

**SITEWIDE CATEGORICAL EXCLUSION FOR TRAINING PROGRAMS,  
EXERCISES, AND DRILLS, PACIFIC NORTHWEST NATIONAL LABORATORY,  
RICHLAND, WASHINGTON**

**Proposed Action:**

The U.S. Department of Energy (DOE), Pacific Northwest Site Office (PNSO) proposes to conduct exercises, drills, and simulations to support training goals in areas such as emergency response, spill cleanup, and environment, safety, and health.

**Location of Action:**

The proposed action would occur on the Pacific Northwest National Laboratory (PNNL) campuses in Richland and Sequim, Washington, and elsewhere as necessary to support training goals and participate in regional exercises and drills.

**Description of the Proposed Action:**

DOE proposes to conduct exercises and drills in conjunction with, but not limited to, emergency response training, spill cleanup training, firefighting and rescue training, environmental and safety training, and counter chemical, radiological and biological weapons training. Exercises and drills would include actions such as 1) establishing command posts and emergency operations centers, 2) dispatching field teams, 3) conducting safeguards and security force-on-force exercises, 4) testing fire protection and environmental and safety equipment, 5) using mobile laboratories to provide chemical, radiological and biological sample analyses in the field, 6) simulating fire and spill emergencies, 7) testing alarm systems, and 8) using metal, chemical, radiological and biological materials detectors.

PNSO and PNNL staff are occasionally requested to provide offsite training or exercise support to other agencies and organizations. Such support usually consists of classroom training, procedure development, observation and evaluation of field exercises, and occasionally, participation in field exercises. It is the responsibility of the lead agency to prepare any required National Environmental Policy Act (NEPA) or other environmental documentation before conducting offsite exercises or drills.<sup>a</sup>

In addition, PNSO and PNNL staff would continue to team with other federal, tribal, state, and local teams in regional exercises and drills. DOE participates in large-scale, complex exercises that provide valuable hands-on training, especially in inter-group communications, coordination, and field experience.

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<sup>a</sup> As an example, drills and other support activities are occasionally conducted at the Volpentest Hazardous Materials Management and Emergency Response training and education center. The NEPA review for these activities has been completed by the DOE Richland Operations Office.

The extent of planning, preparedness, response, recovery, and readiness assurance for exercises and drills would directly correspond to the type and scope of hazards present and the potential consequences of events. The specific type of emergency exercise or drill determines specified, preplanned responses and actions for the protection of participants, the public, and the environment.

The proposed activities would include foreseeable actions necessary to implement these training activities, such as maintenance, use, and demonstration of instrumentation, detectors, and mounting systems; consultation and planning with other agencies and organizations; equipment transportation activities; maintenance, calibration, and use of mobile emergency trailers and analytical equipment; and award of grants and contracts.

### **Biological and Cultural Resources:**

Biological and cultural resources reviews will be conducted prior to such activities to assure that impacts to sensitive resources are avoided or minimized.

The biological resources review will identify the occurrence of federally and state-protected species and habitats in the project area such as avian species protected under the Migratory Bird Treaty Act (MBTA); species protected by the Marine Mammal Protection Act (MMPA); essential fish habitat as defined by the Magnuson-Stevens Fisheries Conservation and Management Act (MSA); plant and animal species and critical habitat protected under the Endangered Species Act (ESA), including candidates for such protection; and state species listed as threatened or endangered. Resource review recommendations will be followed during activities covered under this categorical exclusion (CX) to assure there are no adverse impacts to sensitive species and resources.

DOE will conduct a cultural resources review as part of the Section 106 process of the National Historic Preservation Act (NHPA). The Section 106 process assesses undertakings to determine if the undertaking will have an adverse effect/impact to historic properties.

If the biological and/or the cultural resources review determines that resources may be adversely affected/impacted, the use of this CX would be reevaluated. Potential options could be, but are not limited to, changing the proposed activity location, the development of mitigation measures to render the impacts not significant, or the performance of additional NEPA analysis and review.

### **Categorical Exclusion to Be Applied:**

As the proposed action is to conduct training exercises, drills, and simulations, the following CX as listed in DOE's NEPA implementing procedures, 10 CFR 1021, would apply:

*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.

Generic CXs are authorized by 10 CFR 1021.410(f) for recurring activities to be undertaken during a specified period of time, after considering potential aggregated impacts.

**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 environmental impact statement preparation.

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

<b>INTEGRAL ELEMENTS, 10 CFR 1021, SUBPART D, APPENDIX B (1)-(5)</b>	
<i>Would the Proposed Action:</i>	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: <ul style="list-style-type: none"> <li>• protected historic/archaeological resources</li> <li>• protected biological resources and habitat</li> <li>• jurisdictional wetlands, 100-year floodplains</li> <li>• Federal- or state-designated parks and wildlife refuges, wilderness areas, wild and scenic rivers, national monuments, marine sanctuaries, national natural landmarks, and scenic areas.</li> </ul>	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).

## Summary of Environmental Impacts

The following table summarizes environmental impacts considered when preparing this CX determination.

<b>Environmental Impacts Considered when Preparing this CX Determination</b>	
<i>Would the Proposed Action:</i>	Evaluation
Result in more than minimal air impacts?	Although not expected to result in significant quantities, activities such as fire suppression exercises and burn and combustion tests might generate airborne emissions. Exercises and drills with the potential to generate airborne emissions would be compliant with applicable permits, local, state, and federal regulations, DOE orders, and PNNL guidelines.
Increase offsite radiation dose measurably?	The proposed action would not affect offsite radiation dose.
Require a radiological work permit?	Although the proposed exercises and drills would not involve source, special nuclear, or byproduct materials, emergency preparedness exercises and drills might occur within facilities containing radiological materials. In addition, use of the mobile emergency laboratory during regional field exercises would require the use of sealed sources for calibration and similar purposes. Activities would be performed in compliance with as low as reasonably achievable (ALARA) 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.
Discharge any liquids to the environment?	The discharge of any liquids to the environment might include minor quantities of liquid effluents, for example, rinse water, and fire suppression streams. Effluents would be managed in accordance with applicable regulations and best management practices.
Require a Spill Prevention, Control, and Countermeasures plan?	The proposed action would not require a Spill Prevention, Control, and Countermeasures plan.
Use carcinogens, hazardous, or toxic chemicals/materials?	The proposed training activities might involve use of carcinogens, hazardous and/or toxic chemicals and materials. For example, certain equipment or machinery might contain or require the use of chemicals such as antifreeze, hydraulic fluids, or tire fire suppression chemicals. In addition, analytical field testing of environmental samples would require

	<p>small amounts of toxic and/or radiological standards for calibration and quality-control checks. Chemical and material 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.</p>
<p>Involve hazardous, radioactive, polychlorinated biphenyl, or asbestos waste?</p>	<p>Proposed activities generally use simulants in exercises or drills. However, small amounts of radioactive, mixed, or hazardous wastes might result from analytical tests and other aspects of emergency exercises and drills. If unrecyclable, such wastes would either be returned to the client or characterized, handled, packaged, transported, treated, stored, and/or disposed of in existing treatment, storage, and disposal facilities in accordance with applicable regulations.</p>
<p>Cause more than a minor or temporary increase in noise level?</p>	<p>The proposed action would not cause more than a minor or temporary increase in noise level.</p>
<p>Create light / glare, or other aesthetic impacts?</p>	<p>The proposed action would not create long-term light, glare, or other aesthetic impacts. There could be short-term use of lights if work at night is required.</p>
<p>Require an excavation permit (e.g., for test pits, wells, utility installation)?</p>	<p>Although not expected, certain training activities might involve soil excavation, which would require an excavation permit such as a PNNL or Hanford Site Excavation Permit. Stipulations in the excavation permit to minimize potential impacts to safety and the environment would be followed.</p>
<p>Disturb an undeveloped area?</p>	<p>Regional training activities sometimes occur at field sites away from existing infrastructure and developed roads. Such exercises and drills rarely involve more than basic access requirements. Additional NEPA would be required if disturbances would impact sensitive species and/or habitats; cultural resources, including historic buildings and Traditional Cultural Properties; or other resources.</p>
<p>Result in more than minimal impacts on transportation or public services?</p>	<p>The proposed action would not impact transportation or public services.</p>
<p>Disproportionately impact low-income or minority populations?</p>	<p>The proposed action would not disproportionately impact low-income or minority populations.</p>
<p>Require environmental or other permits from federal, state, or local agencies?</p>	<p>Although not expected during most training exercises, select permits, plans, and notifications might be required for some activities (e.g., air agency notifications, air permits, burn permits, discharge notifications). Activities will abide by all applicable permit requirements.</p>

**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, I have determined that the proposed action may be categorically excluded from further NEPA review and documentation. This determination must be reviewed at least once every 5 years.

**Signature:** \_\_\_\_\_

Tom McDermott  
PNSO NEPA Compliance Officer

cc: ES Norris, PNNL