# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 1 of 2

CX Posting No.: DOE-ID-INL-17-044

SECTION A. Project Title: TRA-621 (NMIS) Facility Upgrades

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

The TRA-621 NMIS facility is in need of security upgrades and modifications. These upgrades will include:

- Construction of new entrance control facility attached to the front (west side) of the NMIS facility.
- New access control equipment for a new search package with Special Nuclear Material and explosive detectors
- New doors and door repairs
- New exterior lighting
- New cameras and sensors
- New gated ladder cages on TRA-605
- New duct banks and utilities to support the modifications.

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

#### **Air Emissions**

There is a potential to disturb asbestos containing building materials in drywall (presumed, not sampled), floor tile, and penetration compound throughout the building.

Fugitive dust may be generated when excavating for duct banks and the foundation for the entrance control facility.

### **Disturbing Cultural or Biological Resources**

TRA-605 (Warm Waste Treatment Facility) is eligible for nomination to the National Register of Historic Places and is considered a Category 2 historic property. Removal and/or changes of original features may adversely impact this historic property. Prior to implementing any project activities a cultural resource review must be completed; contact Christina Olson (526-1692, christina.olson@inl.gov) to initiate cultural resource review.

TRA-621 has had issues with bird nests in the past. The project must coordinate with the Environmental Surveillance and Ecological Research (ESER) contractor for a biological review if nests are present. Bird nests must not be disturbed without authorization from Environmental Support and Services (ES&S) and ESER personnel.

The proposed action would be performed on a building built prior to 1970. The facility may be eligible for nomination to the National Register of Historic Places.

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

Industrial waste in the form of scrap metal, scrap wood, packaging material, clean soil, concrete, asphalt, Resource Conservation and Recovery Act (RCRA) empty containers, etc., will be generated during the project.

Hazardous waste and polychlorinated biphenyl (PCB) bulk product waste may be generated if old paint removal becomes necessary while installing the security upgrades to the buildings (including TRA-605).

Asbestos waste may also be generated.

### **Releasing Contaminants**

Typical construction chemicals such as adhesives, fuels, lubricants, oils, paints, etc., would be used on the project. Chemical use has a potential for small amounts of air emission and spills.

There is a potential to disturb paints suspected to contain PCBs.

The construction of the entrance control facility and duct bank is within an area currently being evaluated under the CERCLA process. A decision on the boundary of the site has not yet been established.

#### 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.

# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 2 of 2

CX Posting No.: DOE-ID-INL-17-044

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, B2.2 "Building and equipment instrumentation"

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, B2.2 "Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment)."

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 8/24/2017