

**NEPA REVIEW SCREENING FORM**  
**for Actions Included in CXs**

Document ID #:  
DOE/CX-00069Rev5

**I. Project Title:**

Annual Categorical Exclusion for PNNL Projects involving Routine Maintenance Activities on the Hanford Site (B1.3)

**II. Describe the proposed action, including: location, time period over which proposed action will occur, project dimension (e.g., acres displaced/disturbed, excavation length/depth), area/location/number of buildings. Attach maps and drawings, as applicable. Describe existing environmental conditions and potential for environmental impacts from the proposed action. If the proposed action is not a project, describe the action or plan.**

Pacific Northwest National Laboratory and its subcontractors perform routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructure (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);
- P. Removal of debris.

Some of these activities may result in the incidental removal of small quantities of asbestos-containing materials and polychlorinated biphenyl-containing items from buildings, transmission systems, or associated infrastructure. PNNL would undertake actions foreseeably necessary to manage these wastes in compliance with DOE Orders, and Federal and state regulations and

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guidelines.

The buildings, structures, infrastructures, and equipment subject to this Annual CX include, but may not be limited to, those listed in Table 2 of the Operational Agreement between the Office of Science, Pacific Northwest Site office, and the Office of Environmental Management, Richland Operations Office, Revision 2, December 2015.

Actions performed under this Annual CX shall not individually or cumulatively have a significant effect on the human environment. This Annual CX shall only be applied to actions that meet the requirements (i.e., 10 CFR 1021.410) and conditions that are "integral elements" (i.e., 10 CFR 1021, Subpart D, Appendix B) for categorically excluding actions under the provisions of the NEPA regulations. There shall be no extraordinary circumstances where normally excluded actions may have significant effects on the human environment.

To avoid extraordinary circumstances potentially affecting ecological resources, ecological resources reviews shall be performed in accordance with established protocols, policies, and procedures to identify plant and animal species for protection under the Endangered Species Act, candidates for protection, or listing by federal or state agencies as threatened or endangered consistent with DOE/RL-96-32, "Hanford Site Biological Resources Management Plan" or other applicable guidance documents and agreements. Caution shall be exercised during the bird nesting season (mid-March to mid-July). If nesting birds, pair of birds of the same species, or bird defensive behaviors is observed, then work shall stop and a qualified Ecological Resources Specialist shall be contacted for guidance. Actions that potentially affect ecological resources shall require a resources review and clearance before proceeding. This includes, but may not be limited to, actions that require an excavation permit; disturb the ground; remove or modify dead or living vegetative cover; occur within a Bald Eagle exclusion zone; expand roadways/parking lots; require off-road travel; involve unusual noise, light, or chemicals that may affect wildlife; located on the Hanford Reach National Monument; located in a posted ecologically sensitive area; conducted on the outside of structures; conducted in abandoned structures; and have the potential to alter or affect the living environment. If an ecological resources review determines potentially adverse impacts, then appropriate mitigation actions shall be identified and implemented to avoid, minimize, eliminate, rectify, or compensate the impacts.

To avoid extraordinary circumstances potentially affecting cultural resources, cultural resources reviews shall be performed in accordance with established protocols, policies, and procedures to identify resource protection consistent with the "Programmatic Agreement among the U.S. Department of Energy, Advisory Council on Historic Preservation, and Washington State Historic Preservation Office for Maintenance, Deactivation, Alteration, and Demolition of the Built Environment on the Hanford Site" (DOE/RL-96-77); the "Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan (DOE/RL-97-56); the "Cultural Resources Management Plan" (DOE/RL-98-10), and other applicable guidance documents and agreements (e.g. "Gable Mountain and Gable Butte Management Plan" [DOE/RL-2008-17]). Cultural sensitivity shall be determined using site location topographic maps, geographic information system databases, and/or pedestrian surveys to identify proximity to cultural resources (i.e., historic buildings, traditional cultural properties, artifacts, and previously recorded archaeological sites).

Actions located within the geographic boundary of a significant cultural resource or historic property, Traditional Cultural Property (including but not limited to Rattlesnake Mountain, Gable Mountain, Gable Butte, Mooli Mooli, and other undocumented areas), cemetery or burial sites, or within 400 meters of the Columbia River may be located in culturally sensitive areas.

