

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

**SECTION A. Project Title:** Removal of Flat Bars Around Test Reactor Area (TRA)-671 Cold Well Screens.

**SECTION B. Project Description:**

The proposed action would remove the metal strips around TRA-671 cold well screens (see Figure 1) that pose a tripping hazard. The metal strips are coated with suspect polychlorinated biphenyl (PCB) paint. Work would consist of prying the metal strips from the cold well screen framework or stripping suspect PCB paint from metal strips then removing the strips by cutting/grinding.



Figure 1. Proposed work metal strip removal.

Projected Start Date: February 2015  
Projected End Date: February 2015  
Estimated Cost: Approximately \$1,000

**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 Biological or Cultural Resources** - TRA-671 was constructed before 1970, but it is not eligible for nomination to the National Register. Therefore, a cultural resource review is not required.

**Generating and Managing Waste** - All waste generated from this activity will be managed in accordance with laboratory procedures. Contact Waste Generator Services (WGS) prior to start of activity to begin waste identification, classification and characterization. Removed metal strips and other waste products exposed to suspect PCB paint will be handled as PCB bulk product waste and delivered to WGS for appropriate disposition. All waste generated will be transferred to WGS for appropriate disposition.

**Releasing Contaminants** – There is a potential for possible disturbance of suspect polychlorinated biphenyl (PCB) paint during this activity. All chemicals typically used in construction/maintenance, if used, will be managed in accordance with laboratory procedures.

**Using, Reusing, and Conserving Natural Resources** - 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:** 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: 1/6/2015