

SECTION A. Project Title: ICP Routine Maintenance

SECTION B. Project Description

The purpose of this document is to address actions that meet the intent of the categorical exclusion (CX) B1.3 as described in 10 CFR 1021, Appendix B to Subpart D. Both typical and non-typical types of actions, such as routine maintenance, minor modifications, and custodial services required to support safe and efficient plant operations even if performed on an infrequent basis are addressed. All of the activities will be performed in support of CWI operations. The actions will occur within site boundaries of the INL and ICP facilities and within leased facilities in Idaho Falls, Idaho.

Routine maintenance includes custodial services for buildings, structures, rights-of-way, infrastructures (e.g., pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed. Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (i.e., repair), preventive, and predictive are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that the replacement is in kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility. For example, it does not include the replacement of a reactor vessel near the end of its useful life or the expansion of an existing laboratory facility for operational purposes.

Routine maintenance activities include, but are not limited to those listed below:

- A. Repair of facility equipment, such as lathes, mills, pumps, and presses
- B. Doors and window repair or replacement
- C. Wall, ceiling, or floor repair
- D. Reroofing
- E. Plumbing, electrical utility, and telephone service repair
- F. Routine replacement of high-efficiency particulate air filters
- G. Inspection and/or treatment of currently installed utility poles
- H. Repair of road embankments
- I. Repair or replacement of fire protection sprinkler system
- J. Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing
- K. Erosion control and soil stabilization measures (such as reseeding and revegetation)

L. Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management"

M. Repair and maintenance of transmission facilities, including replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed transmission lines

N. Routine testing and calibration of facility components, subsystems, or portable equipment (including but not limited to, control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes)

O. Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming) including removal of contaminated intact equipment and other materials (other than spent nuclear fuel or special nuclear material in nuclear reactors).

SECTION C. Environmental Aspects / Potential Sources of Impact

1. Air Pollutants – Fugitive dust may be generated during maintenance activities. All fugitive emissions should be controlled.

Radionuclide Emissions – Radiological emissions to the environment, including those from diffuse sources, must be determined for demonstrating compliance with the RAD NESHAP Standard (see 40 CFR 61 Subpart H). If any fugitive or point radiological emissions are released, the performing organization Project Manager or Source Owner/Manager shall ensure that the emissions were evaluated for permitting requirements. Calendar year emissions are determined and reported to Regulatory Integration for the preceding year.

Maintenance of any equipment containing refrigerants or ozone-depleting substances must be performed in accordance with applicable requirements.

2. Asbestos Emissions – Performing maintenance activities could include equipment and components that contain asbestos-containing material, such as pipe insulation, gaskets, and flanges, walls, roofing and flooring. Electronic Form 450.04 (Asbestos Removal Notification) must be submitted prior to any asbestos removal. However, if abatement of regulated asbestos containing material over the threshold quantities (160 square feet or 260 linear feet or 35 cubic feet) is planned, a renovation/demolition notification to the Department of Environmental Quality (with copy to the Environmental Protection Agency) is required at least 10 working days prior to commencement of any demolition or renovation operations.

4. Chemical Use and Storage – Project personnel will use non-hazardous chemical substitutes in the place of hazardous chemicals as long as the non-hazardous substitutes meet the requirements/specifications of the requester. Spill prevention/ minimization measures will be used during storage and use of chemicals/fuels. Affirmative Procurement, as implemented through applicable procedures will be used procuring applicable chemicals and materials. For management of pesticides, herbicides, and fertilizers, see the applicable procedures and the instructions on the product label.

5. Contaminated Sites Disturbance – Covered activities that include soil disturbance may impact CERCLA sites and require a Notice of Soil Disturbance.

6. Cultural/Historical Resource Disturbance – Project personnel will contact the INL Cultural Resource Management Office prior to performing any soil disturbing activities, construction of facilities, storage of equipment, or off-road vehicle access outside of the facility fence boundaries. A cultural resource survey will be performed of the area.

The stop work requirement typically applies when objects or materials are found such as bones and dense concentrations of obsidian artifacts. Project personnel are to stop work until the Cultural Resource Management Office can be contacted for guidance.

In addition, activities or properties that are not exempted will need to be reviewed by the INL Cultural Resource Management Office. The review must be completed prior to performing the maintenance activities.

7. Discharge to Wastewater Systems or Groundwater – Actions may include maintaining and repairing wastewater systems lines and connections that could impact the discharge to wastewater systems.

8. Drinking Water Contamination – Performing maintenance activities on the ICP drinking water systems and those buildings served by these systems must be performed in compliance with IDAPA 58.0108, the Uniform Plumbing Code.

