

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

SECTION A. Project Title: Specific Manufacturing Capability (SMC) Pavement Repair and Replacement Plan

SECTION B. Project Description and Purpose:

The Specific Manufacturing Capability (SMC) is paved with asphalt within the facility fence. The asphalt paving has drainage issues and shows signs of deterioration. Better stormwater drainage would eliminate ponding that can be a safety hazard. The proposed action would remove and replace most of the pavement and patch and/or seal small areas of pavement not in need of replacement inside the fenced area at SMC. New pavement would also be installed along the east side of building Test Area North (TAN)-629. In areas where replacement of pavement is proposed, all concrete manhole collars would also be replaced. In addition, a new drainage plan would be designed that would include a new trench drain that would extend from the south to the north end of the area between buildings TAN-679 and TAN-629. The SMC area is excluded from the stormwater corridor.

The proposed action would be completed in two phases over four years. A detailed course of action is outlined in TEV-2767, Specific Manufacturing Capability (SMC) Pavement Refurbishment Plan.

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 new trench drain that would extend from the south to the north end of the area between buildings TAN-679 and TAN-629, and stormwater would be discharged to the ground outside of the facility perimeter. The SMC area is excluded from the stormwater corridor.

Disturbing Cultural or Biological Resources

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

Generating and Managing Waste

Project activities would generate Industrial waste such as non-hazardous construction waste, asphalt, concrete, etc. Asphalt will be taken to the Central Facilities Area (CFA) landfill and will be staged for recycle/reuse. All waste will be characterized and dispositioned at the direction of Waste Generator Services (WGS). All generated waste will be turned over to WGS for disposition.

Releasing Contaminants

Construction chemicals such as marking paint, fuels, lubricants, adhesives, paints, etc., would be used during the project. Although not anticipated, spills have the potential to occur.

Using, Reusing, and Conserving Natural Resources

Asphalt removed as part of the project would be placed in the asphalt pile at the CFA landfill for reuse/recycle. Other materials suitable for recycle such as scrap metal would be diverted from landfill disposal when 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 items B1.3, "Routine Maintenance/custodial services for buildings, structures, infrastructures, equipment," B2.5, "Facility safety and environmental improvements," and B1.33 "Stormwater runoff control."

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Justification: The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D and the following categorical exclusions:

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 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.

B2.5, "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

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: 4/18/2017