

## **Sitewide Categorical Exclusion for Routine Custodial Services**

### **Introduction**

As defined in the U.S. Department of Energy’s (DOE) Richland Operations Office Integrated Management System Procedure, *NEPA Analysis at Hanford*, a sitewide categorical exclusion is:

An application of DOE categorical exclusions described in 10 CFR 1021, Appendices A and B, which may apply to Hanford Site proposed actions (activities) that are “sitewide” in nature and extent, which the cognizant DOE Hanford NCO has determined fit within the scope (i.e., same nature and intent, and of the same or lesser scope) of DOE categorical exclusions described in 10 CFR 1021 Appendices A and B. The cognizant DOE Hanford NCO may issue specific sitewide categorical exclusions for use on proposed actions in which separate DOE approval to proceed is not required.

The nature of the proposed action subject of this sitewide categorical exclusion, as well as guidance to implement this exclusion as described herein, may be revised to reflect contemporary experience from the application of this exclusion; changes to, or development of, relevant policy and guidance; and changes to DOE’s categorical exclusions resulting from future rulemakings.

### **Proposed Action**

The DOE’s Richland Operations Office and Office of River Protection propose to undertake actions to perform routine custodial services on buildings, structures, infrastructure and equipment on and near the Hanford Site.

### **Location of Action**

On and near the Hanford Site, Richland, Washington.

### **Description of Proposed Action**

DOE’s proposed action is to perform routine custodial services on buildings, structures, infrastructure, and equipment (collectively referred to as facilities for this sitewide categorical exclusion) on and near the Hanford Site. For purposes of this sitewide categorical exclusion, custodial services are defined as activities necessary to preserve facility appearance, working conditions and sanitation.

Under the proposed action, buildings and structures would be maintained in a safe and sanitary condition by cleaning (for example, vacuuming floors, cleaning restrooms), washing windows, collecting trash, indoor pest control activities (for example setting bait traps and spraying of

building footings, etc), and supplying personnel needs such as hand soaps and emergency medical equipment and supplies. In addition, from time-to-time buildings and structures would be repainted, office equipment and furnishings would be repaired or replaced, lawns would be mowed and maintained, and snow and ice would be removed from parking areas and walkways.

The implementation of these proposed activities may generate materials and incidental quantities of solid and hazardous wastes. Consistent with DOE's procedures that implement NEPA (10 CFR 1021), DOE would undertake actions foreseeably necessary to implement this proposed action, and therefore would manage these wastes in compliance with DOE orders, and Federal, and state regulations and guidelines. As necessary, wastes would be packaged, staged for transport, transported, and disposed of at onsite or offsite facilities.

In addition, DOE would move equipment and materials necessary to perform routine custodial services onto and within the Hanford Site, as necessary. Use of the equipment and associated vehicles would generate air pollutants from combustion, local noise levels would increase, and nonrenewable resources such as petroleum products would be consumed. In all instances, the demand for resources and environmental impacts resulting from implementation of these proposed activities would be small and temporary in nature.

### **Applicable Categorical Exclusion**

DOE's Categorical Exclusion (B1.3):

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (e.g., pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed.<sup>1</sup> Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that replacement is in kind and is not a substantial upgrade or improvement. In kind replacement includes installation of new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

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<sup>1</sup> Routine maintenance services are addressed in *Sitewide Categorical Exclusion for Routine Maintenance Services*.

- (a) Repair of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair;
- (d) Reroofing;
- (e) Plumbing, electrical utility, and telephone service repair;
- (f) Routine replacement of high-efficiency particulate air filters;
- (g) Inspection and/or treatment of currently installed utility poles;
- (h) Repair of road embankments;
- (i) Repair or replacement of fire protection sprinkler systems;
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing;
- (k) Erosion control and soil stabilization measures (such as reseeded and revegetation);
- (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 5820.2, “Radioactive Waste Management”;
- (m) Repair and maintenance of transmission facilities, including replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed transmission lines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions);
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (including but not limited to, control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes); and
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), including removal of contaminated intact equipment and other materials (other than spent nuclear fuel or special nuclear material in nuclear reactors).

### **Implementing Guidance**

This sitewide categorical exclusion may be applied to activities under the proposed actions to perform routine custodial services that are “sitewide” in nature and extent. For example, this exclusion may be implemented as a one-time yearly application in instances where the proposed action would involve lawn mowing and trash collection for all buildings across the Hanford Site. This exclusion may not be applied to routine maintenance services (see footnote 1 above).

Application of this sitewide categorical exclusion requires compliance with the Richland Integrated Management System Procedure, *NEPA Analysis at Hanford*. Sitewide categorical

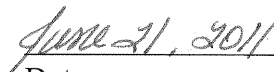
exclusions are determined solely by the cognizant DOE Hanford NCO and are applied through a screening process which documents that the proposed action:

1. Fits within the scope of actions identified in a DOE Hanford NCO-approved sitewide categorical exclusion
2. Meets the eligibility requirements for Appendix B categorical exclusion (“integral elements”) of 10 CFR 1021, Subpart D, Appendix B, B(1) through B(4)
3. Is not connected to other actions with potentially significant impacts (see 40 CFR 1508.25(a)(1)) or with cumulatively significant impacts (see 40 CFR 1508.25(a)(2))
4. Is absent extraordinary circumstances that may affect the significance of the environmental effects of the proposed action
5. Is not located on nor directly impacts the Hanford Reach National Monument, Rattlesnake Mountain, Gable Mountain, Gable Butte, within ¼ mile of the Columbia River, other known Traditional Cultural Properties, or properties of historic, archaeological or architectural significance designated by Federal, state or local governments or properties eligible for listing on the National Register of Historic Places, and
6. Is not located on nor cause direct impacts to sensitive species or their habitats, such as old-growth sagebrush.

### Compliance Action

I have determined that the proposed action meets the requirements for Categorical Exclusion B1.3 and that there are no extraordinary circumstance related to this action that may affect the significance of the environmental effects of the action; this action is not “connected” to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211. All activities to be conducted under this Sitewide Categorical Exclusion Determination must be documented with the NEPA Review Screening Form (see Hanford Site Form RL-721) pursuant to *NEPA Analysis at Hanford* and demonstrably meet the criteria described in 1 through 6 above. Accordingly, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This exclusion is being implemented as a one-time yearly application for the proposed action described herein.

  
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Ralph W. Russell, DOE NEPA Compliance Officer

  
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Date