

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Transient Reactor Test (TREAT) Outdoor Chemical Storage Prefabricated Building

SECTION B. Project Description and Purpose:

The Transient Reactor Test (TREAT) Facility at Idaho National Laboratory's Materials and Fuels Complex (MFC) needs flammable and combustible liquids storage space. The proposed action is to procure an outdoor, prefabricated chemical storage building designed for storage of 55 gallon drums containing flammable or combustible liquids. The facility would be a hazardous material storage building made with double-walled galvanized steel with 3" of insulated air space for extra strength and safety. The double-walled building has been tested for tornado resistance, withstanding F-4 tornado force winds of 250 mph. The outer wall of the chemical storage center would be welded 16 or 12 gauge steel. The inner wall would be constructed of 20 gauge steel. The hazardous materials storage building would include a 12 gauge welded steel liquid-tight sump, removable galvanized steel grating and safety floor planking. Convection vents would be located throughout. Twelve 12 gauge galvanized steel forklift channels to assist in transporting the building would be provided. National Fire Rating (NFR) warning labels, ratings and instructions would also be included. The facility would be finished in chemical, corrosion and ultra-violet (UV) resistant paint. The facility would meet National Fire Protection Association (NFPA) code 30 and would comply with Occupational Safety and Health Administration (OSHA) and Environmental Protection Agency (EPA) regulations.

Product Specifications would include the following:

- Width - 7 feet
- Depth - 9 feet
- Height 8 feet 4 inches
- 55 Gallon Drum Capacity -10 Unstacked -12 Stacked
- Steel Construction
- Sump Capacity - 206 Gallon
- Weight 3224 lbs
- Approval/Regulations - Factory Mutual/Underwriter's Laboratory (UL) listed, Meets NFPA Code 30, Complies with OSHA and EPA regulations

The outdoor chemical storage building would store both new and used product oil for maintenance. The new product oil storage is for equipment having large capacities that may require a long lead time to obtain. Used oil will be stored in the chemical storage building while awaiting analysis from sampling for disposal.

The outdoor chemical storage building will be placed on a previously constructed concrete pad that is approximately 10 feet from building MFC-720. This location has been approved by the MFC Fire Protection Engineer.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Generating and Managing Waste

Generating waste has been identified for used oil storage while awaiting analysis from sampling before disposal. It is anticipated the used oil will be non-radioactively contaminated and recyclable. If analysis identifies the oil is not recyclable, the facility personnel will work with Waste Generator Services (WGS) to properly dispose of the oil as waste.

Waste from construction activities may include wooden forms and general construction debris. This non-hazardous waste will be recycled to the extent practicable. All waste will be managed by WGS in accordance with Battelle Energy Alliance, LLC (BEA) procedures.

Releasing Contaminants

Although not anticipated, small spills of substances (e.g., petroleum and/or other fluids) may occur. Any releases would be cleaned up, containerized and provided to WGS for management and disposition. The spill notification team (241-6400) and environmental support would also be notified.

Using, Reusing, and Conserving Natural Resources

An existing concrete pad that is approximately 10 feet from MFC-720 will be utilized for a foundation for the pre-fabricated building.

Scrap material, such as wood and metal, will be recycled to the extent practical. All applicable waste will be diverted from disposal in the landfill when possible. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, or are non-toxic or less-toxic alternatives.

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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: 10 CFR 1021, Appendix B to subpart D, items 1.15 "Support buildings."

Justification: Project activities described in this Environmental Checklist (EC) are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.15 "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 covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix."

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: 6/13/2016