

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: Erection and Use of Tension Fabric Structure at the National Security Test Range (NSTR)

### SECTION B. Project Description:

This Environmental Checklist (EC) addresses the erection and use of a tension fabric structure at the National Security Test Range (NSTR). A tension fabric structure is a non-permanent tent-like structure. The tension fabric structure would be placed in the second laydown area at the NSTR and provide personnel with a work area somewhat protected from adverse weather conditions (i.e., wind, blowing sand, snow, etc.) The structure would be 82 feet wide by 100 feet long. The structure would have an interior center ceiling height of approximately 26 feet. CONEX storage containers would be used to support the roof truss system and would also form the first eight feet of the back wall. The front of the structure would be enclosed and equipped with a 22 foot by 22 foot rollup door with a chain hoist and a personnel door. The CONEX containers would be set on concrete footings to ensure that the containers rest on a stable, level surface. Footings and anchors would be installed in accordance with the manufacturers written instructions to ensure stability of the structure. A concrete apron would be placed at the front of the structure to provide a stable, level surface for the base of the structure and the rollup door. Concrete pads may be placed inside of structure as operational needs dictate. The structure and all associated activities would be restricted to the existing laydown area.

The structure would be used primarily for target construction/assembly but may also be used for meetings/training, to provide visual protection for sensitive items, temporary storage, and/or a short term equipment work area. Explosive operations would not be conducted in the structure. The function CONEX containers would not change (i.e., if a CONEX container is currently used to store tools, then it would continue to be used to store tools), but would be rearranged to form the base. If there are insufficient CONEX containers at the NSTR, additional containers would be acquired to provide a stable support system for the roof.

Target construction would include the uses of power and hand tools, machinery (i.e., forklift), and welding. All hot work would require a hot work permit. Work control procedures would be addressed in laboratory instructions, to include the use of chemicals and waste disposal procedures.

The structure would not have electricity or air conditioning. Should electricity be needed for lighting, power tools, portable heaters, fans, etc., a generator would be placed outside of the structure and extension cords would be routed to the equipment as needed. Other portable heat sources may also be used including, but not limited to, propane heaters.

The structure, all associated concrete, and anchors would be removed and disposed in accordance with company requirements, when the structure is no longer needed.

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

**Air Emissions** - This project has the potential to generate air emissions in the form of: 1) fugitive dust during excavation for concrete footers; 2) welding activities; and 3) emissions from stationary electrical generators. An APAD will be required to address emissions from the stationary sources (tent and associated generator) and determine if a permit to construct is required. Steps must be taken to control fugitive dust in accordance with the INL Title V Air permit. These include, when appropriate, use of dust control measures such as water application and logging the date, time, type of dust suppressant and amount applied, in facility records.

**Disturbing Cultural or Biological Resources** - Excavation for the concrete footings does not require a pre-survey by biological or cultural resources personnel. However, discovery of bones or other cultural artifacts during excavation requires an immediate cessation of work and a review by the BEA Cultural Resources personnel. In addition, placement of the tent must not result in an expansion of the existing fire protection perimeter around the lay-down area.

**Generating and Managing Waste** - Waste from construction activities may include wooden forms and truck run-out (if pre-formed footings are not used), and general construction debris. This non-hazardous waste will be recycled to the extent practicable. Waste generated during routine operations may include scrap wood, metal, lubricants, and cleaning materials. Hazardous and industrial waste will be managed by Waste Generator Services (WGS) in accordance with Battelle Energy Alliance, LLC (BEA) procedures.

**Releasing Contaminants** - Small amounts of contaminants will be released to the atmosphere due to welding and operation of the electrical generator.

**Using, Reusing, and Conserving Natural Resources** - Scrap material, such as wood and metal, shall be recycled to the extent practical. All applicable waste will be diverted from disposal in the landfill when possible. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will 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, or are non-toxic or less-toxic alternatives. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <http://www.sftool.gov/GreenProcurement/ProductCategory/14>).

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**SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s):** Identify the applicable categorical exclusion from 10 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 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 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 which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

**References:** 10 CFR 1021, Appendix B to subpart D, items 1.15 "Support buildings."

**Justification:** Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item 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 covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)       Yes     No

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 3/10/2014