

**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) Site 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.¹

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.

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

¹ 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.

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:

It is not likely that the majority of training programs, exercises, and drills 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 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.

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: <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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.</p>
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. 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.
3. 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 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. 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 local, state, and federal regulations, PNNL requirements and best management practices.
7. Although not expected, certain training activities might involve soil excavation on the PNNL Site, which would require an excavation permit. Stipulations in the excavation permit to minimize potential impacts to safety and the environment would be followed.

8. **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. If training activities are located on or cause 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. **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 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.**
10. **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 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 during most training exercises, the following types of permits, plans, and notifications might be required for some activities:**
 - **A 31-day notification to the Benton Clean Air Agency might be required to use a temporary and portable air pollution source, e.g., equipment using internal combustion engines such as portable electric generators**
 - **Fire suppression exercises may require air permits from the Washington State Departments of Health or Ecology. Burn and combustion tests might require a burn permit from the Benton Clean Air Agency**
 - **Any discharge of wastewater to ground must be reviewed before being discharged to determine if it meets Washington State Groundwater Quality Criteria; if it requires permitting under Washington State Waste Discharge regulations (Washington Administrative Code 173-216); and/or if it meets applicable purge water discharge requirements.**

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