

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: MFC Perimeter Road Mowing

SECTION B. Project Description and Purpose:

PLN-14401, Idaho National Laboratory Wildland Fire Management Plan, provides general wildland fire management information and practices to organizations directly involved in the preparedness, prevention, response, and recovery from wildland fires at the INL. Seasonal preparedness actions, such as mowing, are to occur to ensure that adequate defensible spaces are provided. To confirm adequate defensible spaces are in place, the INL Fire Department conducts an annual vegetation assessment prior to each wildland fire season. The assessment identifies general and facility specific seasonal actions that are required to be completed.

Due to extreme fire conditions, the Equipment Operators at the Materials and Fuels Complex plan to mow the approach road to MFC and facility perimeter roads to a 50-ft defensible space. Previously, roads have not been mowed to 50-ft. The roads to be mowed to a 50-ft defensible space are:

- Taylor Boulevard
- Buchanan
- Harrison Boulevard
- T-25
- Newly paved perimeter road to future VTR and East Gate

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Activities addressed have the potential to contribute to air emissions through the operation of fuel burning equipment and the use of maintenance equipment. If mobile sources (equipment) will be used, they must meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements.

Fugitive dust will likely be generated during proposed work.

Discharging to Surface-, Storm-, or Ground Water

N/A

Disturbing Cultural or Biological Resources

Areas of soil that have not been previously disturbed will require a cultural resource review of the area before the area is disturbed. The area will also require a nesting bird survey from April 1 to October 1 for compliance with the Migratory Bird Treaty Act. This project has the potential to disturb sagebrush habitat which will require compensatory mitigation for damaged or lost sagebrush.

Generating and Managing Waste

N/A

Releasing Contaminants

N/A

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)-

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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 to subpart D, items B1.3 Routine Maintenance.

Idaho National Engineering and Environmental Laboratory Wildland Management Environmental Assessment, DOE/EA-1372, April 2003.

Justification: The proposed activity is consistent with CX 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); and (p) Removal of debris.

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: 07/20/2021