DOE/RL-96-77 exempts from cultural resources review certain actions that take place indoors or do not affect certain facilities identified in Tables A.5 through A.7 of DOE/RL-97-56. These actions are listed in Stipulation III of DOE/RL-96-77 and include, but may not be limited to, routine maintenance; replacement in kind; refinishing in kind; energy conservation measures; security and personal safety systems; actions associated with post-cold war buildings and structures; asbestos abatement actions; and facility transition actions to deactivate, de-energize, or isolate systems. Exemptions are also provided for mobile trailers, modular buildings, subsurface structures,

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storage tanks, wells/boreholes, and towers. If the action affects a facility that appears in Tables A.5 or A.6 of DOE/RL-97-56 and the undertaking is not exempt based on Section III.B of DOE/RL-96-77, then a cultural resources review shall be performed.

Historic structures or locations that require cultural resources review and clearance include, but may not be limited to, The Hanford Site Manhattan Project National Historic Park, including the Bruggeman Agricultural Complex Warehouse, White Bluffs Bank, Hanford High School, B Reactor and Hanford Irrigation District Pump House. Other historic structures and locations include, the White Bluffs Log Cabin, Hanford Townsite, Hanford Substation, White Bluffs Townsite, AAA Military Camps, NIKE Missile Base, and selected historic buildings.

Workers shall be directed to watch for cultural materials (i.e., bones, stone tools, mussel shells, cans, bottles, etc.). If encountered, then work near the discovery shall stop until a qualified Cultural Resource Specialist is contacted, the significance of the find determined, appropriate Tribes notified, and mitigation arranged and implemented, as needed.

PNNL uses an Electronic Prep and Risk (EPR) System to screen project impacts. It shall be incumbent upon the Environmental Compliance Officers, NEPA Subject Matter Expert, or other NEPA trained individuals to assure that the requirements and conditions discussed herein are met prior to applying this Annual CX to PNNL actions. They shall also be responsible for assuring that no extraordinary circumstances exist where normally excluded actions may have significant effects on the human environment.

This Annual CX is approved pursuant to 10 CFR 1021.410(f) which states that "proposed recurring actions undertaken during a specified time period such as routine maintenance for a year, may be addressed in a single categorical exclusion determination after considering the potential aggregated impacts" to assure no extraordinary circumstances exist. This Annual CX will expire one year from the date authorized by the Hanford NEPA Compliance Officer and will require reauthorization on an annual basis.

**III. Applicable Reviews (attach to NRSF):**

Biological Review Report #: \_\_\_\_\_

Cultural Review Report #: \_\_\_\_\_

Additional Attachments:

**IV: Existing Documentation:**

Are the impacts of the proposed action evaluated in a previous EA, EIS, or CERCLA document?

Yes  No

If "YES", use Site Form [A-6006-948](#), *Actions Adequately Evaluated in NEPA or CERCLA Document*

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**V. Categorical Exclusion:**

Does the proposed action fall within a category of actions that is listed in Appendixes A or B to Subpart D of 10 CFR 1021? If extraordinary circumstances or integral elements would preclude the use of a CX, check "No".  Yes  No

Are there extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal?  Yes  No

Is the proposal connected to other actions with potentially significant impacts or result in cumulatively significant impacts (not precluded by 40 CFR 1506.1 or 10 CFR 1021.211)?  Yes  No

List CX to be applied and complete Categorical Exclusion Integral Elements (where an action might fit within multiple CXs, use the CX that best fits the proposed action):  
10 CFR 1021 Subpart D, Appendix B, B1.3 "Routine Maintenance"

**Categorical Exclusion Integral Elements:**

Would the proposed action threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, or health, including DOE and/or Executive Orders?  Yes  No

Would the proposed action require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities?  Yes  No

Would the proposed action 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?  Yes  No

Would the proposed action adversely affect environmentally sensitive resources?  Yes  No

Would the proposed action involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species such that the action is not contained or confined in a manner designed, operated, and conducted in accordance with applicable requirements to prevent unauthorized release into the environment?  Yes  No

If "NO" to all Integral Elements questions above, complete Section VI, and provide NRSF to DOE NCO for review.  
If "YES" to any of the Categorical Exclusion Integral Elements questions above, contact DOE NCO for additional NEPA Review.

**VI. Responsible Contractor Signatures:**

Initiator:  
Michael R. Sackschewsky  6/29/2017  
Name *Print* Signature Date

**Cognizant Environmental Compliance Officer:**

Name *Print* Signature Date

**VII. DOE Approval/Determination**

DOE NEPA Compliance Officer: Diori L. Kreske, NEPA Compliance Officer (NCO)

Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), the proposed action fits within the specified class of action:

NCO Determination:  CX \*NCO Recommendation:  EA  EIS

 6/29/17  
Signature Date

\*NRSF A-6006-950 would be completed by responsible contractor