DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-15-022

SECTION A. Project Title: Idaho National Laboratory (INL) Fire Stations' Vehicle Exhaust Extraction Systems Replacement

SECTION B. Project Description:

The vehicle exhaust extraction systems at the INL Fire Stations (Central Facilities Area [CFA-1611], Materials and Fuels Complex [MFC]-725, and Test Area North [TAN]-687) are over 15 years old and not working as originally intended. Because of this inadequate system, personnel in the buildings are continually exposed to diesel exhaust fumes. The proposed project would remove the outdated vehicle exhaust extraction systems including fans, ducting, hose reels, rails, and other materials needing to be replaced. Once removed, new systems with associated ducting would be installed that hook directly to each emergency vehicle parked in the various stations.

Estimated Start Date: Late May 2015 Estimated End Date: September 2015 Approximate Cost: \$350,000

SECTION C. Environmental Aspects or Potential Sources of Impact:

<u>Air Emissions</u> - Vehicles are not considered a stationary emission source and therefore an Air Permitting Applicability Determination would not be required.

<u>Generating and Managing Waste</u> - Industrial waste in the form of ducting, exhaust hoses, scrap wood, Resource Conservation and Recovery Act (RCRA) empty chemical containers, insulation, etc., would be generated during the project. Some electronic waste associated with the current exhaust system controls may be generated and would be managed appropriately. Scrap metal would be recycled when practical. All waste would be characterized, stored, and disposed at the direction of Waste Generator Services (WGS).

<u>Releasing Contaminants</u> - Typical construction chemicals such as lubricants, fuels, adhesives, paints, etc., would be used by the subcontractor. A chemical inventory list with associated Material Safety Data Sheets (MSDS's) will be submitted in the vendor data system by the subcontractor. All chemicals would be entered into the INL Comply Plus Chemical Management System by the Construction Chemical Coordinator.

Using, Reusing, and Conserving Natural Resources - All materials would be reused and recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, and are non-toxic or less-toxic alternatives.

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

For projects checked above as "CX," 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 B2.3, ""Personnel safety and health equipment."

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B2.3 "Installation of, or improvements to, equipment for personnel safety and health (including, but not limited to, eye washes, safety showers, radiation monitoring devices, fumehoods, and associated collection and exhaust systems), provided that the covered action would not have the potential to cause a significant increase in emissions."

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

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 5/14/2015