

# DOE-ID-NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Descriptive Information: Decontamination Shower in Test Reactor Area (TRA)-605

### SECTION B. Project Description:

The purpose of this project is to install a decontamination shower into TRA-605 (Warm Waste Treatment Facility) to provide a way of decontaminating individuals that have become radiologically contaminated while performing their duties in TRA-605. The decontamination shower will be a "water on demand system" that will only require water flow for decontamination of individuals and testing of shower. This is a facility change requested by Radiological Control (RadCon) to provide additional safety to individuals working in the Warm Waste Treatment Facility. The water that is fed to the shower will be low pressure demineralized water from an 8 inch pipe supplied from the demineralized water building (TRA-608). In the event that the shower is used, the wastewater will discharge to the warm waste tank then out to the evaporation pond.

There may be old paint in between the epoxy and the cement floor where the decontamination shower is being installed. Up to ten quarter inch holes will be drilled in the concrete wall to anchor the pipe to the wall and fourteen holes will be drilled into the floor through the epoxy to anchor the shower and heater units to the floor. Two 3/8 inch holes will be drilled through two painted horizontal supports (four total holes) to anchor this supply pipe to the two horizontal supports. A 3 3/4 inch wide by 3 7/8 inch deep notch will have to be cut out of the concrete lip around the drop into the basement for proper drainage of water from the shower to the warm waste tank. No insulation and/or other asbestos known containing material will be encountered during this activity.

Projected start date: March 2013

Projected end date: June 2013

Estimated cost: \$2,000

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

**Disturbing Biological or Cultural Resources:** TRA-605 and TRA-608 were activated in 1952 and are eligible for listing on the National Register of Historic Places. Prior to beginning work, obtain cultural/historical resource review and clearance by contacting Julie (Braun) Williams (526-0926) in the INL Cultural Resource Management Office. Approval must be demonstrated by written communication from this organization prior to beginning work, and any instructions contained in the clearance must be followed.

**Generating and Managing Waste:** All waste generated from this activity will be managed in accordance with laboratory procedures. Pollution prevention/waste minimization will be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated will be transferred to Waste Generator Services (WGS) for appropriate disposition.

**Releasing Contaminants:** All chemicals utilized by this project will be managed in accordance with company procedure.

Concerning management of suspect PCB containing painted material:

- There will be no cutting of any painted material /surface utilizing a cutting torch, grinder or any other tool that would generate enough heat to cause the paint to burn.
- Inform the welders /laborers /mechanic /fitters there will be no cutting of any painted material /surface utilizing a cutting torch, grinder or any other tool that would generate enough heat to cause the paint to burn.
- Any painted surface that is scheduled to be cut /welded, must have the paint removed in accordance with the National Association of Corrosion Engineers (NACE) standard.

The following guidance is provided to ensure contamination of employee clothing and involved equipment is managed in a reasonable manner:

1. Use engineering controls if practicable (High-Efficiency Particulate Air [HEPA] vac., etc.) to minimize the migration of dust/particulates.
2. If visible dust is present during execution of the work, have impacted employees (determined by Industrial Hygiene (IH) and Environmental Support) don Tyvek coveralls, boot covers and gloves to minimize the contamination of personnel clothing and boots. When removed dispose of personal protective equipment (PPE) through WGS.
3. At the completion of a given job, wipe down exposed external surfaces on any equipment that may have been contaminated with paint or dust/particulate during the work until no visible dust is present, and dispose of the wipes through WGS.
4. Dispose of HEPA vac. filters through WGS.

**Using, Reusing, and Conserving Natural Resources:** All materials will be reused and/or recycled where economically practicable and as accepted by the customer. All applicable waste will be diverted from disposal in the landfill where conditions allow. 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>). In addition, 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.

**DOE-ID-NEPA CX DETERMINATION**  
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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:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule. 10 CFR 1020 Appendix B to Subpart D, Categorical Exclusion B2.3 "Personnel safety and health equipment" effective November 14, 2011.

**Justification:** Project activities in this EC are consistent with 10 CFR 1021 Appendix D to Subpart D, Categorical Exclusion B2.3. "Installation of, or improvements to, equipment for personnel safety and health (including, but not limited to, eye washes, safety showers, radiation monitoring devices, fumehoods, and associated collection and exhaust systems), provided that the covered actions would not have the potential to cause a significant increase in emissions."

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: 2/27/2013