

Sitewide Categorical Exclusion for Routine Maintenance 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 maintenance 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 maintenance 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 exclusion, maintenance is defined as those actions necessary to maintain and preserve buildings, structures, infrastructure, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance also includes replacement-in-kind, which would allow the replacement of outdated technology with more modern technology.

Under the proposed action, DOE would:

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- Maintain buildings including structural repair, repair or replacement of retaining walls and other associated outdoor structures
- Maintain equipment and vehicles
- Remove and/or replace non-radioactive above or below ground tanks and related piping (if there is no evidence of leakage as determined by vapor monitoring wells or other means)
- Undertake erosion control and revegetation adjacent to facilities, and
- Perform surveillance and maintain surplus facilities.

More specifically, routine maintenance includes, but is not limited to:

- Repairing or replacing facility equipment, such as lathes, mills, pumps, and presses
- Repairing or replacing doors, windows, walls, ceilings and floors
- Repairing or replacing roofing
- Servicing plumbing, electrical, communication, fire protection, and other systems in and adjacent to facilities
- Replacing high-efficiency particulate air filters
- Inspecting and treating utility poles
- Repairing rights-of-way, roads and parking areas
- Maintaining and repairing transmission facilities, including conductors of the same voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed transmission lines, and
- Testing and calibrating facility components, subsystems or portable equipment such as control valves, in-core monitoring devices, transformers, and capacitors.
- Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings.

The implementation of these proposed activities may generate materials and incidental quantities of solid, hazardous, radioactive, polychlorinated biphenyl and/or asbestos 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. Wastes would be packaged, staged for transport, transported, and disposed of at onsite or offsite facilities. Incidental materials, such as excess communication cable or electrical wire, may be recycled, reused or disposed of.

In addition, DOE would move equipment and materials necessary to perform routine maintenance services onto and within the Hanford Site, as necessary. Use of the equipment and associated vehicles would generate air pollutants from combustion and possibly limited ground-disturbance, local noise levels would increase, water may be used for dust suppression, 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. 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.¹ 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:

- (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

¹ Routine custodial services are addressed in *Sitewide Categorical Exclusion for Routine Custodial Services*.

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 maintenance 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 window replacement or resurfacing of parking areas for multiple buildings across the Hanford Site. This exclusion may not be applied to routine custodial 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.

This sitewide categorical exclusion may not be applied to proposed actions that would involve the construction of new buildings, structures, infrastructure and equipment. It also may not be applied to actions that would require renovations or modifications to existing buildings, structures, infrastructure and equipment that would result in substantial upgrades or improvements, or significantly extend the useful life, design capacity or function of facilities. It also may not be applied to environmental restoration and waste management activities that involve removal of underground storage tanks and associated piping and containment systems to be in compliance with RCRA Subtitle I (40 CFR Part 280) and other applicable requirements.

This sitewide categorical exclusion may not be applied to facilities in which widespread and persistent contamination would need to be removed to enable maintenance to proceed safely (i.e., major decontamination actions are not allowed), or to facilities contaminated by spent nuclear materials or special nuclear materials. In contrast, it may be applied for actions in which incidental contamination would result from removal of contaminated equipment such as labware, glove and other clothing, and from the removal of spot or minor contamination on the surfaces of equipment, rooms or other interior surfaces of facilities; removal would be accomplished, for instance, by wiping with rags, using strippable latex, and minor vacuuming.


This sitewide categorical exclusion also may not be applied at locations in which previously undisturbed land would be occupied by vehicles, equipment or temporary structures.

Compliance Action

I have determined that the proposed action meets the requirements for Categorical Exclusion B1.3 and that there are no extraordinary circumstances 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.



Ralph W. Russell, DOE NEPA Compliance Officer



Date