

PMC-EF2a

(2.04.02)

U.S. DEPARTMENT OF ENERGY
EERE PROJECT MANAGEMENT CENTER
NEPA DETERMINATION



RECIPIENT:NREL

STATE: CO

PROJECT TITLE : Site Ops - Abatement Services Bldg 16/370,371, 269, 189, 190, 384; NREL Tracking No. 10-036

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
		NREL-10-036	GO10337

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Order 451.1A), I have made the following determination:

CX, EA, EIS APPENDIX AND NUMBER:

Description:

- B1.16** Removal of asbestos-containing materials from buildings in accordance with 40 CFR part 61 (National Emission Standards for Hazardous Air Pollutants), subpart M (National Emission Standard for Asbestos); 40 CFR part 763 (Asbestos), subpart G (Asbestos Abatement Projects); 29 CFR part 1910, subpart I (Personal Protective Equipment), Sec. 1910.134 (Respiratory Protection); subpart Z (Toxic and Hazardous Substances), Sec. 1910.1001 (Asbestos, tremolite, anthophyllite and actinolite); and 29 CFR part 1926 (Safety and Health Regulations for Construction), subpart D (Occupational Health and Environmental Controls), Sec. 1926.58 (Asbestos, tremolite, anthophyllite, and actinolite), other appropriate Occupational Safety and Health Administration standards in title 29, chapter XVII of the CFR, and appropriate state and local requirements, including certification of removal contractors and technicians.
- B2.1** Modifications of an existing structure to enhance workplace habitability (including, but not limited to: improvements to lighting, radiation shielding, or heating/ventilating/ air conditioning and its instrumentation; and noise reduction).

Rational for determination:

B2.3 – Installation of, or improvements to, equipment for personnel safety and health, including, but not limited to, eye washes, safety showers, radiation monitoring devices, and fumehoods and associated collection and exhaust systems, provided that emissions would not increase.

This proposed project would be for removal of existing laboratory exhaust ventilation systems and its subsequent replacement in multiple spaces at DOE/NERL leased Building 16, at the Denver West Office Park, City of Golden, County of Jefferson, State of Colorado. The proposed work would involve rooms 370, 371, 269, 190, and 384 within the building.

The proposed project would entail the removal of an asbestos-containing transite fume hood from Lab 370 by a State of Colorado licensed asbestos abatement contractor. The transite panels would be removed intact and properly bagged. The scope also includes the demolition of exhaust fan soffits in several areas, such as Office 182 which services the exhaust components in Lab 190. Additionally, the abatement contractor would perform removal of non-asbestos containing ceiling panels, which have negligible or no heavy metal contamination. Moreover, the project would include the removal of general ventilation components, such as fan coil units, associated ducting and grating, which may not be contaminated with deposited heavy metals, but would be disposed as hazardous waste as a precautionary measure. This work would primarily facilitate modification of laboratories to increase functionality of local exhaust ventilation. The work would also improve fire protection, through the installation of new ceiling panels. Work is projected to begin in late August 2010. The work would be conducted in 2 phases: abatement and putback or reinstallation. The abatement would be performed using modified secondary containment or modified full, negative pressure containment systems. Non-contaminated materials (e.g., ceiling panels) would utilize drop cloths, but not containment. Putback would involve standard trade practices. Final visual and air monitoring clearances would be provided by a third-party State of Colorado Air Monitoring Specialist.

The asbestos abatement activities would be conducted in accordance with applicable federal, state, and local regulations, including, but not limited to, the OSHA Asbestos in Construction (29 CFR 1926.1101) and General Industry (29 CFR 1910.1001) Standards, US EPA asbestos National Emission Standards for Hazardous Air Pollutant (NESHAP)(40 CFR 61 Part M) regulations, and the State of Colorado Air Quality Control Commission Regulation No. 8 Part B – Emission Standards for Asbestos. Furthermore, the asbestos abatement work would abide by NREL Laboratory Level Procedure 6-4.18 - Asbestos Management. By utilizing the proper engineering controls, work practices, and personal protective equipment, this would project would not result in emissions of asbestos fibers or other air pollutants above regulatory thresholds, and would not pose a health risk to the abatement workers or occupants of Building 16. The asbestos containing transite panels would be disposed of offsite at properly licensed disposal facility. The general ventilation components that would be managed as a hazardous waste, would be handled

by OSHA 40-hr HAZWOPER training personnel, managed, accumulated, and dispose of offsite a properly licensed disposal facility per the Resource Conservation and Recovery Act (40 CFR 260 et seq.) and the State of Colorado Hazardous Waste Regulations (6 CCR 1007-3 Part 260 et seq.). Building 16 is considered a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste and has been assigned the following EPA ID No. CO4890000017.

This proposed project would not impact prime farmlands, wetlands, floodplains, critical habitats, threatened and endangered species, or culture resources. Building 16 is less than 50 years old, is not on the National Register of Historic Places, and not within a historic district. The project would result in negligible air emissions of particulates and VOCs (potentially from the spray-on encapsulant). While this project would result in one-time generation and offsite disposal of hazardous waste, the anticipated quantity of material to be conservatively managed as hazardous waste, its toxicity, and proper management by trained personnel, would not be significant. Additionally, the intact removal of non-friable asbestos containing transite panels in a negative containment enclosure by a licensed abatement contractor, and its subsequent offsite disposal at a properly licensed disposal facility presents a de minimis risk to human health and the environment.

Based upon the information above, this proposed action would qualify for Categorical Exclusions B1.16, B2.1, and B2.3.

NEPA PROVISION

DOE has made a final NEPA determination for this award

Insert the following language in the award:

Note to Specialist :

EF2a prepared by Rob Smith on 08/26/2010.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature: *Kou Blummer* Date: 8/26/2010
NEPA Compliance Officer

FIELD OFFICE MANAGER DETERMINATION

Field Office Manager review required

NCO REQUESTS THE FIELD OFFICE MANAGER REVIEW FOR THE FOLLOWING REASON:

- Proposed action fits within a categorical exclusion but involves a high profile or controversial issue that warrants Field Office Manager's attention.
- Proposed action falls within an EA or EIS category and therefore requires Field Office Manager's review and determination.

BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO :

Field Office Manager's Signature: _____ Date: _____
Field Office Manager