

# DOE-ID NEPA CX DETERMINATIONS

## Idaho National Laboratory

**SECTION A. Project Title:** High-Efficiency Particulate Air (HEPA) Filter Installation in the Dry Transfer Cubicle Ventilation System

**SECTION B. Project Description:**

In order to minimize the risk of contamination from the Advanced Test Reactor (ATR) Dry Transfer Cubicle (DTC), a filtration system needs to be added to the ATR DTC ventilation system in the ductwork between the installed roughing filters and DTC exhaust fan 670-HVE-1735. The filtration system would consist of a HEPA-type filter contained in a metal housing with appropriate adapters to connect to the ducting. The existing corrugated duct would be replaced with a smoother galvanized steel duct of the same size but less susceptible to trapping particles. A differential pressure gauge would be installed across the filter housing to help indicate airflow problems. Prefilters (roughing filters) mounted in filter holders on the wall upstream of the ventilation duct would be replaced with new filters with the same design and purpose.

Project Start Date: August 25, 2014  
Project End Date: August 27, 2014  
Estimated Cost: Approximately \$5,000.00

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

**Air Emissions:** There is a potential for disturbing regulated asbestos containing material (RACM). If the scope of work specified in the work package identifies an amount of RACM to be removed that equals or exceeds the threshold quantity specified in 40 Code of Federal Regulation (CFR) 61.145 (260 linear feet on pipes / 160 square feet on other facility components / 35 cubic feet on facility components where the length or area could not be measured previously), contact the Asbestos Coordinator and provide the necessary information for completion of a 10-Day Demolition or Renovation Notification. Instructions provided in Laboratory-Wide Procedure (LWP)-8000 Section 4.3 would be implemented where applicable.

Project activities that result in changes to air emissions would constitute a new source or modification to an existing source, and would require preparation of an air permitting applicability determination (APAD) in accordance with Management Control Procedure (MCP)-3705.

**Disturbing Cultural or Biological Resources:** Test Reactor Area (TRA)-670 is eligible for nomination to the National Register of Historic Places. The activities described in the project description are exempted from cultural resource review ("Idaho National Laboratory (INL) Cultural Resource Management Plan" Table 2, exemption 6 [Department of Energy Idaho Operations Office (DOE/ID)-10997 rev. 5]). Therefore, the project could proceed as described without further cultural resource review.

**Generating and Managing Waste:** The work would be conducted in a radiation area. Project personnel will contact Waste Generator Services (WGS) to identify waste streams, handling, storage, and disposal requirements. All radioactive waste will be managed in accordance with laboratory procedures and established waste streams to ensure compliance with Department of Energy Order (DOE O) 435.1 CHG 1.

**Releasing Contaminants:** All chemicals would be managed in accordance with laboratory procedures.

**Using, Reusing, and Conserving Natural Resources:** All materials would be reused and recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. 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. New HVAC equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <http://www.sftool.gov/GreenProcurement/ProductCategory/14>) and new building finishes will meet affirmative procurement requirements as appropriate (see <https://sftool.gov/green-products/0/building-finishes>).

**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.

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"

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**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: 8/19/2014