

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Materials and Fuel Complex (MFC) Ladder and Platform Modifications

SECTION B. Project Description:

The scope of work is to modify, replace, or remove fixed ladders and platforms at various locations at MFC that do not meet safety requirements including:

- MFC-785 Hot Fuel Examination Facility (HFEF)
 - Exterior Stack Platform Modification
 - Exterior South Second Level Ladder
 - Interior Basement ROV-3 Ladder and Platform
 - Interior Basement Generator Room Ladder
 - Interior Highbay West Walkway Ladder
 - Interior Highbay Elevator Motor Room Ladder
- MFC-752 Analytical Laboratory (AL)
 - Removal of Interior A102 Vault Roof Access Ladder
- MFC-777
 - Exterior West Ladder
 - Exterior North Ladder and Roof Access Railings
- MFC-792
 - Interior Northwest Corner Swing Gate
 - Interior Northeast Corner Ladder
- MFC-709
 - Exterior South Roof Access Ladder
- MFC-793
 - Interior North Mezzanine Ladder
 - Interior Ladder to 5-Ton Mezzanine Crane

A subcontractor would remove, modify, fabricate/procure, paint, deliver and install ladders, platforms, guardrails, swing gates, and ladder accessories.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions - There is the potential for disturbing asbestos containing material while removing/replacing these ladders. Appropriately trained personnel will be required if asbestos is to be disturbed during the project. Subcontractor training and asbestos removal practices would be reviewed and approved by Battelle Energy Alliance, LLC (BEA) personnel prior to beginning work.

Disturbing Cultural or Biological Resources - HFEF (MFC-785), MFC-752, MFC-777, and MFC-792 are eligible for nomination to the National Register of Historic Places. The activities described are exempted from cultural resource review ("INL Cultural Resource Management Plan" Table 2, exemption 6, DOE/ID-10997 rev. 5). Therefore, the project could proceed as described without further cultural resource review.

Generating and Managing Waste - Typical Construction debris such as packaging material, scrap metal, empty chemical containers, etc., would be generated during the project. Polychlorinated biphenyl (PCB) bulk product waste may be generated from suspect PCB paint that is on the existing ladders/facilities. All waste would be characterized, stored, and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants - Typical construction chemicals such as paints, adhesives, 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.

There may be paints on some of the ladders and building surfaces that are suspect for PCB's. Welding/torch cutting or any activity that heats the PCB paint to the point of burning would not be allowed. When PCB paint is disturbed, contamination would be controlled using methods such as high-efficiency particulate air (HEPA) vacuum, wipes, PPE, etc., as necessary and according to the Subcontractor Requirements Manual.

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 <http://www.sftool.gov/GreenProcurement/ProductCategory/14>). 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 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 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: 9/25/2014