

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: CFA-664 Fire Water Upgrade and Building Modifications

### SECTION B. Project Description and Purpose:

In 2016, Power Management identified the need to store heavy equipment indoors during adverse weather conditions. Sometime between August 2017 and February 2018, Power Management began storing heavy equipment in building Central Facilities (CF)-664. A six-inch automatic dry pipe valve fire suppression system protected CF-664 until INL placed an Out-of-Service impairment on the system in the winter of 2016- 2017. INL needs to repair the fire suppression system to meet property protection requirements of DOE Order (O) 420.1C Chg. 3. To meet this need, INL proposes to engineer, design, and install a new fire suppression system. INL has replaced the fire system spool piece and valve to allow the INL Fire Department to pressurize the system in case of fire until the new system can be installed.

The proposed action also removes the air handling unit, catwalk, ladder, and steam lines in room 114 to make room for Power Management equipment, repairs Door 10 and surrounding masonry, and repairs the roof.

Figure 1 shows the floor plan of CF-664.

Figure 1. Floor Plan for CF-664



Building CF-664 is eligible for listing on the National Register of Historic Places. Modifying buildings eligible for the National Register of Historic Places requires review by the Cultural Resource Management Office (CRMO) and the Department of Energy Idaho Operations Office (DOE-ID). Removing and changing original features may adversely affect this historic property. As such, the INL CRMO must review and clear final plans and drawings prior to beginning work.

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

#### Air Emissions

Project activities have the potential to release refrigerants and greenhouse gases.

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Certain roofing materials may contain asbestos that could become friable without proper control. The proposed action removes non-friable category I Asbestos Containing Material (ACM) using non-rotary blade removal methods described in 40 CFR 61, Subpart M, Appendix A, "Interpretive Rule Governing Roof Removal Operations." These methods include using power slicers and manual methods such as spud bars, pry bars, shovels, knives, etc., that do not destroy the structural matrix or integrity of the material. Properly trained workers, using appropriate control methods, must remove any Regulated Asbestos Containing Material (RACM) discovered during project completion.

INL needs to remove portions of an asbestos insulated steam line to take out the catwalk in room 114. The proposed action removes a total amount of RACM that is less than threshold quantities (260 linear ft.) and does not require a 10-day renovation notification.

### Discharging to Surface-, Storm-, or Ground Water

The new fire system ties into existing water lines, and the project has the potential to discharge water to the ground during tie-in.

### Disturbing Cultural or Biological Resources

CFA-664 was built in 1951 and is considered a Category 3 historic architectural property. The INL CRMO reviewed the project and determined that the activities are not exempt and will result in destruction, damage, or alteration of all or part of the property. Mitigation strategy for Category 3 historic architectural properties requires digital photo documentation and completing the Idaho Historic Sites Inventory (IHSI) form. The CRMO took digital photos for removing the catwalk and completed the IHSI form under Cultural Resource Review Record BEA-18-H012.

The CRMO needs to review and approve the additional scope for replacing the fire suppression system and roof repairs. Removing or changing original features may adversely affect this historic property. As such, the CRMO must review and clear final plans and drawings prior to beginning work.

### Generating and Managing Waste

Removing firewater piping, sprinkler heads, catwalk, ladders and overhead steam piping will generate scrap metal. Painted items older than 1982 could potentially contain metals and PCB's. INL will characterize paint to determine whether scrap items can be sent for recycling. Removing paint with stripper generates paint waste. Door repair has the potential to generate block wall waste, and roof repairs and asbestos pipe insulation abatement work generates asbestos waste. All waste will be characterized, stored and disposed at the direction of Waste Generator Services.

### Releasing Contaminants

Paint on the catwalk, ladder, beams and fire water piping is older than 1982 and presumed to contain PCB's. Practices such as vacuum, wet methods, drilling through duct tape, etc., are used to prevent the spread of original paint. There will be no welding, torch cutting, or heating to the point of burning of suspect PCB materials.

Asbestos containing pipe insulation and roofing materials will need to be removed as stated in the project description and the Air Emissions section of this Environmental Checklist.

Typical construction chemicals such as fuels, lubricants, adhesives, etc., will be used while installing the trailers 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.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility PEL. If the PEL 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

Scrap metal will be recycled to the extent practical.

**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

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“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, B1.15 "Support buildings" and B2.2 "Building and equipment instrumentation."

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, B1.15, "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, , and B6.10 of this appendix.

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 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: 12/10/2019