

**DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory**

SECTION A. Project Title: Dispose of Old Materials and Fuels Complex (MFC) Security Trailer

SECTION B. Project Description and Purpose:

The old MFC security trailer is a wood-framed, mobile office trailer with a metal chassis. The trailer has not been occupied for at least five years and needs to be disposed. The trailer is approximately 11 feet by 32 feet. It was located by the gun range outside of the MFC perimeter fence. The trailer does not contain operating sanitary facilities or a potable water connection. According to a sign on the exterior of the trailer, the sealant around the tail light and the seam material on the roof contain asbestos. The Backup Technical Point of Contact (TPOC) for Asbestos concluded that the caulking along the vertical seams on the corners of the trailer and the caulking around the exterior of the window may also contain asbestos; however, he characterized it all as Category II non-friable asbestos. The trailer was not attached to a foundation.

The proposed action would dispose of the MFC security trailer at the Central Facilities Area (CFA) Landfill.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The trailer contains Category II Non-Friable Asbestos. Standard operating procedures for the CFA Landfill will not disturb the asbestos. Mobile sources are not regulated under the demolition and renovation provisions of the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). Therefore, the trailer is exempt from 10-day Notification requirements.

Generating and Managing Waste

The sealant around the tail light and the seam material on the roof of the old security trailer contain asbestos. The caulking along the vertical seams on the corners of the trailer and the caulking around the exterior of the windows could also contain asbestos. Therefore this activity will involve disposing of asbestos-containing material.

All solid waste will be disposed through Waste Generator Services.

Releasing Contaminants

All chemicals utilized by this activity will be managed in accordance with laboratory procedures.

SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: Identify 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, B1.24 "Property transfers"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B1.24 "Transfer, lease, disposition, or acquisition of interests in personal 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."

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: 12/9/2015