

**CATEGORICAL EXCLUSION FOR THE 272-AW BUILDING RENOVATION  
PROJECT CONDUCTED UNDER THE *AMERICAN RECOVERY  
AND REINVESTMENT ACT*, 200 EAST AREA,  
HANFORD SITE, RICHLAND, WASHINGTON**

**Proposed Action**

The U.S. Department of Energy, (DOE) Office of River Protection (ORP) and the Richland Operations Office (RL) propose to renovate the 272-AW Building in FY 2010 through FY 2011.

**Location of Action**

The work will take place at the 272-AW Building, located within the 200 East Area, Hanford Site, Richland, Washington.

**Description of Proposed Action**

The 272-AW building is located on Canton Avenue in the 200 East Area, and it consists of a single-story building. The 272-AW building is landscaped and located within a developed area where active utilities and currently used roads are readily accessible. The building was originally 18,000 square feet, and in fiscal year 1992 it was remodeled. The 1992 expansion added an addition wrapping around the west and south sides of the existing building, bringing the total square footage up to approximately 29,000.

The 272-AW building needs to be repaired and refurbished due to the age, deterioration, and general wear and tear of the facility. A number of deficiencies, including life safety code issues, have been identified for the 272-AW building that will be fixed as part of this renovation.

Representative types of building renovations planned include the following:

- Prepare existing 272-AW roof to receive foaming seal (approximately 28,000 square feet of roof surface).
- Apply foam seal to 272-AW roof (approximately 38,000 square feet of roof surface.)
- Remove and replace all vinyl flooring throughout 272-AW (approximately 14,250 square feet) and cove /base material (approximately 200 linear feet) inclusive of all necessary floor preparation.
- Replace floor tiles in kitchen areas.
- Replace men's and women's office bathroom ceramic tile with vinyl flooring. Remove wall tile up to 4 feet in height and replace with wainscot.
- Removal and disposal of existing carpeting throughout the office area and replace with new carpeting (approximately 14,250 square feet) including all floor preparation and new cove/base (approximately 200 linear feet).

- In main office men's and women's restroom remove and replace water closets (10), sinks (10), partitions (6), and plumbing fixtures (10).
- Remodel men's and women's locker rooms including: replacing showers (15), sinks and counter tops (6); water closets (8); privacy partitions (15); clean and paint lockers; upgrade and install new lights; refurbish walls and ceilings as needed; and re-tile the floor bringing area up to code (approximately 480 square feet).
- Repair wall and ceiling drywall as needed.
- Prepare and repaint all existing painted walls throughout the facility (approximately 29,000 square feet of surface area) with two coats of paint.
- Replace electric water heater, remove obsolete system piping, and install new piping and insulate piping.
- Upgrade fluorescent lighting fixtures throughout facility.
- Removal and disposal of existing interior T12 light fixtures, install replacement energy efficient T8 light fixtures (141) throughout the facility inclusive of all suspended ceiling system adjustments. Remove and dispose of all exterior mounted lights (6) and install replacement fixtures.
- Remove and replace the main office area restroom water heater; remove and replace the recirculation water pump, remove and replace the cold and hot water supply piping to and from the men's and women's office area restrooms including all fittings and insulation.
- Remove and replace all exhaust fans in the locker rooms and office area restrooms.

The above proposed actions will be performed entirely within the 272-AW building and no adverse ecological or cultural/historic impacts will occur. The 272-AW building is classified as a historical non-contributing/exempt property under DOE/RL-97-56, *Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan*, Revision 1, as listed within Table A.7, "Non-Contributing/Exempt Properties", page A.30. All equipment, flooring, fixtures, etc. will be properly recycled or disposed of, as needed, in an appropriately licensed treatment, storage, and disposal facility.

A temporary construction laydown will be set up immediately adjacent to the 272-AW building. The laydown area is necessary to support the renovation as it will serve as a storage location for the construction/renovation supplies, equipment, and debris (prior to disposal), and it will contain the trailers to temporarily house the displaced and construction employees needed to support the renovation work. A second laydown area will also be set up immediately adjacent to the 272-AW building to serve as an access, equipment staging, and storage location for the roofing contractor's crew and supplies. Figure 1 is an aerial photograph showing the relative locations of the 272-AW building, the two laydown areas, the connex box, the three temporary trailers, and the dumpster.

The laydown areas include the following:

- One (1) 10 feet by 40 feet connex box for storage. 120 volt power will be provided via above ground cable (extension cord will be run from an existing power panel). This will provide sufficient power to support operation of the connex lights and small tool receptacles. The connex will be located on the east side of the 272-AW building.
- One (1) temporary trailer about 10 feet by 40 feet will be installed to serve as a shower / locker room. This is a self contained trailer that will have both fresh water holding tanks and waste water holding tanks. The Mission Support Contractor (MSC) will service this trailer's water supply and waste removal. The trailer will be "dry", i.e., no water or sewer connects are required so there will be no need for water and sewage tie-ins. The trailer will only contain three (3) shower stalls and a locker/change area. This trailer will not contain restrooms or sinks. The trailer installation will include hook up to an existing electricity source. Trailer will be leveled, tied down, and two (2) access steps will be attached in front of each door.
- One (1) temporary office trailer approximately 10 feet by 60 feet will be used for housing 272-AW employees and construction employees as needed. The trailer will be "dry", i.e., no water or sewer connects are required. The trailers installation will include hook up to an existing electricity source, HLAN, and phone. Trailers will be leveled, tied down, and two (2) access steps will be attached in front of each door.
- One (1) temporary contractor office trailer approximately 10 feet by 30 feet will be used for housing contractor construction employees as needed. The trailer will be "dry", i.e., no water or sewer connects are required. The trailers installation will include hook up to an existing electricity source, HLAN, and phone. Trailers will be leveled, tied down, and access steps will be attached or installed as needed.
- One (1) large construction dumpster approximately 22 feet long by 8 feet wide and 6 feet high that will be used to collect and store waste prior to disposal.

