

DOE-ID NEPA CX DETERMINATION

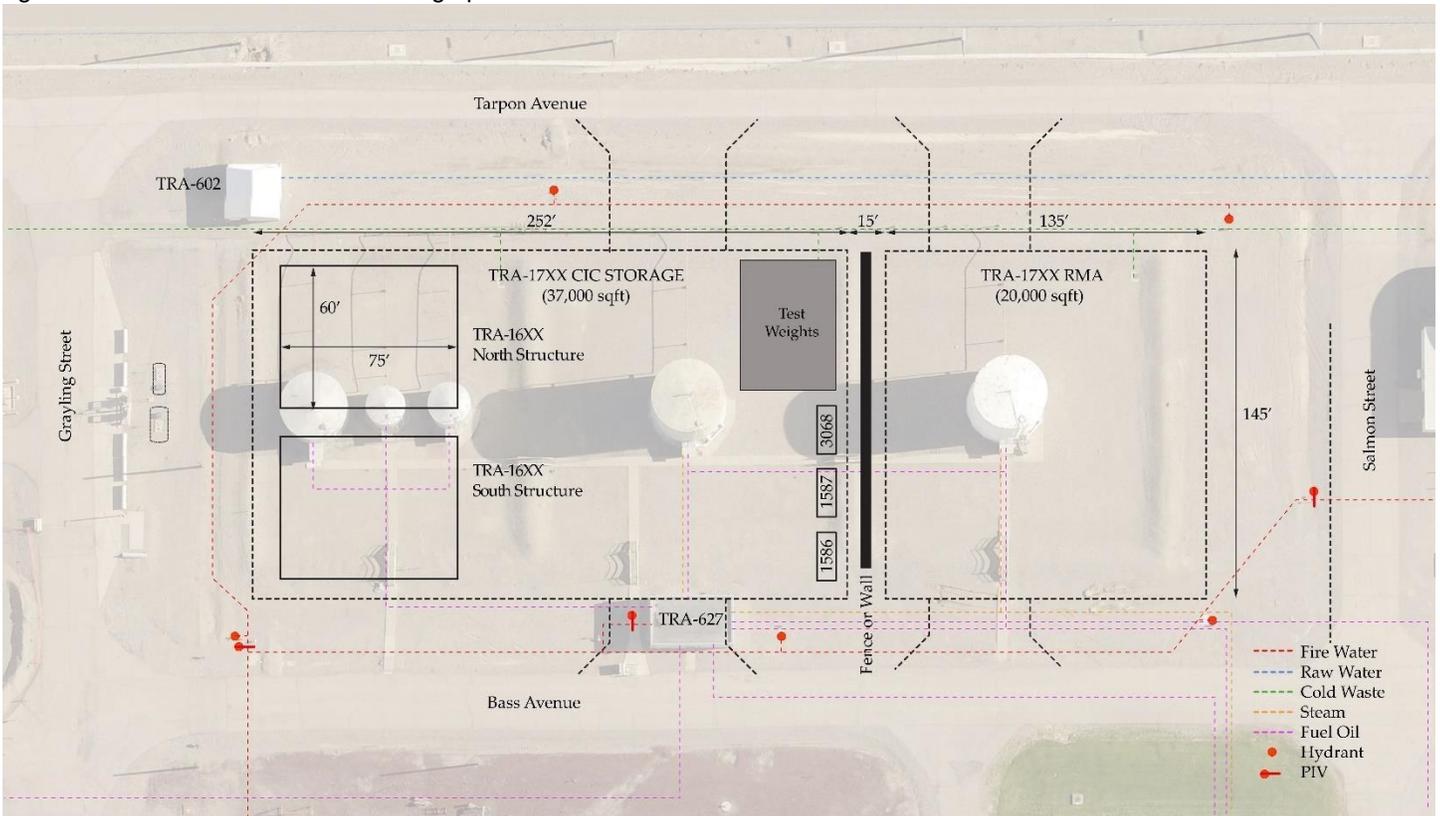
Idaho National Laboratory

SECTION A. Project Title: Two New Storage Pads at ATR Complex

SECTION B. Project Description and Purpose:

Storage capacity at the ATR complex for heavy equipment, materials, and radioactive waste will need to be expanded to support upcoming larger projects such as the Core Internal Changeout (CIC). The proposed action is to construct two new storage pads at the north end of the ATR Complex between Salmon Street and Grayling Street: one large pad for the storage of heavy equipment and other non-radiological material (CIC heavy equipment storage pad will be 37,000 ft²) and one smaller pad for Radioactive Waste Area (RWA) for low-level radioactive waste generated from ATR Complex Operations (RMA storage pad will be 20,000 ft²). See Figure 1. The RWA storage pad will be managed as a less than Haz Cat 3 Radiological Facility. None of the pads are associated with any treatment, storage, and disposal, or RCRA permits. This activity includes erecting two sprung structures side by side (pictured below), widening the road access points, and allowing for a 10 – 15 ft separation between both pads to differentiate the equipment storage from the rad waste storage areas.

Figure 1. Location of the two new storage pads at ATR



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SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to generate fugitive dust.

Radioactive waste stored on the pads generates air emissions from radionuclides. Low-level waste emissions are tracked through the Integrated Waste Tracking System (IWTS) using waste container radionuclide inventories and using 40 CFR Part 61 Appendix D emission factors. These fugitive emissions are included in the INL Annual National Emission Standards for Hazardous Air Pollutants (NESHAP) Report for Radionuclides. Past years

ATR Complex waste handling fugitive emissions have resulted in off-site dose rates significantly below 0.1 mrem/year and this would remain the case with the proposed project.

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

Project activities have the potential to disturb biological and cultural resources.

Generating and Managing Waste

The proposed action generates industrial waste such as asphalt, wood, packaging materials, etc.

Waste stored at the replacement locations will be from existing ATR Complex Operations. This waste is characterized, stored, and disposed at the direction of Waste Generator Services (WGS) and according to company procedures. The amounts of radiological low level waste that will be generated at the ATR Complex are anticipated to be consistent with past operations.

Pollution prevention will be implemented where economically practicable to reduce the volume of waste generated.

Releasing Contaminants

Construction chemicals such as marking paint, fuels, lubricants, adhesives, paints, etc., will be used during the project. The subcontractor will submit chemical inventories and associated Safety Data Sheets through the vendor data system prior to bringing them to the INL. The Construction Chemical Coordinator will enter these chemicals into the INL Comply Plus chemical management system for tracking purposes.

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 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

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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:

B1.13 "Pathways, short access roads, and rail lines", B1.15 "Support Buildings" and B6.10 "Upgraded or replacement waste storage facilities"

Justification:

The activities in this ECP are consistent with B1.13, "Construction, acquisition, and relocation, consistent with applicable right-of-way conditions and approved land use or transportation improvement plans, of pedestrian walkways and trails, bicycle paths, small outdoor fitness areas, and short access roads and rail lines (such as branch and spur lines)",

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, 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", and

B6.10 "Siting, construction, modification, expansion, operation, and decommissioning of a small upgraded or replacement facility (less than approximately 50,000 square feet in area) within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible) for storage of waste that is already at the site at the time the storage capacity is to be provided. These actions do not include the storage of highlevel radioactive waste, spent nuclear fuel or any waste that requires special precautions to prevent nuclear criticality. (See also B6.4, B6.5, B6.6 of this appendix, and C16 of appendix C.)"

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: 7/15/2020