

Sitewide Categorical Exclusion for Removal of Asbestos from Buildings

Introduction

As defined in the U.S. Department of Energy's (DOE) Richland Operations Office Integrated Management System Procedure, *NEPA Analysis at Hanford*, a sitewide categorical exclusion is:

An application of DOE categorical exclusions described in 10 CFR 1021, Appendices A and B, which may apply to Hanford Site proposed actions (activities) that are "sitewide" in nature and extent, which the cognizant DOE Hanford NCO has determined fit within the scope (i.e., same nature and intent, and of the same or lesser scope) of DOE categorical exclusions described in 10 CFR 1021 Appendices A and B. The cognizant DOE Hanford NCO may issue specific sitewide categorical exclusions for use on proposed actions in which separate DOE approval to proceed is not required.

The nature of the proposed action subject of this sitewide categorical exclusion, as well as guidance to implement this exclusion as described herein, may be revised to reflect contemporary experience from the application of this exclusion; changes to, or development of, relevant policy and guidance; and changes to DOE's categorical exclusions resulting from future rulemakings.

Proposed Action

The DOE's Richland Operations Office and Office of River Protection propose to remove asbestos containing materials (ACM) from Hanford Site buildings.

Location of Action

On and near the Hanford Site, Richland, Washington

Description of Proposed Action

DOE's proposed action is to remove ACM and associated, but incidental materials and other wastes from Hanford Site buildings and other structures as the need occurs. As part of the modification or demolition of buildings and other structures, such as adjacent support towers, DOE would remove, handle, and encapsulate as necessary ACM and incidental materials (e.g., ventilation ducting, piping) and other wastes (e.g., demolition debris) pursuant to DOE orders, and Federal and state regulations and guidelines.

Consistent with DOE's procedures that implement NEPA (10 CFR 1021), DOE also would undertake actions foreseeably necessary to implement this proposed action. Therefore, under

this proposed action, DOE would transport construction equipment (e.g., dumptrucks) to specific locations for which ACM would be removed, and establish as necessary temporary structures (e.g., office-change trailers) at those locations to facilitate removal of ACM. In addition, removal may generate materials and other types of waste. In such instances, DOE would package, stage for transport, transport, and dispose of ACM and associated incidental waste at onsite or offsite facilities; incidental materials may be recycled, reused or disposed. All such activities would be undertaken in compliance with DOE orders, and federal and state regulations and guidelines.

Use of the equipment and associated vehicles would generate air pollutants from combustion and limited ground-disturbance, local noise levels would increase, water may be used for dust suppression, and nonrenewable resources such as petroleum products would be consumed. In all instances, the demand for resources and environmental impacts resulting from implementation of these proposed activities would be small and temporary in nature.

Applicable Categorical Exclusion

DOE's Categorical Exclusion B1.16:

Removal of asbestos-containing materials from buildings in accordance with 40 Code of Federal Regulations (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.

Implementing Guidance

This sitewide categorical exclusion may be applied to activities under the proposed actions that are "sitewide" in nature and extent. For example, this exclusion may be implemented as a one-time yearly application in instances where the proposed action would involve the removal of asbestos from multiple buildings or structures across the Hanford Site.

Application of this sitewide categorical exclusion requires compliance with the Richland Integrated Management System Procedure, *NEPA Analysis at Hanford*. Sitewide categorical

exclusions are determined solely by the cognizant DOE Hanford NCO and are applied through a screening process which documents that the proposed action:

1. Fits within the scope of actions identified in a DOE Hanford NCO-approved sitewide categorical exclusion
2. Meets the eligibility requirements for Appendix B categorical exclusion (“integral elements”) of 10 CFR 1021, Subpart D, Appendix B, B(1) through B(4)
3. Is not connected to other actions with potentially significant impacts (see 40 CFR 1508.25(a)(1)) or with cumulatively significant impacts (see 40 CFR 1508.25(a)(2))
4. Is absent extraordinary circumstances that may affect the significance of the environmental effects of the proposed action
5. Is not located on nor directly impacts the Hanford Reach National Monument, Rattlesnake Mountain, Gable Mountain, Gable Butte, within ¼ mile of the Columbia River, other known Traditional Cultural Properties, or properties of historic, archaeological or architectural significance designated by Federal, state or local governments or properties eligible for listing on the National Register of Historic Places, and
6. Is not located on nor cause direct impacts to sensitive species or their habitats, such as old-growth sagebrush.

This sitewide categorical exclusion may not be applied to proposed actions that involve the construction of new buildings or structures, the repair or routine maintenance of existing buildings or structures, or the construction or expansion of waste disposal, recovery, treatment, or storage facilities. It may not be applied to buildings and structures in which the ACM is cross-contaminated with radioactive materials or chemically hazardous materials. It also may not be applied at locations in which previously undisturbed land would be occupied by construction equipment or temporary structures.

Compliance Action

I have determined that the proposed action meets the requirements for Categorical Exclusion B1.16 and that there are no extraordinary circumstance related to this action that may affect the significance of the environmental effects of the action; this action is not “connected” to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211. All activities to be conducted under this Sitewide Categorical Exclusion Determination must be documented with the NEPA Review Screening Form (see Hanford Site Form RL-721) pursuant to *NEPA Analysis at Hanford* and demonstrably meet the criteria described in 1 through 6 above. Accordingly, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This exclusion is being implemented as a one-time yearly application for the proposed action described herein.



Ralph W. Russell, DOE NEPA Compliance Officer



Date