

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Fire Department Training Fires at MFC 713

SECTION B. Project Description and Purpose:

Prior to D&D, the INL Fire Department will use MFC-713 for a simulated building fire and subsequent training exercises. MFC-713 will be demolished at a later date. This ECP only covers the FD training activities to take place in 713; it does not cover future demolition. Another ECP will be written for that task when appropriate. The FD plans on using the building to conduct rescue training, search and rescue training, collapse rescue training, and live fire training. To prepare the building, the existing water, power, fire alarm, telecom, evacuation, and voice paging utilities will be removed. Water will be isolated as required and power will be air-gapped between the facility disconnect switch and main panel. The telecom fiber distribution, evacuation alarm, and voice paging will be removed and reconfigured to maintain supply to other facilities. The fire alarm communication loop will continue to be maintained. A vent will also be cut into the roof to allow for proper ventilation and roof access. The building will be uninhabited with no tenants present during utility removal or live fire training. Rooms intended for training use will be prepared with sheet rock and other Class A building materials to allow for controlled burns to take place. The training fires will burn straw and unpainted wood pallets that are placed in FD-prepared rooms throughout the building. Due to the age of the building hazards such as PCB's and Asbestos are not applicable.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

This FD training is considered a type of open burning in the IDAPA air regulations established in IDAPA 58.01.01. DEQ notification is required and will take place as soon as dates are established

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

Training is due to take place in February before the migratory bird nesting season (April 1 to October 1). However, the facility will be evaluated for bird nests prior to training taking place. Preventative measures (surveillances, nest material removal, plastic, etc.) may be necessary to deter birds from building nests on the building.

Generating and Managing Waste

Scrap piping/metal, roofing material, oils, fire alarms panels, etc. will be generated during the training. Waste characterization will be conducted prior to waste generation and items will be disposed of or recycled accordingly. Light bulbs/tubes, light ballasts, mercury switches, circuit boards, brass, bronze, etc. will also be generated during training activities.

Releasing Contaminants

MFC 713 was built in 1992 and is currently 30 years old. Since the facility is not a pre-1982 building no PCB's or asbestos are expected to be present.

Using, Reusing, and Conserving Natural Resources

Scrap piping/metal will be recycled as appropriate.

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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, B1.2 Training exercises and simulations.
10 CFR 1021, Appendix B, B1.27 Disconnection of Utilities

Justification:

B1.2: Project Activities are consistent with 10 CFR 1021, Appendix B to Subpart D, item B1.2 "Training exercises and simulations." 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.

B1.27: Activities that are required for the disconnection of utility services (including, but not limited to, water, steam, telecommunications, and electrical power) after it has been determined that the continued operation of these systems is not needed for safety.

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

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 01/10/2023