

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Advanced Test Reactor (ATR)-C-3 2-Ton Crane Replacement

SECTION B. Project Description and Purpose:

The Advanced Test Reactor (ATR) 2-ton crane system (ATR-C-3) has reached the end of its useful life. Replacement of the crane is needed to continue facility operations. The proposed action would replace all components of the crane system (except for rails attached to the overhead building structure if they are found adequate by the vendor). The new crane would interface with the electrical power. Paint on the old crane is pre-1980 and may potentially contain lead and/or polychlorinated biphenyl (PCB) paint. Although not anticipated, wiring could contain asbestos insulation.

The crane would be replaced late 2016 or early 2017 time frame and requires an ATR reactor outage (the crane may be installed and tested over a series of reactor outages).

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

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 considered a Category 1 historic property and is eligible for nomination to the National Register of Historic Places. Project activities have the potential to impact historical characteristics of the facility. As mitigation for potential impacts, as described by the INL CRMP (Idaho National Laboratory Cultural Resource Management Office. Idaho National Laboratory Cultural Resource Management Plan. DOE/ID10997, revision 5, Idaho Falls, Idaho: U.S. Department of Energy, Idaho Operations Office, 2013), high resolution digital photography of the existing ATR 2-ton crane system (ATRC3) was completed and submitted to the INL Cultural Resource Management Office (CRMO) on February 17, 2016. The photography was approved February 17, 2016. As such, the project may proceed without further cultural resource review.

Generating and Managing Waste

Maintenance activities may generate a variety of waste. It is anticipated that the following types of waste could be generated:

- 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. Note: Lead has been encountered very infrequently (e.g., shielded cables).
- Asbestos waste may be generated when performing maintenance activities on equipment or structures with asbestos-containing materials (ACM) such as insulation, gaskets, flanges, walls, roofing, and flooring.
- 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)

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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: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B1.31 "Installation or relocation of machinery and equipment."

Justification: The proposed activities are consistent with CX B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

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: 3/15/2016