# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-INL-18-032

#### SECTION A. Project Title: Repair Underground 3" HDPE Air Pipe Leak Near TRA-609

#### SECTION B. Project Description and Purpose:

Underground piping (2" to 4" HPTE plastic) at the Advanced Test Reactor (ATR) Complex has developed an air leak near building Test Reactor Area (TRA)-609. The specific airline and its location need to be identified, and the leak needs to be repaired to maintain a reliable air supply to ATR and critical ATR support systems.

The proposed action performs the following activities to repair the air leak:

- 1) Perform isolation troubleshooting to identify the specific leaking airline
- 2) Determine if loads and components downstream from the leak can supply required air pressure and flow through temporary means, and, if so, install temporary air systems
- 3) Perform subsurface evaluation to support excavation
- 4) Excavate suspected leak is location(s), including removal of roadway asphalt
- 5) Perform testing to identify the leak location
- 6) Repair leak
- 7) Perform required NDE inspections as required
- 8) Conduct post repair testing
- 9) Backfill excavated area
- 10) Replace removed roadway asphalt.

Excavation is expected to require vacuum excavation. Repairs include replacing sections of damaged HTPE piping using plastic pipe welding methods.

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

#### Air Emissions

Project activities have the potential to create fugitive dust.

Mobile generators, welders, heavy equipment, and compressors will contribute to air emissions during construction.

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

Industrial waste such as concrete, asphalt, packaging material, rags, pipe scrap, etc., will be generated during the project.

Hazardous waste generation is not anticipated, although paint waste, adhesive waste, and spill material have the potential for being hazardous.

#### **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.

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

Recycled materials will be used to the greatest extent practicable in the selection of building materials.

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, B5.4 "Repair or replacement of pipelines."

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, CX B5.4, "Repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way, provided that the actions are in accordance with applicable requirements (such as Army Corps of Engineers permits under section 404 of the Clean Water Act). Pipelines may convey materials including, but not limited to, air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water.

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: 7/10/2018