SITEWIDE CATEGORICAL EXCLUSION FOR SAFETY AND SECURITY COMPONENT INSTALLATION AND ALTERATION, PACIFIC NORTHWEST NATIONAL LABORATORY, RICHLAND, WASHINGTON

Proposed Action:

The U.S. Department of Energy (DOE) Pacific Northwest Site Office (PNSO) proposes to install, alter, and/or maintain safety and security components to maintain an adequate protective planning stance.

Location of Action:

The proposed action would occur on the Pacific Northwest National Laboratory (PNNL) Site and in the vicinity of PNNL facilities in the State of Washington.

Description of the Proposed Action:

DOE proposes to install, alter, and/or maintain safety and security systems to continue to provide appropriate levels of protection against unauthorized access, theft, diversion, loss of custody, and destruction of DOE assets. As determined necessary, these activities would consist of installing, altering, and/or maintaining components such as:

- Alarm, warning, and emergency call systems; access control systems; control systems to provide automatic shutdown; fire detection and protection systems; and radiation and criticality monitors and alarms
- Vehicle and pedestrian access points
- Safety and security information signs
- Fencing, barriers, and other devices, as long as they do not have the potential to significantly impede wildlife population movements (including migration) or surface water flow, to direct authorized access and to deter unauthorized access.

The proposed action would also include reasonably foreseeable actions necessary to implement the safety and security activities, such as staging personnel, equipment, and materials, installing conduit and wiring, providing personal protective equipment and other supplies, maintaining equipment, and awarding grants and contracts.

Biological and Cultural Resources:

It is not likely that safety and security component installations and modifications would result in adverse impacts to sensitive biological or cultural resources. However, when special project circumstances warrant it, biological and cultural resource reviews would be conducted to assure that impacts to sensitive resources are avoided and minimized.

Biological resource reviews would assure that impacts to sensitive biological resources are avoided. These reviews would identify the occurrence of federal and state protected species in the project area such as avian species protected under the Migratory Bird Treaty Act (MBTA); plant and animal species protected under the Endangered Species Act (ESA), including candidates for such protection; and species listed as threatened or endangered by the state of Washington. Resource review recommendations would be followed to assure there are no adverse impacts to sensitive species and resources.

Cultural resource reviews would assure that impacts to sensitive cultural resources are avoided. Impact avoidance and mitigative measures would be implemented as stipulated by the resource review. Tagged historic artifacts would not be damaged. If consultation with the State Historic Preservation Office and/or affected tribes is deemed necessary, it would be initiated before project implementation.

Categorical Exclusion to Be Applied:

As the proposed action is to install, alter, and/or maintain safety and security components, the following CXs as listed in the DOE National Environmental Policy Act (NEPA) implementing procedures, 10 CFR 1021, would apply:

B1.11 Installation of fencing, including, but not limited to, border marking, that would not have the potential to significantly impede wildlife population movements (including migration) or surface water flow.

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 safeguards and security equipment).

Eligibility Criteria:

The proposed activity meets the eligibility criteria of 10 CFR 1021.410(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(1)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during EIS preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied as discussed below:

INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, APPENDIX B (1)-(5)	
WOULD THE PROPOSED ACTION:	**EVALUATION:**
Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health?	The proposed action would not threaten a violation of regulations or DOE or executive orders.
Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities?	No waste management facilities would be constructed under this CX. Any generated waste would be managed in accordance with applicable regulations in existing facilities. Waste disposal pathways are identified prior to generating waste and waste generation is minimized.
Disturb hazardous substances, pollutants, or contaminants that preexist in the environment such that there would be uncontrolled or unpermitted releases?	No preexisting hazardous substances, pollutants, or contaminants would be disturbed in a manner that results in uncontrolled or unpermitted releases.
Have the potential to cause significant impacts on environmentally sensitive resources., including, but not limited, to: • protected historic/archaeological resources • protected biological resources and habitat • jurisdictional wetlands, 100-year floodplains • Federal- or state-designated parks and wildlife refuges, wilderness areas, wild and scenic rivers, national monuments, marine sanctuaries, national natural landmarks, and scenic areas.	No environmentally sensitive resources would be adversely affected. Resource reviews would be conducted for special circumstances. Refer to the Biological and Cultural Resources section for details regarding the application of cultural and biological resource reviews. The proposed action would not adversely affect floodplains, wetlands regulated under the Clean Water Act, national monuments or other specially designated areas, prime agricultural lands, or special sources of water.
Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species?	The proposed action would not involve the use of genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements.

