DOE-ID NEPA CX DETERMINATION IDAHO NATIONAL LABORATORY

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SECTION A. RWMC/AMWTP - Procure and Install Fence Around Wastewater Storage Lagoons

SECTION B. Project Description

Purchase and install a fence around the Radioactive Waste Management Complex (RWMC) Sanitary Wastewater Treatment Plant Lagoons. The proposed fence will prevent wildlife access to this area and keep grazing animals out of the wastewater lagoons. The RWMC wastewater lagoons are located at the Idaho National Laboratory site and were constructed prior to April 15, 2007.

Wastewater lagoons constructed in the State of Idaho are required to meet specific fencing requirements as prescribed by the Department of Environmental Quality. According to IDAPA, the following Miscellaneous Pond Construction Details will be applied to this project.

- > 58.01.16.493.09c.i, Fencing. "The pond area shall be enclosed with an adequate fence to prevent entering of livestock and discourage trespassing."
- > 58.01.16.493.09c.iii, Warning signs. Appropriate permanent signs shall be provided along the fence around the pond to designate the nature of the facility and advise against trespassing. At least one (1) sign shall be provided on each side of the site and one (1) for every five hundred (500) feet of its perimeter. (3-30-07)

SECTION C. Environmental Aspects / Potential Sources of Impact

Air Pollutants – Fugitive dust may be generated during the fence installation. All fugitive dust emissions should be controlled. Equipment such as trucks, tractors and a portable cement mixer may be used to support the action.

Chemical Use and Storage - Commercial chemical products will be used to absorb or neutralize spills, decontaminate equipment, tools, etc. and for enabling proper operation of equipment. Project personnel will use non-hazardous product alternatives or substitutes in place of hazardous chemical products as long as the non-hazardous alternatives meets the performance requirement or specifications of the requester. Spill prevention/minimization measures will be applied to all aspects of storage and utilization of chemicals/fuels. Affirmative Procurement practices will be used in procuring chemicals and other materials as applicable.

Material or Waste Packaging and Transportation - All waste handling and or transportation will be coordinated with transportation personnel in full accordance with all transportation plans and procedures as applicable. Appropriate methods will be used to prevent leaks and spills during waste handling and transportation.

A hazardous waste determination will be performed for all waste streams to develop the appropriate management practices. Waste streams will be evaluated to determine if any of the materials can be recycled or reused and to implement actions for minimizing waste entering the landfill.

Waste Generation and Management – Typical <u>industrial wastes</u> such as wood, wiring, and metal may be generated and disposed of as nonhazardous, nonradioactive waste to the INL Landfill Complex. All potential waste materials will be evaluated prior to generation for waste minimization in accordance with applicable procedures.

Interaction with Wildlife/Habitat - If migratory bird nests with birds and/or eggs are discovered, cease work nearby, and notify the facility Project Environmental Lead and follow instructions in applicable procedure(s).

Vegetation removal (including mowing) that may affect nesting birds (between April 1 through October 1) requires a nesting bird survey no more than two weeks in advance of beginning work. If the work is not completed within two weeks of the survey, a new survey will be required.

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Use, Reuse and Recycling of Resources – If INL borrow sources are used to supply the fill materials, the action must be coordinated through applicable personnel and completion of applicable Form(s) is required.

SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification, and the approval date.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment 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) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: B1.11, Fencing
Justification: The fence will prevent wildlife access and keep grazing animals out of the wastewater lagoons and will not significantly impede wildlife population movement (including migration) or surface water flow.
Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act)
Approved by Jason Andersen, DOE-ID NEPA Compliance Officer on August 25, 2021.