

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Fire Department Training Fires at TAN-610

SECTION B. Project Description and Purpose:

The INL Fire Department (FD) has been given permission to use building TAN-610 for training purposes. TAN-610 hasn't been used since the SMC drinking water system was extended to serve the remaining active TAN buildings. TAN-610 is old and in poor condition and will be demolished at a later date when funding becomes available. This ECP only covers the FD training activities to take place in TAN-610, it does not cover future demolition. Another ECP will be written for that task when appropriate.

The FD plans on using the building to conduct rescue training, search and rescue training, collapse rescue training, and live fire training. During these evolutions FD personnel will cut pipes and other fixtures in the building using circular cutting tools and cutting torches. They will remove cut pieces of pipe and fixtures out of the building and place them in identified waste or recycle containers.

The FD will also use the building to conduct NFPA 1403 live fire training. The FD has chosen a few locations to conduct these burns. The first location is the air compressor room (room 102) in the southeast corner of the building, The second location is in the northeast corner of the building near the interior water tank. The third location is along the south-central wall of the building near the fire alarm panel. These areas are well suited to perform live fire training in that they already are concrete block walls. This will require little prep work for the walls and resetting the burn areas between fires will require minimal work. Other building locations will be considered if the desired locations are not suitable.

To prep the building according to the requirements of NFPA 1403, a roof vent is required. The FD believes that the existing roof vent will be sufficient for the burns, however, if it is not large enough the FD will be required to cut a roof vent. The training fires will be set using a road flare and will burn unpainted pallets and straw that are placed in certain configurations in the previously mentioned building locations.

The building components will be evaluated to determine if suitable for the desired burn and training. This will include paint sampling, asbestos sampling, waste characterization, and equipment evaluation/removal. Paint, oils or other material that have PCB's will not be burned or cut using methods that will burn the material (such as torch cutting).

This training will take place in late summer or early fall of CY2022 and will include at least 12 fires and possibly up to 24 fires. The TAN-610 FD training is expected to last approximately 2 weeks.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

This FD training fire is considered a type of open burning in the IDAPA air regulations established in IDAPA 58.01.01. DEQ notification is required and will take place as soon as dates are established.

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

TAN-610 is an exempt property type and there are no effects on cultural resources.

The facility will be evaluated for bird nests well in advance of the training. Preventative measures (surveillances, nest material removal, plastic, etc.) may be necessary to deter birds from building nests on the building.

Generating and Managing Waste

Scrap piping/metal, roofing material, air compressors, oils, fire alarm panels, etc. will be generated during the training. Waste characterization will be conducted prior to waste generation and items will be disposed or recycled accordingly. Light bulbs/tubes/, light ballasts, mercury switches, circuit boards, brass, bronze, etc. will also be generated during training activities.

Releasing Contaminants

TAN-610 is 68 years old and paints and oils that may be disturbed as part of the training could potentially contain PCB's. Samples will be taken from these items and results will determine what activities can be conducted and what controls are to be used. PCB containing items will not be burned. The facility is inactive and will be demolished in the near future. Asbestos reports show very little asbestos is in the building, however additional asbestos sampling may be necessary.

Using, Reusing, and Conserving Natural Resources

Scrap piping/metal will be recycled as appropriate. Painted metals will only be recycled if there are no PCB's in the paint.

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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, B1.2 Training exercises and simulations.

Justification:

Project Activities are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.2 "Training exercises and simulations." Training exercises and simulations (including, but not limited to, firing-range training, small-scale and short-duration force-on-force exercises, emergency response training, fire fighter and rescue training, and decontamination and spill cleanup training) conducted under appropriately controlled conditions and in accordance with applicable requirements.

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

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 05/17/2022