

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Idaho National Laboratory (INL) Routine Maintenance Activities (Overarching)

SECTION B. Project Description:

This environmental checklist (EC) replaces EC INL-10-069.

The purpose of this overarching EC is to address activities that would meet the intent of the Categorical Exclusion (CX) B1.3 as described in 10 Code of Federal Regulation (CFR) 1021, Appendix B to Subpart D. These activities include routine maintenance and custodial services required to support safe and efficient operations. Activities would occur at Idaho National Laboratory (INL) Site locations and at in town (Idaho Falls) facilities. These activities would be performed by INL Facility and Site Services personnel or off-site contractors. None of these activities would be performed as part of or in support of a larger project requiring an environmental assessment or environmental impact statement. Activities not covered by this overarching EC include, but may not be limited to, the following:

- a) Actions that change the scope or mission of a facility
- b) Actions, changes, additions or alterations to an area, facility, structure, system, or component that alters the appearance, environmental impact, design basis, or expected equipment life (for example building color, drainage, habitat preservation, flow rates, seismic strengths, delta pressures, control parameters, program sequence, load carrying capacity, response time, fire suppression/detection capabilities, shielding, criticality spacing, corrosion resistance)
- c) Actions that cause a significant increase in environmental impacts
- d) Actions for which a separate categorical exclusion is specified in 10 CFR 1021, Appendix B to Subpart D
- e) Actions that would require a permit or permit modification
- f) Actions that remove or disturb sagebrush anywhere on the INL Site
- g) Actions that disturb any type of vegetation within the Sage-grouse Conservation Area.

In addition, this EC would not support the expansion of a laboratory facility for operational purposes.

Routine maintenance includes activities and custodial services for buildings, structures, rights-of-way, infrastructure (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, infrastructure, and equipment in a condition suitable for a facility to be used for its designated purpose. Maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance includes replacements to the extent that replacement is in-kind and not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components as long as the replacement does not significantly change the 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 replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to the following:

- a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses (includes replacement of the hydraulic/cutting/lubricating oils)
- 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 Department of Energy (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 761 [Polychlorinated Biphenyls (PCBs) 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)

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- 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)
- p) Removal of debris.

This EC does not include routine maintenance of unpaved roads at the INL Site. Maintenance of unpaved roads is covered in EC INEL-02-024 or its revisions or replacements. Activities requiring use of gravel/borrow sources must review EC INL-14-045, "Idaho National Laboratory Gravel/Borrow Pits (Overarching)."

Those conducting maintenance activities would use the instructions from Laboratory-wide Procedure (LWP)-6200 'Maintenance Integrated Work Control Process' and all applicable instructions in LWP-8000.

This EC gives overarching coverage for those activities described and that fall under the categorical exclusion, B1.3 (i.e. routine maintenance activities). Each project approved under this overarching EC must meet the conditions of the CX established in 10 CFR 1021, Appendix B to Subpart D, item B1.3.

SECTION C. Environmental Aspects or Potential Sources of Impact:

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

Hazardous and radiological emissions may also be generated during maintenance activities such as operation of fuel burning equipment, decontamination work, use of maintenance products that contain hazardous constituents, and disturbance of contaminated soils.

All asbestos work must be conducted by properly trained personnel using appropriate abatement methods. Quantities of asbestos that are to be disturbed would be communicated to the appropriate Environmental Support and Services (ES&S) representative in order to file the Asbestos Removal Notification Form (450.04). Asbestos work would not take place until the project has received approval from the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) Technical Point of Contact (TPOC).

Discharging to Surface-, Storm-, or Ground Water - Some maintenance activities have the potential to contaminate surface water, groundwater, or storm water that could possibly reach waters of the United States (U.S.).

Disturbing Cultural/Biological Resources - Routine maintenance activities would be conducted both inside and outside of facility fence lines and may involve off-road travel, construction or demolition work, some of which may involve historic structures, equipment staging and storage, other soil disturbance activities, and off-road vehicle travel that could impact cultural and biological resources.

Project activities that have the potential to impact historic properties must receive approval in writing from the Cultural Resource Management Office (CRMO) prior to beginning work. Contact Christina Olson at 526-1692.

