DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 1 of 3

CX Posting No.: DOE-ID-INL-15-035

SECTION A. Project Title: Power Burst Facility (PBF)-622 Moran Project Facility Modifications

SECTION B. Project Description:

The equipment and process for the Moran Project (formerly "PUREX") are documented in Environmental Checklist (EC) INL-14-029 and its revisions.

The Moran Project is located at Idaho National Laboratory's (INL's) Critical Infrastructure Test Range Complex (CITRC), in building PBF-622. Modifications to PBF-622 are needed to support research and development activities related to Moran Project operations. Operational activities for the Moran Project are under review, and the scope of operations will be included as a revision to this EC when those activities are finalized. Modifications to PBF-622 known to be needed at this time include the following:

- 1. Install new building air supply and exhaust systems. The new air supply system would condition the air heating only.
- Install new concrete equipment pads.
- 3. Install electrical conduits and equipment power supplies.
- 4. Install heating, ventilating, and air conditioning (HVAC) equipment and controls.
- 5. Hook up, start up, and test existing air compressor;
- 6. Install new ductwork and two exhaust air stacks, including one high-efficiency particulate air (HEPA) filter housing.

The current air system would be removed. This includes removal of supply ductwork, supply fans, duct heaters, duct heater conduit and conductors, and two roof-top mounted exhaust fans.

Building surveys have not found asbestos containing materials.

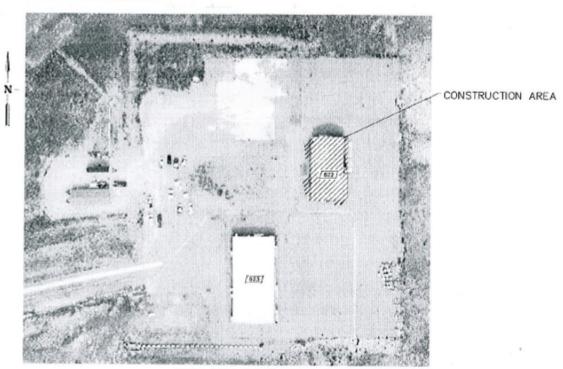
In addition, a concrete equipment pad is needed for the project. Approximately 228 cubic feet of asphalt and 228 cubic feet soil would be removed to prepare a base for the concrete. The soil in the pad area would be compacted and topped with 6 inches of compacted crushed gravel before installing rebar and pouring concrete. Asphalt removal and soil excavation would not impact any known Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site.

PBF-622 is not listed as a historic building.

DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 2 of 3

CX Posting No.: DOE-ID-INL-15-035



CITRC AREA PHOTO



SECTION C. Environmental Aspects or Potential Sources of Impact:

<u>Air Emissions</u> - The building ventilation system would supply and exhaust general building air that has the potential to include very low concentrations of depleted uranium. An air permit applicability determination (APAD) would be required for both radionuclide and potential chemical emissions. Soil excavation has the potential to generate fugitive dust. All reasonable precautions would be taken to control fugitive dust. If dust control methods are required, the subcontractor must record the methods that were used in their daily logbooks and submit to Battelle Energy Alliance, LLC (BEA) as project records.

<u>Disturbing Cultural or Biological Resources</u> - Disturbance of biological and cultural resources is not anticipated. However, areas subject to ground disturbance, including previously disturbed areas, are subject to cultural reviews prior to disturbance. Recommendations made by cultural personnel will be implemented and cultural resource monitoring may be necessary in the CITRC area during ground disturbance. Contact Brenda Pace at 526-0916.

DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 3 of 3

CX Posting No.: DOE-ID-INL-15-035

<u>Generating and Managing Waste</u> - Industrial waste, in the form of asphalt, duct work, fans, and related material would be generated. 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. All waste will be characterized, stored, and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants - Typical construction chemicals such as fuels, lubricants, paints, etc., will be used during the project. A chemical inventory list with associated Safety Data Sheets (SDS's) will be required to be submitted by the subcontractor and be approved by BEA in the vendor data system. The Construction Chemical Coordinator will enter these chemicals into the Comply Plus chemical management system for tracking purposes. All spills will be reported to the Construction Field Representative and to the Spill Notification Team if applicable.

<u>Using, Reusing, and Conserving Natural Resources</u> - 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. 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, or are non-toxic or less-toxic alternatives (see https://sftool.gov/green-products/0?agency=7).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify applicable categorical exclusion from 10 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 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 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 B1.31 Installation or relocation of machinery and equipment

Justification: The proposed activities are consistent with CX B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

| Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) | ☐ Yes ⊠ No |
|--|------------|
| Approved by Jack Depoerschmidt, DOF-ID NEPA Compliance Officer on: 6/29/2015 | |