## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-15-050

## SECTION A. Project Title: Plant Protective System (PPS) Battery Rooms Exhaust Fans Replacement

### SECTION B. Project Description and Purpose:

The Plant Protective System (PPS) Battery Room Exhaust Fans 670-HVE-1538 and 1539, located on the Test Reactor Area (TRA)-670 diesel generator room, have reached the end of their useful life and replacement parts are obsolete. The fans provide ventilation to maintain hydrogen gases below National Fire Protection Association lower explosive limit concentrations in the battery rooms. The proposed action would install a new exhaust fan system and modify the PPS battery room heating system to maintain battery electrolyte temperatures at required temperatures. To maintain PPS battery room fire rating, the battery room man-doors need to be replaced with new fire rated man-doors and fire rated door dampers/registers. In addition, a volume controllable fire damper would be installed in the room exhaust duct. The new fan system would be installed on the PPS battery room roof and would require installation of fall protection railing and equipment service platforms.

Project Start Date: May 1, 2016 Project End Date: May 15, 2016 Project Cost: Approximately \$40,000.00

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

#### **Disturbing Cultural or Biological Resources**

Although TRA-670 is classified as a Category 1 historic property in the Idaho National Laboratory (INL) Cultural Resource Management Plan (Department of Energy Idaho Operations Office (DOE/ID)-10997 rev. 5, Appendix I), and is considered eligible for listing on the National Register of Historic Places, the project as described is an exempt activity (DOE/ID-10997 rev. 5, Table 2, Exemption 2); as such, the project may proceed as described with no further cultural review.

#### **Generating and Managing Waste**

All waste generated from this activity will be managed in accordance with laboratory procedures. Pollution prevention/waste minimization will be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated will be transferred to Waste Generator Services (WGS) for appropriate disposition. All waste generated from these activities will have an identified disposition path prior to it being generated.

#### **Releasing Contaminants**

All chemicals typically used in construction/maintenance, if used, will be managed in accordance with laboratory procedures.

#### Using, Reusing, and Conserving Natural Resources

All material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. 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. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see http://www.sftool.gov/GreenProcurement).

# SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify applicable specific 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 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.

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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 a	and Reinvestment Act of 2009 (Recovery A	ct) 🗌 Yes	🛛 No
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Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 8/31/2015