DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-16-090

SECTION A. Project Title: Transfer Waste Management Activities from Central Facilities Area (CFA)-637 to CFA-674

SECTION B. Project Description and Purpose:

Windy conditions recently caused an electrical conduit anchored into the concrete retaining wall of the Hazardous Chemical Storage Facility, Building CFA-637, to fall and disconnect power from the facility. Repair of the retaining wall to restore facility power is not possible due to the age and condition of the facility, and waste handling operations need to be relocated. The proposed action is to move CFA-637 waste handling operations to CFA-674, the Roads and Grounds and Materials Storage building. CFA-674 has a fire sprinkler system, overhead doors, loading docks, concrete floors, phone and data, restrooms, and adequate space. However, the facility would require some modifications.

The Hazardous Chemical Storage Facility, Building CFA-637, is the waste handling facility at the Central Facilities Area (CFA). The building is used for waste management and contains several Satellite Accumulation Areas ([SAAs] for chemical waste storage, mercury containing materials, broken light bulbs and tubes, and Resource Conservation and Recovery Act [RCRA] debris), a 90-day storage area, polychlorinated biphenyls (PCB) storage, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) waste storage, Universal waste storage, radioactive waste storage, and other nonregulated waste storage.

The RMA stores low-level radioactive waste and soil standards with small activity levels. The 90-day storage area provides storage of Resource Conservation Recovery Act (RCRA)-regulated wastes for short-term storage prior to shipment to a RCRA-regulated storage or disposal facility. Typical wastes stored in the facility are paints, solvents, spill cleanup materials, and other chemicals generated from maintenance activities around CFA. However, on occasion, unknown materials are discovered that require sampling and analysis to characterize the waste. In the past, this included gasoline, used motor oil, organic liquids, and sludge. The chemical storage SAAs collects maintenance types of chemicals that are no longer usable. This waste is usually chemical test kits, paints, aerosols, and other flammable types of waste. On occasion, acids and bases are generated. The acids, bases, and flammables are all stored separately to prevent potential reactions.

Addition of a lockable fenced area (approximately 60 ft. X 40 ft.) to the northeast corner of CFA-674 is needed. The fence would be bolted into the concrete floor and would have lockable access gates to prevent unauthorized entry. Project activities also include minor repairs to CFA-674 including painting floors and patching and painting damaged walls. Electrical and data re-routing would also be completed as necessary. Secondary containment (e.g., pallets, drip pans, etc.) would be needed to store certain wastes due to a lack of curbing on the concrete floor.

Equipment located in CFA-637, including spill control materials, waste containers, scales, packing material, flammable cabinets, storage cabinets, desks, chairs, computers, file cabinets, books, fire extinguishers, etc., would be moved to CFA-674. Registration paperwork, RCRA contingency plan, and other documentation would have to be updated with the change of location.

When operating, CFA-674 would have a 90-day Storage Area, SAA, Universal Waste Storage Areas, TSCA Storage Area, Asbestos Storage Area, Low-Level Waste Storage, Mixed Waste (in SAA or temporary accumulation area [TAA]), RCRA Scrap Metal Storage, Battery Storage for Recycle, Used Oil containers, and Used Antifreeze Containers.

CFA-637 would be decontaminated and decommissioned. The facility would be demolished, and the site returned to grade. The cement pad upon which the facility is built would also be removed. There are no water or sewer connections to CFA-637.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

There will be a small amount of emissions (volatile organics) from opening/closing waste storage containers. Waste storage tanks are not anticipated. The waste management area will not have a dedicated exhaust or stack; the area vents through the general building vents. Waste container lids are secured when not adding or removing waste. An Air Permitting Applicability Determination is not required.

Disturbing Cultural or Biological Resources

CFA-674 is older than 1970 and modifications would require Cultural Resource review. The modifications to CFA-674 are all on the interior of the building.

Generating and Managing Waste

Typical industrial (non-hazardous, non-radioactive) waste such as scrap metal will be generated during modifications to CFA-674. Asbestos containing waste may be generated. The building is older than 1982 and all painted materials will be treated as suspect for containing PCBs.

Releasing Contaminants

The paint in CFA-674 is older than 1982 and is suspect for containing PCBs. Contamination control methods would be required if disturbing the suspect PCB paint.

The CFA-674 Waste Handling Facility will have spill control equipment on hand and would adhere to the RCRA Contingency Plan. There are no floor drains in this area of the building.

Using, Reusing, and Conserving Natural Resources

Excess materials such as equipment, wood, wire, conduit, and scrap metal will be diverted from the landfill and excessed, reused, and/or recycled to the extent practicable.

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 to Subpart D, B6.10 "Upgraded or replacement waste storage facilities"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B to Subpart D, B6.10, "Siting, construction, modification, expansion, operation, and decommissioning of a small upgraded or replacement facility (less than approximately 50,000 square feet in area) within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible) for storage of waste that is already at the site at the time the storage capacity is to be provided. These actions do not include the storage of high-level radioactive waste, spent nuclear fuel or any waste that requires special precautions to prevent nuclear criticality. (See also B6.4, B6.5, B6.6 of this appendix, and C16 of appendix C.)

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: 8/3/2016