## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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SECTION A. Project Title: Materials and Fuel Complex (MFC)-785 Monorail System Upgrade

SECTION B. Project Description:

The proposed project would install a longitudinal support system on the north and south monorails along with a trolley and chain hoist in MFC-785. The monorail sits in the walkway above the main cell (117) and decon cell (118) in the Hot Fuel Examination Facility (HFEF). The support system is needed to reinforce the monorail system so that it can handle the additional load associated with the new trolley and chain hoist. The new trolley and chain hoist are needed to support facility operations and maintenance activities.

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

<u>Air Emissions</u> - All asbestos work must be conducted by properly trained personnel using appropriate abatement methods. Quantities of asbestos that are to be disturbed would be communicated to the Construction Environmental Support and Services (ES&S) representative in order to file the Asbestos Removal Notification Form (450.04). Asbestos work would not take place until the project has received approval from the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) Technical Point of Contact (TPOC).

<u>Disturbing Cultural or Biological Resources</u> - HFEF (MFC-785) is eligible for nomination to the National Register of Historic Places. The activities described in this Environmental Checklist (EC) 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 may proceed as described without further cultural resource review.

<u>Generating and Managing Waste</u> - Typical Construction debris such as packaging material, scrap metal, empty chemical containers, etc., would be generated during the project. Polychlorinated biphenyl (PCB) bulk product waste may be generated from suspect PCB paint that is on the existing facility components. 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.

<u>Releasing Contaminants</u> - Typical construction chemicals such as paints, lubricants, adhesives, etc., will be used by the subcontractor. A chemical inventory list with associated Safety Data Sheets (SDS's) will be submitted in the vendor data system by the subcontractor. All chemicals will be entered into the INL Comply Plus Chemical Management System by the Construction Chemical Coordinator.

There may be paints on facility surfaces that are suspect for PCB's. There will be no hot work (welding, torch cutting, etc.) on any of painted surfaces suspected to contain PCBs. All attachments are bolt on. If PCB paint is disturbed, contamination will be controlled using methods such as high-efficiency particulate air (HEPA) vacuum, wipes, personal protective equipment (PPE), etc., as necessary and according to the Subcontractor Requirements Manual.

<u>Using, Reusing, and Conserving Natural Resources</u> - 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: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B1.31 "Installation or relocation of machinery and equipment."

**Justification:** The proposed activities are consistent with CX B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)  $\square$  Yes  $\square$  No