

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Test Reactor Area (TRA)-609 Switchgear Replacement, Rollup Door Installation, and Diesel Removal

SECTION B. Project Description:

TRA-609 houses the air compressors and much of the electrical switchgear for equipment in the outer area of the Advanced Test Reactor (ATR). The switchgear equipment is nearing the end of its useful life and needs to be replaced. The proposed work scope is to replace the electrical switchgear with a new, functionally equivalent piece of equipment. The new switchgear will not fit through the personnel doors in the building, and an old diesel generator set that was previously abandoned in place is located in the south end of the building near the switchgear. To facilitate the new switchgear installation, a new rollup door (approximately 12' x 12') would be installed on the south exterior wall, and the diesel generator set, radiator, fuel tank, filter housing, exhaust stack, associated piping and electrical would be removed.

Project Start Date: March 2016

Project End Date: April 2016

Project Cost: Approximately \$4.4 Million

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.

There is a potential for disturbing regulated asbestos containing material (RACM). All asbestos work must be conducted by properly trained personnel using appropriate abatement methods. Quantities of asbestos 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 - TRA-609 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; however, INL cultural resource review has determined that the project, as described, is an exempted activity ("INL Cultural Resource Management Plan" Table 2, exemption 2 [Department of Energy Idaho Operations (DOE/ID)-10997 rev. 5]). Therefore, the project may proceed as described without further cultural resource review.

Generating and Managing Waste - The proposed action would generate industrial waste in the form of oils, fuel, carbon steel piping, structural steel components, electrical conduit and wiring along with other miscellaneous construction waste streams. This activity has the potential to generate Resource Conservation and Recovery Act (RCRA) hazardous waste and PCB waste which would be managed according to 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 Waste Generator Services (WGS) for appropriate disposition. All waste generated from these activities would have an identified disposition path prior to it being generated.

Releasing Contaminants - All chemicals typically used in construction/maintenance, if used, would be managed in accordance with laboratory procedures. There is the potential for possible disturbance of suspect polychlorinated biphenyl (PCB) paint. Approved work controls would be in place to ensure that no releases occur during project activities.

Using, Reusing, and Conserving Natural Resources - All material would be reused 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 (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)).

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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: 3/9/2015