

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

**SECTION A. Project Title:** Advanced Test Reactor (ATR) Complex Road Repairs

**SECTION B. Project Description and Purpose:**

This revision is to add additional scope to the original Environmental Checklist (EC). The revised project scope would remove and replace all of Swordfish Boulevard, Mackerel Street, and Bass Avenue. In addition, Pike, Marlin, Pickerel, and Perch Street would be added to the projects. The remaining scope of the original EC will not change. Environmental aspects, work activities, and conditions and instructions remain the same as those identified in the original EC.

### Original EC

Certain roads inside the ATR Complex are in poor condition, have storm water drainage problems and are in need of repair. The proposed project would remove and replace portions of Swordfish Boulevard, Mackerel Street, and Bass Avenue. A portion of the drainage area along the east side of Swordfish Boulevard will be modified to include concrete valley gutters, catch basins, and storm drain piping. Approximately 150,000 sq. ft. of asphalt will be removed, the road base will be re-graded to allow for better surface drainage and new asphalt will be laid down. All areas are previously disturbed inside of ATR Complex and native vegetation would not be disturbed.

Estimated Start Date: May, 2016

Estimated Completion Date: September, 2016

**SECTION C. Environmental Aspects or Potential Sources of Impact:**

### **Air Emissions**

Fugitive dust may be generated during excavation activities. All reasonable precautions will be taken to control fugitive dust. Dust control methods that are used will be recorded and used to show compliance to the Idaho National Laboratory (INL) air permit and Idaho Administrative Procedures Act (IDAPA) air requirements.

### **Discharging to Surface-, Storm-, or Ground Water**

A portion of the drainage area along the east side of Swordfish Boulevard will be modified to include concrete valley gutters, a sloped cobble catch basin, and polyvinyl chloride (PVC) storm drain piping. The cobble catch basins lined with a geotextile fabric will drain to the 12" PVC drain pipe (non-perforated) that ultimately discharges above ground at the end of the basin. This would not be considered a shallow injection well as it is not a subsurface fluid distribution system and the discharge is to the land surface.

There are no shallow injection wells in the area that will be disturbed.

### **Disturbing Cultural or Biological Resources**

The project will take place inside the ATR Complex and will be on previously disturbed areas. Native vegetation grows to the west of Swordfish Boulevard, however, the project should not disturb this area. Since the project is in previously disturbed soils within a fenced facility, cultural surveys are not needed. In the unlikely event that any cultural resources (i.e. artifacts, bones) are discovered during excavation, the subcontractor will stop work and notify the Construction Field Representative and the Cultural Resource Management Office as soon as possible. Cultural Resource personnel will be contacted for instruction. Project personnel will contact Gonzales-Stoller personnel if it becomes necessary to disturb native vegetation to the west of Swordfish Blvd.

### **Generating and Managing Waste**

Typical non-hazardous construction waste such as asphalt, concrete, PVC pipe scrap, geotextile fabric scrap, etc., will be generated during the project. Asphalt will be taken to the Central Facilities Area (CFA) landfill and will be staged for recycle/reuse. All waste will be characterized and dispositioned at the direction of Waste Generator Services (WGS).

### **Releasing Contaminants**

Construction chemicals such as marking paint, fuels, lubricants, adhesives, paints, etc., will be used during the project. The subcontractor will submit chemical inventories and associated Safety Data Sheets through the vendor data system prior to bringing them to the INL. The Construction Chemical Coordinator will enter these chemicals into the INL Comply Plus chemical management system for tracking purposes. Spills will be reported to the Construction Field Representative and the Spill Notification Team.

### **Using, Reusing, and Conserving Natural Resources**

The existing asphalt that will be removed will be placed in the asphalt pile at the CFA landfill for reuse/recycle. Other waste that is suitable for recycle such as any scrap metal will be diverted from landfill disposal when practicable.

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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 item B2.5, "Facility safety and environmental improvements" and B1.3, "Routine Maintenance/custodial services for buildings, structures, infrastructures, equipment."

**Justification:** The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D and the following categorical exclusions:

B2.5, "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

B1.3, "Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. 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. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. 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, provided that 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). Routine maintenance activities include, but are not limited to:

- (a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair or replacement;
- (d) Reroofing;
- (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;
- (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 systems;
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
- (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
- (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- (m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as 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), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
- (p) Removal of debris.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)

Yes  No