Checklist Summarizing Environmental Impacts: The following checklist summarizes environmental impacts that were considered when preparing this CX determination. Answers to relevant questions are explained in detail in the text following the checklist.

	Would the proposed action:	YES	NO
1	Result in more than minimal air impacts?	X	
2	Increase offsite radiation dose measurably?		X
3	Require a radiological work permit?	X	
4	Cause more than a minor or temporary increase in noise level?		X
5	Discharge any liquids to the environment?	X	
6	Require a Spill Prevention Control and Countermeasures plan?		X
7	Require an excavation permit (e.g., for test pits, wells, utility installation)?	X	
8	Disturb an undeveloped area?	X	
9	Use carcinogens, hazardous, or toxic chemicals/materials?	X	
10	Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?	X	
11	Require environmental permits?	X	

Explanations:

1. There might be temporary and localized dust and fumes from construction equipment while safety and security components are being installed or altered. These would be minimized as necessary, using water applications or other emission controls, and would be compliant with applicable permits, local, state, and federal regulations, DOE orders, and PNNL guidelines.
3. It is possible that installing or altering radiation detection or other safety and security components might require a radiological work permit. Activities would be performed in compliance with as low as reasonably achievable principles, applicable state and federal regulations, DOE Orders, and PNNL guidelines. The radiation received by workers during the performance of activities would be administratively controlled below DOE limits as defined in 10 CFR 835.202(a). Under normal circumstances, those limits control individual radiation exposure to below an annual effective dose equivalent of 5 rem.
5. Although unlikely, it is possible that safety and security alterations might result in minor and short-term liquid discharges, for example, water applications to control dust and cleanup rinse water. Effluents would be managed in accordance with applicable local, state, and federal regulations, PNNL requirements and best management practices.
7. An excavation permit might be required to install signs or other safety and security components. Stipulations in the excavation permit to minimize potential impacts to safety and the environment would be followed.
8. It is possible that security signs, access controls, or other components might be placed in undeveloped areas. If located on or causes impacts to sensitive species or their

habitats, such as old-growth sagebrush, additional NEPA would be required. Additional NEPA review would be required for activities on the Hanford Reach National Monument; within ¼-mile of the Columbia River; other sensitive environments, including wetlands, 100-year floodplains, critical habitats, and areas of traditional cultural properties or properties of historic, archeological, or architectural significance.

9. Although unlikely, safety and security activities might involve the use of carcinogens, hazardous and/or toxic chemicals and materials, such as cleaning solvents, fuel, oil, and antifreeze. Project inventories would be maintained at the lowest practicable levels, and chemical wastes would be recycled, neutralized, or regenerated if possible. Product substitution (use of less toxic chemicals in place of more toxic chemicals) would be considered where reasonable.
10. Safety and security activities might result in minor amounts of waste, such as excess caulking, paint, epoxy, and cleaning fluids and rags. If unrecyclable, such wastes would be characterized, handled, packaged, transported, treated, stored, and/or disposed of in existing Hanford Site or offsite treatment, storage, and disposal facilities in accordance with applicable local, state, and federal regulations, DOE Orders and guidelines.
11. Although not expected, it is possible that limited safety and security activities might require notifications and approvals from the Benton Clean Air Authority or the State of Washington Department of Ecology to use temporary and portable air pollution sources, such as engines or generators. Any necessary applications would be coordinated with PNSO staff.

Compliance Action:

I have determined that the proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, and meets the requirements for the CX referenced above. Therefore, using the authority delegated to me by DOE Order 451.1B, Change 2, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation.

Signature: _____ **Date:** 11/28/11

Theresa L. Aldridge
PNSO NEPA Compliance Officer

cc: JA Stegen, PNNL