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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

07-ESQ-137

AUG 29 2007

Mr. C. M. Murphy, President
and Chief Executive Officer
Fluor Hanford, Inc.
P.O. Box 1000
Richland, Washington 99352

Dear Mr. Murphy:

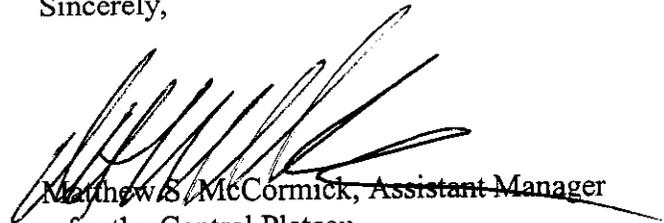
CONTRACT NO. DE-AC06-RL13200 – APPROVAL OF CATEGORICAL EXCLUSION FOR
T-PLANT ROOF ADDITION 200 WEST AREA, HANFORD SITE, RICHLAND,
WASHINGTON

The purpose of the letter is to respond to the July 30, 2007, (FH-0701605) request for approval of the National Environmental Policy Act (NEPA) Categorical Exclusion for the T-Plant Roof Addition. The U.S. Department of Energy, Richland Operations Office has reviewed your request and the Categorical Exclusion was signed by the NEPA Compliance Officer on August 3, 2007. A copy of the signed Categorical Exclusion is attached for your information.

If, in my capacity as a Contracting Officer's Representative (COR), I provide any direction which your company believes exceeds my COR authority, you are to immediately notify the Contracting Officer and request clarification prior to complying with the direction.

If you have any questions, please contact me, or your staff may contact Mark French, of my staff, on (509) 373-9863.

Sincerely,



Matthew S. McCormick, Assistant Manager
for the Central Plateau

ESQ:RWR

Attachment

cc w/attach:
S. W. Bork, FHI
M. T. Jansky, FHI
J. L. Nuzum, FHI
M. S. Strickland, FHI
Administrative Record
Environmental Portal

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Attachment
07-ESQ-137

Categorical Exclusion for T-Plant Roof Addition
200 West Area, Hanford Site, Richland, Washington

**CATEGORICAL EXCLUSION FOR
T PLANT ROOF ADDITION
200 WEST AREA, HANFORD SITE, RICHLAND, WASHINGTON**

Proposed Action

The U.S. Department of Energy, Richland Operations Office (RL), needs to add a new roof over the old roof of the 221-T Building (T Plant). The existing flat asphalt/gravel roof is leaking and the new roof will prevent future leaks and extend the useful life of the building.

Location of Action

200 West Area, Hanford Site, Richland, Washington (Figure 1).

Description of Proposed Action

The proposed action would involve addition of a sloping metal roof structure on the 221-T Canyon and on a small portion of the adjoining 271-T administration building.

- Removing roof top structures such as the existing metal stairway and portions of the unused ventilation equipment.
- Removing existing roofing asphalt/gravel material only as required for installation of the structural standing seam metal roof components.
- Installing the roof addition on the 221-T Building and a portion of 271-T Building.
- Enclosing remaining ventilation equipment located on the roof of the 221-T Building with a metal-framed structure and integrated to the roof system.
- Installing new metal wall panels around the penthouse structure and along the exposed portion of the 160-foot long wall between the 221-T and 271-T Buildings.
- Installing flashing where structures and tubing penetrate the roof system and where the wall panels interface with the 221-T and 271-T Buildings.
- Installing roof drainage around all walls to allow proper drainage and no standing water.
- Removing the existing louver house from the penthouse on the 271-T Building.
- Repairing existing 271-T Building roofing with like materials as required.

Construction activities are scheduled to start in FY 2007 and be completed in FY 2007.

Categorical Exclusion (CX) to be Applied

The following CX is listed in Title 10, Code of Federal Regulations (CFR) 1021, "National Environmental Policy Act Implementing Procedures," 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). 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 reseeding 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).

ELIGIBILITY CRITERIA

Since there are no extraordinary circumstances that may affect the significance of the environmental effects of the proposal, 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.

