

**GENERIC CATEGORICAL EXCLUSION FOR TRANSFER ACTIONS,
PACIFIC NORTHWEST NATIONAL LABORATORY,
RICHLAND, WASHINGTON**

Proposed Action:

The U.S. Department of Energy (DOE) Pacific Northwest Site Office (PNSO) proposes to transfer radiological materials and/or waste, in accordance with U.S. Department of Transportation and other applicable regulations, to or from the Pacific Northwest National Laboratory (PNNL) and other Department of Energy (DOE) sites, national laboratories, commercial facilities, and research institutions, or to waste management or disposal sites.

Location of Action:

Radiological materials and/or waste would be transferred between PNNL-operated facilities in Richland, Washington or Sequim, Washington and other DOE sites, national laboratories, commercial facilities, and public or private research institutions, or to waste management or disposal facilities throughout the United States.

Description of the Proposed Action:

Radiological materials may be transferred to and from PNNL facilities to support a wide range of research projects; these materials would be packaged and transported in accordance with U.S. Department of Transportation and other applicable regulations. Prior to receipt of materials, PNNL would follow internal procedures and perform the appropriate reviews and analyses, if needed, to assure that receipt and possession of the materials would comply with all facility limits, permits, or other approvals; ultimate disposal pathways would be identified prior to receipt of the materials. Prior to transferring materials to another national laboratory or other facility PNNL would assure, commensurate with the level of risk and potential hazard of the specific material, that the receiving site is permitted, licensed, or otherwise approved to receive the specific type and quantity of material.

Waste (including but not limited to low level waste and mixed-low level waste) would be handled and processed for safe transfer to the offsite location for either temporary storage or permanent disposal. Waste would be packaged and transported in accordance with U.S. Department of Transportation and/or other applicable regulations. The waste from PNNL operations would be within the capacity of the receiving facility and will comply with the receiving facility's waste acceptance criteria; this would assure that the facility has the capacity and capability to receive and manage the waste. Waste receiving facilities would be enrolled in the Department of Energy Consolidated Audit Program (DOECAP), which assures that the site has all permits, licenses, or approvals appropriate to the waste to be transferred.

Biological and Cultural Resources:

The proposed transfer actions are not likely to result in adverse impacts to sensitive biological or cultural resources. Activities that could cause impacts to cultural or biological resources are not included in the scope of this generic Categorical Exclusion (CX). If any transfer action includes activities that would trigger a biological and/or cultural resource review, those activities must have

separate NEPA coverage with supporting cultural and biological reviews as required.

Categorical Exclusion to Be Applied:

As the proposed action is to transfer materials and waste, the following CX, as listed in the DOE National Environmental Policy Act (NEPA) implementing procedures, 10 CFR 1021, would apply:

B1.30 *Transfer Actions*, in which the predominant activity is transportation, provided that (1) the receipt and storage capacity and management capability for the amount and type of materials, equipment, or waste to be moved already exists at the receiving site and (2) all necessary facilities and operations at the receiving site are already permitted, licensed, or approved, as appropriate. Such transfers are not regularly scheduled as part of ongoing routine operations.

Generic CXs are authorized by 10 CFR 1021.410(f) for recurring activities to be undertaken during a specified time period, after considering potential aggregated impacts.

Eligibility Criteria:

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(1)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed below:

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, Appendix B (1)-(5)	
Would the Proposed Action:	EVALUATION:
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations or DOE or Executive Orders.
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste management facilities would be constructed under this CX. The receiving facility would already be fully licensed or permitted to receive the type and quantity of waste.
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that or results in uncontrolled or unpermitted releases.
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action would not involve the use of genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, Appendix B (1)-(5)	
Would the Proposed Action:	EVALUATION:
Have the potential to cause significant impacts on environmentally sensitive resources., including, but not limited, to: • protected historic/archaeological resources • protected biological resources and habitat • jurisdictional wetlands, 100-year floodplains • Federal- or state-designated parks and wildlife refuges, wilderness areas, wild and scenic rivers, national monuments, marine sanctuaries, national natural landmarks, and scenic areas.	No environmentally sensitive resources would be adversely affected by the proposed transfer actions The proposed action would not adversely affect floodplains, wetlands regulated under the Clean Water Act, national monuments, or other specially designated areas, prime agricultural lands, or special sources of water.

Summary of Environmental Impacts:

The following table summarizes environmental impacts considered when preparing this CX determination.

<i>Would the Proposed Action:</i>	Evaluation
Result in more than minimal air impacts?	Trucks or other transport vehicles and equipment used to transfer materials would emit small amounts of combustion products. Overall, these would be minimal impacts.
Increase offsite radiation dose measurably?	Transport of radioactive materials on public roads or rails would contribute to a de minimus population dose along the transport route.
Require a radiological work permit?	Work within the PNNL transfer location and the receiving site would be conducted under applicable radiological work permits for each location.
Discharge any liquids to the environment?	There would be no planned liquid discharges associated with the proposed transfer of materials.
Require a Spill Prevention Control and Countermeasures plan?	Work at the PNNL transfer location and the receiving site would be conducted under applicable spill control plans for each facility.
Use carcinogens, hazardous, or toxic chemicals/materials?	Use of carcinogens, hazardous, or toxic chemicals/materials would be limited to the use of fuels for the transport vehicles and loading equipment, and the material itself.
Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	The proposed action includes the transfer of waste including, but not limited to, low level waste and low level mixed waste. Waste would be handled and packaged following DOE regulations and best management practices. Transport will be conducted in accordance with U.S. Department of Transportation and other applicable regulations. The receiving site would be fully licensed and permitted to receive, handle, and store or dispose the type and quantity of waste.
Cause more than a minor or temporary increase in noise level?	Noise caused by transport vehicles and other equipment will be minor and temporary at any specific location.

<i>Would the Proposed Action:</i>	Evaluation
Create light / glare, or other aesthetic impacts?	Minor, temporary reflections from transport vehicles and containers are possible.
Require an excavation permit (e.g., for test pits, wells, utility installation)?	No excavation permits are expected to be needed at the PNNL site to support the proposed material transfer. Any work performed at the receiving site would not be performed specifically to receive the materials from the PNNL site.
Disturb an undeveloped area?	No undeveloped areas at the PNNL Site would be disturbed. Undeveloped areas at the receiving site would not be disturbed specifically to receive this material.
Result in more than minimal impacts on transportation or public services?	Vehicle movement would be along established transportation routes and would have minimal impacts on transportation or public services.
Disproportionately impact low-income or minority populations?	Transport routes would be well established and regularly used by trucks and other vehicles. Some of these routes may pass through areas with a high proportion of minority or low-income residents. The occasional transport under the proposed scope would not have a disproportionate impact on these areas or populations.
Require environmental or other permits from federal, state, or local agencies?	Normal transport of materials will not require special permits from the Department of Transportation or other agencies, although DOT permits might be needed for special circumstances.

Compliance Action:

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This determination must be reviewed at least once every 5 years.

Signature: _____

Date: 5-5-2020

Tom McDermott, PNSO NEPA Compliance Officer

cc: MR Sackschewsky, PNNL