require maintaining and repairing vehicles and power equipment (excluding air conditioning and emission control systems), including, but not limited to, buses, trucks, earth-moving equipment, mowers, forklifts, and specialized equipment.

Building and Structural Maintenance

Maintenance activities also include repairing/replacing equipment and facility components. Building and structural maintenance at INL includes, but not limited to, the following activities:

- Repairing, and replacing exterior siding, rain-gutters, decks, fencing, and heat tracing
- Minor modifications to or removing components to increase effective use of space (e.g., doors, ceilings, floor coverings, walls, windows, stairs, platforms and ramp repositioning)
- Painting and coating indoor and outdoor surfaces (e.g., equipment surfaces, walls, floors, ceilings, and decks) with paint, epoxy, and other coatings, including surface preparation, such as cleaning, grouting, scraping, sanding, sandblasting, or other methods
- Removing and installing roofing materials and installing insulating materials, roofing materials, and sealants.

Please refer to Table 1 on page 6 for a list of historic properties. Activities that may adversely impact historic resources or resources potentially eligible to the National Register of Historic Places or projects that require mitigation for historical resources require preparation of project specific ECs. Maintenance on EBR-I requires preparation of a separate EC.

Custodial Services

Custodial services covered by the scope of this EC include, but not limited to, the following:

- Applying approved pesticides, herbicides, and rodenticides.
- Cleaning, housekeeping, and janitorial activities.
- Cleaning storm water drainage systems (e.g., ditches, catch basins, etc.).
- Establishing storage areas within buildings for maintenance tools, equipment, and supplies.
- Grading and repairing drainage and culverts and cleaning up sediment.
- Installing non-skid surfaces on steps, ramps, and other well-traveled areas.
- Maintaining grounds, such as lawn mowing, grass trimming, landscaping, shrub and tree pruning, snow removal, erosion control and soil stabilization.
- Maintaining paved areas, including, but not limited to, parking lots, sidewalks, and roads including crack seal, seal coating, striping and asphalt patching of roads and parking lots. Repaving of roads or parking lots require a separate EC.
- Maintaining rail lines including embankments and ditches.
- Maintaining the spreading area diversion dam.
- Routine load testing of lifting equipment.
- Removing bird nests that have been verified inactive, pest control, and relocating nuisance wildlife away from facilities in accordance with laboratory procedures (i.e., LWP-14107 and LI-340). Activities that require a permit from state or federal entities require separate ECs.

Monitoring Equipment

INL also maintains and repairs on-Site and off-Site environmental monitoring equipment and stations, which includes, but not limited to, the following:

- Calibrating, repairing, and replacing radiation monitoring equipment, including portal monitors, continuous air monitors, and ambient air monitoring stations
- Controlling weeds around the stations
- Repairing or replacing groundwater monitoring wells and sampling equipment
- Repairing or replacing environmental monitoring sheds, weirs, equipment and sample lines
- Trimming trees and cutting grass around environmental monitoring stations
- Repairing or replacing electrical and communication systems at environmental monitoring stations.

Security, Communications, and Data Systems

Maintenance required to maintain security, communication, and data systems, to resolve safety concerns, and to prevent hazards, includes, but not limited to, the following activities:

- Excavating to repair utility systems within facility fences
- Replacing and repairing steps, ramps, walkways, safety railings, handrails, guard rails, platforms, and frames
- Installing protective guards on machinery
- Maintaining and repairing fire protection and detection systems, including, but not limited to, portable and fixed firefighting equipment and sprinkler systems and detection systems
- Maintaining and replacing freeze protection and related activities, including the removing old insulation and installing new insulation
- Maintaining, and repairing security fences, gates, and lighting systems
- Maintaining detection, monitoring, surveillance, alarms, and camera systems

- Maintaining on-Site and off-Site communications facilities, such as antennas, radios, and monitoring and data transfer systems
- Repairing and testing emergency equipment (e.g., generators)
- Routine decontamination and spill clean-up actions.

