

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: BSKF Digital Alarm Communicator Transmitter (DACT) Replacement - Sitewide

SECTION B. Project Description and Purpose:

There are nine fire alarm panels remaining at the INL Site that report fire alarm information using the Binary Frequency Shift Keying (BFSK) format. This is a security alarm format and reports all conditions as an alarm, which causes confusion for the fire alarm center operators. These fire alarm panels are located at CFA and the Site Wide Complex. The proposed action replaces them with new fire alarm panels that will report over the INL intranet to the INL Fire Alarm Center. This will improve the speed of communication and the quality of information

The proposed action replaces fire alarm panels in the following facilities: CFA-612, CFA-638, CFA-1618, CFA-668, CFA-698, CFA-B21-608, CFA-HP, PBF-608, and TAN-605. A subcontractor will replace and test the fire alarm panels.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Air Emissions (Describe Impact): The proposed action has the potential to remove or disturb asbestos-containing materials (ACM). Project personnel must submit the quantity of asbestos removed form 450.04 and obtain approval from the INL Asbestos Technical Point of Contact (TPOC). All asbestos waste must be handled, packaged, and disposed in compliance with federal and state regulations, DOE Orders, and INL asbestos management procedures. Projects involving greater than threshold quantities (i.e., greater than or equal to 260 linear feet on pipes; greater than or equal to 160 square feet on other facility components or; greater than or equal to 35 cubic feet of "off facility" components within the area of disturbance or adjacent storage areas), and projects that demolish any load-supporting structural member of a facility require a 10-day notification to EPA, and are not covered by this EC.

Disturbing Cultural or Biological Resources

Project activities have the potential to impact properties eligible for listing on the National Register of Historic Places. Prior to implementing projects under this EC, contact the Cultural Resource Management Office (CRMO) to coordinate the completion of a cultural resource review. If you have any question about the specified activities or the buildings outlined in the table provided, please contact the CRMO at the grp-crmo@inl.gov email.

Project activities performed between April 1 and October 1 have the potential to impact nesting birds. Threats include, but are not limited to, noise, vegetation removal, human activity around nests, lighting, and collisions with windows and other infrastructure. If warranted, a work activity could be postponed, moved, or other restrictions could be developed to protect active migratory bird nests. If nests or nesting bird activity is identified in the area, stop work, do not disturb the area, and notify Environmental Support and Jackie Hafla (208-227-9031).

Generating or Managing Waste

Project activities may generate the following types of waste: Industrial (non-hazardous, non-radioactive) waste includes typical maintenance wastes such as boxes, wood, wiring, paper, insulation, and some metals. Potential waste materials would be evaluated for waste minimization prior to generation, and industrial waste generated during maintenance activities would be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

Hazardous wastes have the potential to be generated during maintenance operations on systems or equipment containing hazardous chemicals, or by using hazardous chemicals to clean or decontaminate equipment and systems. Hazardous metal waste (e.g., lead, electronics, brass, metal containing paints, etc.) may also be generated during maintenance work or by replacement of outdated equipment.

Asbestos-containing material has the potential to be generated.

Polychlorinated Biphenyl (PCB) waste could be generated when performing maintenance associated with pre-1982 equipment/materials such as capacitors, lubricants/dielectric fluids, transformers/bushings, painted surfaces and other electrical equipment/components.

All waste will be characterized and disposed at the direction of Waste Generator Services (WGS).

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, paints, etc., will be used 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. 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 Environmental Staff. If the Environmental Staff 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.

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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. The project would practice sustainable acquisition.

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 are consistent with 10 CFR 1021, Appendix B, 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: 7/6/2020