

DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

SECTION A. Project Title: Radiochemistry Laboratory (RCL) Supply Intake Filter Housing

SECTION B. Project Description:

The Radiochemistry Laboratory (RCL) air supply system does not adequately filter the fresh air drawn into the facility. Additional filtration on the fresh air supply is needed.

The proposed action includes the following:

- Add filter housing to RCL supply system which would be capable of 12,000 actual cubic feet per minute (ACFM).
- Add differential gauges across the filter bank.
- Add infrared heating to prevent hoar frost from developing on the filters.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Generating and Managing Waste: The proposed action has the potential to generate industrial waste. Project personnel will work with Waste Generator Services (WGS) to properly dispose of all waste.

Releasing Contaminants: Typical construction chemicals such as fuels, adhesives, lubricants, paints, etc., would be used on the project. All chemicals and associated Material Safety Data Sheets (MSDS's) would be entered in the vendor data system for approval. The Construction Chemical Coordinator would track these chemicals in the Idaho National Laboratory (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 would be reported to the Spill Notification Team and would be cleaned up by the subcontractor.

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 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

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: 8/7/2014