

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: Idaho National Laboratory (INL) Routine Maintenance Activities (Overarching)

### SECTION B. Project Description and Purpose:

This environmental checklist (EC) replaces EC INL-16-151.

The purpose of this overarching EC is to address activities through FY 2020 that would meet the intent of the Categorical Exclusion (CX) B1.3 as described in 10 Code of Federal Regulation (CFR) 1021, Appendix B to Subpart D. These activities include routine maintenance and custodial services required to support safe and efficient operations. Activities would occur at Idaho National Laboratory (INL) Site locations and at in town (Idaho Falls) facilities. None of these activities would be performed as part of or in support of a larger project requiring an environmental assessment or environmental impact statement.

Activities **not** covered by this overarching EC include, but may not be limited to, the following:

- a) Actions that change the scope or mission of a facility
- b) Actions, changes, additions or alterations to an area, facility, structure, system, or component that alters the appearance, environmental impact, design basis, or expected equipment life or function (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)
- c) Actions that cause a significant increase in environmental impacts
- d) Actions for which a separate categorical exclusion is specified in 10 CFR 1021, Appendix B to Subpart D
- e) Actions that are modifications as defined in Laboratory-wide Procedure (LWP)-8000 "Environmental Instructions for Facilities, Processes, Materials and Equipment"
- f) Actions that require a permit or permit modification
- g) Activities that generate transuranic (TRU) waste
- h) Actions that remove or disturb sagebrush anywhere on the INL Site
- i) Actions that disturb any type of vegetation within the Sage-grouse Conservation Area.

In addition, this EC would not support the expansion of a laboratory facility for operational purposes.

Routine maintenance includes activities and custodial services for buildings, structures, rights-of-way, infrastructure (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, infrastructure, and equipment in a condition suitable for a facility to be used for its designated purpose. Maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance includes replacements to the extent that replacement is in-kind and not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components as long as the replacement does not significantly change the 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 replacement of a reactor vessel near the end of its useful life).

Routine maintenance includes, but is not limited to the following:

- a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses (includes replacement of the hydraulic/cutting/lubricating oils)
- 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 Department of Energy (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 761 [Polychlorinated Biphenyls (PCBs) 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)

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- 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.

This EC does not include routine maintenance of unpaved roads at the INL Site. Maintenance of unpaved roads is covered in EC INL-18-029, "Maintaining Unpaved Roads on the INL." Activities requiring use of gravel/borrow sources must review EC INL-14-045, "Idaho National Laboratory Gravel/Borrow Pits (Overarching)."

This EC gives overarching coverage for those activities described and that fall under the categorical exclusion, B1.3 (i.e., routine maintenance activities). Each project approved under this overarching EC must meet the conditions of the CX established in 10 CFR 1021, Appendix B to Subpart D, item B1.3.

In addition, activities conducted under this EC may require preparation of project specific 2nd tier ECs. Examples include, but are not limited to, road and parking area resurfacing, large roofing projects, activities involving cultural or historical resources, activities with the potential to disturb vegetation, etc.

Before conducting activities under this EC, contact the appropriate PEL to verify the proposed action falls within the scope of this EC. If proposed activities do not fall under this overarching EC, prepare a 1st tier EC for DOE approval. Project personnel should note approval of 1st tier ECs can take three weeks or longer, and should prepare accordingly.

Activities with the potential to disturb sagebrush are not authorized by this EC.

### **SECTION C. Environmental Aspects or Potential Sources of Impact:**

#### **Air Emissions**

Project activities have the potential to contribute to air emissions through the following:

- 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 and halon
- Purchasing equipment containing refrigerants or halon
- Acquiring and dispositioning chemicals
- Disturbing 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 impact waters of the United States (U.S.), floodplains, or groundwater through conduct of the following:

- 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
- Maintaining or repairing septic tanks or septic systems
- Discharging Wastewaters
- Managing storm water discharges.

#### **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
- Management of migratory birds and bird nests on the INL and at in-town facilities
- Modifying buildings or structures constructed on INL before 1970, including experimental Breeder Reactor I (EBR-I).

#### **Generating and Managing Waste**

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Routine maintenance activities have the potential to generate waste from conducting the following activities:

- 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 of asbestos-containing material
- Disturbing asbestos or removing asbestos-containing material
- Other routine maintenance 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
- 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 the following:

- 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
- Engaging in sustainable acquisition practices.

<p><b>SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification:</b> Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.</p>
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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

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- 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: 7/3/19