INTEGRAL ELEMENTS 10 CFR 1021, SUBPART D, APPENDIX B	
Would the Proposed Action:	Comment or explanation:
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, 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.	Wastes generated during the proposed action would not require expansion/modification of existing waste management facilities.
Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No. There would be no uncontrolled or unpermitted releases.
<p>Adversely affect environmentally sensitive resources including, but not limited to:</p> <ul style="list-style-type: none"> (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 U.S.C. 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? 	<p>The 221-T Building has been designated as a signature facility and the 271-T Building has been designated as a contributing property under DOE/RL-97-56, Rev. 1, <i>Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan</i>. None of the environmentally sensitive resources listed (i through vii) will be adversely affected.</p> <p>The proposed action would not affect the qualities of the properties that qualify them for listing on the National Register. In fact, the proposed action will have a beneficial effect in that it will prevent water intrusion within the facilities and prolong the life of the T Plant Buildings.</p>

CULTURAL AND BIOLOGICAL RESOURCES REVIEWS

The National Register-eligible 221-T and 271-T Buildings are both contributing properties within the Hanford Site Manhattan Project and Cold War Era Historic District with documentation required. The 221-T Building has also been designated a DOE Signature Facility. As directed by provisions of the *Hanford Site Manhattan Project and Cold War Era Historic District Treatment Plan* (Treatment Plan) (Marceau 1998), Historic American Engineering Record level documentation was completed for 221-T and Historic Property Inventory Form level documentation was completed for 271-T.

A cultural resources review (CRR) specifically for the project was conducted (HCRC #2007-200-023). In accordance with 36 CFR 800.4, RL has transmitted the CRR to the State Historic Preservation Officer (Letter, 07-SED-0293, D. Shoop, RL, to A. Brooks, SHPO, "Transmittal of Cultural Resources Review (CRR) for Roofing of 221-T and 271-T (T Plant) Buildings, Hanford Site, Benton County, Richland, Washington," dated June 15, 2007). Therein, RL found that the proposed action would not affect the qualities of the properties that qualify it for listing on the National Register; the proposed action will have a beneficial effect in that it will prevent water intrusion within the facilities and prolong the life of the T Plant Buildings. The State of Washington Department of Archaeology and Historic Preservation has issued a determination of "No Adverse Effect" for the proposed project (Letter, S. Mathison, DAHP, to D. Shoop, RL, "Reroof NO Adverse Effect," dated June 25, 2007).

A biological review specifically for the project has been conducted (Letter, M. Sackschewsky, PNNL, to P. W. Martin, FH, "Biological Review of the T Plant Complex/WSD Project, 200W Area, ECR #2007-200-024," dated May 18, 2007). It was noted that migratory birds commonly nest on the exterior of buildings on the Hanford Site, including the 221-T Canyon Building; the nesting season is nominally March 1 through July 15. The review indicated that personnel should be aware of the potential for nesting birds, making appropriate contact with PNNL staff should any be observed. With this caveat, no adverse impacts to species or other biological resources are expected to result from the proposed action.

Compliance Action: I have determined that the proposed action meets the requirements for the referenced CX. 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:

 7/3/07

R. W. Russell
Hanford NEPA Compliance Officer

cc:

M. T. Jansky, FH
P. W. Martin, FH
B. B. Nelson-Maki, FH

A. L. Rodriguez, RL
R. S. Weeks, PNNL

The following checklist summarizes environmental impacts that were considered

IMPACT TO AIR

	Would the proposed action:	YES	NO
1.	Result in more than minor and temporary gaseous discharges to the environment?		X
2.	Release other than nominal and temporary particulates or drops to the atmosphere?		X
3.	Result in more than minor thermal discharges?		X
4.	Increase offsite radiation dose to >0.1 mrem (40 CFR 61 Subpart H)?		X

IMPACT TO WATER

	Would the proposed action:	YES	NO
5.	Discharge any liquids to the environment?		X
6.	Discharge heat to surface or subsurface water?		X
7.	Release soluble solids to natural waters?		X
8.	Provide Interconnection between aquifers?		X
9.	Require installation of wells?		X
10.	Require a Spill Prevention Countermeasure and Control Plan (40 CFR 112 and 761).		X
11.	Violate water quality standards (WAC 713-200, Table 1)		X

IMPACT TO LAND

	Would the proposed action:	YES	NO
12.	Conflict with existing zoning or land use?		X
13.	Involve hazardous, radioactive, PCB, or asbestos waste?		X
14.	Cause erosion?		X
15.	Require an excavation permit?		X
16.	Disturb an undeveloped area?		X

