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CX Posting No.: DOE-ID-INL-17-049 R1

SECTION A. Project Title: MFC-716 Trailer and MFC-TR-01 Removal and Replacement

SECTION B. Project Description and Purpose:

The purpose of this revision is to add removal of the old security trailer at the Materials and Fuels Complex (MFC), MFC-TR-01, to environmental checklist INL-17-100.

MFC-TR-1 was built in 1960. The proposed action removes the MFC-TR-01 potable water line back to the valve in the MFC-759 restroom and caps the line downstream from this valve. The cap and open pipe will be sanitized. The cap on the potable water line must meet the requirements for new or replacement equipment that meet the standard of 0.2 percent lead when used with respect to solder and flux and not more than a weighted average of 0.25 percent lead (this is considered lead free) for pipes, plumbing fixtures, fittings, and pumps that come in contact with water (i.e., wetted surfaces). The sewer line will also be removed and capped at the ground.

Communications connections, fire alarm connection, pull wires, and conduit will be removed and capped at the ground surface. The power conductors will be removed back to transformer TF406, the conduit stub moved back to the concrete pad, and the stub will be capped.

The trailer will be transported from MFC to Excess at CFA.

The scope of the original EC stated that MFC-716 is leased and will be removed by the owner. However, MFC-716 is not a leased facility but is owned by the Department of Energy (DOE). This mobile facility will be transferred to Excess at CFA.

The "Environmental Assessment for the Multipurpose Haul Road within the Idaho National Laboratory Site" (DOE/EA-1772, 2010) limits use of the haul road to the following activities (DOE/EA-1772 p.1):

- Transporting spent fuel
- Transporting special nuclear material
- Accommodating research fuel transfers
- Transporting test or experiment materials
- Transporting Waste

"Waste" is defined in DOE/EA-1772 as "Nuclear material residues that have been determined to be uneconomical to recover (p. ix)." DOE further states in the haul road EA that additional uses of the haul road require additional National Environmental Policy Act (NEPA) review (p. B-16). If project personnel propose to use the haul road to transport these facilities to Excess, additional NEPA review is required.

The remaining scope of the original EC remains valid and is discussed below:

Several modular office buildings are in use at the Materials and Fuels Complex (MFC) ranging in age from 15 to 30+ years old, and all require significant upgrades to support Idaho National Laboratory's (INL's) vision of offering world-class working facilities. Modular office building MFC-716 began operation in 1990. The facility has reached the end of its useful life, and anticipated growth cannot be accommodated within the current space provided. The proposed action replaces MFC-716 with a new, wider modular facility.

The scope of the proposed action is to disconnect the facility from utilities (i.e. electrical power, water, and sewer) and remove the modular structure. A new wider facility will be leased and placed in the same location following site preparation. The wider footprint of the proposed structure requires a storm water drainage ditch and culverts between MFC-716 and -759 be moved about 5 feet east to accommodate the footprint of the new, wider structure.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project grading activities have the potential to generate fugitive dust.

Discharging to Surface-, Storm-, or Ground Water

The storm water ditch and culverts east of MFC-716 will be moved about 5 feet east to accommodate the wider facility.

Disturbing Cultural or Biological Resources

Activities will be completed inside the MFC perimeter fence in a previously disturbed area, and impacts to cultural resources are not anticipated.

Generating and Managing Waste

Project activities have the potential to generate industrial waste such as scrap metal, conduit, wire, cable, etc.

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Releasing Contaminants

Typical construction chemicals such as wire pulling lubricant, fuels, adhesives, etc., may be used on the project.

Using, Reusing, and Conserving Natural Resources

Industrial materials generated during removal and installation, such as scrap metal, will be reused or recycled to the extent practicable.

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 to Subpart D, B1.15 "Support buildings" and B1.24 "Property transfers."

Justification: Project activities described in this EC 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 B1.24 "Transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land), provided that under reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests."

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: 2/21/2018