## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

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CX Posting No.: DOE-ID-INL-15-024

## SECTION A. Project Title: Materials and Fuels Complex (MFC) MH50 Fiber Optic Installation Project

## SECTION B. Project Description:

MFC has a facility entry fiber bottleneck that limits the ability to recover networks and telecommunications in the event of a single fiber strand failure. The proposed project would provide available fibers in a failure situation and reduce risks to MFC Operations. The proposed project would install approximately 6,700 feet of fiber optic telecommunication cable from MFC-1728 (MFC Dial Room) to Manhole 50 (near MFC-735, MFC Checkpoint Guardhouse). The route (see Figure 1.) would use concrete ducting inside MFC and up to the retractable vehicle barriers just outside the MFC fence. A trench (approx. 2 feet deep) would be dug from the vehicle barrier area out to Manhole 50 along the same footprint that was used for the Design Basis Threat (DBT) Project. Trenching would not impact any known Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites. An underground power line was replaced as part of the DBT, and the proposed action is along the same path. This area was reseeded at the completion of that (DBT) Project. The new fiber optic cable would also be routed inside MFC-1728 as directed by project personnel. The project would include on-reel and post-installation end-to-end testing and installation of some conduit.

Start date is dependent upon available funding being released Approximate Cost: \$275,000

Figure 1.



SECTION C. Environmental Aspects or Potential Sources of Impact:

**<u>Air Emissions</u>**: Fugitive dust may be generated during trenching activities. All reasonable precautions would be taken to control fugitive dust. If dust control methods are required, the subcontractor must record the methods that were used in their daily logbooks and submit to Battelle Energy Alliance, LLC (BEA) as project records.

**Disturbing Cultural or Biological Resources**: Trenching activities from outside the MFC parking lot to the Manhole 50 has the potential to disturb Cultural and Biological Resources. Project review by both Cultural and Biological Resources personnel must be performed and documented prior to beginning work. Recommendations in the reviews must be followed/implemented. The proposed route is not located in the Sage-Grouse Conservation Area (SGCA) or the Sagebrush Steppe Ecosystem Reserve.

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It is unlikely that excavation activities within fenced facility boundaries would disturb cultural or biological resources. However, discovery of bones or other cultural artifacts during excavation requires an immediate cessation of work and a review by BEA Cultural Resources personnel.

Cultural resource surveys would be required for all areas outside the MFC perimeter fences. Project activities would be organized to avoid impacts to any culturally sensitive materials identified during these surveys. Brenda Pace (526-0916) of the INL Cultural Resource Management Office would be contacted to arrange for a cultural resource review.

There is also the potential for some impact to wildlife and habitat during the course of the proposed action. Contact Jackie Hafla (525-9358) at Gonzales-Stoller Surveillance to arrange for biological resource surveys (including nesting bird surveys), at least two weeks in advance, or to respond to any questions or concerns with biological resources.

Trenching and other ground disturbance may require re-seeding with native species and supplying supplemental water until revegetation is successful.

<u>Generating and Managing Waste</u>: Fiber optic cable installation is expected to generate small amounts of industrial waste. All waste will characterized, stored, and disposed at the direction of Waste Generator Services (WGS).

**<u>Releasing Contaminants</u>**: Typical construction chemicals such as fuels, lubricants, cable cleaner, etc., would be used during the project. A chemical inventory list with associated Safety Data Sheets (SDS's) will be required to be submitted by the subcontractor and be approved by BEA in the vendor data system. The Construction Chemical Coordinator will enter these chemicals into the Comply Plus chemical management system for tracking purposes. All spills will be reported to the Construction Field Representative and to the Spill Notification Team if applicable.

<u>Using, Reusing, and Conserving Natural Resources</u>: All materials would be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill where conditions allow. The project would 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 (see https://sftool.gov/green-products/0?agency=7).

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): 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 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, B4.7, "Fiber optic cable."

**Justification:** Project activities are consistent with 10 CFR 1021, Appendix B, 4.7 "Adding fiber optic cable to transmission facilities or burying fiber optic cable in existing powerline or pipeline rights-of-way. Covered actions may include associated vaults and pulling and tensioning sites outside of rights-of-way in nearby previously disturbed or developed areas."

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 5/19/2015