GENERAL

	Would the proposed action:	YES	NO
17.	Disturb Arid Lands Ecology or Wahluke Slope Reserves		X
18.	Cause other than a minor increase in noise level?		X
19.	Make a long-term commitment of large quantities of nonrenewable resources?		X
20.	Require new utilities or modifications to utilities?		X
21.	Use pesticides, carcinogens, or toxic chemicals?		X
22.	Require a radiation work permit?	X	

Items marked "yes" in the Environmental Impact Checklist located above, are addressed in the following paragraphs:

22. Before starting work, a radiation work permit would be required.

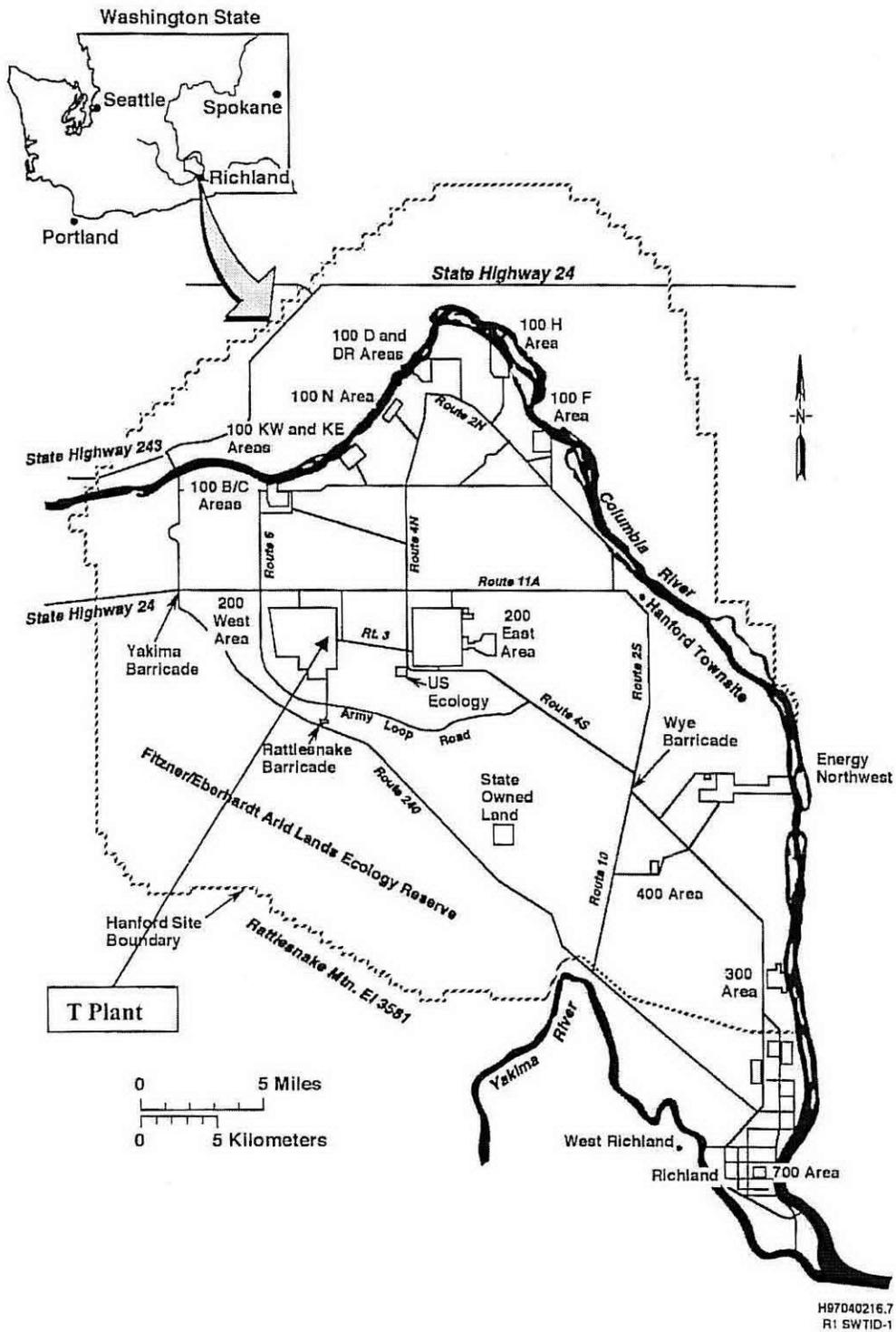


Figure 1. Hanford Site.