

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Relocation of National and Homeland Security (N&HS) activities from Transient Reactor Experiment and Test Facility (TREAT) to Critical Infrastructure Test Range Complex (CITRC)

SECTION B. Project Description:

The proposed project will relocate Homeland Security personnel who currently reside at TREAT to CITRC. The scope of this environmental checklist is only for the purchase and installation of three modular trailers.

Three modular buildings are to be purchased by Battelle Energy Alliance, LLC (BEA) and will be installed by Subcontract personnel. One trailer will consist of two modular units connected together and will be used as a field station office for Homeland Security personnel. The other modular building will be a restroom trailer. These trailers will be located where Power Burst Facility (PBF)-641 once stood. Potable water will be supplied by extending a 2" service connection that provided water to PBF-641. The restroom facility will discharge either to the existing septic system through a 4" sanitary waste line that served PBF-641 or the trailer will be a self contained comfort station.

The modular office unit will be approximately 1440 square feet and will house Homeland Security personnel. In addition to a number of cubicles, there will be two hard wall offices, two storage rooms, and one telecommunication room within the building. The restroom trailer will be approximately 360 square feet and will have men's and women's restroom units. The trailers will be transported to the designated location, assembled, blocked, leveled, anchored and utility tie-ins will be completed.

The proposed site (former PBF-641 location) will need to have approximately 6" of existing rock/soil removed and have a new 8" compacted gravel pad constructed. Some additional excavation will be required to expose and extend the potable water service line connection and electrical lines. This excavation will take place in a previously disturbed area near where the PBF-641 building sat.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions - Fugitive dust may be generated while constructing the gravel pad for the trailer. All reasonable precautions will be taken to prevent particulate from becoming airborne. If dust control methods are required, the method used must be recorded in the project records and will be used to demonstrate compliance with the Idaho National Laboratory (INL) Title V Air Permit.

Disturbing Cultural or Biological Resources - Ground disturbing activities must be reviewed and approved by the Cultural Resource Management (CRM) office. Written approval from the CRM office must be kept in the project record and any instruction from the CRM office must be followed. Contact Brenda Pace (526-0916) at least two weeks prior to any ground disturbing activities. If objects of potential archaeological or historical significance (e.g., arrowheads, flints, bones, etc.) are encountered, personnel would discontinue activities in the area and contact the CRM office.

Jackie Hafla (525-9358) with Gonzales-Stoller Surveillance must be contacted at least two weeks prior to beginning work to determine if biological surveys are required.

Generating and Managing Waste - Construction activities will generate typical construction debris waste such as scrap wood, scrap metal, plastic, RCRA empty containers, wire, etc. Certain materials that can be diverted from the landfill will be separated and recycled as practical. Hazardous waste generation is not anticipated, however, there is a possibility for adhesive/paint related/spilled material types of waste to be hazardous. All waste will be evaluated and disposed of at the direction of Waste Generator Services (WGS).

Releasing Contaminants - The trailers will discharge wastewater from toilets and sinks to either the existing PBF-641 septic system or to a self-contained comfort station. Options that are being considered include: 1. Repairing the pumps that pump water to the drain field and using the system as designed. 2. Contacting the District 6 Health Department and try to get approval to use the existing septic tank as a holding tank and pump it out when required. 3. Bring in a self-contained comfort station and pump when required. A state of Idaho permitted septic system pumping company that has the endorsement to discharge to the CFA Sewage Treatment System will be used.

Typical construction chemicals such as fuels, lubricants, paints, adhesives, etc., will be used during the project. A chemical inventory list with associated MSDS's will be required to be submitted by the subcontractor and be approved by BEA in the vendor data system. The Construction Chemical Coordinator will enter these chemicals into the Comply Plus system for tracking purposes. All spills will be reported to the Construction Field Representative and to the Spill Notification Team.

Using, Reusing, and Conserving Natural Resources - All applicable waste will be diverted from disposal in the landfill when possible. 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 equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <http://www.sftool.gov/GreenProcurement/ProductCategory/14>).

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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 which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: 10 CFR 1021, Appendix B to Subpart D categorical exclusion B1.15 "Support buildings."

Justification: The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D categorical exclusion B1.31 "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking, cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix."

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: 7/30/2013