GENERIC CATEGORICAL EXCLUSION FOR INSTALLATION, MAINTENANCE, TESTING, AND CALIBRATION OF EQUIPMENT, PACIFIC NORTHWEST NATIONAL LABORATORY, RICHLAND, WASHINGTON

Proposed Action

The U.S. Department of Energy (DOE) Pacific Northwest Site Office (PNSO) proposes to install, relocate, maintain, test, qualify, and calibrate equipment for research, environmental monitoring, safety and health monitoring, and radiation detection.

Location of Action

Actions covered by this generic CX may occur at the Pacific Northwest National Laboratory (PNNL) Richland, Washington Campus or Sequim, Washington Campus, or at other research or operations sites throughout the United States and its territories.

Description of the Proposed Action

PNNL would install or relocate laboratory equipment, electronic hardware, maintenance equipment, health and safety equipment, safeguards and security equipment, radiation monitoring equipment, sensors, alarms, control systems, remote monitoring and surveillance systems, and similar equipment and systems. Other activities include, but are not limited to, equipment and systems maintenance, upgrades, and qualification for use, calibration of sensors or diagnostic equipment, and testing and modifications to improve system reliability or to augment information on safety-related system components.

The proposed action would also include reasonably foreseeable actions necessary to implement the equipment installation and qualification such as personnel and material staging, small scale excavation for equipment foundations or utility connections, management of temporary piles of dirt/debris from excavation, location of temporary support structures (e.g., utility connections, sanitary facilities, and office trailers), and award of grants and contracts.

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.

Any excavation would comply with requirements for excavation safety and protection of the environment. For example, requirements to avoid underground utilities, protect cultural and biological resources, and implement excavation safety requirements.

Biological and Cultural Resources

It is not likely that equipment installation, maintenance, or qualification would result in adverse impacts to sensitive biological or cultural resources. However, when excavations are performed or other special project circumstances warrant it, biological and cultural resource reviews would be conducted to assure that impacts to sensitive resources are avoided and minimized.

Biological resource reviews would assure that impacts to sensitive biological resources are avoided. These reviews would identify the occurrence of federally and state-protected species in the project area such as avian species protected under the Migratory Bird Treaty Act; federally protected marine mammals (Marine Mammal Protection Act), species and habitats protected under the Magnuson-Stevens Act; plant and animal species protected under the Endangered Species Act (ESA), including candidates for such protection; and state species listed as threatened or endangered. Resource review recommendations would be followed to assure there are no adverse impacts to sensitive species and resources.

Cultural resource reviews would assure that impacts to sensitive cultural resources are avoided. Impact avoidance and mitigation measures would be implemented as stipulated by the resource review. If consultation with the State Historic Preservation Office and/or affected tribes is deemed necessary, it would be initiated before project implementation.

Categorical Exclusion to Be Applied

Because the proposed action is to install, relocate, maintain, test, and calibrate equipment, the following Categorical Exclusions (CXs), as listed in the DOE National Environmental Policy Act (NEPA) implementing procedures, 10 CFR 1021, would apply:

- *B1.31 Installation or relocation of machinery and equipment.* 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.
- B2.2 Building and equipment instrumentation. Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment).
- B2.4 Equipment qualification. Activities undertaken to (1) qualify equipment for use or improve systems reliability or (2) augment information on safety-related system components. These activities include, but are not limited to, transportation container qualification testing, crane and lift-gear certification or recertification testing, high efficiency particulate air filter testing and certification, stress tests (such as "burn-in" testing of electrical components and leak testing), and calibration of sensors or diagnostic equipment.

Generic CXs are authorized by 10 CFR 1021.410(f) for recurring activities to be undertaken

during a specified time period, after considering potential aggregated impacts.

