DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-14-047

SECTION A. Project Title: Chemical Processing Plant (CPP)-1634 Potable Water System Modifications

SECTION B. Project Description:

During investigation of water leak in the facility bathroom it was noticed that all potable water piping in CPP-1634 was black iron. The decision has been made to replace all black iron piping with a code approved replacement such as copper. During investigation of the water leak the drywall on the south wall of the restroom, the sink, and the vanity were removed.

Work Scope:

- Remove all black iron piping contained in the potable water system within CPP-1634. This includes removal of approximately 150' of 2" black iron piping and approximately 150' of ½" - ¾" piping. Approximately 80% of the piping is exposed and should allow for ease of removal. Some additional drywall removal will be necessary to access piping in the restroom. Replace piping on the east wall of the facility (approximately 70' of 2" pipe) and in the restroom (approximately 100' of ½" - ¾" piping) with copper or other code approved piping.
- Install new potable water backflow valve, two filter isolation valves, and two filter housings on the east wall of the facility.
- Replace existing water heater with a similar unit and move the location of the water heater to the north-west corner of the restroom. This will require re-routing of water heater piping and also electrical power to the water heater.
- Install appropriate amount of insulation behind drywall on the south wall of the restroom in order to help prevent pipes from freezing (approximately 60 sq/ft).
- Install drywall on the south wall of the restroom and any other locations where drywall was removed (approximately 120 sq/ft).
- Paint drywall on the south wall of the restroom and any other locations where drywall was removed (approximately 120 sq/ft).
- Re-install sink, toilette, and vanity in the restroom.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Generating and Managing Waste: Typical construction debris waste such as drywall, scrap metal piping, packaging material, Resource Conservation and Recovery Act (RCRA) empty chemical containers, etc., will be generated during the project. Hazardous waste is not anticipated, however there is a potential for generating hazardous waste from adhesives, paints, solders or chemical spills. All waste will be characterized and dispositioned at the direction of Waste Generator Services.

Releasing Contaminants: Typical Construction chemicals such as fuels, adhesives, lubricants, paints, etc., will be used on the project. The Subcontractor will submit all chemicals and associated Material Safety Data Sheets (MSDS's) in the vendor data system for approval. The Construction Chemical Coordinator will 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 will be reported to the Spill Notification Team and will be cleaned up by the subcontractor.

Potable water piping and backflow prevention devices will be replaced according to plumbing code. Facility personnel are taking into consideration the requirements in Environmental Support and Services-Technical Interpretation (ES&S-TI)-027 for the work they plan to do in the building and will consult Dave Marrow regarding backflow prevention.

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?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.

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 Code of Federal Regulations (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: 11/10/2014