

## **Sitewide Categorical Exclusion for Safety and Environmental Improvements of a Facility, and Replacement/Upgrade of Facility Components**

### **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 undertake safety and environmental improvements, as well as replace and/or upgrade facility components, at buildings and structures on and nearby the Hanford Site.

### **Location of Action**

On and near the Hanford Site, Richland, Washington.

### **Description of Proposed Action**

DOE’s proposed action is to undertake safety and environmental improvements, as well as replace and/or upgrade facility components, at buildings and structures (collectively referred to as facilities in this sitewide categorical exclusion) on and nearby the Hanford Site. Structures include, for example, parking lots, sidewalks, utilities, gantries, and transmission lines and associated systems.

Under the Proposed Action, activities would include, but not be limited to:

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- Replacing and/or upgrading control valves, in-core monitoring devices, and gaseous and/or liquid exhaust monitoring equipment
- Modifying and upgrading existing facility air filtration systems, and substation transformers or capacitors
- Adding safety railings, walkways, or other safety-related features
- Adding structural bracing to mitigate high wind or snow loading, or to meet safety and code requirements, and
- Replacing above ground or below ground piping and tanks (if there is no evidence of leakage as determined by vapor monitoring wells or other means).
- Replacing and/or upgrading to more environmentally sustainable and safety-oriented systems.

Prior to replacing or upgrading facilities and their components, DOE would isolate, disconnect and remove utilities (for example, power, water and sewer), and disconnect, pack and/or remove machinery, equipment, or other items that are to be replaced or upgraded. In addition, buildings and structures would be decontaminated as necessary. Materials recovered would be recycled, reused or disposed of, as appropriate. At this point, replacements and/or upgrades would proceed.

The implementation of these proposed activities may generate small (incidental) quantities of 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 in compliance with DOE orders, and Federal, and state 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 provide safety and environmental improvements, and affect replacement and upgrades of facilities onto and within the Hanford Site, as necessary. These actions also may require the establishment of temporary structures. Use of the equipment and associated vehicles would generate air pollutants from combustion and limited ground-disturbance, local noise levels would increase, water may be used for dust suppression, 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.

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## **Applicable Categorical Exclusion**

DOE’s Categorical Exclusion B2.5:

Safety and environmental improvements of a facility, including replacement and upgrade of facility components, that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements may include, but are not limited to: replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of above ground or below ground tanks and related piping if there is no evidence of leakage, based on testing that meets performance requirements in 40 CFR part 280, subpart D (40 CFR part 280.40). This includes activities taken under RCRA, subtitle I; 40 CFR part 265, subpart J; 40 CFR part 280, subparts B, C, and D; and other applicable state, Federal and local requirements for underground storage tanks. These actions do not include rebuilding or modifying substantial portions of a facility, such as replacing a reactor vessel.

## **Implementing Guidance**

This sitewide categorical exclusion may be applied to activities under the proposed actions to provide safety and environmental improvements, as well as replace and/or upgrade facility components 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 the same type of safety upgrades or the replacement of the same type of components in multiple buildings or structures located across the Hanford Site.

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 actions that would require rebuilding or modifying substantial portions of buildings and structures, or that would result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. It also may not be applied to actions involving facilities in which widespread and persistent contamination would need to be removed to enable improvements, replacements or upgrades to proceed (i.e., more than incidental contamination). It also may not be applied at locations in which previously undisturbed land would be occupied by vehicles, equipment or temporary structures, or would require extensive excavation (i.e., beyond that necessary to implement the proposed action).

### **Compliance Action**

I have determined that the proposed action meets the requirements for Categorical Exclusion B2.5 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



Date