

**DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory**

SECTION A. Project Title: Off-Road Weed Spraying Activities

SECTION B. Project Description and Purpose:

BEA is required to manage noxious weeds at the INL Site, which is accomplished primarily through the application of herbicides. These weed spraying activities at the INL Site are not always roadside and would occasionally require travel off road to access large noxious weed infestations to manage properly. Applicators attempted to spray the identified areas on foot with backpack sprayers, with little impact to noxious weed populations. The scope of this document is to allow applicators to use ATV / side-by-side type vehicles to travel off road to reach these infestations. Infestations and spray routes will be identified by applicators and provided to the Cultural Resources Management Office (CRMO) and to Biological Resources personnel in advance. Locations shall also be provided to the ES&S CERCLA lead so a munitions response area activity notification (MRAAN) can be completed, (if required).* Off-road driving and spraying activities will not be performed until all surveys and other notifications have been completed. Applicators will follow driving routes identified by Cultural and Biological resources while they perform the spraying activities. Use of T-roads is not considered off road travel.

Many of the areas with known noxious weed infestations are remote and not easily accessible on foot with a back-pack sprayer. Or they are large and would require multiple trips to and from a vehicle for refills. For this reason, four high priority areas have been identified as having noxious weeds that would be good candidates for off-road ATV travel. They include: spreading areas south of RWMC (~640 acres), NE INL corner spreading area near T9 (~450 acres), spreading area near the Howe sinks (~350 acres), spot spray locations off of T3 from CFA to MFC, and spot locations off of T4 between highways 26 and 20. These are not acreages of infestations, just a demonstration of how large the area is that needs to be covered to check for infestations. Additional noxious weed infestations may be discovered throughout INL and off-road ATV travel may be necessary for quick response/control to prevent further spreading. Any new locations will be evaluated and surveyed by cultural and biological resources prior to any actions.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Off-road travel may create fugitive dust.

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

Off-Road travel may impact Cultural or Biological Resources

Generating and Managing Waste

N/A

Releasing Contaminants

Application of herbicides.

Using, Reusing, and Conserving Natural Resources

N/A

SECTION D. Determine Recommended Level of Environmental Review, Identify Reference(s), and State Justification: 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 Comprehensive Environmental Response, Compensation, and Liability Act (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)).

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References:

10 CFR 1021, Appendix B, B1.3 "Routine maintenance" and B1.20 "Protection of cultural resources, fish and wildlife habitat."

Justification:

Project activities are consistent with 10 CFR 1021, Appendix B1.3: Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses
- b) Door and window repair or replacement
- c) Wall, ceiling, or floor repair or replacement
- d) Reroofing
- e) Plumbing, electrical utility, lighting, and telephone service repair or replacement
- f) Routine replacement of high-efficiency particulate air filters
- g) Inspection and/or treatment of currently installed utility poles
- h) Repair of road embankments
- i) Repair or replacement of fire protection sprinkler systems
- j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces
- k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation)
- l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor
- m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor
- n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes)
- o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors)
- p) Removal of debris."

And B1.20: Small-scale activities undertaken to protect cultural resources (such as fencing, labeling, and flagging) or to protect, restore, or improve fish and wildlife habitat, fish passage facilities (such as fish ladders and minor diversion channels), or fisheries. Such activities would be conducted in accordance with an existing natural or cultural resource plan, if any.

Is the project funded by the American Recovery and Reinvestment Act of 2009 (Recovery Act) Yes No

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 08/17/2021