# Sitewide Categorical Exclusion for Indoor Bench-Scale Research Projects and Conventional Laboratory Operations

#### Introduction

As defined in the U.S. Department of Energy's (DOE) Richland Operations Office Integrated Management System Procedure, *NEPA Analysis at Hanford*, a sitewide categorical exclusion is:

An application of DOE categorical exclusions described in 10 CFR 1021, Appendices A and B, which may apply to Hanford Site proposed actions (activities) that are "sitewide" in nature and extent, which the cognizant DOE Hanford NCO has determined fit within the scope (i.e., same nature and intent, and of the same or lesser scope) of DOE categorical exclusions described in 10 CFR 1021 Appendices A and B. The cognizant DOE Hanford NCO may issue specific sitewide categorical exclusions for use on proposed actions in which separate DOE approval to proceed is not required.

The nature of the proposed action subject of this sitewide categorical exclusion, as well as guidance to implement this exclusion as described herein, may be revised to reflect contemporary experience from the application of this exclusion; changes to, or development of, relevant policy and guidance; and changes to DOE's categorical exclusions resulting from future rulemakings.

## **Proposed Action**

The DOE's Richland Operations Office and Office of River Protection propose to conduct indoor bench-scale research, conventional laboratory operations, and small-scale research and development and pilot projects on and near the Hanford Site.

#### **Location of Action**

On and near the Hanford Site, Richland, Washington.

#### **Description of Proposed Action**

DOE's proposed action is to conduct (1) indoor bench-scale research projects, (2) conventional laboratory operations, (3) small-scale research and development projects, and (4) pilot projects to verify proof-of-concept before demonstration actions (generally lasting less than two years). Under the proposed action, DOE would modify (as necessary), operate and deactivate existing facilities that are integral to the performance of these activities. Modification of facilities would include, but not be limited to utility systems (for example, electricity, heating/cooling and communications systems), and safety systems (for example, fume hoods, fire protection, material control). All such facilities would be equipped to provide appropriate safety systems, exhaust

ventilation, air filtration, and other confinement or control appropriate to the nature of the materials and equipment used in the project or operation.

For some proposed projects or operations, hazardous and/or radioactive materials would be used. In these instances, DOE would ensure that inventories of these materials in the facilities would be maintained at the lowest levels appropriate for undertaking the specific project or operation.

At the conclusion of these proposed projects and operations, DOE would deactivate laboratories and facilities to place them in a safe, stable condition. Deactivation would include, for example, final process runs and preliminary decontamination activities to facilitate eventual equipment removal.

Implementation of these proposed projects and operations may generate small quantities of solid, hazardous, radioactive, polychlorinated biphenyl and/or asbestos wastes. Consistent with DOE's procedures that implement NEPA (10 CFR 1021), DOE would undertake actions foreseeably necessary to implement this proposed action, and therefore, would manage these wastes and liquids in compliance with DOE orders, and federal, state and local regulations and guidelines. Wastes would be packaged, staged for transport, transported, and disposed of at onsite or offsite facilities.

In addition, DOE would move equipment and materials necessary to modify, operate and deactivate existing facilities, and to undertake the proposed projects and operations, onto and within the Hanford Site, as necessary. Movement and storage of such equipment and materials would be limited to developed areas (where active utilities and currently used roads are readily accessible. Use of the equipment and vehicles would generate air pollutants from combustion, local noise levels would increase, and nonrenewable resources such as petroleum products would be consumed. In all instances, the demand for resources and environmental impacts resulting from implementation of these proposed activities would be small and temporary in nature.

## **Applicable Categorical Exclusion**

DOE's Categorical Exclusion B3.6:

Siting, construction (or modification), operation, and decommissioning of facilities for indoor bench-scale research projects and conventional laboratory operations (for example, preparation of chemical standards and sample analysis); small-scale research and development projects; and small-scale pilot projects (generally less than two years) conducted to verify a concept before demonstration actions. Construction (or modification) will be within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). See also C12.

### **Implementing Guidance**

This sitewide categorical exclusion may be applied to activities under the proposed actions that are "sitewide" in nature and extent. For example, this exclusion may be implemented as a one-time yearly application in instances where the proposed action would involve projects and operations intended to demonstrate the same proof-of-concept, or perform laboratory operations within laboratory facilities.

Application of this sitewide categorical exclusion requires compliance with the Richland Integrated Management System Procedure, *NEPA Analysis at Hanford*. Sitewide categorical exclusions are determined solely by the cognizant DOE Hanford NCO and are applied through a screening process which documents that the proposed action:

- 1. Fits within the scope of actions identified in a DOE Hanford NCO-approved sitewide categorical exclusion
- 2. Meets the eligibility requirements for Appendix B categorical exclusion ("integral elements") of 10 CFR 1021, Subpart D, Appendix B, B(1) through B(4)
- 3. Is not connected to other actions with potentially significant impacts (see 40 CFR 1508.25(a)(1)) or with cumulatively significant impacts (see 40 CFR 1508.25(a)(2))
- 4. Is absent extraordinary circumstances that may affect the significance of the environmental effects of the proposed action
- 5. Is not located on nor directly impacts the Hanford Reach National Monument, Rattlesnake Mountain, Gable Mountain, Gable Butte, within ¼ mile of the Columbia River, other known Traditional Cultural Properties, or properties of historic, archaeological or architectural significance designated by Federal, state or local governments or properties eligible for listing on the National Register of Historic Places, and
- 6. Is not located on nor cause direct impacts to sensitive species or their habitats, such as old-growth sagebrush.

This sitewide categorical exclusion may not be applied to proposed actions that involve the siting and construction of new buildings or structures. It also may not be applied to existing facilities in which modifications would be in addition to those required to develop the requisite capability to perform the proposed actions, or if the modifications would not be contiguous to an already developed area (where active utilities and currently used roads are readily accessible).

This sitewide categorical exclusion may not be applied to decontamination and dismantlement of facilities, except to the extent that such actions are necessary to place terminated projects and operations in a safe, and stable condition.

#### **Compliance Action**

I have determined that the proposed action meets the requirements for Categorical Exclusion B3.6 and that there are no extraordinary circumstance related to this action that may affect the

significance of the environmental effects of the action; this action is not "connected" to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211. All activities to be conducted under this Sitewide Categorical Exclusion Determination must be documented with the NEPA Review Screening Form (see Hanford Site Form RL-721) pursuant to *NEPA Analysis at Hanford* and demonstrably meet the criteria described in 1 through 6 above. Accordingly, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This exclusion is being implemented as a one-time yearly application for the proposed action described herein.

Ralph W. Russell, DOE NEPA Compliance Officer