GENERIC CATEGORICAL EXCLUSION FOR SITING, CONSTRUCTING, MODIFYING, AND OPERATING SMALL-SCALE STRUCTURES, PACIFIC NORTHWEST NATIONAL LABORATORY, RICHLAND, WASHINGTON

Proposed Action:

The U.S. Department of Energy (DOE) Pacific Northwest Site Office (PNSO) proposes to site, construct, modify, and operate small-scale support buildings and structures.

Location of Action:

The proposed action would largely occur on the Pacific Northwest National Laboratory (PNNL) campus in Richland, Washington and the Marine Sciences Laboratory (MSL) near Sequim, Washington, and occasionally at other locations in the United States.

Description of the Proposed Action:

DOE proposes to site, construct, modify, and/or operate small-scale support structures. Siting and construction activities would generally be limited to small facilities and support structures, such as parking areas and storage facilities, that are within or contiguous to an already developed area. The construction of waste management facilities would require additional NEPA review.

Modification activities would generally be limited to small-scale changes to existing facilities and structures that would not substantially alter the intended use. More extensive modifications would continue to require additional NEPA review. The proposed action would also include reasonably foreseeable actions necessary to implement the proposed activities, such as excavation, equipment and material staging, waste management, equipment maintenance, office and furniture moves, and award of grants and contracts.

Biological and Cultural Resources:

It is not likely that small-scale structure construction and modifications would result in adverse impacts to sensitive biological or cultural resources. However, when excavations are performed or other special project circumstances warrant it, biological and cultural resource reviews would be conducted to assure that impacts to sensitive resources are avoided and minimized.

Biological resource reviews would assure that impacts to sensitive biological resources are avoided. These reviews would identify the occurrence of federally and state-protected species in the project area such as avian species protected under the Migratory Bird Treaty Act; federally protected marine mammals (Marine Mammal Protection Act), species and habitats protected under the Magnuson-Stevens Act; plant and animal species protected under the Endangered Species Act (ESA), including candidates for such protection; and state species listed as threatened or endangered. Resource review recommendations would be followed to assure there are no adverse impacts to sensitive species and resources.

Cultural resource reviews would assure that impacts to sensitive cultural resources are avoided.

Impact avoidance and mitigation measures would be implemented as stipulated by the resource review. If consultation with the State Historic Preservation Office and/or affected tribes is deemed necessary, it would be initiated before project implementation.

Categorical Exclusion to Be Applied:

As the proposed action is to site, construct, modify, or operate small-scale structures, the following CX, as listed in the DOE National Environmental Policy Act (NEPA) implementing procedures, 10 CFR 1021, would apply:

B1.15 Siting, construction, or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purpose. but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in BI.IO, 81.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6 and B6.10 of this appendix.

Generic CXs are authorized by 10 CFR 1021.410(f) for recurring activities to be undertaken during a specified period of time, after considering potential aggregated impacts.

Eligibility Criteria:

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(l)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed below:

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, Appendix B (1)-(5)	
Would the Proposed Action:	**EVALUATION**:
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations or DOE or Executive Orders.

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, Appendix B (1)-(5)	
Would the Proposed Action:	**EVALUATION**:
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste management facilities would be constructed under this CX. Any generated waste would be managed in accordance with applicable regulations in existing facilities. Waste disposal pathways would be identified prior to generating waste and waste generation would be minimized.
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that or results in uncontrolled or unpermitted releases.
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action would not involve the use of genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species (unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements).
Have the potential to cause significant impacts on environmentally sensitive resources., including, but not limited, to: • protected historic/archaeological resources • protected biological resources and habitat • jurisdictional wetlands, 100-year floodplains • Federal- or state-designated parks and wildlife refuges, wilderness areas. wild and scenic rivers. national monuments, marine sanctuaries, national natural landmarks, and scenic areas.	No environmentally sensitive resources would be adversely affected by the proposed actions The proposed action would not adversely affect floodplains, wetlands regulated under the Clean Water Act, national monuments, or other specially designated areas, prime agricultural lands, or special sources of water. Potential impacts to Biological or Cultural resources would be addressed as described above.

Summary of Environmental Impacts:

The following table summarizes environmental impacts considered when preparing this CX determination.

Would the Proposed Action:	Evaluation
Result in more than minimal air impacts?	There might be temporary and localized dust and fumes from construction equipment while structures are constructed or modified. These would be minimized as necessary, using water applications or other emission controls, and would be compliant with applicable permits, local, state, and federal regulations, DOE orders, and PNNL guidelines.

