DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-15-063

SECTION A. Project Title: Test Reactor Area (TRA)-653 Machine Shop Reconfiguration and Equipment Installation Project

SECTION B. Project Description and Purpose:

In an effort to update capabilities and realign resources in support of future missions, the Advanced Test Reactor (ATR) machine shop in TRA-653 is being considered for a new Mazak VTC-800 machining center.

The proposed scope of work includes removing several machining centers using various disposition paths including relocation in the machine shop, trade-in for purchase of new machines, and excess. Minor demolition would be conducted to remove abandoned conduit and support structures associated with the existing machining centers. Construction and reinforcement of the floor would be needed to support the new machining center(s). Installation of future machining center(s) (machines other than the Mazak VTC-800) is also included in this work scope along with other facility modifications to accommodate the machines.

The proposed action consists of:

- 1. Removing and staging the Fryer MB-15 and Axelson Lathe, including disconnection of utilities (electrical and compressed air), disassembly required for transporting, and mounting of the lathe to a pallet for transport
- 2. Relocating a small saw, small sander, sharp, Bridgeport, and Harding
- 3. Excessing an old drill and TL2 machining center
- 4. Demolishing and removing the old computer room
- 5. Installing an air compressor
- 6. Evaluating, demolishing, and constructing a new reinforced concrete floor for the new Mazak VTC-800
- 7. Installing a new Mazak VTC-800
- 8. Installing additional new machining center(s) (if purchased in Fiscal Year [FY] 16).

Project Start Date: Fiscal Year 2016 Project End Date: Fiscal Year 2016 Project Cost: Approximately \$340,000.00

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

There is a possibility for disturbance of asbestos containing building materials. All asbestos work must be conducted by properly trained personnel using appropriate abatement methods. Quantities of asbestos that are to be disturbed would be communicated to the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs) Technical Point of Contact (TPOC) using the Asbestos Removal Notification Form (450.04). Asbestos work would not take place until the project has received approval from the Asbestos NESHAPs TPOC.

Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new stationary emission source.

Fugitive dust may be generated. All reasonable precautions would be taken to prevent particulate matter from becoming airborne. If dust control methods are required, the method used and frequency applied must be recorded in the project records and would be used to demonstrate compliance with the Idaho National Laboratory (INL) Title V Air Permit.

Mobile sources such as generators, welders, and compressors may be used temporarily (less than a year) by subcontractors at the construction site. These sources would be required to meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emissions opacity requirements.

Disturbing Cultural or Biological Resources

TRA-653 is eligible for nomination to the National Register of Historic Places and removal and/or changes of original features may adversely impact this historical property. Written approval must be obtained from the Cultural Resource Management Office before the project can proceed. Contact Christina Olson at 526-1692.

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.

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Releasing Contaminants

All chemicals typically used in construction/maintenance, if used, will be managed in accordance with laboratory procedures. There is the potential for possible disturbance of suspect polychlorinated biphenyl (PCB) paint. Approved work controls will be in place to ensure that no releases occur during project activities.

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, or are non-toxic or less-toxic alternatives (see https://.sftool.gov/GreenProcurement).

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: National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion 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 Depperschmidt, DOE-ID NEPA Compliance Officer on: 11/4/2015	