DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

CX Posting No.: DOE-ID-INL-19-011

SECTION A. Project Title: TRA-666/666A HVAC Replacement

SECTION B. Project Description and Purpose:

The heating and ventilation (HVAC) equipment in building Test Reactor Area (TRA)-666/666A, Safety and Tritium Applied Research (STAR) facility, is outdated and needs to be replaced. The proposed activity replaces the HVAC system with two new air handing units (AHUs) and related equipment, including building thermostat controls to match the other buildings at ATR. The proposed action installs new AHUs and a compressor on the north-east end of TRA-666/666A which requires removing and replacing asphalt, concrete, and gravel. Other major steps include removing and sealing the external inlet air doghouse and roof ventilators, replacing the ceiling in rooms 102 and 103, and replacing ductwork.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

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

- Distributing, excessing or disposing of appliances containing refrigerants
- Maintaining, servicing or repairing stationary heating, ventilation, air conditioning and refrigeration equipment
- Acquiring and dispositioning chemicals
- Disturbing asbestos
- Generating fugitive dust or other fugitive emissions.

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.

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 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

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"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 B2.1,"Workplace enhancements."

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B2.1, "Modifications within or contiguous to an existing structure, in a previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction)."

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

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 3/4/2019