Mechanical and Electrical Systems

Maintaining electrical Mechanical/Electrical Systems, includes, but is not limited to, maintaining and repairing the following:

- Electrical system component replacement, or installation and rewiring conduit, junctions, switch and receptacle boxes; rerouting and minor additions of conduit, wire, cable, control panels, boxes and receptacles (i.e., minor additions for 480-volt system or less); placing new wire in existing conduit; installing conduit supports to facilitate access and maintenance
- Repair or replacement of pump motors, manipulators, blower motors, motor starters, starter control systems, , and switchgear
- Repair or replacement of regular and emergency lighting
- Repair or replacing of facility breakers, switches, disconnects, transformers, and insulators.

Maintaining and repairing electrical systems for this EC does not cover replacing power poles or anchors or structures or activities associated with test and treat activities for the INL power grid.

Water Systems

Maintaining wastewater treatment facilities and other water systems includes, but not limited to, the following efforts:

- Inspecting, cleaning, and repairing manholes, sewer lines, traps, treatment process and collection tanks and chambers, and pipe clean-outs
- Maintaining and repairing sewage treatment plants, storm water, and wastewater treatment facilities, including, but not limited to:
    - Adding chemicals to control wastewater quality (e.g., pH)
    - Plant drainage (e.g., foundation under-drains)
    - Process and effluent monitoring equipment
    - Sanitary wastewater holding tanks
    - Storm water drainage systems and discharge outfalls
    - Treatment and collection/holding basins, vessels, tanks, chambers, and pits
    - Wastewater holding lagoons and lagoon discharge system
    - Groundwater Monitoring Systems
    - Groundwater Water Wells and Supply System
    - Water Treatment Systems, Chemical Addition
    - Supply System/Equipment (Sinks, Showers, Toilets, Hoses, Hydrants)
    - Sampling and Monitoring Equipment
    - Well Pumps and Pump Houses
    - Oil/Water Separator
    - Ion-Exchange Columns
    - Sanitary sewers, and Sewage Collection and Holding Tanks

Schedule and Timing

INL completes the routine maintenance activities evaluated in this EC on a routine and "as-needed" basis utilizing applicable manuals and procedures to determine the frequency at which routine maintenance activities are performed. INL bases these determinations on manufacturer manuals, plant experience, and good engineering practices

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Equipment used to perform routine maintenance generates minor Carbon Monoxide (CO), Carbon Dioxide (CO_2) and particulate air emissions. This equipment includes trucks, excavators, paving equipment, front-end loaders, high-lifts, lawn maintenance equipment, and snow removal equipment. These emissions occur intermittently over a ten-hour day.

Maintenance activities also generate fugitive dust. INL controls fugitive dust as necessary to minimize impact.

Volatile organic emissions could be generated during refueling and hydraulic fluid replacement of the equipment. Such emissions will be minimal and will not require any controls under state and federal Clean Air Act regulations. Volatile organic compound (VOC) emissions could also be generated from painting. Similarly, particulate emissions could be generated from sandblasting.

Routine maintenance activities with the potential to generate any radiological or non-radiological emissions will be evaluated on a case-by-case basis to determine compliance with regulatory requirements under the Clean Air Act and National Emission Standards for Hazardous Air Pollutants

(NESHAPS). Radiological air emissions are monitored and controlled through authorized control treatment systems in accordance with the radiological National Emission Standards for Hazardous Air Pollutants (NESHAPS).

The charging and recharging of air conditioning and refrigeration equipment and the recovery of refrigerants from air conditions and refrigeration equipment will be performed by certified technicians.

Some maintenance activities remove or disturb asbestos-containing materials (ACM) that could release friable material to the air.

Discharging to Surface-, Storm-, or Ground Water

INL generates wastewater including sanitary and industrial wastewater and storm water run-off impacted by industrial activities. Routine maintenance activities would not result in changes to the volumes, types, or amounts of wastewater and storm water run-off.

