DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-15-062

SECTION A. Project Title: Remove Radioactive Liquid Waste Treatment Facility Truck Loading Station Outside of the Hot Fuel Examination Facility

SECTION B. Project Description and Purpose:

The Radioactive Liquid Waste Treatment Facility (RLWTF) truck loading station located on the northwest exterior of Hot Fuel Examination Facility (HFEF) is no longer used. The vent and pump discharge piping (two lines) penetrate the foundation wall approximately three feet below grade in a pit. During inclement weather, water pools in the pit and then drains into the Retention Tank Room (room 020) located on the Service Floor level of HFEF, which is a radiologically-controlled area. To prevent the influx of water into the room, the piping and exterior enclosure need to be removed, the penetrations and foundation waterproofed and the pit filled-in.

The influx of water into radiologically-controlled room 020 must be stopped. The inactive Truck Loading station is a significant source for water intrusion. Removal of the system and patching/plugging the penetrations with waterproof material should curb this influx.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Fugitive dust may be generated during excavation and demolition activities. No radiological emissions are anticipated, however, Radiological Control Technicians will be present to minimize the spread of any potential contamination during piping removal activities.

There is a possibility for disturbance of asbestos containing building materials.

Disturbing Cultural or Biological Resources

Materials and Fuels Complex (MFC)-785 is potentially eligible for nomination to the National Register of Historic Places. Removal and/or changes of original features could adversely impact this historic property.

Generating and Managing Waste

Project activities would generate industrial waste. Polychlorinated biphenyl (PCB) contamination is not anticipated. Asbestos waste may be generated if sampling indicates regulated asbestos containing materials are present.

Releasing Contaminants

Chemicals such as fuels, lubricants, marking paint, etc., will be used during the project. Spill cleanup waste will be disposed at the direction of Waste Generator Services (WGS).

There are no underground pipes and no sign of leakage to soil. Radiological control would be involved in all aspects of the project to identify any unsuspected contamination.

Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow.

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"

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Justification: Project activities are consistent with 10 CFR 1021, Appendix B, 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 and 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 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)."

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: 10/29/2015