

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

**SECTION A. Project Title:** Materials and Fuels Complex Mobile Structure Decontamination and Decommissioning (D&D) and MFC Protected Area Intrusion Detection Upgrade

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

The purpose of this revision is to capture project scope not included in the original Environmental Checklist (EC). Specifically, this revision adds the construction of three storm water dry wells to provide adequate storm water drainage for the site.

Original EC:

Security at Idaho National Laboratory's (INL's) Materials and Fuels Complex (MFC) requires the use of infrastructure-related efforts to assure appropriate controls, systems, and security personnel are available to protect the facility against theft, diversion, or destruction. As part of these security requirements, MFC needs to detect and prevent unauthorized intrusions to the complex and to certain facilities within the complex perimeter.

To address these needs, an upgrade to the security system is proposed. The scope of the proposed action includes the following activities:

1. Replace protected area sensors
2. Perform site grading and leveling for proper drainage, including storm water dry wells
3. Expand boundary and install new entry gate on north side of the protected area
4. Remove mobile structure
5. Remove degraded asphalt sections throughout the protected area and install new asphalt (approximately 15 ft wide) around the entire perimeter within the exterior and interior fences to provide a suitable surface for access by snow removal equipment.

A mobile structure needs to be demolished. The proposed action would demolish and dispose the structure, and all utilities connected to the building would be removed.

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

#### **Air Emissions**

The project is considered a demolition under the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) and requires a 10-day demolition notification. Non-friable asbestos-containing floor tile and presumed asbestos-containing roof felt identified; see Asbestos Reinspection Report ASB-MFC-718 2011 REV. 0, 2/7/2011.

If air conditioner (AC) units are to be disposed, refrigerants will be evacuated per applicable procedures/regulations.

Fugitive dust may be generated. All reasonable precautions shall be taken to prevent particulate from becoming airborne. If dust control methods are required, the method used and frequency applied must be recorded in the project records and will be used to demonstrate compliance with the INL Title V Air Permit.

Mobile sources such as generators, welders, and compressors may be used temporarily (less than a year) by subcontractors at the construction site. These sources will be required to meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

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

Installation of shallow injection wells must comply with IDAPA 37.03.03.070.

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

Biological and cultural resource reviews are not required. However, excavation activities have the potential to disturb artifacts which may require cessation of work.

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

Typical construction debris such as asphalt, concrete, scrap wood, scrap metal, etc., will be generated during the project. It is possible that the building contains polychlorinated biphenyl (PCB) light ballasts. Scrap metal shall be recycled when practical. Pollution prevention/waste minimization shall be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated shall be transferred to Waste Generator Services (WGS) for appropriate disposition.

#### **Releasing Contaminants**

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Typical construction chemicals such as lubricants, fuels, adhesives, paints, etc., will be used by the subcontractor. A chemical inventory list with associated Safety Data Sheets (SDSs) shall be submitted in the vendor data system. All chemicals shall be entered into the INL Comply Plus Chemical Management System.

**Using, Reusing, and Conserving Natural Resources**

All material will be reused and/or recycled where economically practicable. All applicable waste will be diverted from disposal in the landfill when possible. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, and are non-toxic or less-toxic alternatives.

**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 B1.23, "Demolition and disposal of buildings" and B2.2 "Building and equipment instrumentation"

**Justification:** Project activities in this Environmental Checklist (EC) are consistent with 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B1.23, "Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces), provided that 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 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).

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)       Yes     No

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 6/27/2016