

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: TAN 601 Fire Suppression Upgrade

### SECTION B. Project Description and Purpose:

The dial room at the Specific Manufacturing Capability (SMC) in building Test Area North (TAN)-601 lacks a fire suppression system. The proposed action designs and installs a self-contained clean agent fire suppression system similar to systems in wide use across INL. The new system includes a new fire panel to relay notifications and alarms. Work scope includes, 1) removing old piping, 2) installing new piping, valves, and sprinkler heads (wall coring/penetration), 3) installing either a) plant air, b) nitrogen cylinder, or c) riser mounted air compressor and associated power, and 4) installing new fire alarm supervision modules with wiring and Fire Alarm Control Panel programming. Construction is expected to begin in the April or May time frame and will cost ~\$100K.

### SECTION C. Environmental Aspects or Potential Sources of Impact:

#### Air Emissions

Activities addressed by this EC have the potential to contribute to air emissions through:

- Purchasing chemicals and operating combustion emissions. Some activities may involve stationary air emission sources, including stationary internal combustion engines.
- Maintaining, testing, or disposing of halon-containing equipment and halon.
- Purchasing equipment containing refrigerants or halon.
- Working with asbestos.
- Generating fugitive dust or other fugitive emissions.

#### Disturbing Cultural or Biological Resources

Project activities have the potential to disturb cultural or biological resources through:

- Constructing or modifying facilities, structures, equipment or processes
- Maintaining or repairing facilities, structures, equipment or processes
- Impacting migratory birds and bird nests on the INL and at in-town facilities
- Modifying buildings or structures constructed on the INL before 1970.

#### Generating and Managing Waste

Typical construction debris waste such as wood, wire, scrap metal piping, packaging material, Resource Conservation and Recovery Act (RCRA) empty chemical containers, etc., will be generated during the project. Hazardous waste is not anticipated, however, there is a potential for generating hazardous waste from adhesives, paints or chemical spills. Waste could also be generated from the following activities:

- Decontaminating equipment containing or contaminated with polychlorinated biphenyls (PCBs) (From equipment manufactured before 1982)
- Maintaining equipment containing or contaminated with PCBs (From equipment manufactured before 1982)
- Disposing asbestos-containing material
- Disturbing asbestos or removing asbestos-containing material.

#### Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, etc., will be used while installing the trailers and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The Facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility PEL. If the PEL cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

#### Using, Reusing, and Conserving Natural Resources

All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow.

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**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 item B2.2 "Building and equipment instrumentation."

**Justification:** Project activities in this EC are consistent with 10 CFR 1021 Appendix B to Subpart D, Categorical Exclusion B2.2, "Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)       Yes     No

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 3/13/2019