DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-15-061

SECTION A. Project Title: Materials and Fuels Complex (MFC) Machine Shop Reconfiguration and Installation Project

SECTION B. Project Description and Purpose:

The Machine Shop at the Materials and Fuels Complex (MFC) building MFC-782 is undergoing an effort to better align its capabilities with current and future needs. To support this effort, the proposed action would reconfigure the machine shop to allow for better, more strategic work flow and to update machining capabilities via the addition of new machining centers.

The scope of work for MFC-782 would consist of removing of several machining centers using various disposition paths including relocation in the machine shop, trade-in for purchase of new machines, and excess. Minor demolition would be conducted to remove abandoned conduit, and support structures associated with the old machining centers. Installation of new machining centers would also include other facility modifications pertaining to compressed air and electrical supply to accommodate the new and relocated machines. A brief detailed description of the scope includes:

- 1. Removal of the following: two Monarch Lathes, Drill Press, two Bridgeport Mills, and some other miscellaneous small equipment
- 2. Relocation and re-installation of the following: HASS TL2, Harding Machine, two Bridgeport Mills, VF2 Mill, Track Bed Mill, and two Track Lathes
- 3. Installation of the following: HAAS UMC 750 and Mazak QTN 200 250 Mill.

Infrastructure upgrades would be needed to support the supply of power and compressed air to the relocated and new machines. This would include the addition of new electrical circuits and the removal of ones no longer needed. Machines that are either relocated or newly installed will be fitted with connectors (plugs and cords) rather than being hard wired in place. New compressed air lines would need to be plumbed and discontinued lines would be reduced and capped.

The project was initiated on June 03, 2015 with a targeted completion date of December 24, 2015. The estimated costs for the project currently stand at approximately \$316,000.00 based on the preliminary class 5 estimate. An update to the estimate (class 3) is anticipated to be performed at the completion of final design.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

There is a possibility for disturbance of asbestos containing building materials. 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 Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) Technical Point of Contact (TPOC) using the Asbestos Removal Notification Form (450.04). Asbestos work would not take place until the project has received approval from the Asbestos NESHAPs TPOC.

Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new stationary emission source.

Fugitive dust may be generated. All reasonable precautions would be taken to prevent particulate matter from becoming airborne. If dust control methods are required, the method used and frequency applied must be recorded in the project records and would be used to demonstrate compliance with the Idaho National Laboratory (INL) Title V Air Permit.

Mobile sources such as generators, welders, and compressors may be used temporarily (less than a year) by subcontractors at the construction site. These sources would be required to meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emissions opacity requirements.

Disturbing Cultural or Biological Resources

MFC-782 is eligible for nomination to the National Register of Historic Places and removal and/or changes of original features may adversely impact this historical property. Written approval must be obtained from the Cultural Resource Management Office before the project can proceed. Contact Christina Olson at 526-1692.

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. All waste generated from these activities will have an identified disposition path prior to it being generated.

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Releasing Contaminants

All chemicals typically used in construction/maintenance, if used, will be managed in accordance with laboratory procedures. There is the potential for possible disturbance of suspect polychlorinated biphenyl (PCB) paint. Approved work controls will be in place to ensure that no releases occur during project activities.

Using, Reusing, and Conserving Natural Resources

All material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. 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/GreenProcurement).

SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: 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 Department of Energy (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)

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 10/26/2015