9. Hazardous/Mixed Waste Generation and Management – Hazardous waste may be generated from actions such as maintaining equipment containing hazardous materials, such as acids, bases, heavy metals, and RCRA hazardous metals. Activities will be planned and performed to minimize generation of hazardous waste. Hazardous wastes will be stored, treated, and or disposed in compliance with applicable RCRA regulations at an EPA permitted treatment, storage, and disposal facility in accordance with the facility's waste acceptance criteria.

Small quantities of mixed waste may be generated. Activities will be planned and performed to minimize generation of mixed waste. This waste stream will be treated and/or disposed of through one of the contracted RCRA TSD facilities.

10. Hazardous/Rad. Material or Waste Handling and Trans – A hazardous waste determination will be performed for all waste streams to develop the appropriate management practices. Waste streams will be evaluated to determine if any of the materials can be recycled or reused and to implement actions for minimizing waste entering the landfill.

11. Industrial Waste Generation and Management – Typical maintenance wastes such as boxes, wood forms, wiring, piping, paper, insulation, and metal will be generated and disposed of as nonhazardous, nonradioactive waste to the INL Landfill Complex. All potential waste materials will be evaluated prior to generation for waste minimization. Materials will be evaluated for recycling.

12. Interaction with Wildlife/Habitat – If migratory bird nests with birds and/or eggs are discovered while performing maintenance activities within facility boundaries, cease nearby work, and notify the applicable Project Environmental Lead for assistance and guidance on a path forward.

Any maintenance activities performed outside of facility fences including off-road vehicle access outside of the facility fence boundaries will require a biological survey.

Vegetation removal (including mowing) that may affect nesting birds (between May 1 through September 1) requires a nesting bird survey. If the work is not completed within two weeks of the survey, a new survey will be required.

13. Managing Property and Materials – Should furniture or equipment no longer be needed as a result of the maintenance activities, the materials will be excessed for reuse.

14. PCB Contamination – There is the potential that PCBs will be encountered while performing the covered activities, such as applied coatings and sealants (e.g., paints), gaskets, electrical cabling, caulking and oils associated with lathes, mills, pumps, presses, air compressors, small capacitors and electrical equipment manufactured prior to 1980. PCBs will be managed in accordance with applicable procedures.

16. Radioactive Waste Generation and Management – Activities performed inside contaminated areas will result in some radioactive waste. Typical types of waste will include anti-contamination clothing, radiation enclosures and barriers, contaminated materials and components, contaminated HEPA filters, and contaminated absorbent used to clean up small spills. These materials will be packaged and disposed of through Waste Generation Services.

17. Storage of Hazardous/Rad. Materials or Waste in Tanks – Tanks may be used to store waste in support of the maintenance activities.

Routine maintenance does not include removal of product or waste from tankage for purposes of preparing the tankage for removal, decommissioning, and or demolition. However, if the tankage has been identified as inactive and contains product or waste, the removal of the product or the waste would be considered a maintenance activity.

18. Use, Reuse and Recycling of Resources – Some maintenance actions may require soil, gravel or fill materials. If INL borrow sources are used to supply the materials, the action must be coordinated through the appropriate personnel and completion of Form 450.AP01 is required.

19. Work within areas Subject to Flooding - The potential for surface water flooding at the INL has been evaluated and portions of some ICP facilities are subject to flooding. However, if a hypothetical flood event were to occur while performing maintenance actions, access to this site and operation of related equipment may be interrupted as a result of the 100-year overland flow runoff event. Planned activities could resume after flood-related interruption.

By definition, the projects included in this EC are routine maintenance only, and do not include expansion or increases in the sizes or elevations of road surfaces or road embankments or other structures that can influence flood flow characteristics. Therefore, projects that are considered to be and are included in the scope of this EC are not expected to impact or change the dimensions or flow characteristics of the 100-year floodplains of the Big Lost River, or of the RWMC or INTEC runoff areas.

SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

**DOE-ID NEPA CX DETERMINATION
IDAHO NATIONAL LABORATORY**

References: B1.3, Routine maintenance/custodial services for buildings, structures, infrastructures, equipment

Justification: These activities will be performed by ICP plant and construction personnel or subcontractors. None of the activities will be performed as part of or in support of a larger project requiring an Environmental Assessment or Environmental Impact Statement. Proposed activities not included: a) actions which will change the scope or mission of a facility, and b) actions which will cause a significant increase in environmental impacts.

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

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on November 6, 2012.