# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-16-105

# SECTION A. Project Title: Central Facilities Area/Materials and Fuels Complex (CFA/MFC) Live Fire Range Modifications

## SECTION B. Project Description and Purpose:

The CFA and MFC Live Fire Ranges are in need of modifications to meet the training needs of Protective Forces.

Proposed modification to the MFC range includes the following:

- 1. Extend three concrete shooting slabs, and associated gravel base, to the west of the existing concrete slabs.
- 2. Install 30 shooting barricade posts/pockets. Installation would include 10 barricades at the 25 yard, 50 yard and 100 yard firing lines. These 4"x4" pockets will be set in concrete with gravel drainage below the concrete. The barricade posts would be able to be removed from the pockets as needed. Plugs would be placed in the pockets when they are not in use.
- 3. Repair and seal the asphalt shooting slab.
- 4. Clear vegetation from an area approximately 100 ft. x 200 ft behind the bullet impact berm as was described in Environmental Checklist (EC) Idaho National Laboratory (INL)-15-064.

Proposed CFA range modifications are listed below:

- 1. Construct a 20' x 20' permanent metal cover to provide overhead shelter on range #2.
- 2. Clear vegetation and extend the Range #7 Explosive Training Area to the north by an additional 100 ft. x 155 ft. for a fire break and to allow for additional space for breaching/explosive training.
- 3. Remove electrostatic filters from the B21-608 indoor range heating, ventilating, and air conditioning (HVAC) system, reconfigure the filter support bracing, and install paper fabric pre-filters.
- 4. Perform asphalt repairs near B21-608.

In addition, a ring target for 40 mm chalk training round practice would be constructed at both CFA and MFC Live Fire Ranges. The targets would be landscape retaining wall blocks placed as a circular target on a slightly sloped gravel pad (approximately 80 ft. x 80 ft.). Excavation would be required to build the gravel pads and gravel would be obtained from the Monroe gravel pit. Excavation at the CFA Live Fire Range would occur on either range 5 or 6. The MFC target would be located approximately 200 yards north of the current platform. Vegetation disturbance would occur in both locations.

To maintain DOE's goal in the Candidate Conservation Agreement (CCA) to achieve no net loss of sagebrush on the INL Site, the project must compensate for any lost sagebrush. The project must re-establish sagebrush in acreages equal to or greater than acreages lost by project activities. Re-establishment must occur within the restoration priority areas identified in the CCA. Restoration activities may be coordinated with other sagebrush restoration activities currently being conducted on the INL Site.

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

## Air Emissions

There will not be an increase in emissions by changing from the electrostatic filters to the fabric pre-filters, therefore an Air Permitting Applicability Determination (APAD) is not required. The indoor firing range inside B21-608 will continue to operate under the State of Idaho, Air Quality Bureau Director's Exemption that was received on September 19<sup>th</sup>, 1988.

Fugitive dust may be generated during soil disturbing activities.

#### Discharging to Surface-, Storm-, or Ground Water

The CFA Live Fire Range is located in the INL Storm Water Corridor. A 100 ft. x 155 ft. area to the north of range #7 will be cleared and made into an extension of the existing Explosive Range. The total area to be disturbed will be less than 1 acre, therefore a Storm Water Pollution Prevention Plan and Notice of Intent are not required.

The barrier support pockets will have an open gravel bottom, however, they will not be considered Shallow Injection Wells because the intent of these pockets is not to dispose of storm water but to act as a support hole for the barriers. Plugs will be placed in the pockets to prevent water infiltration when not in use.

#### **Disturbing Cultural or Biological Resources**

Excavation activities at both the MFC and CFA ranges could disturb cultural artifacts or birds nests.

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#### **Generating and Managing Waste**

Typical construction debris waste such as asphalt, concrete, metal, wood, etc., will be generated during the project. The electrostatic filters will either be sent to excess for scrap metal recycle or be disposed as hazardous waste through Waste Generator Services (WGS). The electrostatic filters may be required to be washed down prior to sending them out for recycle. This wash water would be sent through the existing drain line and sump and collected as hazardous waste for disposal. The new paper pre-filters will be disposed as hazardous waste unless sufficient sample data becomes available. The Generator Treatment Plan (GTP) will need to be updated to include the changes to the filters. The wastewater line from the electrostatic filters to inside sump will occasionally receive water from snowmelt and rain events. All waste will be characterized and disposed through WGS.

#### **Releasing Contaminants**

Chemicals such as fuels, lubricants, marking paint, adhesives, asphalt, etc., may be used on the project. All chemicals will be approved for use in the INL Comply Plus Chemical Tracking System. Any spills will be reported to the Spill Notification team and cleaned up as soon as possible.

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

Scrap metal will be recycled when appropriate and practical. Once the electrostatic filters are replaced, there will no longer be wash water generated from cleaning them, thus reducing hazardous waste quantities.

# 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:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Categorical Exclusion B1.31 "Installation or relocation of machinery and equipment" and B1.15 "Support buildings."

**Justification:** The proposed activities are consistent with CX B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts;" and B1.15 "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix."

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Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 9/9/2016