

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: MFC-725 Fire Station Upgrades and MFC-713 Exterior Drainage Upgrades

### SECTION B. Project Description and Purpose:

The purpose of the proposed action is to improve stormwater runoff and address stormwater leaks into the fire station at the Materials and Fuels Complex (MFC) and to improve drainage west of building MFC-713. At present, stormwater can accumulate on the western side of the fire station (building MFC-725), and leak into the building. Storm water is also infiltrating the walls through improperly installed siding on the north, west, and south sides of the building. The proposed action would be completed in two phases. Phase I of the project is to repair the damaged walls, and replace the siding, doors, and window casings, as necessary to seal and protect the building interior. Phase II will focus on improving the stormwater drainage away from the building, which may require demolition/replacement of portions of the concrete and asphalt pads, grading of the area to slope away from the building, and installation of other drainage systems such as piping and depressions.

In addition, culverts west of MFC-713 will be connected with new corrugated metal pipe and a catch basin. The existing ditch will be filled in around the new pipe and catch basin. The grade will be sloped toward the new catch basin and improved to allow better stormwater flow to the drainage system.

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

#### Air Emissions

Project activities have the potential to generate fugitive dust.

#### Discharging to Surface-, Storm-, or Ground Water

The proposed actions would improve stormwater drainage near MFC-725 and MFC-713. Buildings MFC-725 and MFC-713 are not located in the stormwater corridor.

#### Disturbing Cultural or Biological Resources

Activities would be completed inside the MFC perimeter fence in previously disturbed areas. Since the projects are located on previously disturbed soils within a fenced facility, cultural surveys are not needed.

#### Generating and Managing Waste

Project activities will generate industrial waste such as non-hazardous construction waste, asphalt, concrete, scrap metal, etc.

#### Releasing Contaminants

Construction chemicals such as marking paint, fuels, lubricants, adhesives, paints, etc., may be used during the projects. Although not anticipated, spills may occur.

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

Industrial materials generated during demolition, such as scrap metal and asphalt, may be reusable or recyclable.

### 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, items B1.3 "Routine maintenance" and B1.33 "Stormwater runoff control"

**Justification:** Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, items B1.3 "Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles

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and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- a. Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
- b. Door and window repair or replacement;
- c. Wall, ceiling, or floor repair or replacement;
- d. Reroofing;
- e. Plumbing, electrical utility, lighting, and telephone service repair or replacement;
- f. Routine replacement of high-efficiency particulate air filters;
- g. Inspection and/or treatment of currently installed utility poles;
- h. Repair of road embankments;
- i. Repair or replacement of fire protection sprinkler systems;
- j. Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
- k. Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
- l. Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- m. Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;
- n. Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);
- o. Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
- p. Removal of debris;"

and, B1.33 "Design, construction, and operation of control practices to reduce stormwater runoff and maintain natural hydrology. Activities include, but are not limited to, those that reduce impervious surfaces (such as vegetative practices and use of porous pavements), best management practices (such as silt fences, straw wattles, and fiber rolls), and use of green infrastructure or other low impact development practices (such as cisterns and green roofs).

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: 4/27/2017