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CX Posting No.: DOE-ID-INL-19-069

SECTION A. Project Title: Wildland Fire Chainsaw Training

SECTION B. Project Description and Purpose:

The National Wildfire Coordinating Group (NWCG) requires the Idaho National Laboratory (INL) fire department to have chainsaw packages on Type 4 wildland fire engines. Prior to placing these chainsaws into service, the INL fire department must train firefighters to chainsaw operational and safety protocols, including both classroom and hands-on training in the field. To enable realistic hands-on training scenarios, the INL fire department has identified a proposed training location east of the East Butte near the T-4 road that has a stand of previously burned junipers. Pickups and Type 4 engines will be used to access the location and off road travel is not authorized (except for turnaround areas). Crews would limb, fell, and size dead standing junipers. Up to 100 dead junipers may be used. In addition, dead trees located throughout the Central Facilities Area may also be identified and used for this training.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Project activities have the potential to generate fugitive dust while traveling to and from training location on existing gravel roads and two track trails. All reasonable precautions will be taken to prevent particulate from becoming airborne.

Disturbing Cultural or Biological Resources

The location and activities associated with this training exercise require clearance by both Biological Resources (Jackie Hafla, 208-227-9031) and the Cultural Resource Management office (Nick Holmer 208-526-0760) prior to each training event.

The proposed site was selected because this location has a two track road near the burned junipers and off road travel will not be necessary except for vehicle turnaround. The junipers were burned in a previous fire and crews will limb, fell, and size these dead standing trees. Only dead trees will be used, and material would be left in place.

Generating and Managing Waste

Project activities are expected to generate minor amounts of uncontaminated industrial waste. The small amount of waste that may be generated could include uncontaminated garbage such as plastic water bottles or other miscellaneous waste. All waste will be disposed of in appropriate recycling containers at INL facilities or in the INL Landfill Complex through Waste Generator Services (WGS). Project personnel will incorporate waste minimization measures by using reusable materials where practical.

Releasing Contaminants

Chemicals such as fuels, lubricants, 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 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

Fuel would be used in vehicles while traveling to and from the training location. Project personnel would carpool and/or use alternative fuel vehicles when appropriate. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would incorporate waste minimization and recycling where practical. Fuel would also be used in chainsaws.

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 to subpart D, items B1.2 "Training exercises and simulations"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B1.2, "Training exercises and simulations (including, but not limited to, firing-range training, small-scale and short-duration force-on-force exercises, emergency response training, fire fighter and rescue training, and decontamination and spill cleanup training) conducted under appropriately controlled conditions and in accordance with applicable requirements."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 10/22/2019