

NEPA REVIEW SCREENING FORM (NRSF) 3A
Categorically Excluded Actions

Document ID #:
DOE/CX-00190

I. Project Title:

ACTIVITY-SPECIFIC CATEGORICAL EXCLUSION FOR HANFORD FIRE DEPARTMENT EQUIPMENT AND VEHICLE TRAINING IN SELECTED HANFORD SITE BORROW PITS

II. Describe the proposed action, including location, time period over which proposed action will occur, project dimension (e.g., acres displaced/disturbed, excavation length/depth), and area/location/number of buildings. Attach narratives, maps and drawings of proposed action. Describe existing environmental conditions and potential for environmental impacts from the proposed action. If the proposed action is not a project, describe the action or plan.

The Department of Energy (DOE), Richland Operations Office (RL), Security, Emergency Services, and Information Management Division (SEI) proposes to conduct Hanford Fire Department (HFD) wildland firefighting equipment and vehicle training in selected active borrow pits (Pits 6, 9, 23, 30, and 34) on the Hanford Site (Figure 1). Wildland firefighting vehicles would include grass trucks, brush trucks, all-terrain vehicles (ATVs), utility task vehicles (UTVs), ambulances, and four-wheel drive pickups. Training would involve vehicle operations, maneuvering on uneven surfaces, and use of firefighting equipment (pumps, fire hoses, and water cannons) to understand equipment operations, water spray patterns, and water spray ranges by discharging water into open borrow pit areas.

Windblown tumbleweeds would continue to be collected and burned in active borrow pits in accordance with existing HFD protocols, policies, and procedures that incorporate applicable WAC 173-425 requirements for outdoor burning, as enforced by the Benton Clean Air Agency (BCAA), including the provisions of the annual Hanford Fire Department Prescribed Fire Plan (HNF-44199). Tumbleweed burning in active borrow pits would minimize the accumulation of fuels, reduce the potential for wildland fires, mitigate noxious weeds and invasive plant species, and provide training in the use of ignition devices. Ignition devices would include drip torches, Terra-Torches, Poly Sphere Dispensers, and fuses; and may include additional techniques as new technologies emerge. A wet line (pretreatment with water) would be established prior to burning to control fire behavior, as needed. HFD would burn tumbleweeds on declared burn days, unless prior approval has been granted by the BCAA.

The selected borrow pits are in close proximity to existing fire stations in the 100, 200, and 300 Areas. This would allow training in normal response zones so firefighters remain available for emergency response without adversely affecting response times. In addition, this would eliminate the need for backup firefighters during training thereby reducing cost and schedule impacts, and allow flexibility so training could be performed on short notice when firefighting demands are low.

The borrow pits are previously disturbed areas, which simulate off-road, wide-open, and uneven terrain typical of wildland firefighting conditions. Training would be performed during normal shift hours with 4-hour sessions, one or two times per month on average, and involve up to ten firefighters and ten vehicles per session. Training would be scheduled around borrow pit operations to eliminate potential conflicts and comply with applicable borrow pit requirements, such as dust control.

Training would reinforce strategies, tactics, and terminology used by firefighters while fighting wildland fires and enhance safety by reducing potential injuries and accidents. Lessons learned from past wildland fires (communications, operation of ignition devices, and standard operating procedures for firefighting equipment and vehicles) would be emphasized.

The borrow pits proposed for HFD equipment and vehicle training were previously evaluated under the National Environmental Policy Act (NEPA) to support ongoing environmental cleanup projects, as well as construction and maintenance activities across the Hanford Site (DOE/EA-1934, "Environmental Assessment for Expansion of Borrow Areas on the Hanford Site"). The evaluation included cultural and ecological resource reviews.

AIR QUALITY. Air quality effects would be created by exhaust emissions from equipment and vehicles, fugitive dust, and tumbleweed burning. HFD would control fugitive dust using water sprays from equipment and vehicles. Vehicle and equipment exhaust emissions would be controlled by maintaining emission control devices (catalytic converters, charcoal canisters, etc.) in accordance with manufacturer's service recommendations, and continued use of unleaded gasoline, ultra-low sulfur diesel fuel (15 ppm maximum), or biodiesel blends. HFD would control smoke by restricting tumbleweed burning if any of the following conditions apply: air pollution episode,

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air stagnation advisory, fire danger rating at or above high, or winds forecasted at or above 20 miles per hour, as determined by weather forecasts obtained from the National Weather Service website or onsite Hanford Meteorological Station. No adverse air quality impacts are anticipated.

