

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Removal of PCB Contamination in Building TRA-619

SECTION B. Project Description and Purpose:

Building TRA-619 is located at the Advanced Test Reactor (ATR) Complex at the INL site and houses critical safety related raw water and firewater systems and components. The current floor coating system in Building TRA-619 has been sampled and confirmed to contain Polychlorinated Biphenyls (PCB's). The United States Environmental Protection Agency (EPA) has granted the U.S Department of Energy Idaho National Laboratory (DOE-ID) approval authorization to conduct removal of PCB paint on the floor of the TRA-619 building, followed by interim cleanup in the form of encapsulation of any residual PCB's in the underlying concrete substrate. The proposed work scope is to remove existing floor coating using chemical stripping methods and to encapsulate potential PCB remaining in the floor using two layers of solvent-resistant and water-repellent coating of contrasting colors, along with markings.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Disturbing Cultural or Biological Resources

TRA-619 (Raw Water Pump House) is an exempt property under exemption 6 (utility structures) listed in Table 1 (Idaho National Laboratory Cultural Resource Management Office. Idaho National Laboratory Cultural Resource Management Plan. DOE/ID-10997, revision 6, Idaho Falls, Idaho: U.S. Department of Energy, Idaho Operations Office, 2016, pg 49). As such, the project activities may proceed as described without further cultural resource review.

Generating and Managing Waste

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

- Decontaminating equipment containing or contaminated with polychlorinated biphenyls (PCBs) (From equipment manufactured before 1982)
- Maintaining equipment containing or contaminated with PCBs (From equipment manufactured before 1982)
- Generating wastes.
 - Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals.
 - Hazardous wastes have the potential to be generated during maintenance operations on systems or equipment containing hazardous chemicals, or by using hazardous chemicals to clean or decontaminate equipment and systems.
 - Polychlorinated Biphenyl (PCB) waste could be generated when performing maintenance associated with pre-1982 equipment/materials such as capacitors, lubricants/dielectric fluids, transformers/bushings, painted surfaces and other electrical equipment/components.

Releasing Contaminants

Although not anticipated, chemical use has a potential for small air emissions and spills.

Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would practice sustainable acquisition.

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, B1.17 "Polychlorinated biphenyl removal"

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Justification: Activities are consistent with 10 CFR 1021, Appendix B, B1.17, "Removal of polychlorinated biphenyl (PCB)-containing items (including, but not limited to, transformers and capacitors), PCB-containing oils flushed from transformers, PCB-flushing solutions, and PCB-containing spill materials from buildings or other aboveground locations in accordance with applicable requirements (such as 40 CFR part 761)."

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: 11/06/2017