INL performs routine maintenance activities on water systems, including the groundwater water supply system. Water for INL Site operations is piped from water supply wells. Potable water from the water supply wells meets drinking water standards.

Waterways on the INL Site include drainage ditches, storm water piping, and culverts. Inspections during site storm water runoff episodes and periods of snowmelt can lead to the need for repairs to the storm water drainage system. This can include cleaning, removing debris, earthen slope maintenance, and repair of soil erosion controls.

Disturbing Cultural or Biological Resources

There are numerous historic properties (i.e. properties eligible for listing on the National Register of Historic Places) located at INL (see Table 1). Removal or changes to original features may adversely affect these historic properties. In addition, activities outside fenced facility boundaries have the potential to impact cultural and historical resources.

Table 1 - List of Historic Properties located at ATR Complex, CFA, CITRC, INTEC, MFC, and TAN/SMC.

Facility Area	Building Number*	Historic Name
CFA		
	CF-601	Warehouse
	CF-633	Ordnance Offices
	CF-638	High Explosives Magazine (Dosimetry Calibration Lab)
	CF-642	Pump House (CFA Well No. 2)
	CF-651	Pump House (CF Well No. 1)
	CF-661	Material Storage Building
	CF-664	Storage Building
	CF-668	Communications Building
	CF-674	Warehouse (Roads & Grounds / Materials Storage)
	CF-676	Storage Building (DOE Equipment Storage)
	CF-685	Bus Depot
	CF-695	Fire Safety Equipment Storage
	CF-697	Equipment Storage
	CF-698	Standards & Calibration Laboratory
	CF-699	Radio & Alarm Shop
INTEC		

Facility Area	Building Number*	Historic Name
	CPP-603	Fuel Receiving and Storage Building
	CPP-604	Waste Treatment Building
	CPP-606	Service Building/Powerhouse
	CPP-618	Tank Farm Measurement and Control Building
	CPP-628	Tank Farm Control House
	CPP-632	Tank Farm Instrument House
	CPP-635	Waste Storage Pipe Manifold Building
	CPP-636	Waste Storage Pipe Manifold Building (Waste Station WM-189-190)
	CPP-639	Blower Building
	CPP-646	Instrument Building for Bin Set II
	CPP-647	Instrument Building for Bin Set III
MFC		
	MFC-720	TREAT Reactor Building
	MFC-721	TREAT Office Building
	MFC-751	Safety Storage Building
	MFC-752	Laboratory and Office Building
	MFC-753	Plant Services Building
	MFC-759	Emergency Entrance/Old Fire House
	MFC-765	Fuel Conditioning Facility
	MFC-765A	FCF Office Annex
	MFC-767	EBR-II Reactor Plant Building
	MFC-768	Power Plant
	MFC-768B	Water Chemistry Laboratory
	MFC-768E	Flammable Material Storage
	MFC-769	Dangerous Material Storage
	MFC-770B	Sodium Components Storage
	MFC-772	EBR II Engineering Laboratory
	MFC-774	ZPPR Support Wing
	MFC-775	ZPPR Vault Work/Equipment Room
	MFC-777	ZPPR Equipment Building
	MFC-780	Laundry Sorting Building (Quality Level A&B Storage Building)
	MFC-781	Material Handling Building
	MFC-782	Machine Shop Building
	MFC-783	Rigging Test Facility
	MFC-784	Advanced Fuels Facility
	MFC-785	Hot Fuel Examination Facility
	MFC-787	Fuel Assembly and Storage Building (Fuels & Applied Science Building)
	MFC-788	EBR II Maintenance Shop