WATER QUALITY. HFD wildland firefighting equipment and vehicles would discharge between 500 and 3,000 gallons of water per training session. Discharge of water from firefighter training is exempt under Hanford Site Categorical State Waste Discharge Permit Number ST0004511, Condition G12.C, "Wastewater Discharge Stream Exemptions." In addition, source water would be used in accordance with permit condition S3.A, "Source Water Limitations," which allows raw Columbia River water, raw groundwater, potable water (treated Columbia River or groundwater), or demineralized water.

HFD would apply best management practices, which include limited water discharge flowrates to prevent erosion/ponding and maintaining a distance greater than 300-feet from known inactive cribs, ditches, or trenches used for disposal of hazardous or radioactive wastes. HFD would maintain a water discharge log during each training session based on the measured or known rate of discharge of the equipment, or the known water capacity of the vehicles (grass trucks and brush trucks hold 500 gallons and 2,500 gallons of water, respectively). No adverse water quality impacts are anticipated.

ECOLOGICAL RESOURCES (ECR-2018-637). DOE Environmental Compliance evaluated the Proposed Action. The following summarizes the ecological resources and controls associated with each of the selected borrow pit locations.

Pit 6 (Figure 2). Active portions of the borrow pit are largely void of vegetation with sparse patches of native plants and nonnative invasive species. There are no ecological controls associated with training in active portions of the borrow pit.

Pit 9 (Figure 3). Vegetation in active portions of the borrow pit is primarily invasive grasses and nonnative plant species with sparse occurrences of native plant species. A Washington State listed noxious weed was observed along the northern end of the borrow pit. Training would avoid native shrubs found in active portions of the borrow pit. The undercarriages of vehicles used during the training would be washed before leaving the borrow pit to avoid the spread of noxious weed seeds.

Pit 23 (Figure 4). Active portions of the borrow pit are mostly barren gravel. Most of the inactive areas are dominated by native and nonnative plant species, invasive grass species, Washington State listed noxious weeds, and a well-developed cryptogamic crust (thin layer of mosses, lichens, algae, and bacteria) on the soil surface. Training would be limited to non-vegetated areas within the borrow pit. The undercarriages of vehicles used during the training would be washed before leaving the borrow pit to avoid the spread of noxious weed seeds.

Pit 30 (Figure 5). Active portions of the borrow pit contain a mix of open gravel areas, spoil mounds, and flat areas that have been previously disturbed. The open gravel areas are generally void of vegetation. Vegetation is predominantly native and nonnative plant species and invasive grass species. The borrow pit is one of few areas on the Hanford Site where a small hilltop patch of an uncommon native plant species has been found. Training activities would be limited to the non-vegetated areas within the borrow pit.

Pit 34 (Figure 6). Active portions of the borrow pit are largely void of vegetation. Sparse patches of nonnative invasive species were observed along the edges of active borrow pit areas. There are no ecological controls associated with training in active portions of the borrow pit.

No plant or animal species protected under the Endangered Species Act, candidates for such protection, or species listed by the Washington State government as threatened or endangered were observed. Birds can nest within and around the borrow pits, and the nesting season is typically from mid-March to mid-July. If any nesting birds are encountered or suspected, or bird defensive behaviors are observed, then HFD would contact DOE Environmental Compliance to evaluate the situation. No adverse ecological resource impacts are anticipated.

The HFD Training Coordinator would use pre-exercise briefings to ensure training activities are limited to non-vegetated areas within the borrow pits and the undercarriages of vehicles used during the training are washed before leaving the borrow pits to control the spread of noxious

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weed seeds, as applicable. The HFD Environmental Compliance Officer would provide oversight to ensure implementation of mitigation measures. (Based on personal conversations with the Captain of the HFD Training Department and the HFD Environmental Compliance Officer on March 14, 2019).

CULTURAL RESOURCES. DOE Cultural and Historic Resources Program considered the Proposed Action and determined it is not an undertaking that would trigger a cultural resources review. Although no impacts to cultural resources are anticipated, HFD would watch for cultural materials (bones, stone tools, mussel shell, cans, and bottles) during training. If cultural materials are encountered, then training near the discovery would stop until a DOE-RL Cultural and Historic Resources Program archaeologist has been notified, the significance of the find assessed, appropriate Tribes notified, and if necessary, arrangements made for mitigation of the find. No adverse cultural resource impacts are anticipated.

CONCLUSION. This is an Activity-Specific Categorical Exclusion (ASCX) citing 10 CFR 1021, Subpart D, Appendix B, CX B1.2, "Training Exercises and Simulations." This ASCX only applies to the Proposed Action and any changes would require approval by the DOE-RL NEPA Compliance Officer.

