

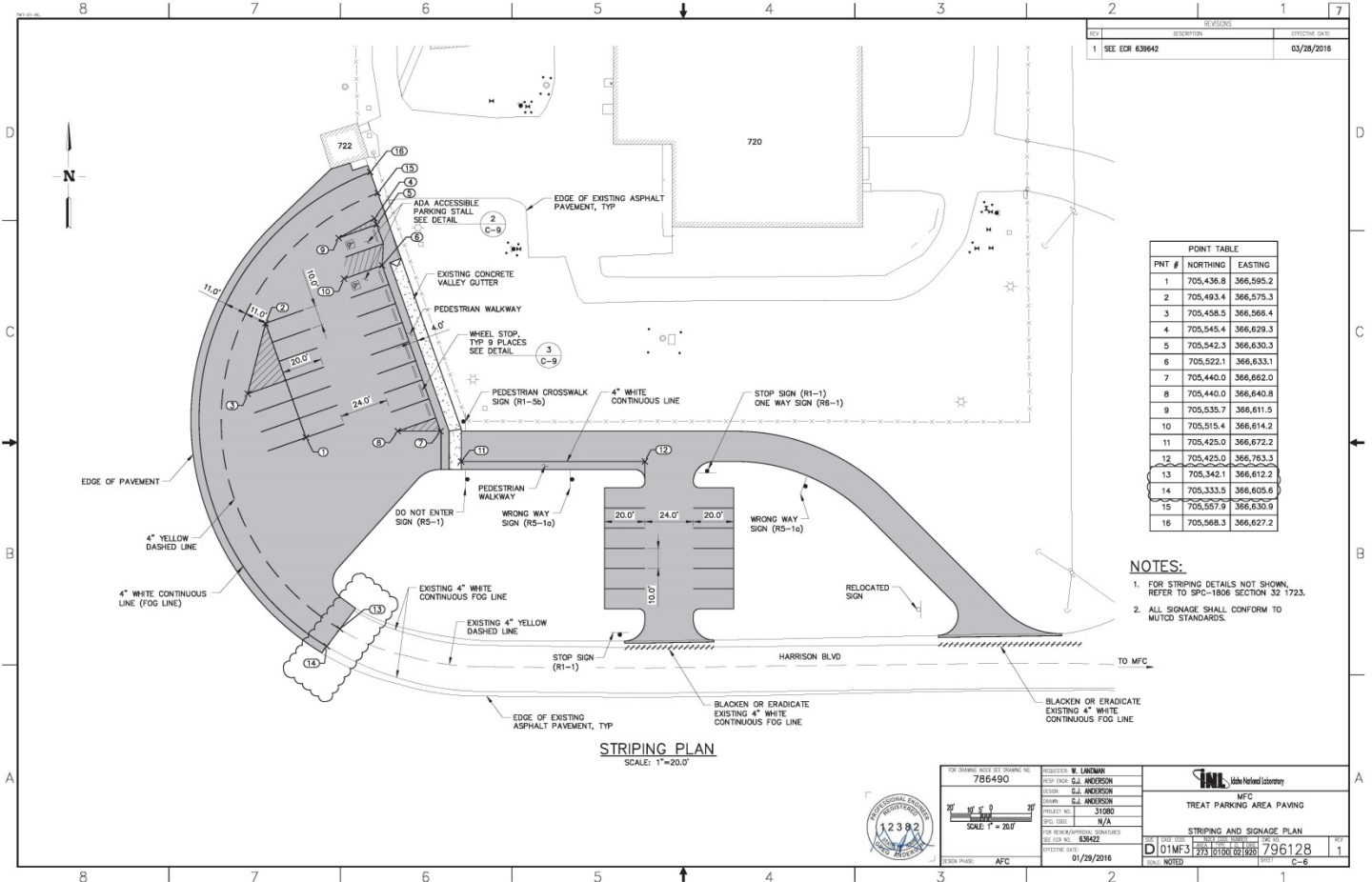
# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

**SECTION A. Project Title:** Transient Reactor Test (TREAT) Parking Area Grading and Paving

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

The TREAT facility (Materials and Fuels Complex [MFC]-720) is being prepared for restart of transient testing and needs various maintenance, modifications, and replacements to bring the facility to operational status. TREAT needs adequate access and parking for operation of the facility. The current TREAT parking area is in very poor condition and needs to be repaired. The proposed action is to regrade and resurface the parking lot and to construct a small overfill parking area with access road to the south and east in a previously disturbed area (See Figure 1).

