DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 1 of 1

CX Posting No.: DOE-ID-INL-15-021

SECTION A. Project Title: Materials and Fuel Complex (MFC)-752 Analytical Laboratory Main Stack Modifications for Sample Probe Replacement

SECTION B. Project Description:

The proposed action is to install two 4" inspection/velocity traverse ports approximately 2' below the existing sample probe port as part of the engineering job (EJ-1684) and to replace the existing sample probe with a new one (that will sample isokinetically). Inspections are not currently required, so no ports exist. However, there is potential for an unmitigated release exceeding the threshold of 0.1 mrem/yr (1% of 10 mrem/yr) listed in 40 CFR 61.93 (b)(4)(i)1 to occur at some point in the future based on the volatile nature of the work being performed in the analytical laboratory. If a future analysis shows that this is possible, regular inspections of the probe, including velocity traverses, will be required and, therefore, these ports will be necessary.

SECTION C. Environmental Aspects or Potential Sources of Impact:

<u>Air Emissions:</u> No Clean Air Act regulated pollutants are anticipated to be discharged as part of this project. Therefore no air permit applicability determination is required.

Disturbing Cultural or Biological Resources: The MFC-752 is potentially eligible for nomination to the National Register of Historic Places. Removal and/or changes of original features could adversely impact this historic property. Prior to beginning work, obtain cultural/historical resource review by contacting Christina Olson (526-1692). Approval must be demonstrated by written communication from this organization prior to beginning work, and any instructions contained in the review must be followed.

<u>Generating and Managing Waste:</u> Project activities would generate industrial waste. All waste generated from this activity would be managed in accordance with laboratory procedures. Pollution prevention/waste minimization would be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated would be transferred to Waste Generator Services (WGS) for appropriate disposition. Polychlorinated Biphenyl (PCB) contamination is not anticipated, however, contamination control methods may be required if disturbing painted surfaces.

Using, Reusing, and Conserving Natural Resources: All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. 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 (see https://sftool.gov/green-products/0?agency=7).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 Code of Federal Regulation (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 Comprehensive Environmental Response, Compensation, and Liability Act (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, B2.2 "Building and equipment instrumentation"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B2.2 "Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment)."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 5/11/2015