

**DOE-ID NEPA CX DETERMINATION**  
**Idaho National Laboratory**

**SECTION A. Project Title:** Installation of Staircase to Access Idaho Falls (IF)-603 Water Storage Tank

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

The IF-603 225,000 gallon water storage tank is insulated and mounded with dirt. Craft personnel require access to the top of the mound to add water using a hose through a manhole cover. Dragging the hose to the top of the mound presents a safety hazard, especially during the winter months. The proposed action would mitigate this safety hazard by installing a staircase 21 feet long, including the upper and lower landings, with a rise of approximately 9 feet. The staircase would be fabricated with aluminum structural members, stair treads, and handrails, and would meet Occupational Safety and Health Administration (OSHA) requirements. The staircase would be completely fabricated in the shop and installed on concrete sonotube footings.

Estimated Cost: ~ \$30K.

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

**Air Emissions**

Emissions/fumes from common construction adhesives and are anticipated. Fugitive dust is not expected, but is possible. If portable emission sources are used, equipment must meet opacity requirements.

**Disturbing Cultural or Biological Resources**

The project will disturb soil in a previously disturbed area.

**Generating and Managing Waste**

Industrial waste, in the form of common construction debris, is expected. All Solid Waste would be managed by Waste Generator Services (WGS).

**Releasing Contaminants**

Typical construction chemicals such as lubricants, paints, adhesives, etc., will be used during the project.

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

All applicable waste would be diverted from disposal in the landfill when possible.

**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, B2.5 "Facility safety and environmental improvements"

**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: 8/16/2016