



NEPA Compliance Officer Rationale
Office of Secure Transportation
OST15-001

Application of DOE NEPA Procedure: Categorical Exclusions B1.3, Applicable to Facility Operations (10 CFR Part 1021, Subpart D, Appendix B).

Rationale: The proposed action in the attached checklist (OER14-001) describes replacement of a water supply line at the facility at Fort Chaffee, Arkansas. The project involves replacement of a leaking water supply line, with no increase in capacity or water use. Proposed ground-disturbing activities would be conducted in previously disturbed area, specifically the parking lot and adjacent landscaped area. A more in depth discussion can be found under Attachment 1 of this checklist, which is hereby incorporated by reference. Categorical Exclusion B1.3 applies in cases of:

Routine maintenance activities and 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 (that is, 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 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).
(a) through (o);

This proposal fits within the parameters of Categorical Exclusions B1.3.

Based upon the information provided to me, discussions with the project specialists, and my knowledge, this proposal does not present any extraordinary circumstances of a unique or uncertain nature. It is not connected to other actions with potentially or cumulatively significant impacts.¹

¹ See 10 CFR § 1021.410(b)(2)and(3)for full text of regulation.



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Supported by the information provided by the project engineers and my knowledge of this activity, the proposal would not²:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;
2. require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions;
3. disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; or
4. adversely affect environmentally sensitive resources (including but not limited to those listed in paragraph B.(4)).

Therefore, this proposal meets the conditions that are the Integral Elements of the Class of Actions and application of Categorical Exclusion B1.3 is appropriate.

If changes are made to the scope of action as described in the checklist, or if the scope is expanded to encompass other actions, NEPA requirements for the action will need to be reassessed at that time.

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NNSA Office of General Counsel
June 1, 2015

² See 10 CFR Part 1021 Subpart D Appendix B (B(1)through(4)).