

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Idaho National Laboratory (INL) Facility Safety and Environmental Improvements (Overarching)

SECTION B. Project Description and Purpose:

The purpose of this Environmental Checklist (EC) is to address activities at any Idaho National Laboratory (INL) facility, building or structure, either in-town or at the INL site, that meet the intent of Categorical Exclusion (CX) B2.5 as described in 10 Code of Federal Regulations (CFR) 1021, Appendix B to Subpart D. These activities may consist of typical actions for the purpose of implementing 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 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR 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). Actions proposed under this EC require individual 2nd tier ECs.

This EC does not cover activities having the potential to generate TRU waste.

Activities within the Sagebrush Steppe Reserve, Sage Grouse Conservation Area, Critical Infrastructure Test Range Complex (CITRC) fenced boundary, the area between Specific Manufacturing Capability (SMC) and Test Area North (TAN), or the INL storm water corridor require preparing an activity-specific 1st Tier EC, rather than a 2nd tier Environmental Checklist (EC) under this overarching EC.

If any action within the scope of the proposed work requires obtaining a new or modified permit from a regulator, this overarching EC shall not be used and a project-specific 1st tier EC must be prepared.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Activities addressed by this EC may require an APAD and have the potential to contribute to air emissions through:

- Generating air pollutants, including but not limited to radionuclides, chemical and combustion emissions. Some activities may involve stationary air emission sources, including stationary internal combustion engines.
- Generating hazardous and radiological emissions, such as by operation of fuel burning equipment, decontamination work, use of maintenance products that contain hazardous constituents, and disturbance of contaminated soils.
- Distributing, excessing or disposing of appliances containing refrigerants.
- Maintaining, servicing or repairing stationary heating, ventilation, air conditioning and refrigeration equipment.
- Maintaining, testing, or disposing of halon-containing equipment or halon.
- Purchasing equipment containing refrigerants or halon.
- Acquiring and dispositioning chemicals.
- Working with asbestos.
- Generating fugitive dust or other fugitive emissions.
- Purchasing, relocating, operating, modifying or maintaining portable air emission sources, including non-road internal combustion engines.

Discharging to Surface-, Storm-, or Ground Water

Activities addressed by this EC have the potential to contaminate waters of the United States (U.S.) or groundwater through:

- Construction or modification of drinking water systems and cross connections at the INL and in-town facilities
- Maintaining, repairing, or altering drinking water systems and cross connection at the INL and in-town facilities
- Using drinking water systems and cross connections at the INL and in-town facilities
- Constructing or modifying sewage and other reuse systems
- Maintaining or repairing septic tanks or septic systems
- Discharging Wastewaters
- Managing storm water discharges.

Disturbing Cultural or Biological Resources

Activities addressed by this EC have the potential to disturb cultural or biological resources through:

- Constructing or modifying facilities, structures, equipment or processes
- Maintaining or repairing facilities, structures, equipment or processes
- Management of migratory birds and bird nests on the INL and at in-town facilities

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- Modifying buildings or structures constructed on the INL before 1970, including Experimental Breeder Reactor-I (EBR-I).

Generating and Managing Waste

Activities addressed by this EC have the potential to generate waste requiring management through:

- Constructing or modifying facilities, equipment or processes at permitted or interim status Resource Conservation Recovery Act (RCRA) facilities
- Decontaminating equipment containing or contaminated with polychlorinated biphenyls (PCBs) (From equipment manufactured before 1982)
- Maintaining equipment containing or contaminated with PCBs (From equipment manufactured before 1982)
- Disposing asbestos-containing material
- Disturbing asbestos or removing asbestos-containing material
- Generating wastes.

Releasing Contaminants

Activities addressed by this EC have the potential to release contaminants through:

- Acquiring, using, storing and dispositioning chemicals
- Managing and dispositioning excess property and materials
- Reporting and cleaning up spills and releases
- Managing elemental lead
- Removing lead from service or from a structure.

Using, Reusing, and Conserving Natural Resources

Activities addressed by this EC have the potential for use, reuse and conservation of natural resources related to:

- Generating greenhouse gasses
- Building energy use
- Consuming potable, industrial or irrigation water
- Generating storm water
- Generating landfill waste or construction and demolition wastes
- Generating recyclable materials
- Providing an opportunity to engage in sustainable acquisition practices.

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: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B2.5 "Facility safety and environmental improvements."

Justification: The proposed activities are 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 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR 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)."

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

Yes No

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Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 11/21/2019