

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

**SECTION A. Project Title:** Idaho Falls (IF)-685 ERV-1 Work Platform

**SECTION B. Project Description:**

The proposed project will construct an elevated work platform around an air handler unit (ERV-1) in IF-685 (ESL). The platform is needed so that maintenance personnel will be able to more easily and safely access the elevated air handler. The project will consist of rerouting existing conduit to follow the air handler surfaces, cutting holes in existing walkway grating to allow for support column pass-through, installing support legs, vibration dampening pads, spreader feet, platform framing, handrails, ladder, ladder support and Fibergate molded fiberglass grating. Touch up painting will be completed as necessary.

Estimated Start Date: March 2015

Approximate Cost: \$75,000

**SECTION C. Environmental Aspects or Potential Sources of Impact:**

**Generating and Managing Waste** - Typical construction debris such as packaging material, scrap metal, Resource Conservation and Recovery Act (RCRA) empty containers, etc., would be generated during the project. All waste would be characterized, stored, and disposed at the direction of Waste Generator Services (WGS).

**Releasing Contaminants** - Chemicals such as adhesives, paints, fuels, lubricants, cutting fluids, weld rod, etc., would be used by the subcontractor. A chemical inventory list with associated Material Safety Data Sheets (MSDS's) would be submitted in the vendor data system by the subcontractor. All chemicals would be entered into the Idaho National Laboratory (INL) Comply Plus Chemical Management System by the Construction Chemical Coordinator.

**Using, Reusing, and Conserving Natural Resources** - Scrap material, such as wood and metal, will be recycled to the extent practical. All applicable waste will be diverted from disposal in the landfill when possible. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will 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 (<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, B2.5 "Facility safety and environmental improvements"

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, B2.5 "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not 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 and 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 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: 3/11/2015