DOE-ID NEPA CX DETERMINATION IDAHO NATIONAL LABORATORY

Page 1 of 2 CX Posting No.: DOE-ID-ICP-16-010

SECTION A. Project Title: RWMC – Transuranic Analytical Laboratory Closure (Cold, Dark and Dry)

SECTION B. Project Description

The Analytical Laboratory located at the Radioactive Waste Management Complex (RWMC) will be placed in a cold, dark, and dry status. The laboratory was used to analyze samples for use in characterizing transuranic (TRU) waste for Waste Isolation Pilot Plant (WIPP). There is no work scope in the current contract to support use of the laboratory. The samples are sent to an off-site laboratory.

The equipment inventory includes glove boxes, hoods, a ventilation system, a water demineralization system, safety showers, eyewash stations, propane generator, liquid propane tank, refrigerators, freezers, and a liquid nitrogen tank.

<u>Specific actions include:</u> Disconnect the electrical line at the box located outside of the trailer. Deactivate the alarms. Disconnect heat system. Disconnect and remove the propane tank. Isolate contaminated hood and glovebox exhaust systems. Remove chemicals. Leave in place empty nitrogen Dewars. Seek reuse for equipment and if not found leave equipment in place. Disconnect the potable and fire water lines. Isolate fire water connections within ten (10) feet of the water main. Drain wet systems (demin, potable, and firewater). Fill and contour the area of soil disturbance.

The analytical laboratory is not connected to the RWMC Sanitary Waste System. The facility does not contain appreciable amounts of radiological material. No samples are stored in the laboratory.

SECTION C. Environmental Aspects / Potential Sources of Impact

1. Air Pollutants -Laboratory operations generated emissions including radionuclide emissions. The laboratory is equipped with laboratory hoods and HEPA exhaust units for emission containment and abatement. The exhaust and glove box fume hood ventilation and skirts will be sealed with tape. The blowers will be wrapped with heavy plastic. The filters will not be removed. The stacks will be sealed with metal caps. The activities will be conducted in a manner that will not result in the generation of any radiological emissions.

Fugitive dust emission will be generated should heavy equipment be used to perform the digging and fill activities to support the air-gap of the fire and potable water lines. All diesel- powered equipment emissions are exempt per IDAPA 58.01.01.222.02.e.

4. Chemical Use and Storage -To support laboratory operations, typical laboratory chemicals were used. Gases such as helium, P10, nitrogen, hydrogen compressed air, and liquid argon were used in the laboratory. Chemical Services has inventoried the product chemical inventory and the inventory has been placed on the MEP program.

Free-released household chemical items as such as Windex, Static Guard etc., will be use at RWMC for maintenance and operations. The chemicals that can be free released will be transferred to WMF-609 for storage. The chemicals that cannot be free released because of radiological contamination will remain at RWMC and those that cannot be used will be transferred to WGS heated storage in WMF-609. Many of the radiologically-contaminated chemicals can be used in radiological areas at RWMC-ARP for maintenance and operations.

8. Drinking Water Contamination - Water for the safety showers and water demineralization system are supplied by the RWMC Potable Water System.

DOE-ID NEPA CX DETERMINATION IDAHO NATIONAL LABORATORY

The fire water and potable water lines will be isolated from the RWMC Facility lines. A subcontractor will air gap both lines. The potable water will also be turned off at the valve outside the building and the service connection for the trailer needs to be excavated and capped as near as possible to the 4-inch water main.

9. Hazardous/Mixed Waste Generation and Management – Project personnel are working to find a use for platinum (radiochemistry planchets) that are currently stored in the laboratory. If a use is not found, the planchets will be disposed of as mixed waste.

Secondary hazardous and mixed low-level waste may be generated from closing laboratory. This waste will contain radionuclides and hazardous constituents. Secondary waste may include personal protective equipment (PPE), decontamination debris, and equipment. Mixed low-level waste will be treated/disposed of through Waste Generator Services. Waste Generator Services manages the waste in appropriate Temporary Accumulation Areas until it is shipped to an appropriate off-site treatment/disposal facility.

10. Hazardous/Rad. Material or Waste Handling and Trans -A hazardous waste determination will be performed for waste streams to develop the appropriate management practices. Waste streams will be evaluated to determine if any of these materials can be recycled or reused and will be evaluated to implement actions for minimizing waste entering the landfill.

11. Industrial Waste Generation and Management -Limited quantities of industrial waste will be generated from closing the laboratory operations. This waste stream will be disposed of at the INL Landfill Complex.

13. Managing Property and Materials – Equipment and materials may be excessed for reuse or offered for sale.

15. Radioactive Materials Use and Storage - Radioactive source materials will be stored in the WMF-609 heated storage cargo until reuse or disposal.

16. Radioactive Waste Generation and Management - Secondary radioactive waste will be generated in the form of PPE and decontamination residues. These waste streams will be managed through Waste Generator Services and disposed of offsite.

SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

Note: For Categorical Exclusions (CXs) the proposed action must not: 1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) 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; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: B1.28, Minor activities to place a facility in an environmentally safe conditon, no proposed uses

Justification: The actions to close the Transuranic Analytical Laboratory and place the facility in a cold, dark and dry status do not significantly impact the environment.

s the project funded by the America	n Recovery and Reinvestment Act of 2	009 (Recovery Act)	🗌 Yes 🛛 No
-------------------------------------	--------------------------------------	--------------------	------------

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on November 14, 2016.