

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: ATR Door Replacements

SECTION B. Project Description and Purpose:

Doors around the Advanced Test Reactor (ATR) Complex need to be replaced due to old age and degradation. The purpose of the proposed action is to replace entryway and rollup doors around the ATR Complex; along with other structures that may be related to the door replacements. The proposed doors are to a variety of buildings; including: TRA-653, TRA-658, TRA-662, TRA-666, TRA-667, TRA-678, TRA-679, TRA-1626 and TRA-628. The construction will begin on TRA-666 where two large roll up doors will be replaced, an uninterrupted power system (UPS) will be replaced, and an entry vestibule for the main door will be constructed. The other buildings listed include single or double entry way doors and a roll up door in TRA-662.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

There is a possibility for disturbance of asbestos containing materials.

Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new emissions source.

The activity has a potential to generate fugitive dust.

Mobile sources such as generators, welders, and compressors may be used temporary (less than a year) by subcontractors at the construction site. These sources would be required to meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emissions opacity requirements.

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

Activities included in this EC have the potential to disturb cultural or biological resources as follows:

- Maintaining or repairing facilities, structures, equipment or processes
- Modifying historical buildings or structures.
- Operating facilities, equipment, or processes.

Generating and Managing Waste

Proposed activities have the potential to generate waste from conducting the following activities:

- Modifying or disposing of buildings, structures, or equipment built before 1982 may contain PCBs (paint, caulk, light fixtures, adhesives, ceiling tiles, etc.)
- Disposing asbestos-containing material
- Disturbing asbestos or removing asbestos-containing material
- Other activities that generate waste.

Releasing Contaminants

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

- Acquiring, using, storing and dispositioning chemicals
- Managing and dispositioning excess property and materials.

Using, Reusing, and Conserving Natural Resources

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

- Generating landfill waste or construction and demolition wastes
- Generating recyclable materials
- Engaging 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

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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: 8/26/2019