III. Existing Evaluations (Provide with NRSF to DOE NCO):

Ecological Review Report No. and Title:

Ecological Clearance for Hanford Fire Department Equipment and Vehicle Training in Active Borrow Pits 6, 9, 23, 30, and 35 (ECR-2018-637), MSA-1802417, June 20, 2018

Cultural Review Report No. and Title:

Memo, S. J. Sexton to W. K. Hudson, FW: One New Service Ticket - ECR-2018-637 (HFD Borrow Pit Training) - work does not trigger a Cultural Resources Review per Site Form A-6006-139.

Maps:

N/A

Other Attachments:

- Figure 1 - Hanford Site Borrow Pits Proposed for HFD Equipment/Vehicle Training
- Figure 2 - Aerial View of Borrow Pit 6
- Figure 3 - Aerial View of Borrow Pit 9
- Figure 4 - Aerial View of Borrow Pit 23
- Figure 5 - Aerial View of Borrow Pit 30
- Figure 6 - Aerial View of Borrow Pit 34

IV. List applicable CX(s) from Appendix B to Subpart D of 10 CFR 1021:

B1.2, Training Exercises and Simulations

V. Integral Elements and Extraordinary Circumstances (See 10 CFR 1021, Subpart D, B. Conditions that are Integral Elements of the Class of Actions in Appendix B; and 10 CFR 1021.410(b)(2) under Application of Categorical Exclusions)	Yes	No
Are there extraordinary circumstances that may affect the significance of the environmental effects of the proposed action? If yes, describe them.	<input type="radio"/>	<input checked="" type="radio"/>
Is the proposed action connected to other actions with potentially significant impacts, or that could result in cumulatively significant impacts? If yes, describe them.	<input type="radio"/>	<input checked="" type="radio"/>
Would the proposed action threaten a violation of applicable statutory, regulatory, or permit requirements related to the environment, safety, health, or similar requirements of DOE or Executive Orders?	<input type="radio"/>	<input checked="" type="radio"/>
Would the proposed action require siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities?	<input type="radio"/>	<input checked="" type="radio"/>
Would the proposed action disturb hazardous substances, pollutants, contaminants, or natural gas products already in the environment such that there might be uncontrolled or unpermitted releases?	<input type="radio"/>	<input checked="" type="radio"/>
Would the proposed action have the potential to cause significant impacts on environmentally sensitive resources? See examples in Appendix B(4) to Subpart D of 10 CFR 1021.	<input type="radio"/>	<input checked="" type="radio"/>
Would the proposed action involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, such that the action is not contained or confined in a manner designed, operated, and conducted in accordance with applicable requirements to prevent unauthorized release into the environment?	<input type="radio"/>	<input checked="" type="radio"/>

If "No" to all questions above, complete Section VI, and provide NRSF and any attachments to DOE NCO for review.
 If "Yes" to any of the questions above, contact DOE NCO for additional NEPA review.

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VI. Responsible Organization's Signatures:

Initiator:

Jerry W. Cammann, MSA NEPA-SME
Print First and Last Name

Jerry W. Cammann
Signature

3/18/2019
Date

Cognizant Program/Project Representative:

Christopher P. Yaroch, DOE-RL SEI
Print First and Last Name

Chris Yaroch
Signature

3/18/2019
Date

VII. DOE NEPA Compliance Officer Approval/Determination:

Based on my review of information conveyed to me concerning the proposed action, the proposed action fits within the specified

CX(s): Yes No

Diori L. Kreske, DOE-RL NCO
Print First and Last Name

Diori Kreske
Signature

3/20/19
Date

NCO Comments:

Figure 1. Hanford Site Borrow Pits Proposed for HFD Equipment/Vehicle Training

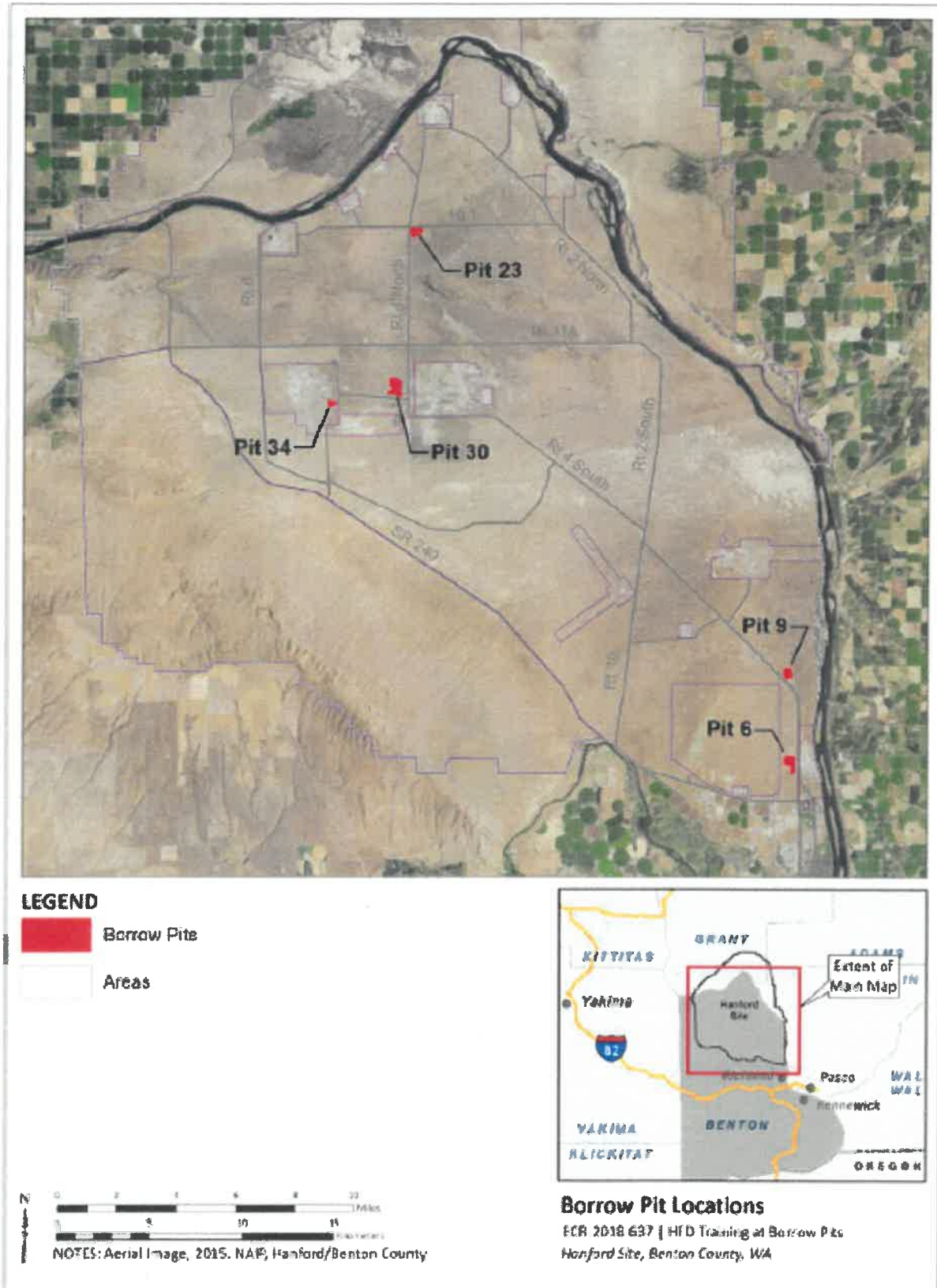


Figure 2. Aerial View of Borrow Pit 6

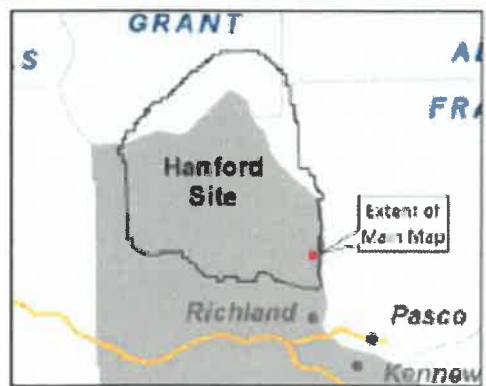


Figure 3. Aerial View of Borrow Pit 9



LEGEND

 Pit 9 (Active Portion)



Borrow Pit 9

ECR-2018-637 | HFD Training at Borrow Pits
Hanford Site, Benton County, WA




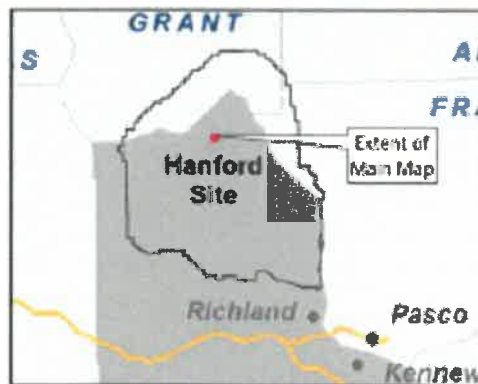



NOTES: Aerial Image 2015, NAIP, Hanford/Benton County

Figure 4. Aerial View of Borrow Pit 23



LEGEND

 Pit 23 (Active Portion)