Would the Proposed Action:	Evaluation
Increase offsite radiation dose measurably?	Siting, construction, modification, and operation of small-scale structures is not likely to include activities that would increase offsite radiation dose.
Require a radiological work permit?	Activities performed in radiologically controlled areas would be performed in compliance with as low as reasonably achievable principles, applicable State and federal regulations, DOE Orders, and PNNL guidelines. The radiation received by workers during the performance of activities would be administratively controlled below DOE limits as defined in 10 CFR 835.202(a). Under normal circumstances, those limits control individual radiation exposure to below an annual effective dose equivalent of 5 rem.
Discharge any liquids to the environment?	During construction or modification activities, there might be minor quantities of liquid effluents, for example, construction rinse water, such as concrete-equipment wash-down water, fire-or safety system-proofing wastewater, hydrotest water, cleanup rinse water, and water used for soil compaction after excavation. Effluents would be managed in accordance with applicable local, state, and federal regulations, PNNL requirements and best management practices.
Require a Spill Prevention, Control, and Countermeasures plan?	Building construction and modifications are not likely to require a formal spill prevention, control, and countermeasures plan. However, standard best management practices would be implemented to prevent and control accidental releases of fluids from heavy equipment used during project work.
Use carcinogens, hazardous, or toxic chemicals/materials?	Although unlikely, proposed activities might involve the use of carcinogens, hazardous and/or toxic chemicals and materials. For example, excavation equipment might contain or require the use of chemicals such as antifreeze, hydraulic fluids, or fuel. In addition, road and utility alteration activities might require the use of adhesives, cleaning solvents, and other potentially toxic substances. Project inventories would be maintained at the lowest practicable levels, and chemical wastes would be recycled, neutralized, or regenerated if possible. Product substitution (use of less toxic chemicals in place of more toxic chemicals) would be considered when reasonable.

Would the Proposed Action:	Evaluation
Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	Building construction and modifications might generate hazardous or possibly radioactive waste (if alterations must be conducted in a contaminated area) such as excess wire, conduit, and pipe. If unrecyclable, such wastes would be characterized, handled, packaged, transported, treated, stored, and/or disposed of in existing Hanford Site or off site treatment, storage, and disposal facilities in accordance with applicable local, state, and federal regulations, DOE Orders, and guidelines.
Cause more than a minor or temporary increase in noise level?	Equipment used for building construction and modifications may cause short-term, intermittent increases in noise. These would be typical of construction equipment and would be within regulatory limits and temporary.
Create light / glare, or other aesthetic impacts?	Building construction and modifications may require construction lighting to allow for work to proceed after dark. This would be a temporary impact. No other aesthetic impacts are expected to occur.
Require an excavation permit (e.g., for test pits, wells, utility installation)?	Building construction and modification might require excavation permits. Stipulations in the excavation permit to minimize potential impacts to safety and the environment would be followed.
Disturb an undeveloped area?	A small-scale support building might be sited on land that is within or contiguous to an already developed area. Active utilities and roads would be accessible, or additional NEPA review would be required. If located on or causes impacts to sensitive species or their habitats, such as old-growth sagebrush, additional NEPA would be required. Additional NEPA review would also be required for modification or construction of support buildings on the Hanford Reach National Monument; within 1/4-mile of the Columbia River; other sensitive environments, including wetlands, 100-year floodplains, critical habitats, and areas of traditional cultural properties or properties of historic, archaeological, or architectural significance.
Result in more than minimal impacts on transportation or public services?	Building construction and modification are not expected to affect transportation or public services.
Disproportionately impact low-income or minority populations?	Building construction and modification are not expected to disproportionately affect low-income or minority populations.

Would the Proposed Action:	Evaluation
Require environmental or other permits from federal, state, or local agencies?	Although not expected, construction or modification activities might require submittal of a notice of construction to the State Department of Health, for example, when a modification results in a change to an existing radiological control system. Notifications and approvals might be required from the Benton County Clean Air Authority, for example, to use temporary air pollution sources such as portable generators. Any necessary applications would be coordinated with PNSO staff.

Compliance Action:

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me by DOE Order 451.1 B, Change 3, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This determination must be reviewed at least once every 5 years.

Signature: _____ Date: 12-8-17

Tom McDermott, PNSO NEPA Compliance Officer

cc: MR Sackschewsky, PNNL