DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-19-076

SECTION A. Project Title: SMC Life Safety System Upgrade

SECTION B. Project Description and Purpose:

The Life Safety System (LSS) for the Specific Manufacturing Capability (SMC) and Test Area North (TAN) is over 20 years old, and replacement parts are no longer available. Idaho National Laboratory (INL) needs to update the LSS to allow the system to be repaired when necessary. The proposed action disconnects, removes, and disposes of old LSS components and installs new LSS components, including fiber optic cables in two phases.

Phase I replaces the fire alarm systems at designated SMC facilities. Single mode fiber optic cable connects the fire alarm panels and transmits system status messages the INL Fire Alarm Center.

Each fire alarm panel includes a Digital Voice Controller and amplifiers to broadcast messages. The proposed action also installs speakers and strobes and adds auxiliary power for the notification equipment.

Phase 2 upgrades the alarm system at TAN.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Fugitive emissions resulting from cutting/grinding/welding are expected. This activity will not involve the construction of a new stationary emission source.

The proposed action has the potential to disturb asbestos containing materials (ACM). To control the release of asbestos fibers, the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation requires that regulated ACM (RACM) be adequately wetted during cutting or disjoining operations when a facility component covered or coated with RACM is removed from that facility as units or in sections and during stripping operations when a facility component containing RACM remains in place in the facility.

Disturbing Cultural or Biological Resources

TAN-629 is eligible for nomination to the National Register of Historic Places and is considered a Category 1 historic property. Removal or changes of original features may adversely impact this historic property.

Generating and Managing Waste

Scrap metal will be diverted from landfill disposal and recycled where practical.

PCB contaminated materials and asbestos containing waste may be generated.

Fiber optic cable installation is expected to generate small amounts of industrial waste. All waste will be characterized, stored, and disposed at the direction of Waste Generator Services (WGS). Copper will be recycled to the extent practicable.

Project activities have the potential to generate asbestos containing material (ACM) which must be disposed of by properly trained personnel using appropriate abatement methods.

Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, cable cleaner, etc., will be used during the project.

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.

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' and B4.7, "Fiber optic cable."

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Justification: The proposed activities are consistent with 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); and B4.7, "Adding fiber optic cable to transmission facilities or burying fiber optic cable in existing powerline or pipeline rights-of-way. Covered actions may include associated vaults and pulling and tensioning sites outside of rights-of-way in nearby previously disturbed or developed areas."

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: 11/21/19	