Facility Area	Building Number*	Historic Name
	MFC-789	EBR II Engineering Laboratory
	MFC-789A	Equipment Building
	MFC-790	Interim Contaminated Equipment Building
	MFC-792	ZPPR Mockup Building (SSPSF Control Room)
	MFC-793	Sodium Components Maintenance Shop
CITRC		
	PBF-612	CITRC Control System Research Facility (former SPERT II)
	PBF-613	CITRC Communications Research Facility (former SPERT IV)
TAN/SMC		
	TAN-601	Guardhouse
	TAN-629	ANP Hanger
	TAN-658	Storage Building
ATR/TRA		
	TRA-605	Process Water Building
	TRA-607	Carpenter Shop
	TRA-608	Demineralizer Building
	TRA-609	Steam Plant
	TRA-614	Maintenance Office Building/ Bunkhouse
	TRA-616	Cafeteria
	TRA-620	Guardhouse
	TRA-622	Warehouse
	TRA-636	Warm Waste Effluent Monitor Station
	TRA-641	Gamma Facilities Building
	TRA-649	MTR-Office Building, Wing C
	TRA-652	MTR Office Building, Wing B
	TRA-653	Maintenance Shop
	TRA-660	Advanced Reactivity Measurement Facility
	TRA-662	Storage & Receiving / Machine Shop
	TRA-666	Safety & Tritium Applied Research Facility
	TRA-666A	Tritium Lab
	TRA-667	Health and Safety Building (Dispensary / DOE Building)
	TRA-670	ATR Reactor Building
	TRA-671	ATR Cooling Tower Pump House
* This list is only effective for activities being completed in CY2021.		

Routine maintenance activities may involve vegetation removal and soil disturbance. Pesticide application may be required to prevent the spread of noxious weeds and invasive species.

All routine maintenance activities occur solely within areas of previous or ongoing disturbance. Mowing previously mowed areas (i.e., areas that have been mowed within the last year) to maintain defensible space around facilities and along INL Site roads is covered by this ECP. Mowing areas that have not been mowed within the previous year or that have never been mowed requires preparation of a separate ECP and biological and cultural resource review.

Generating and Managing Waste

Routine maintenance generates typical construction waste such as boxes, wood forms, concrete, asphalt, wiring, piping, paper, waste materials (insulation, wood, metal). INL transfers this waste to a certified recycler or a properly permitted solid waste landfill for disposal. Projects characterize and manage soils and environmental media generated during routine maintenance activities in accordance with laboratory procedures. INL has an active program to minimize waste generation. The waste minimization program includes both source reduction and recycling. Waste Minimization and Pollution Prevention Opportunities are also an integral part of the work review process. INL continually considers opportunities for waste minimization and pollution prevention during routine maintenance activities.

Maintenance activities performed inside contaminated areas would generate some radioactive waste. Radiological waste includes anti-contamination clothing, rags, radiation enclosures and barriers, wood, dirt, contaminated materials and components (e.g., pumps, piping, roofing materials), demolition debris (which may include asphalt and concrete), contaminated filters, and contaminated absorbent used to clean up small spills. INL packages these materials and stores them in on-site storage facilities pending disposal at an authorized and permitted facility. For excavation in an area suspected to be radioactively contaminated, Radiological Control personnel assist in developing specific radiation work permits to minimize the potential for encountering contaminated media.

INL manages excavated soils in accordance with site procedures, policies, and applicable regulatory requirements. INL designs excavation activities to minimize waste. To reduce the amount of radioactive waste generated, clean debris is segregated from radioactively contaminated areas and debris. Radioactively contaminated tools are kept in contaminated areas for reuse rather than disposal at the completion of the activity.

Asbestos waste would be sent to a properly permitted solid waste landfill for disposal.

Hazardous Waste - Maintenance activities on equipment containing hazardous materials, such as acids, hazardous and listed solvents, and heavy metals may require management as hazardous waste. INL plans activities and performs maintenance using waste minimizing strategies to limit the generation of hazardous waste. INL sorts, characterizes, treats, and disposes of any hazardous waste in compliance with applicable Resource Conservation and Recovery Act and other waste management regulations.

