

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: 2018 CFA Excess Facilities Deactivation and Demolition

### SECTION B. Project Description and Purpose:

The purpose of the proposed action is to deactivate, decontaminate, and demolish (DD&D) surplus vacant, inactivated or soon to be inactivated facilities and structures to reduce lifecycle costs associated with surveillance and maintenance. The proposed action would DD&D buildings Central Facilities Area (CFA)-638 and B25-601.

Building B25-601 is the Subsurface Disposal Area (SDA) Engineered Barriers Test Facility (DD&D also analyzed in EC INL-13-075 R1). Personnel evaluated engineered soil covers for the Radioactive Waste Management Complex (RWMC) SDA in this earthen covered bunker. Idaho National Laboratory (INL) placed the facility in a cold, dark, and dry status in the past. The building has electrical hookups but no sewer or water connections.

Building CFA-638, the Dosimetry Calibration Lab, is a 75 year old (1943), 2366 square ft., reinforced concrete earthen covered bunker that the Department of Energy (DOE) used to calibrate dosimetry. The facility has electrical service but no sewer or water connections and is no longer needed.

The proposed action performs the following activities:

- Characterize facilities, including waste stream determinations and project development
- Prepare building sites, including mobilization, equipment staging, and surface improvements
- Isolate building utilities, e.g., electrical, communication, ventilation, and life safety
- Remove and manage radiological contamination
- Remove building equipment, e.g., pumps, light fixtures, electrical panels and switch boxes, appliances, and cabinets
- Remove buildings and concrete footers/piers to 3 ft. below grade (below grade structures and intact concrete slabs remain in place if appropriate)
- Dispose and/or recycle/reuse building components and equipment when practical or feasible
- Grade site to match the surrounding contour and ground cover (such as lawn, gravel, or native vegetation) and control wind and water erosion.

In characterizing these facilities, the project would only look for lead in the soil if there is evidence that soil contamination has occurred. Project personnel do not expect to take soil samples, unless stains, unfamiliar odors, or other signs of a spill or contamination are present during D&D.

Collection of samples for chemical and radiological analyses would be performed to provide data necessary to minimize health and safety risk to D&D project workers and for developing and completing hazardous waste determinations for waste dispositions. Off-Site laboratories may be used to perform analyses of samples collected.

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

#### Air Emissions

Air emission aspects associated with this project include:

- Fugitive dust/visible emissions during demolition and excavation activities
- Asbestos removal and building demolition
- Mobile combustion equipment such as generators, welders, compressors, and heavy equipment
- Emissions typical of cutting/grinding/welding
- Sealed sources used in CFA-638 will be removed prior to demolition.

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

B25-601 is located within the INL Storm Water Corridor. The project will not disturb more than 1 acre and will not require Storm Water Pollution Prevention Plan, Notice of Intent or Notice of Termination.

#### Disturbing Cultural or Biological Resources

CFA-638 was constructed during the INL's Historic Period of Significance (1942-1970) and is a Category 2 property eligible for listing on the National Register of Historic Places. Mitigation for Category 2 Properties requires photographs of facility interior, when possible, and exterior with large-format, archive processed, black-and-white film. Photographs must include one photograph of each side of the building or structure, oblique photographs showing the relationship of the building or structure to associated buildings or structures or landscape, and interior photographs that illustrate historic features. The photographs must be preserved along with architectural and engineering drawings that depict elevations, sections, details, and historic features; and with available historic photographs of construction, manufacture, and other activities or experiments, when possible. When a Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER) study is required for the key building or structure in a complex, these photographs and other documents become part of the study.

Mitigation for DD&D of CFA-638 has been completed as part of the 2015 Arco Naval Proving Ground (NPG) Historic Landscape Survey (HALS) (Williams, Julie B., et. al. 2015. Idaho National Engineering Laboratory, Arco Naval Proving Ground, Historic American Landscape Survey. HALS ID-1, Idaho Falls: Idaho National Laboratory). Therefore, the project may proceed without further CRMO review.

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

Building B25-601 was built in 1996 and is not eligible for the National Register evaluation.

Project activities have the potential to disturb natural vegetation, and D&D of facilities has the potential to impact nesting birds.

Noxious weeds may grow within the demolition footprint once activities are completed.

### Generating and Managing Waste

The project has the potential to generate hazardous or mixed waste, including components and materials that contain lead, cadmium, and mercury, such as fusible links (sprinkler heads), lead packing on piping, mercury switches, and fluorescent lamps.

The proposed action also has the potential to generate industrial waste such as concrete and structural steel, wood framing, gypsum board, and scrap metal.

The project will generate asbestos containing waste, and CF-638 may contain residual radiological contamination (both fixed and loose).

Because of the age of CF-638, polychlorinated biphenyls (PCBs) containing waste also has the potential to be generated from painted surfaces, wiring, electrical cable insulation, light ballasts, contaminated fixtures, and hydraulic and dielectric fluids. PCBs may also be present in waste residues within tanks, pumps, piping, floor trenches, sumps, and other components.

### Releasing Contaminants

Project activities have the potential to release contaminants from asbestos removal and demolition, chemical use, and PCB contaminated equipment and facility components.

Typical construction chemicals such as fuels, lubricants, adhesives, etc. will be used. All chemicals utilized by this activity will be managed in accordance with laboratory procedures. Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility PEL. If the PEL cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

### Using, Reusing, and Conserving Natural Resources

DD&D activities require the use of various chemicals, including fuels (gasoline and diesel), sealants, adhesives, fixatives, and paints. Project activities remove building structural components, including lead and equipment.

**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:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule. 10 CFR 1021 Appendix B to Subpart D, Categorical Exclusion B1.23 "Demolition and disposal of buildings."

**Justification:** Project activities are consistent with 10 CFR Appendix B to Subpart D, Categorical Exclusion B1.23 "Demolition and subsequent disposal of buildings, equipment, and support structures (including, but not limited to, smoke stacks and parking lot surfaces), provided that 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."

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: 7/11/2018