Excavation may be required for the underground conduit and panel pads for the trailer(s) electrical supply. Some minor grading may be required to install the leveling blocks for the trailers. The amount of material brought to the site will be minimized to just what is needed to support the work, and all renovation material that is not stored inside the 272-AW building will be locked up in the connex described above. The proposed construction laydown actions will be performed entirely within the existing disturbed area (see Figure 1 below) and no adverse ecological or cultural/historic impacts will occur. The proposed laydown area is considered culturally exempt under Battelle letter 9405630, "*Cultural Resources Exemption of the Tank Farm Areas*".



Figure 1. Aerial photograph showing an example of the relative locations of the temporary connex box, the three associated trailers, the dumpster, and the roofing contractor's laydown/staging area in relation to 272-AW.

### **Categorical Exclusions to be Applied**

The following categorical exclusions (CXs) are listed in 10 CFR 1021, “National Environmental Policy Act Implementing Procedure,” Subpart D, Appendix B, published in the Tuesday, July 9, 1996, 61 Federal Register 36222:

- 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. 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).
- B1.15 Siting, construction (or modification) and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated 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 those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; employee health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (including security posts); fire protection; and similar support purposes, but excluding facilities for waste storage activities, except as provided in other parts of this appendix.
- B2.1 Modifications of an existing structure to enhance workplace habitability (including, but not limited to: improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation; and noise reduction).
- B1.22 “Relocation of buildings (including, but not limited to, trailers and prefabricated buildings) to an already developed area where site utilities and roads are available and demolition and subsequent disposal of buildings and support structures (including, but not limited to, smoke stacks and parking lot surfaces).”

## Eligibility Criteria


Since no extraordinary circumstances that may affect the significance of the environmental effects of the proposal have been identified, the proposed activity meets the eligibility criteria of 10 CFR 1021.410(b), as shown in the following table. The proposed activity is not “connected” to other actions with potentially significant impacts (40 CFR 1508.25[a][1]), or with cumulatively significant impacts (40 CFR 1508.25[a][2]), and is not precluded by 10 CFR 1021.211.

The “Integral Elements” of 10 CFR 1021 are satisfied as discussed below.

<b>INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, APPENDIX B</b>	
<b>Would the Proposed Action</b>	<b>Comment or Explanation</b>
Threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including requirements of DOE and/or Executive Orders?	No applicable laws, regulations, or orders would be violated by the proposed actions.
Require siting and construction or major expansion of waste storage, disposal, recovery or treatment facilities (including incinerators)? The proposal may include categorically excluded waste storage, disposal, recovery or treatment actions.	Action does not require siting and construction of waste storage, disposal, recovery or treatment facilities.
Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?	There will be no uncontrolled or unpermitted releases associated with the proposed actions.
Adversely affect environmentally sensitive resources including but not limited to: (i) Property (e.g., sites, buildings, structures, objects) of historic, archeological, or architectural significance designated by Federal, state, or local governments or property eligible for listing on the National Register of Historic Places. (ii) Federally-listed threatened or endangered species or their habitat (including critical habitat), Federally proposed or candidate species or their habitat or state-listed endangered or threatened species or their habitat. (iii) Wetlands regulated under the Clean Water Act (33 USC 1344) and floodplains. (iv) Federally- and state-designated wilderness areas, national parks, national natural landmarks, wild and scenic rivers, state and Federal wildlife refuges, and marine sanctuaries. (v) Prime agricultural lands. (vi) Special sources of water (such as sole-source aquifers, wellhead protection areas, and other water sources that are vital in a region. (vii) Tundra, coral reefs, or rainforests?	None of the environmentally sensitive resources listed (i through vii) will be adversely affected by the proposed actions.  (i) Proposed action does not adversely affect historical/cultural resources (ii) Proposed action does not adversely affect ecological resources (iii) N/A (iv) N/A (v) N/A (vi) N/A (vii) N/A

Documentation for each use of the categorical exclusions would be maintained according to contractor procedures and DOE requirements.

Compliance Action: I have determined that the proposed action meets the requirements for the referenced Categorical Exclusions. Therefore, using the authority delegated to me by DOE Order 451.1B, Change 1, I have determined that the proposed activities may be categorically excluded from further NEPA review and documentation.

Signature/Date:  08/16/10  
R. W. Russell III  
Hanford NEPA Compliance Officer