### DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-17-042

#### **SECTION A. Project Title:** Modifications to ATR Control Room AC 670-HVA-2

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

Additional cooling is needed in the relay cabinets labeled RC-1 though RC-7 in the ATR Control room. This project will add 4-in branch ducts from the ATR Control Room air conditioner, 670-HVA-2, supply duct to the individual RC cabinets. Volume dampers in each branch line will provide airflow control.

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

#### Air Emissions

There is a potential to disturb asbestos containing building materials throughout the building.

Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new stationary emission source.

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

TRA-670 is eligible for nomination to the National Register of Historic Places. The project as described is exempted from cultural resource review (Idaho National Laboratory [INL] Cultural Resources Management Plan, Table 2, exemption 4 [Department of Energy Idaho Operations Office (DOE/ID)-10997 rev. 6]). Therefore, the project may proceed as planned.

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

Project activities have the potential to generate a variety of waste. The following waste types are anticipated:

- Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals.
- Hazardous wastes have the potential to be generated during maintenance operations on systems or equipment containing hazardous
  chemicals, or by using hazardous chemicals to clean or decontaminate equipment and systems. Hazardous metal waste (e.g., lead,
  electronics, brass, metal containing paints, etc.) may also be generated during maintenance work or by replacement of outdated equipment.
- Polychlorinated Biphenyl (PCB) waste could be generated when performing maintenance associated with pre-1982 equipment/materials such as capacitors, lubricants/dielectric fluids, transformers/bushings, painted surfaces and other electrical equipment/components.

#### **Releasing Contaminants**

Although not anticipated, chemical use has a potential for small air emissions and spills.

#### Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition.

# 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, B1.4 "Air conditioning systems for existing equipment."

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**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, B1.4, "Installation or modification of air conditioning systems required for temperature control for operation of existing equipment."

Approved by Betsy Holmes, acting for Jason Sturm, DOE-ID NEPA Compliance Officer on: