

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: 2019 INL Site-Wide Roof Replacements and Repairs

SECTION B. Project Description and Purpose:

The purpose of this revision is to add the replacement of the TAN-679 roof. The environmental aspects and conditions and instructions remain the same as those in the original EC.

Original EC:

The proposed action repairs or replaces roofs throughout Idaho National Laboratory (INL). Roofs on the preliminary list (not all inclusive) to be replaced are listed below:

- Materials and Fuels Complex (MFC) building 753 Plant Services Building is a maintenance support building built in 1961
- MFC-768 Power Plant is a four level building built in 1961
- MFC-775 Zero Power Physics Reactor (ZPPR) Vault Workroom is a single level research building built in 1968
- MFC-776 ZPPR Reactor Cell is a Category 2 Nuclear Facility built in 1968
- MFC-704 Fuel Manufacturing Facility is a Category 2 Nuclear Facility built in 1986
- Test Area North (TAN)-677 Truck Docking Building at the Specific Manufacturing Capability (SMC) built in 1984.

Repairing or replacing roofing on facilities not listed requires revising this environmental checklist (EC).

The scope of the proposed action includes gravel roofs with thermal insulation and steel decking, concrete pavers with wood fiber decking, and ethylene propylene diene monomer (EPDM) with insulation over a concrete deck. Roofs are replaced with an EPDM membrane (white), cover board, thermal insulation, and an air vapor barrier. Roofers install flashing at all perimeters and penetrations and rubber walkway protection pads at certain locations.

In addition to full roof replacement, many buildings at INL need small repairs such as removing and replacing insulation, applying sealants and coatings, repairing or replacing membranes, EPDM, and flashing. INL anticipates completing numerous roofing activities in 2019 and will revise this EC as future work is planned.

Certain buildings at INL are eligible for listing on the National Register of Historic Places, including MFC-753, MFC-768, MFC-775, and MFC-776. Roof replacement and repairs on buildings eligible for the National Register of Historic Places require review by the Cultural Resource Management Office (CRMO) and the Department of Energy Idaho Operations Office (DOE-ID). Removal and/or changes of original features may adversely affect these historic properties. As such, final plans and drawings must be reviewed and cleared by the INL Cultural Resource Management Office (contact Christina Olson) prior to beginning work.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Certain roofing materials may contain asbestos that could become friable without proper control. Non-friable category I ACM will be removed using non-rotary blade removal methods described in 40 CFR 61, Subpart M, Appendix A, "Interpretive Rule Governing Roof Removal Operations." These methods include using power slicers and manual methods such as spud bars, pry bars, shovels, knives, etc., that do not destroy the structural matrix or integrity of the material. Any Regulated Asbestos Containing Material (RACM) that is discovered must be removed by trained workers using appropriate control methods.

Disturbing Cultural or Biological Resources

Certain buildings at INL are eligible for listing on the National Register of Historic Places, including MFC-753, MFC-768, MFC-775, and MFC-776. Roof replacement and repairs on buildings eligible for the National Register of Historic Places require review by the Cultural Resource Management Office (CRMO) and the Department of Energy Idaho Operations Office (DOE-ID). Removal and/or changes of original features may adversely affect these historic properties. As such, final plans and drawings must be reviewed and cleared by the INL Cultural Resource Management Office (contact Christina Olson) prior to beginning work.

There is potential that bird nesting activity may be present in project areas.

Generating and Managing Waste

Non-friable category I asbestos containing roofing material will be generated and disposed at the Central Facilities Area (CFA) Landfill Complex. Non-hazardous industrial waste may be generated in the form of scrap wood, metal, RCRA empty containers, packaging material, etc. Lead flashing may be found at roof penetrations and will be separated for recycle. Pre-1982 materials are suspect for PCBs. All waste will be characterized, stored and disposed at the direction of Waste Generator Services (WGS)

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Releasing Contaminants

Adhesives, caulks, paints, etc. will be used while installing the new roofing systems. The subcontractor will be required to submit a chemical inventory list with associated safety data sheets in the Vendor Data System prior to bringing them on site. The Construction Chemical Coordinator will track these chemicals in the INL Comply Plus Chemical Management System.

Lead flashing may be found at roof penetrations and will be separated out for recycle.

Using, Reusing, and Conserving Natural Resources

Scrap metal will be diverted from landfill disposal and recycled where appropriate and practical.

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, 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

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- 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: 7/25/2019