

SECTION A. INTEC – Repackaging of Lead Blankets

SECTION B. Project Description

Evaluate and disposition an inventory of legacy lead blankets currently in storage. The lead blankets were used to shield workers from radioactively contaminated soil following excavation in the INTEC Tank Farm during the early 1990's for the Tank Farm upgrade project. The lead blankets were removed from the Tank Farm prior to paving the area in 2017 and have been managed as shielding for potential reuse. They were double wrapped in plastic, J sealed, and the condition and integrity of the bags and blankets are unknown at this time.

Thirteen wood boxes containing approximately 4000 pounds of various sizes of lead blankets per box will be relocated and repackaged. The legacy lead blankets will be moved from storage to a repackaging tent to be constructed on an existing asphalt pad. The tent and air handler system will be built to support waste repackaging efforts. Lead repackaging will be performed in accordance with work control documentation.

Once the wooden boxes are opened, the condition of the lead and previous packaging will be evaluated. Lead identified for disposition will be transferred one blanket at a time from the wooden boxes into the new metal waste containers and managed as mixed waste. The boxes will be transferred for macroencapsulation and performed in accordance with existing environmental and permitting documentation. The macroencapsulated waste boxes will shipped to an offsite waste disposal facility.

SECTION C. Environmental Aspects / Potential Sources of Impact

Air Pollutants – To address air emissions while performing repackaging actions, the tent will be equipped with an air handler, to provide negative pressure ventilation, and radiological and lead containment. This ventilation system will also be used to provide a local exhaust to support any dust generating activities.

Forklifts will be used to move and manipulate the new metal waste boxes and the old wood boxes containing the old lead blankets. Mobile equipment includes forklifts, cranes and transport vehicles, which are powered by diesel fuel. As mobile equipment, such equipment is exempted as mobile internal combustion engines per IDAPA 58.01.01.222.02.e.

Radionuclide Release/Protection of the Public and the Environment – The lead repackaging actions are not likely to release radionuclides to the environment because of the design and operation. However, any potential releases would not exceed as low as reasonably achievable goals as the releases are far below applicable regulatory standards (e.g., NESHAP) and satisfy the exemption criteria.

Chemical Use and Storage – Chemicals may include those used during tent fabrication (welding rods, primers, paints, sealants etc.) and fuel. As applicable, project personnel will use non-hazardous chemical substitutes in place of hazardous chemicals as long as the non-hazardous substitutes meet the requirements/ specifications of the project. Spill prevention/minimization measures will be employed during storage and chemical use.

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

Waste Generation and Management – Lead blankets identified for disposal will be managed as mixed waste (storage and treatment in generator accumulation areas or onsite RCRA-permitted facilities) pending shipment to an offsite disposal facility. Hazardous waste may also be generated from equipment and components as a result of managing the lead blankets. Hazardous wastes will be stored, treated, and or disposed in compliance with applicable RCRA regulations at an EPA permitted treatment, storage, and disposal facility in accordance with the facility's waste acceptance criteria.

A RCRA permit modification has been submitted and approved for lead macroencapsulation.

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Activities performed inside contaminated areas will result in some radioactive waste. Typical types of waste will include anti-contamination clothing, radiation enclosures and barriers, contaminated materials and components, and contaminated absorbent used to clean up small spills. Such waste will be characterized to determine whether it also requires management as hazardous waste due to lead (mixed waste).

Industrial (nonhazardous, nonradioactive waste) waste may also be generated. Such waste will be managed and disposed of in compliance with applicable regulation and procedures.

Managing Property and Material – Project personnel implemented waste minimization actions to use the original wooden boxes (RCRA empty containers) repurposed as waste containers. The boxes will be used for packaging radioactive waste for disposal rather than disposing 13 empty boxes.

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: B6.1, Cleanup actions

Justification: The action is a small-scale, short-term RCRA cleanup action to reduce the risk of release of a hazardous substance to the environment.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on December 7, 2020.