

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: TRA-662 Machine Shop Equipment Relocation

### SECTION B. Project Description and Purpose:

The Advanced Test Reactor Complex machine shop, building TRA-662, contains old machines/equipment that need to be removed and sent to excess property for resale/reuse, freeing up floor space for new machines. The proposed scope of work covers removal, disposition, decontamination, trade-in for purchase of new machines and excessing equipment currently located at TRA-662. Procurement and installation of new machines, along with minor remodeling needed for installation of these new machines is also covered by this ECP.

In preparation for determining possible disposal, reuse or recycle options, paints and oils of certain TRA-662 machines were sampled for PCB's. Results showed that two machines had >50 ppm PCB's in the paint, limiting the option for resale/reuse/recycle. The two machines with PCB's in the paint were a large horizontal bed milling machine (222015) and a large horizontal boring machine (222013).

Options for these two machines were considered, one of which was to have Premier Technology purchase and use them for training machinists and fabricators and also use them for manufacturing in support of INL projects. Before these machines can be sold (distribution in commerce) they would have to be decontaminated per 40 CFR 761.79 requirements (paint removed to NACE Visual Standard No. 2.). It was determined that while INL still has ownership, Premier Technology will be contracted to decontaminate these machines at their facility. Once decontaminated, Premier Technology would then purchase them from INL through the excess property process. The machines will be moved out of TRA-662 by BEA personnel and loaded onto Premier Technology trailers. Premier Technology would be responsible for transporting them to their facility in Blackfoot, Idaho for decontamination.

Activities covered by this ECP are:

Removing and staging equipment, including disconnection of utilities (electrical and compressed air) required for transporting, and transport

Relocating equipment into TRA-662 machine shop

Excessing old equipment from TRA-662 machine shop

Installing new equipment in TRA-662, including minor remodeling needed to install the equipment.

### SECTION C. Environmental Aspects or Potential Sources of Impact:

#### Air Emissions

N/A

#### Discharging to Surface-, Storm-, or Ground Water

N/A

#### Disturbing Cultural or Biological Resources

Due to the age of these machines, a Cultural Resource Review was completed, see CRMO Project Number: BEA-20-H127.

#### Generating and Managing Waste

Premier Technology will be contracted by BEA to decontaminate the machines at their facility. This will include removing PCB paint from the machines to the decontamination standard identified in 40 CFR 761.79 (NACE Visual Standard No. 2). The paint removed from these machines will be managed and disposed by Premier Technology. Copies of disposal documentation (e.g. certificate of disposal) will be provided to BEA from Premier Technology.

#### Releasing Contaminants

PCB paint will be removed from these machines in order to meet the decontamination standard identified in 40 CFR 761.79 (NACE Visual Standard No. 2f). Paint is also likely to be RCRA hazardous for metals (Pb, Cr, etc.). Premier will decontaminate this equipment at their facility and according to their company procedures.

Chemical products such as lubricants may be used by BEA while moving them out of TRA-662. All chemicals used will be approved in the Comply Plus Chemical Management System.

#### Using, Reusing, and Conserving Natural Resources

These machines are valuable usable equipment that will be decontaminated and used as they were intended. The machines would have to be disposed of and most likely not recycled (due to PCB paint) if they were not decontaminated. Continued use of these machines will keep them from being disposed and eventually could be recycled as scrap metal.

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**SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification:** Identify the applicable categorical exclusion from 10 Code of Federal Regulation (CFR) 1021, Appendix B, give the appropriate justification, and the approval date.

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, or similar requirements of Department of Energy (DOE) or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment or facilities; (3) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources (see 10 CFR 1021). In addition, no extraordinary circumstances related to the proposal exist that would affect the significance of the action. In addition, the action is not "connected" to other action actions (40 CFR 1508.25(a)(1)) and is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1608.27(b)(7)).

**References:**

10 CFR 1021, Appendix B, items B1.24, "Property transfers" and B1.31 "Installation or relocation of machinery and equipment."

**Justification:**

The proposed transfer of equipment is consistent with CX B1.24 "Transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land), provided that under reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests," and CX B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts."

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: 10/06/2020