

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: Advanced Test Reactor (ATR)-1D-N and 2B-SE Asbestos Abatement and Insulation Installation

### SECTION B. Project Description and Purpose:

The experiment loop primary cubicles at the Advanced Test Reactor (ATR) contain all of the “out of pile” piping and equipment to operate the experiment loops. Most of this equipment was originally insulated with Asbestos Containing Material (ACM). This becomes problematic when work needs to be performed on equipment in the cubicle. The purpose of this project is to remove and properly dispose of all ACM insulation within the primary cubicles and then purchase and install appropriate replacement insulation material. Removal and replacement would occur in each cubicle, and possibly other areas of ATR, such as the subpile room, as funding becomes available. Asbestos removal in Loops 1C-W and 2A-C was performed during previous projects and is not part of the proposed action.

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

#### Air Emissions

The removal of the asbestos could create a fugitive dust situation for short periods of time in the cubicle being modified. Asbestos abatement will be performed inside of glove boxes to contain any fugitive fibers.

#### Disturbing Cultural or Biological Resources

Test Reactor Area (TRA)-670 is eligible for nomination to the National Register of Historic Places and removal and/or changes of original features may adversely impact this historical property.

#### Generating and Managing Waste

Maintenance activities may generate a variety of waste. It is anticipated that the following types of waste could be generated:

- 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. Hazardous metal waste (e.g., lead, electronics, brass, metal containing paints, etc.) may also be generated during maintenance work or by replacement of outdated equipment. Note: Lead has been encountered very infrequently (e.g., shielded cables).
- Asbestos waste would be generated.
- 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)).

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**References:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B, B1.16 "Asbestos removal"

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, 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 Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 3/7/2016