Eligibility Criteria

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(l)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed in the table below:

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, Appendix B (1)-(5)		
Would the Proposed Action:	EVALUATION:	
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations or DOE or Executive Orders.	
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste management facilities would be constructed under this CX. Any generated waste would be managed in accordance with applicable regulations in existing facilities. Waste disposal pathways would be identified prior to generating waste and waste generation would be minimized.	
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that results in uncontrolled or unpermitted releases.	
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action would not involve the use of genetically engineered organisms, synthetic biology governmentally designated noxious weeds, or invasive species.	
Have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited, to:	No environmentally sensitive resources would be adversely affected by the proposed actions. The proposed action would not adversely affect floodplains, wetlands regulated under the Clean Water Act, national monuments, or other specially designated areas, prime agricultural lands, or special sources of water.	
• protected historic/archaeological resources		
• protected biological resources and habitat		
 Federal- or state-designated parks and wildlife refuges, wilderness areas, wild and scenic rivers, national monuments, marine sanctuaries, national natural landmarks, and scenic areas. 	Potential impacts to Biological or Cultural resources would be addressed as described above.	

Summary of Environmental Impacts

The following table summarizes environmental impacts considered when preparing this CX determination.

Environmental Impacts Considered when Preparing this CX Determination	
Would the Proposed Action:	Evaluation
Result in more than minimal air impacts?	Installation or relocation of equipment is not expected to have more than minimal impacts to air quality; impacts would likely be limited to short-term operation of generators during installation or small amounts of dust from excavations.
Increase offsite radiation dose measurably?	The proposed activities would not measurably increase radiation dose; however, sealed sources could be used for equipment calibration and testing.
Require a radiological work permit?	The proposed installation activities themselves are not expected to require a radiation work permit, but one could be required if the equipment installation, maintenance, or qualification occurs within a radiological area. Sealed sources could be used for equipment calibration or testing and may require a radiation work permit.
Discharge any liquids to the environment?	The proposed activities are not expected to result in any discharge of liquids to the environment.
Require a Spill Prevention, Control, and Countermeasures plan?	The proposed activities would not require a spill prevention, control, and countermeasures plan.
Use carcinogens, hazardous, or toxic chemicals/materials?	The proposed activities would not use carcinogens, hazardous, or toxic chemicals or materials. Sealed sources used for calibration and testing could present a carcinogenic risk to staff if stored or handled improperly.
Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	The proposed activities generally would not generate hazardous, radioactive, PCB, or asbestos waste. Small amounts of radioactive or hazardous waste could be generated if the installation occurs within an existing radiological or hazardous area.
Cause more than a minor or temporary increase in noise level?	There could be temporary noise increases during installation; this would be short-term, minor, and within applicable limits.
Create light / glare, or other aesthetic impacts?	The proposed activities would not create long-term light, glare, or other aesthetic impacts. There could be short-term use of lights if work at night is required.
Require an excavation permit (e.g., for test pits, wells, utility installation)?	Some minor excavation might be required for installation or relocation of equipment. Applicable permits would be obtained including evaluations of impacts to biological and cultural resources.
Disturb an undeveloped area?	Any disturbances would be within or contiguous to a previously disturbed area with active utilities and roads readily accessible. Additional NEPA review

Environmental Impacts Considered when Preparing this CX Determination	
Would the Proposed Action:	Evaluation
	would be required if the installation would impact native habitats, cultural properties, or other sensitive resources.
Result in more than minimal impacts on transportation or public services?	The proposed actions would not disturb transportation or public services except when the equipment or systems are specifically installed to monitor transportation points such as border crossings. In those cases, there could be small temporary impacts during installation and minor on- going impacts on commercial traffic from equipment use.
Disproportionately impact low-income or minority populations?	The proposed actions would not disproportionately impact low-income or minority populations.
Require environmental or other permits from federal, state, or local agencies?	Although not expected, equipment installation or relocation might require notifications to or permits from local, state, or federal authorities or agencies. Any necessary applications would be coordinated with PNSO staff.

Compliance Action

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This determination must be reviewed at least once every 5 years.

Signature: _____

Date: <u>5-5-2020</u>

Tom McDermott, PNSO NEPA Compliance Officer

cc: MR Sackschewsky, PNNL