Borrow Pit 23

ECA 2018-637 | HFD Training at Borrow Pits
Hanford Site, Benton County, WA



NOTES: Aerial Image, 2015, NAIP, Hanford/Benton County

Figure 5. Aerial View of Borrow Pit 30

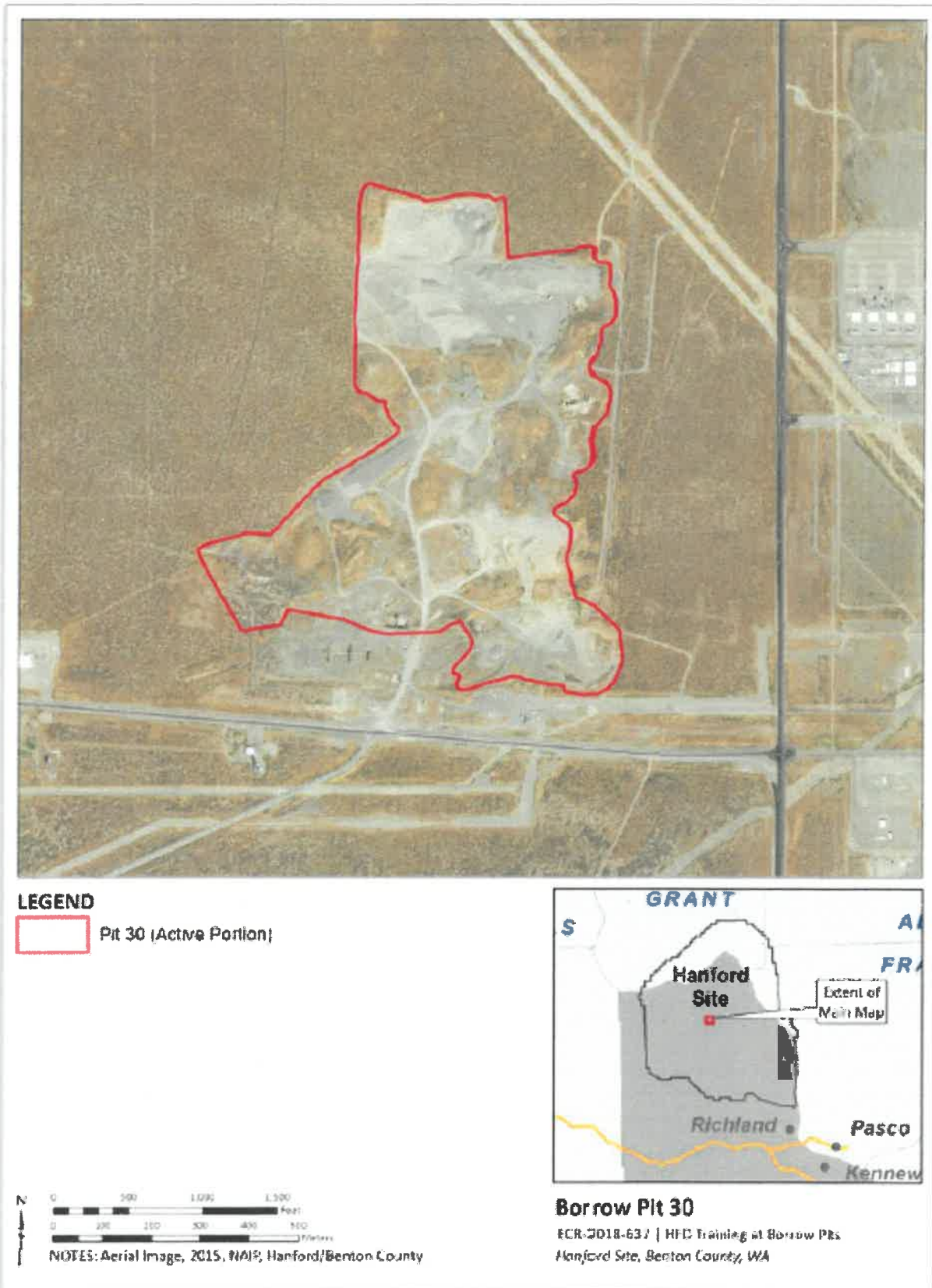


Figure 6. Aerial View of Borrow Pit 34

