DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-21-172

SECTION A. Project Title: Remodel MFC-752 for Relocated Dispensary

SECTION B. Project Description and Purpose:

This ECP is for the remodel of the former MFC-752 cafeteria. In FY-21, the MFC Cafeteria was relocated from MFC-752 to MFC-1747. The infrastructure team has been looking at future uses for the vacated space (H-Wing) for approximately three years. It was decided that the best use of the space would be to utilize it as the MFC Medical Dispensary. The current dispensary (MFC-724) is undersized for the ~800 employees and up to 200 subcontractors that work at the facility. There is no space for the Employee Assistance Program (EAP) and those confidential meetings occur in an MFC-710 office with limited privacy. Additionally, the physical therapist has to close down the gym for testing. Therefore, a pre-conceptual design was commissioned to determine if the vacated MFC-752 cafeteria could appropriately be converted into a dispensary. It was confirmed in July 2021, that the space is of appropriate size and location which led to an approved conceptual design and request for final design.

The following changes will occur in that space (This list is a non-limited list. Additional changes may occur):

Architectural:

- Remove existing cabinetry, fixtures, and furnishings in the existing dining room, preparation area, storage, and locker areas.
- Remove walls and doors in the dining room, dishwashing room, small entry, storage, and locker rooms to accommodate new dispensary layout.
- Remove existing flooring in dining room, preparation area, dishwashing room, small entry, storage, and locker room.
- Existing flooring is ACM so abatement will need to occur as part of demolition.
- Remove existing ceilings in dining room, preparation area, dishwashing room, small entry, storage, and locker room.
- Remove walk-in cooler building addition.
- Install new walls, doors, and viewing/pass-through windows.
- Install new flooring.
- Install new ceilings.
- Install new cabinets, fixtures, and furnishings.
- Replace leaking roof and install curbing for new HVAC unit.

Mechanical (Plumbing/HVAC):

- Remove/cap existing plumbing is required.
- Install new HVAC unit on the roof and remove unit in the basement of MFC-752.
- Redesign HVAC as required for new rooms/spaces, including, but not limited to, removal and/or relocation of exhaust fixtures for kitchen equipment and supply diffusers and return air grilles.
- Install new piping/plumbing fixtures as required to support new rooms/spaces.

Electrical:

- Remove existing receptacles and/or data ports as required to accommodate removal of existing walls and installation of new walls.
- Install new data cabinet in the basement of MFC-752 H-Wing.
- Remove and replace any existing LPs that contain Edison circuits (shared neutrals).
- Remove existing lighting fixtures.
- Install new receptacles and data ports as required to support new rooms/spaces for dispensary.
- Install new LED lighting fixtures.

The outline above illustrates that the facility will be completely emptied in preparation for building the new dispensary in FY-22. Although existing electrical, HVAC, plumbing, fire protection and data systems are being addressed, there remains a risk of discovering additional issues because H-Wing was built in ~1960.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Note: If this project or activity produces or causes air emissions, and it is not stated in this ECP how those emissions caused by this project or activity are exempt, then an APAD is required for documentation.

- Generating air pollutants, including but not limited to chemical and combustion emissions
- Maintaining, servicing, or repairing stationary heating, ventilation, air conditioning and refrigeration equipment
- Acquiring and dispositioning chemicals
- Generating fugitive dust or other fugitive emissions
- Purchasing, relocating, operating, modifying, or maintaining portable air emission sources, including non-road internal combustion engines.

Discharging to Surface-, Storm-, or Ground Water

- Construction or modification of drinking water systems and cross connections
- Maintaining, repairing, or altering drinking water systems and cross connections
- Using drinking water systems and cross connections
- Discharging Wastewaters

Disturbing Cultural or Biological Resources

Activities addressed by this EC have the potential to disturb cultural or biological resources through the constructing facilities, structures, equipment and/or processes. Construction of new facilities may adversely affect the historic character of adjacent historic properties. A cultural resource report was completed for this task (BEA-22-H041).

Generating and Managing Waste

These activities may generate a variety of waste. It is anticipated that the following types of waste could be generated:

• Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals.

• Hazardous wastes have the potential to be generated during maintenance operations on systems or equipment containing hazardous chemicals, or by using hazardous chemicals to clean or decontaminate equipment and systems. Hazardous metal waste (e.g., lead, electronics, brass, metal containing paints, etc.) may also be generated during maintenance work or by replacement of outdated equipment. Note: Lead has been encountered very infrequently (e.g., shielded cables).

•Asbestos waste may be generated when performing maintenance activities on equipment or structures with asbestos-containing materials (ACM) such as insulation, gaskets, flanges, walls, roofing, and flooring.

All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, paints, concrete, concrete cure, asphalt, refrigerants, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

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.

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: B1.15: Support Buildings: B2.1: Workplace Enhancements

Justification: B1.15 Support buildings. Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop

activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix.

B2.1 Workplace enhancements. Modifications within or contiguous to an existing structure, in a previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction).

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) ☐ Yes ☒ No

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 02/07/2022