



U.S. Department of Energy Categorical Exclusion Determination Form

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Proposed Action Title: Asbestos Abatement-Atlas Building

Program or Field Office: Moab UMTRA Project

Location(s) (City/County/State): Moab, Utah

Proposed Action Description:

The proposed action will be the remediation of asbestos flooring in the Atlas building by removing asbestos containing floor tile. A licensed asbestos remediation subcontractor will perform all abatement activities as follows:

1. Secure containment within the facility as necessary to prevent the spread of contamination, e.g. containment barriers, airlocks, etc.
2. Provide, install, operate, and maintain a HEPA negative-pressure system to contain work environment
3. Remove all asbestos contaminated vinyl flooring
4. Clean-up of contamination including floors, and management of contaminated material removed
5. Package removed material for transportation and disposal
6. Transport contaminated material for disposal to a facility approved for asbestos

Categorical Exclusion(s) Applied:

- B1.16 - Asbestos removal
- B2.5 - Facility safety and environmental improvements

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of [10 CFR Part 1021](#).

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

- The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D.
To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, 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 facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.
- There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.
- The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal 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 preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer:

(This form will be locked for editing upon signature)

Date Determined:

May 12 / 2015

Moab UMTRA Project Categorical Exclusion Determination

Asbestos Abatement to Promote Safety and Environmental Improvements

Background: The Project proposes to perform asbestos floor tile removal from the Atlas building to address an assessment concern. As part of a facility assessment in June 2014, it was noted that the Project was “not managing Presumed Asbestos Containing Material (PACM) in accordance with the requirements of 29 CFR 1910.1001 and 29 CFR 1926.1101, or in accordance with the Moab UMTRA Project Health and Safety Plan (DOE-EM/GJ1038), Rev 4.”

Rationale: In response to this assessment, Portage brought in qualified personnel to conduct a Baseline Asbestos Survey of the Atlas Building at the Moab site in accordance with ASTM E2356-14. The Baseline Survey, which was conducted on August 4 and 5, 2014, was a building-wide inspection to provide a general sense of the overall location, type, quantity, and condition of asbestos-containing materials present. The intent of the baseline survey was to provide information on the long-term management of asbestos-containing materials and prioritization of response actions. No major issues were identified, but the following action items were recommended:

- Floor tile should be remediated/covered
- Labeling within the building is required to identify asbestos materials for employees
- Portions of walls are to be painted/patched
- On-going maintenance of the Atlas building has to ensure the continued control of asbestos hazards.
- Applicable facility personnel are to be trained

All of the action items have been addressed except removal of floor tile.

DOE guidance recommends that a simple record of categorical exclusion determination be developed for all but the most routine proposed actions, and asbestos removal is a class of action listed in 10 CFR Part 1021, Subpart D, Appendix B1.16. which require a Categorical Exclusion for facility operation removing asbestos.

Hazard Mitigation:

- Radiation-All work will be performed in accordance with the Project’s *Radiation Safety Plan*.

- Asbestos-The asbestos survey indicated asbestos containing material in some of the walls and tile. The walls have been painted to make them non-friable. The tile will be removed by a licensed asbestos subcontractor. Asbestos containing material is not considered friable and therefore no emissions or other State or EPA permits are required.
- Mold-Personal Protective Equipment and engineering controls required to work with floor tile will serve a dual purpose for working with asbestos and mold.
- Biological-Mouse droppings and other biological hazards will be addressed per the *Project Health and Safety Plan*.

Remediation Documentation:

- Moab UMTRA Project Health and Safety Plan (DOE-EM/GJ1038)
- 29 CFR 1910.1001 and 29 CFR.1926.1101 – OSHA Requirements for Asbestos
- August 14, 2014 Asbestos Survey of the Atlas Building, as performed by AMEC

Basis for Determination:

- This action does not individually or cumulatively have a significant effect on the human environment and for which, therefore, neither an environmental assessment nor an environmental impact statement is required.
- Does not threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including DOE and/or Executive Orders.
- Does not disturb hazardous substances, pollutants or other contaminants.
- Does not adversely affect environmentally sensitive resources such as: cultural resources, endangered threatened or candidate species or their critical habitat, wetlands or floodplains, State or National Parks. Although the Atlas building has been identified as a historical significant feature, mitigation measures have been performed per Memorandum of Understanding with State Historical Preservation Office so that the Project can modify and remediate/remove the building.
- There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.
- The proposal 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.