

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: MFC-721 Fire Sprinkler Upgrade

SECTION B. Project Description and Purpose:

The purpose of this EC is to upgrade the fire sprinklers in MFC-721. A recent inspection of the fire sprinklers conducted by fire protection personnel revealed that the current sprinklers do not meet the standards listed in the National Fire Protection Association (NFPA) 13 Standards for the Installation of Sprinkler Systems due to their incorrect elevation and undersized piping. Therefore, the piping and sprinkler heads need to be replaced in order to meet current NFPA regulatory standards.

The proposed action will consist of removing existing undersized fire sprinkler piping and fire sprinkler heads and replacing with new fire sprinkler piping and fire sprinkler heads. The fire sprinkler upgrade includes:

- Removal of 22 existing fire sprinkler heads and associated piping
- Installation of 22 new sprinkler heads and associated piping from the 2.5" riser feed line
- Installation of 20 new sprinkler heads and associated piping from the 3" riser feed line

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

MFC-721 is an older building and may contain asbestos which could potentially be disturbed during project activities. In addition, taking out piping and other construction has the potential to generate fugitive air emissions.

Discharging to Surface-, Storm-, or Ground Water

The fire system has the potential to contact drinking and /or potable water systems.

Disturbing Cultural or Biological Resources

Project activities have the potential to disturb or alter historical structures.

Generating and Managing Waste

Industrial waste is anticipated to be generated, while hazardous waste is not. While the generation of hazardous waste is not anticipated, if such waste is generated assistance will be obtained from Waste Generator Services (WGS) in managing the waste. All solid waste generated will be managed by WGS.

This building is older than 1982 (built in 1958); any paint on piping, walls, etc. could contain PCBs and result in the generation of PCB waste.

Releasing Contaminants

Chemicals may be used and if so, will need to submit chemical inventory lists with associated Safety Data Sheets (SDSs) for approval 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. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

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 recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible.

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)).

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References: 10 CFR 1021, Appendix B to Subpart D, item B2.2 "Building and equipment instrumentation"

Justification: : The proposed action is 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: 9/4/2019