Project personnel must obtain a cultural resource review before beginning project activities that disturb soil or involve offroad vehicle travel outside established site area boundaries. This includes activities in generally observed or specifically defined rights-of-way (e.g., power lines, railroad, paved road) and in areas that appear to be previously disturbed. Personnel from the CRMO must review and may need to physically observe soil disturbance at or near CITRC, even in disturbed areas. Project personnel must incorporate the instructions and requirements from the cultural resource review into project plans. Contact Brenda Pace at 526-0916.

Routine maintenance activities that would disturb vegetation or nesting birds from April 1 to September 1 must have written approval from Gonzales-Stoller Surveillance. Contact Jackie Hafla (227-9031) two weeks prior to beginning work to arrange for nesting bird surveys.

Ground disturbing activities must comply with the best management practices for the "Candidate Conservation Agreement for Greater Sage-Grouse (*Centrocercus urophasianus*) on the Idaho National Laboratory Site" (DOE/ID-11514). Contact Jackie Hafla (227-3031) at least one week prior to beginning work.

Generating and Managing Waste - Routine maintenance activities would generate a variety of waste including industrial, hazardous, radioactive, and mixed waste. Asbestos and PCB contaminated material may also be encountered during maintenance work and remediation projects. It is anticipated that the following types of waste would be generated:

- **Industrial waste** includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and non-Resource Conservation and Recovery Act (RCRA) metals. Potential waste materials would be evaluated for waste minimization prior to generation, and industrial waste generated during maintenance activities would be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.
- **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. RCRA hazardous

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metal waste may also be generated by discovery during maintenance work or by replacement of outdated equipment. In all cases, potential and existing hazardous waste streams would be evaluated for minimization potential and recycling opportunities prior to disposal.

- **Radioactive waste** may be generated during maintenance activities inside radiologically contaminated areas. Typical types of radioactive waste would include anti-contamination clothing, radiological enclosures and barriers, contaminated materials and components, contaminated high-efficiency particulate air (HEPA) filters, and contaminated absorbent used to clean up small spills. These wastes would be packaged and disposed through Waste Generator Services (WGS).
- **Mixed waste** could be generated during maintenance on equipment or structures containing both hazardous and radioactive materials. Waste minimization techniques would be practiced, and mixed waste would be stored, treated, and disposed in accordance with 40 CFR 268 Land Disposal Restriction (LDR) standards.
- **Asbestos waste** would be generated when performing maintenance activities in equipment or structures that contain asbestos-containing building materials (ACBM) such as pipe insulation, gaskets, flanges, walls, roofing, and flooring. Submittal of form 450.04 (Asbestos Removal Notification) to the Asbestos NESHAP TPOC is required prior to any asbestos removal, and submittal of a renovation/demolition notification to Environmental Protection Agency (EPA) and Idaho Department of Environmental Quality (DEQ) must be made at least 10 working days in advance of a regulated asbestos abatement project which exceeds the threshold quantities (160 square feet or 260 linear feet or 35 cubic feet). Asbestos waste would be disposed at the asbestos portion of the INL Landfill Complex.
- **PCB waste** could be generated when performing maintenance on equipment such as laths, mills, pumps, presses, air compressors, capacitors, and electrical equipment manufactured prior to 1982. PCB wastes would be packaged and disposed through WGS.

All waste generated would be managed in accordance with laboratory procedures. Pollution prevention/waste minimization would be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated would be transferred to WGS for appropriate disposition. All waste generated from these activities will have an identified disposition path prior to it being generated.

Releasing Contaminants - There is the potential to release small amounts of contaminants to the environment during routine maintenance activities. These may include air emissions from the use of fuel burning equipment, decontamination operations, asbestos remediation, and maintenance activities involving soil disturbance. Contaminant release to water and soil may also occur from inadvertent leaks or spills.

All chemicals and associated Material Safety Data Sheets (MSDS's) must be submitted in the vendor data system for approval. The Chemical Coordinator would track these chemicals in the INL Comply Plus Chemical Management System. Chemical use has a potential for small amounts of air emission and spills. Any spills that occur from these chemicals would be reported to the Spill Notification Team and would be cleaned.

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, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, or are non-toxic or less-toxic alternatives (see <https://sftool.gov/green-products/0?agency=7>).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 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, B1.3 "Routine maintenance"

Justification: Project activities are consistent with 10 CFR 1021, Appendix 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

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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)
- p) Removal of debris.

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: 6/1/2015