

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: ATR Complex Outer Areas Asbestos Abatement

SECTION B. Project Description and Purpose:

ATR Complex has several storage tanks and support facilities in the outer areas that are insulated with Asbestos Containing Materials (ACM). These tanks and facilities require ongoing surveillances and maintenance to monitor and repair damaged, degraded, and exposed ACM. The insulation degradation is due to weathering and the age of the initial installation. Replacing the ACM insulation with non-asbestos insulation will eliminate future sample testing, surveillances, and repairs.

The ACM insulation on the storage tanks is typically covered with a wire mesh and a sealant or with metal panels. The storage tanks will require scaffolding and a containment tent to complete the abatement activities. The insulation waste will be containerized and taken to the INL asbestos pit. The in-service tanks will be inspected once all the insulation has been removed. The ladders on each tank will be removed and replaced with new OSHA compliant ladders. New insulation and new metal jacketing will be installed on each tank. The support facilities have associated piping and equipment that contain possible ACM insulation. The insulation on the piping and equipment will be sampled, abated, and reinsulated with new insulation as required. Estimated cost: \$900,000.00

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Working with asbestos has the potential to contribute to air emissions.

Disturbing Cultural or Biological Resources

Activities addressed by this EC have the potential to disturb cultural or biological resources through:

- Constructing or modifying facilities, structures, equipment or processes
- Maintaining or repairing facilities, structures, equipment or processes
- Modifying buildings or structures constructed on the INL before 1970, including Experimental Breeder Reactor-I (EBR-I).

Generating and Managing Waste

Activities addressed by this EC have the potential to generate waste requiring management through:

- Suspect PCB waste will be generated (paint, caulk, adhesives on structures built before 1982 is suspect for containing PCBs)
- Disposing asbestos-containing material
- Disturbing asbestos or removing asbestos-containing material
- Generating wastes.

Releasing Contaminants

Activities addressed by this EC have the potential to release contaminants through:

- Acquiring, using, storing and dispositioning chemicals
- Managing and dispositioning excess property and materials.

Using, Reusing, and Conserving Natural Resources

Activities addressed by this EC have the potential to use, reuse and conserve natural resources related to:

- Generating landfill waste or construction and demolition wastes
- Engaging in sustainable acquisition practices.

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

DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

“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 to subpart D, item B1.16 "Asbestos removal."

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.16 " Removal of asbestos-containing materials from buildings in accordance with applicable requirements (such as 40 CFR part 61, "National Emission Standards for Hazardous Air Pollutants"; 40 CFR part 763, "Asbestos"; 29 CFR part 1910, subpart I, "Personal Protective Equipment"; and 29 CFR part 1926, "Safety and Health Regulations for Construction"; and appropriate state and local requirements, including certification of removal contractors and technicians).

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