Mixed Waste- Maintenance activities on equipment containing hazardous materials, such as acids, hazardous and listed solvents, and heavy metals may require management of resultant waste material as mixed waste. INL plans activities and performs maintenance using waste minimizing strategies to limit the generation of mixed waste. INL sorts, characterizes, treats, and disposes of any mixed waste in compliance with applicable Resource Conservation and Recovery Act and other radioactive waste management regulations.

PCB Waste-Maintenance activities on structures or equipment containing PCBs (e.g., pre-1982 equipment and materials such as capacitors, lubricants/dielectric fluids, transformers and bushings, painted surfaces, caulking, joint sealer, ventilation duct gaskets or insulation, and other electrical equipment/components) may require management as PCB waste. INL stores and manages PCB wastes in compliance with applicable federal regulations.

Activities that generate TRU, HLW, GTCC or any waste with no path for disposition are not included in the scope of work for this EC.

Waste Generator Services (WGS) manages all solid waste using approved laboratory procedures.

Releasing Contaminants

Routine maintenance activities use typical construction chemicals such as fuels, lubricants, adhesives, concrete, concrete cure, asphalt, etc., and those used must be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The facility Chemical Coordinator enters these chemicals into the INL Chemical Management Database. INL manages all chemicals in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

Pesticides may be applied on areas where overfill parking will be expanded and where the temporary parking area will be established, once identified. Pesticides and herbicides may be used to control weeds and localized pest and vegetation control. The types of pesticides and herbicides and the methods of application employed at INL are controlled by federal and state laws, rules, and regulations. INL applies pesticides and herbicides in

accordance with these requirements through laboratory procedures. Only certified applicators apply "Restricted Use" and "General Use" pesticides at INL.

INL stores petroleum products for maintenance activities (e.g., gasoline or diesel) in on-site storage tanks. These tanks are monitored and inspected in accordance with INL procedures. INL manages petroleum storage and use (both on and off the INL Site) in a manner minimizing environmental impacts. Steps include a documented leak inspection program.

Routine maintenance may involve working with PCB-containing or PCB-contaminated equipment (e.g. activities associated with pre-1982 equipment and materials such as capacitors, lubricants/dielectric fluids, transformers and bushings, painted surfaces, caulking, joint sealer, ventilation duct gaskets or insulation and other electrical equipment/components).

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility Environmental Staff. If the Environmental Staff cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

Using, Reusing, and Conserving Natural Resources

INL is committed to protecting the environment and human health. INL aims to comply with environmental laws, regulations, and other requirements that protect the air, water, land, and natural, archeological, and cultural resources potentially affected by routine maintenance activities. INL employs the environmental management system (EMS) modeled by the International Organization for Standardization (ISO) Standard 14001 to establish policy, objectives, and targets to reduce environmental impacts and increase operating efficiency through a continuing cycle of planning, implementing, evaluating, and improving processes. The INL Site Sustainability program implements strategies and practices that meet key DOE sustainability goals, including decreasing water use intensity; increasing diversion of construction and demolition waste from the landfill; and reducing greenhouse gas (GHG) emissions.

INL reuses or recycles all materials where economically practicable. INL also diverts all applicable routine maintenance waste from disposal in the landfill where conditions allow. INL practices 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, B1.3 "Routine maintenance"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B1.3 "Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses
b) Door and window repair or replacement
c) Wall, ceiling, or floor repair or replacement

d) Reroofing
e) Plumbing, electrical utility, lighting, and telephone service repair or replacement
f) Routine replacement of high-efficiency particulate air filters
g) Inspection and/or treatment of currently installed utility poles
h) Repair of road embankments
i) Repair or replacement of fire protection sprinkler systems
j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces
k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation)
l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor
n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes)
o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors)
p) Removal of debris."

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: 08/20/2020