

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: 2020-2021 Campus Improvement Projects at the Idaho National Laboratory (INL)

SECTION B. Project Description and Purpose:

Idaho National Laboratory (INL), as the Department of Energy's (DOE's) Management & Operations Contractor for the Idaho Site, maintains and operates INL Site facilities at the Advanced Test Reactor (ATR) Complex, Central Facilities Areas (CFA), Materials and Fuels Complex (MFC), and Specific Manufacturing Capability (SMC) and DOE-owned and contractor leased facilities at the Research and Education Campus (REC) in Idaho Falls. INL upgrades, remodels, repairs, and replaces facility and equipment components, assemblies, and systems on a continual basis to support the needs of personnel based at each campus. These facility upgrades are needed to deliver adequate support facilities (e.g., office space, cafeteria services, visitor reception, computer and data processing, storage space, machine shop activities, etc.) and enhance workplace habitability (lighting, heating, noise reduction, etc.). Modifications of laboratory space to enhance workplace habitability are also included. The following discussion provides the scope of facility modifications included in this environmental checklist (EC):

- Installing window mounted air conditioning units.
- Installing drywall or paneling, acoustical ceiling tile, and dropped ceilings.
- Installing new facility access ramps.
- Reconfiguring support areas, including bathrooms, offices, break areas and conference rooms, on a continual basis. Reconfiguration and remodel of these spaces includes reconfiguring walls and cubicles; removing, relocating, and adding electrical outlets, switches, data drops and other electrical upgrades; removing, replacing, and relocating light fixtures; and re-routing heating, ventilation, and air conditioning (HVAC) ducting; and changes to HVAC controls to accommodate reconfiguration and remodeling activities.
- Replacing and upgrading facility components such as light fixtures, kitchen appliances in break areas, install or replace drinking water dispensers, cabinets, countertops, carpet, paint, tile, windows, heaters, air conditioners, and audio and visual equipment.
- Upgrading telecommunication rooms, including new network equipment racks, fiber optic cable, and network switches to support user applications, allow for faster internet speeds, and improve technology performance.

The proposed activities would be initiated through fiscal year 2021. These activities do not include ground disturbing activities at the Critical Infrastructure Test Range Complex, activities that disturb sagebrush, or activities that impact historically significant properties (e.g. EBR-I); diesel generator systems; research and development activities; road maintenance; installing or relocating laboratory equipment (reconfiguration of equipment within the same space as it was originally installed is not considered relocation), manufacturing machinery, maintenance equipment, or health and safety equipment; or safety and environmental improvements.

Activities not meeting the scope of this environmental checklist (EC) require separate, project-specific ECs. This EC does not cover replacing and upgrading facility systems (e.g. roof replacement, modifying drinking water systems, replacing or upgrading alarm and surveillance systems, etc.) or modifications to laboratories necessary to accommodate research activities that require project-specific ECs. Project personnel must contact the program environmental lead (PEL) to verify that various projects are within the scope of this EC.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

If mobile sources (equipment) will be used temporarily, they must meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

Work may result in the disturbance or removal of asbestos.

Project activities have the potential to release ozone depleting substances and greenhouse gases.

Fugitive dust may be generated during proposed work.

Discharging to Surface-, Storm-, or Ground Water

Air conditioner (AC) condensers would discharge potable water to the ground.

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 ATR, CFA, and MFC. Removal or changes to original features may adversely affect these historic properties. Prior to implementing any projects under this EC, a cultural resource review must be completed.

Generating and Managing Waste

These activities may generate a variety of waste. It is anticipated that the following types of waste could be generated:

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- Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals.
- Hazardous wastes have the potential to be generated during maintenance operations on systems or equipment containing hazardous chemicals, or by using hazardous chemicals to clean or decontaminate equipment and systems. Hazardous metal waste (e.g., lead, electronics, brass, metal containing paints, etc.) may also be generated during maintenance work or by replacement of outdated equipment. Note: Lead has been encountered very infrequently (e.g., shielded cables).
- Asbestos waste may be generated when performing maintenance activities on equipment or structures with asbestos-containing materials (ACM) such as insulation, gaskets, flanges, walls, roofing, and flooring.
- Polychlorinated Biphenyl (PCB) waste could be generated when performing maintenance associated with pre-1982 equipment/materials such as capacitors, lubricants/dielectric fluids, transformers/bushings, painted surfaces and other electrical equipment/components.

All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, paints, concrete, concrete cure, asphalt, refrigerants, 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. The facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

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

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, items B1.15 "Support buildings" and B2.1 "Workplace enhancements"

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.15 "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 covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix."

Project activities are consistent with 10 CFR 1021, Appendix B, B2.1, "Modifications within or contiguous to an existing structure, in a previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction."

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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: 07/24/2020