

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: IF-616 654 Fire Panel Installation

### SECTION B. Project Description and Purpose:

This revision addresses two changes:

- 1) The categorical exclusion covering this activity was changed from B2.5 "Facility Safety and Environmental Improvements" to B2.2, "Building and Equipment Instrumentation". B2.2 is a more appropriate categorical exclusion for this activity.
- 2) This EC was changed from a Second-Tier to a First-Tier.

#### Original EC:

Buildings IF-616 (Willow Creek Building) and IF-654 (Engineering Research Office Building) fire protection panels and associated fire protection devices need to be upgraded to meet current fire code requirements and to increase the reliability of the systems. The proposed project would remove and replace the outdated pieces of fire protection equipment, and install components to accommodate the upgraded equipment within the two facilities. This work will include:

- Connecting 24-volt door holders to the appropriate new remote power supply panels.
- Disconnecting and reconnecting power supply circuits to the associated power supply panels.
- Disconnecting existing remote interface modules and reconnecting to the notifier monitor modules.
- Disconnecting the water flow devices and system supervisory devices at the existing remote interface modules and reconnecting to the notifier monitor modules.
- Installing conduit and conductor wire.
- Installing notifier modules.
- Installing sampling piping for the Aspirating Smoke Detectors, per manufacturers recommendations.
- Installing wall mounted strobes.
- Removing and replacing fire protection panels throughout the facilities.
- Replacing elevator CPM modules with notifier relay modules.
- Replacing end-of-line horn/strobe resistors.
- Replacing heat detectors with notifier heat detectors.
- Replacing manual pull stations with notifier addressable pull stations and installing additional notifier smoke detectors above fire panel alarms.
- Replacing power supplies with notifier remote power supplies including removal of some existing power supply modules.
- Replacing smoke detectors with notifier smoke detectors, including replacement of duct smoke detectors with non-rely photoelectric duct smoke detectors.

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

#### Air Emissions

Project activities has the potential to break up, dislodge, disturb, or remove asbestos containing material (ACM) that is located throughout both WCB and EROB. Project work locations will be evaluated for ACM prior to material disturbance.

#### Disturbing Cultural or Biological Resources

After reviewing the proposed scope of work, the Cultural Resource Management Office (CRMO) does not have any concerns. However, a cultural resource review (CRR) was completed in order to address Section 106 review requirements under 36 CFR 800. Work may proceed as described.

#### Generating and Managing Waste

Typical construction waste such as fire panel metal cabinets, wire, conduit, packaging material, RCRA empty chemicals containers, wood scrap etc. will be generated during the project. Circuit boards and other electronic waste may also be generated. All waste would be managed through Waste Generator Services (WGS).

#### 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.

Due to the age of WCB (IF-616), existing paints have the potential for containing PCB's. Paint disturbing activities must be completed using appropriate contamination control methods.

**Using, Reusing, and Conserving Natural Resources**

Scrap metal such as conduit and metal cabinets/panels will be available for recycle. 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.

**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 B2.2 "Building and equipment instrumentation."

**Justification:** The proposed activities are consistent with CX B2.5 "instrumentation, 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: 12/5/19