## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-15-051

SECTION A. Project Title: Central Facilities Area (CFA)-753 and CFA-703 Demolition

## SECTION B. Project Description and Purpose:

The Central Facilities Area (CFA) Building 753 (CFA-753) water storage tank was emptied and piping disconnected in approximately 2005. The age (built in 1952) and poor condition of the tank led facility personnel to go to a single tank (CFA-782) storage system. It was determined that CFA-782 had adequate capacity to meet both potable and fire water needs for CFA. Reduction of the CFA footprint is desired and structures that are no longer needed are the most likely candidates for removal. The proposed project would demolish structures CFA-753 and CFA-703 (microwave tower). Heavy equipment including a trackhoe with process head, dump trucks, front end loaders, etc., would be used to take down, sort, and dispose of these structures. In addition, underground concrete water storage tanks (previously filled in with gravel), located directly to the south of CFA-753, need to have void spaces filled-in for safety. Fill material would be clean gravel from an on-Site gravel source (mostly likely, the Monroe Pit.)

Estimated Start Date: 9/21/2015 Estimated End Date: 9/30/2015 Approximate Cost: \$60,000

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

#### **Air Emissions**

Fugitive dust may be generated during excavation and demolition activities. All reasonable precautions will be taken to control fugitive dust. Dust control methods that are used and the frequency applied will be recorded in the work package dust control log and will be used to show compliance to the Idaho National Laboratory (INL) Tier I Air Permit.

An Environmental Protection Agency (EPA) 10-day demolition notification will be required to be submitted. If necessary, all regulated asbestos containing material (RACM) will be removed by appropriately trained personnel prior to demolition.

#### **Generating and Managing Waste**

The tank paint will be sampled for polychlorinated biphenyls (PCBs). If there are no PCBs in the paint, the tank will be sent to excess property for recycle (carbon steel). If PCBs are present in the paint, the tank will be sent to the INL landfill as PCB bulk product waste. Concrete, soil, tank insulation, metal (unsuitable for recycle) and wood will also be generated. Asbestos waste may be generated if sampling indicates RACM is present. Non-friable Category I ACM in the form of asbestos gaskets will be left in place during demolition. CFA-703 is an unpainted tower and will be sent to excess to recycle the carbon steel scrap metal. All waste will be characterized, stored, and disposed at the direction of Waste Generator Services (WGS). Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible.

## **Releasing Contaminants**

Chemicals such as fuels, lubricants, marking paint, etc., will be used during the project. All chemicals will be authorized for use by INL chemical management procedures. Facilities and Site Services (F&SS) Chemical Coordinators will track the use of all chemicals in the INL Comply Plus chemical management system.

Due to the age of the tank (1952) the paint is suspect for containing PCB's. The tank paint will be sampled for PCB's prior to demolition. Appropriate contamination control methods will be used during demolition of the structure.

All spills will immediately be reported to Environmental Support and Services (ES&S) personnel and the Spill Notification Team. Spill cleanup waste will be disposed at the direction of WGS.

#### Using, Reusing, and Conserving Natural Resources

Scrap metal from both the water tank (if no PCB's in the paint) and microwave tower will be diverted from landfill disposal and recycled as reasonably practical.

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 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

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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, B1.23 "Demolition and disposal of buildings"

**Justification:** Activities are consistent with 10 CFR 1021, Appendix B, 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)

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 9/2/2015