DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-020-026

SECTION A. Project Title: Installation of Fire Alarm Panels in Buildings MFC 701, MFC 710, and MFC-725

SECTION B. Project Description and Purpose:

Buildings MFC-701, MFC-710, and MFC-725 have existing fire alarm systems that are hard-wired (copper wire) to other building fire panels. New fire panels will be installed at buildings MFC-701, MFC-710, and MFC-725 that will connect to the site fiber optic cable for communication locally and to the alarm center. Materials and Fuels Complex personnel will install the fire panel at MFC-701 and subcontract personnel will install fire panels at MFC-710, and MFC-725.

The new fire panels will be electrically fed from a dedicated 120 V circuit. Life Safety personnel will program and test the new fire alarm panels locally and for connectivity to the alarm center.

Work details include:

- · Anchoring the fire panel and a documents box to the building walls
- · Anchoring the conduit (power, copper fire alarm wire and fiber optic) that is run to the panel in each building
- Installing a new smoke detector above each new panel
- Installing a new horn in building 701

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Activities in this EC have the potential to remove or disturb asbestos-containing materials (ACM). The quantity of asbestos removed must be submitted on form 450.04 and approved by 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 loadsupporting structural member of a facility require a 10-day notification to EPA, and are not covered by this EC.

Building MFC 701 contains asbestos in floor tile, roofing felt, and coating under a sink. MFC 710 and 725 currently have no reported asbestos, but there is still a potential for asbestos disturbance in drywall, which has never been sampled for asbestos in either building.

Discharging to Surface-, Storm-, or Ground Water N/A

Disturbing Cultural or Biological Resources

In accordance with Section 106 of the National Historic Preservation Act (NHPA), the Cultural Resource Management Office (CRMO) has reviewed the proposed activities as an undertaking potentially causing effects to historic properties. Completion of a Cultural Resource Review Record (CRR) was completed and has determined there to be No Effects to the buildings associated with this EC.

If the scope of work changes, or is expanded to include additional buildings or structures at MFC, additional review by the CRMO is required. Please contact their office at grp-crmo@inl.gov for additional clarification or information.

Generating and Managing Waste

Project activities may generate a variety of waste. It is anticipated that the following types of waste could be generated:

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 to the potential to be generated during activities that involving the drywall in MFC-710 and 725, and activities involving the floor tiles, roofing felt, and under-sink coating in MFC-701.

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, paints, concrete, concrete cure, asphalt, refrigerants, 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.

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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 facility 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.

Using, Reusing, and Conserving Natural Resources

All material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project would practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, and are non-toxic or less-toxic alternatives.

SECTIONDetermine 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: The proposed activity is covered by 10 CFR 1021 Appendix B to Subpart D, Item 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: 4/27/20