

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Advanced Test Reactor (ATR) Cold Waste Collection Tank 670-M-186 Vessel Replacement

SECTION B. Project Description:

The 670-M-186 vessel to the ATR cold waste collection tank has a history of developing leaks. Ultrasonic thickness testing performed on the vessel found excessive wall thinning due to corrosion. The technical evaluation completed in 2015 determined the vessel needs to be replaced.

The proposed action would replace the 670-M-186 vessel with a new stainless steel vessel. The new vessel would be fabricated to approximately the same dimensions and configuration as the existing vessel. Installation would require replacement of plumbing. The replacement plumbing would follow the same layout with minor adjustments, as necessary. The paint on the current vessel and piping predates 1982 and may contain lead and polychlorinated biphenyls (PCBs). This work would be performed during a reactor outage either late 2015 or 2016. The total estimated cost is approximately \$50,000.00.

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 - Test Reactor Area (TRA)-670 is eligible for nomination to the National Register of Historic Places and removal and/or changes of original features may adversely impact this historical property. Prior to beginning work, obtain cultural/historical resource review by contacting Christina L. Olson (526-1692). Approval must be demonstrated by written communication prior to beginning work, and any instructions contained in the review must be followed, if applicable.

Generating and Managing Waste - This activity has the potential to generate Resource Conservation and Recovery Act (RCRA) hazardous waste that needs to be managed according to laboratory procedures. Pollution prevention and waste minimization would be implemented where economically practicable to reduce the volume and toxicity of waste generated. All waste would be transferred to Waste Generator Services (WGS) for appropriate disposition. All waste generated from these activities must have an identified disposition path prior to it being generated.

There is the potential for possible disturbance of lead and suspect polychlorinated biphenyl paint. Approved work controls must be in place to ensure that no releases occur during project activities.

Releasing Contaminants – All chemicals typically used in construction/maintenance, if used, would be managed in accordance with laboratory procedures.

Using, Reusing, and Conserving Natural Resources - All material would be reused or recycled where economically practicable. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. 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, and 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 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, B6.3 "Improvements to environmental control systems."

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B6.3 "Improvements to environmental monitoring and control systems of an existing building or structure (such as changes to scrubbers in air quality control systems or ion-exchange devices and other filtration processes in water treatment systems), provided that during subsequent operations (1) Any substance collected by environmental control systems would be recycled, released, or disposed of within existing permitted facilities and (2) there are applicable statutory or regulatory requirements or permit conditions for disposal, release, or recycling of any hazardous substances or CERCLA-excluded petroleum or natural gas products that are collected or released in increased quantity or that were previously collected or released."

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: 6/9/2015