

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Materials and Fuels Complex (MFC)-765 Elevator Upgrade

SECTION B. Project Description:

The MFC-765 freight elevator is currently not operational and in an unsafe condition. The proposed project would upgrade the existing freight elevator with new controls/fixtures, jack pump unit, and doors. The elevator car, shaft, pit tracks, pit springs and pit would be reused.

The proposed action would remove and replace the following elevator components: elevator control system, call stations, car doors, screened gate, motor operators, elevator jack and plunger, elevator power unit, and approximately 85 gallons of hydraulic fluid.

The elevator car would be removed, retained and reinstalled. The elevator shaft, pit tracks, pit springs and pit would remain in place.

New elevator components as required to complete the installation would also be used, and plant or facility features disturbed by construction activities would be reconnected or disconnected to facilitate connection of new components. Any facility features damaged during project activities would also be repaired.

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 will 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 will 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: MFC-765 is eligible for listing on the National Register of Historic Places. The project as described is in-kind replacement and is exempted under the "Idaho National Laboratory (INL) Cultural Resource Management Plan" Table 2 #3. Therefore, the project may proceed without further cultural resource review.

Generating and Managing Waste: The components of the elevator that are being replaced will need to be disposed or recycled. These include the controls/fixtures, call station, elevator doors, screened gate, motor operators, elevator jack and plunger, elevator power unit and approximately 85 gallons of hydraulic fluid (glycol based, Houghto-Safe 271). Typical construction debris waste such as wire scrap metal, wood, packaging material, Resource Conservation and Recovery Act (RCRA) empty containers, etc., will also be generated. There may be lead solders, light bulbs, circuit boards, associated with the elevator that will need to be removed and managed accordingly. The 85 gallons of hydraulic fluid will be sampled for polychlorinated biphenyls (PCBs) and will be managed based on these sample results through Waste Generator Services (WGS). All waste will be characterized and dispositioned at the direction of WGS.

Releasing Contaminants: Releasing Contaminants: Typical Construction chemicals such as hydraulic oil, adhesives, lubricants, paints, etc., would be used on the project. The Subcontractor would submit all chemicals and associated Material Safety Data Sheets (MSDS's) in the vendor data system for approval. The Construction Chemical Coordinator would track these chemicals in the INL Comply Plus Chemical Management System. Chemical use has a potential for small amounts of air emissions and spills. Any spills that occur from these chemicals would be reported to the Spill Notification Team and would be cleaned up by the subcontractor.

The existing hydraulic oil and the components containing the hydraulic oil will be removed and replaced as part of the project. Due to the age of the system (1961), the hydraulic oil will be sampled for PCB's prior to starting work. If the sample results show PCB's in the hydraulic oil, precautions will be taken (personal protective equipment [PPE], plastic sheeting, containment equipment, etc.) to prevent the spread of contamination. Once removed, the hydraulic oil and components in contact with the oil will be disposed as PCB waste through WGS. If hydraulic oil has spilled to the elevator shaft, decontamination per 40 Code of Federal Regulation (CFR) 761 will be required. If decontamination levels cannot be achieved, consultation with Environmental Protection Agency (EPA) will be necessary and a Risk Based Disposal Agreement may be required.

Using, Reusing, and Conserving Natural Resources: All materials would be reused and/or recycled where economically practicable and as accepted by the customer. All applicable waste would be diverted from disposal in the landfill where conditions allow. New equipment would meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <https://sftool.gov/green-products/0/hvacmechanical?agency=0>). In addition, 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, or are non-toxic or less-toxic alternatives. Such purchases could include hydraulic fluid in accordance with BioPreferred requirements (<https://sftool.gov/green-products/0/lube-oil-hydraulic-fluid-grease?agency=0>) as appropriate and practicable.

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

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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: 12/17/2014