

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: MFC-787 Equipment Enclosure

SECTION B. Project Description and Purpose:

The 180 kW emergency diesel generator for the Fuels and Applied Science Building (FASB) at the Materials and Fuels Complex (MFC) building MFC-787 needs to be protected from inclement weather. The proposed action constructs a single-story structure (about 672 square feet) having a roof, walls, and a floor resistant to snow and rain. Work scope includes pouring a concrete pad and removing the tongue of the trailer on which the emergency generator sits allowing the trailer to fit in the proposed structure. Other minor trailer modifications are proposed to allow permanent connection to the concrete pad. The enclosure is not intended for human occupancy. The diesel generator requires a minimum clear width of 30 inches on at least three sides.

The proposed action includes supplying artificial lighting and battery-powered emergency lighting to the enclosure. Electrical wiring, overcurrent protection, grounding, and equipment installation meets NFPA 70, National Electrical Code (NEC) requirements. If required by code, a fire protection system will be installed. The project also installs heat to maintain the temperature above 40°F, installs piping to exhaust generator emissions outside, and installs intake ventilation for generator operation.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The emergency generator is a stationary source that emits combustion air pollutants (NO_x, CO, SO₂, PM, PM₁₀, Ozone [VOC's]) when operating. The engine is considered an emergency engine, because it supplies backup power to FASB when there is a loss of facility power. The engine also runs during maintenance checks and readiness testing. An Air Permitting Applicability Determination (APAD) will be prepared for these engines documenting permitting exemptions and operational requirements. Air emissions for the diesel generator have been identified by APAD INL-13-006.

Generating and Managing Waste

It is anticipated that project activities will generate industrial (non-hazardous, non-radioactive) typical construction wastes such as boxes, wood, wiring, paper, insulation, and metal. Potential waste materials will be evaluated for waste minimization prior to generation, and industrial waste generated during proposed activities will be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

All solid waste will be managed by WGS using approved laboratory procedures.

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, paints, concrete, concrete cure, asphalt, refrigerants, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility PEL. If the PEL 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 material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project would practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, and are non-toxic or less-toxic alternatives.

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

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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 to Subpart D, item B1.15 "Support buildings" and B1.31 "Installation or relocation of machinery and equipment."

Justification: Activities are consistent with 10 CFR 1021, Appendix B to Subpart D, item 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 covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix;" and

B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that the uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

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: 6/05/2019