

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Hot Fuel Examination Facility (HFEF) Lab Hot Water System Modification

SECTION B. Project Description:

The Hot Fuels Examination Facility (HFEF) Laboratory Hot Water system is equipped with a water storage tank that contains a steam supplied heat exchanger section for heating water distributed to a number of labs within the facility. Much of the system has been capped, resulting in limited use. In addition, the result from the last Boiler and Pressure Vessel inspection recommended that the 190-gallon tank/exchanger be taken out of service. Therefore, modifications to the system are needed.

The proposed action would install a point-of-use water heater in room 124. This unit is a small (about 6-gallon) electric water heater to supply the needs in this room. Additionally, the steam, condensate, and laboratory cold water system would be isolated and unused lines from these systems would be removed.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions - There is a possibility for disturbance of asbestos containing building materials. 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 Construction 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).

Disturbing Cultural or Biological Resources - HFEF (MFC-785) is eligible for nomination to the National Register of Historic Places. The activities described in this Environmental Checklist (EC) are exempted from cultural resource review ("Idaho National Laboratory [INL] Cultural Resource Management Plan" Table 2, exemption 2 (Department of Energy Idaho Operations Office [DOE/ID]-10997 rev. 5). Therefore, the project may proceed as described without further cultural resource review.

Generating and Managing Waste - The installation of the electric water heater and the removal of steam, condensate, and water lines and the 190 gallon tank/exchanger would create industrial type waste. Waste determination and disposition forms (WDDF's) would be established, and the disposal of all waste would be worked with Waste Generator Services (WGS). Some insulation may be asbestos. Asbestos waste would be disposed in the Central Facility Area (CFA) landfill.

Releasing Contaminants - Typical construction chemicals such as fuels, adhesives, lubricants, paints, etc., would be used on the project. All chemicals would be entered 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 up.

Polychlorinated Biphenyl (PCB) contamination is not anticipated, however, contamination control methods may be required if disturbing painted surfaces inside HFEF.

Using, Reusing, and Conserving Natural Resources - All material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. 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. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (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 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 B2.5, "Facility safety and environmental improvements."

Justification: The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D categorical exclusion B2.5, "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not

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result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

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: 4/14/2015