Figure 1. Proposed Area of Asphalt Replacement, Overfill Parking, and Access Road.



Department of Energy (DOE) previously prepared an Environmental Assessment (EA) for the Resumption of Transient Testing of Nuclear Fuels and Materials (DOE/EA-1954) and issued a Finding of No Significant Impact (FONSI). An Environmental Checklist (EC) (Idaho National Laboratory [INL]-14-025 "2014 to 2018 Transient Testing Program Activities") and Plan (PLN)-4687 "General Environmental Requirements for the Resumption of Transient Testing of Nuclear Fuels and Materials at Idaho National Laboratory" were also prepared for the reactivation of the TREAT facility. The EA for the restart of TREAT (DOE/EA-1954) analyzed effects of activities associated with restart on the TREAT Reactor Building (MFC-720), the TREAT Reactor Control Building (MFC-721), and the cable corridor between the two facilities (DOE/EA-1954 p. 17). Activities analyzed in the EA were limited to refurbishment or like-for-like replacement of systems and equipment necessary to prepare the TREAT Reactor for restart and operation. Analysis of impacts to cultural resources associated with the TREAT restart was limited to the direct area of potential effects (APE). The direct APE was limited to buildings, parking lot footprints at the time of survey, surrounding gravel aprons, the roadway between MFC-720 and MFC-721, the buried cable corridor parallel to the road, and a narrow strip of land between the cable corridor and adjacent road where staging, laydown, and temporary parking areas were expected to be located (DOE/EA-1954 p. 21). In addition, the EA noted, "Disturbance of soil and vegetation will only occur within parking area around TREAT and MFC-721 and the cable corridor that parallels the roadway from the TREAT Reactor Control Building to TREAT" (p. 20) and "New footprints would not be established and soil disturbance would be minimized..." (p. 29).

Although the TREAT facility maintenance, modifications and replacements are part of DOE/EA-1954, EC INL-14-025, and PLN-4687 "General Environmental Requirements for the Resumption of Transient Testing of Nuclear Fuels and Materials at Idaho National Laboratory," the impacts associated with the proposed paving and parking area expansion were not analyzed in these documents.

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This EC documents the proposed parking area work and construction of an overflow parking lot and associated access road. The asphalt and subsoil in the current parking area would be removed (approximately 3 feet below grade); the area would be regraded with a new gravel subbase and resurfaced with new asphalt, and a small overflow parking area with access road to the south and east in a previously disturbed area would be constructed as shown in Figure 1.

This area for proposed work has been previously disturbed and is void of vegetation. Biological and Cultural clearances have been obtained. No impacts to biological or cultural resources are expected. In addition, the proposed action is unlikely to result in cumulative impacts to resources as analyzed in the EA.

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

#### **Air Emissions**

Fugitive dust may be generated during excavation activities. All reasonable precautions will be taken to control fugitive dust. Dust control methods that are used will be recorded and used to show compliance to the INL air permit and Idaho Administrative Procedures Act (IDAPA) air requirements.

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

The project will disturb soil from a previously disturbed area void of vegetation. Cultural Resources (Brenda Pace) was contacted and provided clearance based on surveys completed in 2013. Standard Stop-Work requirements for unexpected cultural finds will be observed. Biological Resources (Jackie Hafla) was contacted and because the excavation will not disturb vegetation and there is no need for mowing, approval to proceed with the project was granted.

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

Typical non-hazardous construction waste such as asphalt, concrete, Resource Conservation and Recovery Act (RCRA) empty marking paint, cans, etc., will be generated during the project. 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).

#### **Releasing Contaminants**

Construction chemicals such as marking paint, fuels, lubricants, adhesives, traffic paints, etc., will be used during the project. The subcontractor will submit chemical inventories and associated Safety Data Sheets through the vendor data system prior to bringing them to the INL. The Construction Chemical Coordinator will enter these chemicals into the INL Comply Plus chemical management system for tracking purposes. Spills will be reported to the Construction Field Representative and the Spill Notification Team.

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

The asphalt to be removed will be placed in the asphalt pile at the CFA landfill for reuse/recycle. Other waste that is suitable for recycle, such as scrap metal, will 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 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, item 1.15 "Support buildings."

**Justification:** Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.15 "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance

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activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix."

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: 6/9/2016