

# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

### SECTION A. Project Title: MFC Perimeter Road Improvements and New East Guard Gate

### SECTION B. Project Description and Purpose:

This revision provides additional information about the procurement, installation, and operation of an emergency diesel generator and docking station to support the new East Guard Gate.

The purpose of the proposed action is to promote safer traffic flow at the MFC complex through rerouting all delivery traffic away from the parking lot in order to reduce the amount of interaction between pedestrians and commercial vehicles.

Project activities include:

1. Widen the East/West perimeter road by approximately 2'-3' on each side and the North/South perimeter road by approximately 5-6' on each side.
2. Install a gravel roadway from the east perimeter road into MFC. This will include road section between the existing gravel road and the outer fence for an inspection area, turnaround area, and small parking area outside the perimeter fence station and inside the perimeter fence near the guard station.
3. Install access gates in the existing security fencing.
4. Install a pre-fabricated building to be used as a security guard station. This building will not be permanently mounted. Skirting and or other materials will be installed at the base of the building to prevent rodents from entry under the building. The security guard station will require stand-alone heating/cooling.
5. Install electrical power (both overhead and underground) to the security guard station and security items, such as, camera towers, intrusion detection system modifications, and exterior lighting.
6. Install a vehicle inspection area.
7. Install a comfort station near the security guard station.
8. Install a large diameter culvert inside the perimeter fence for access over an existing drainage ditch.
9. Installation of security items, such as, camera towers, modification to existing intrusion detection system, and exterior lighting.
10. Procurement, installation, and operation of an emergency diesel generator and docking station to provide power to the security guard station when commercial power is interrupted.

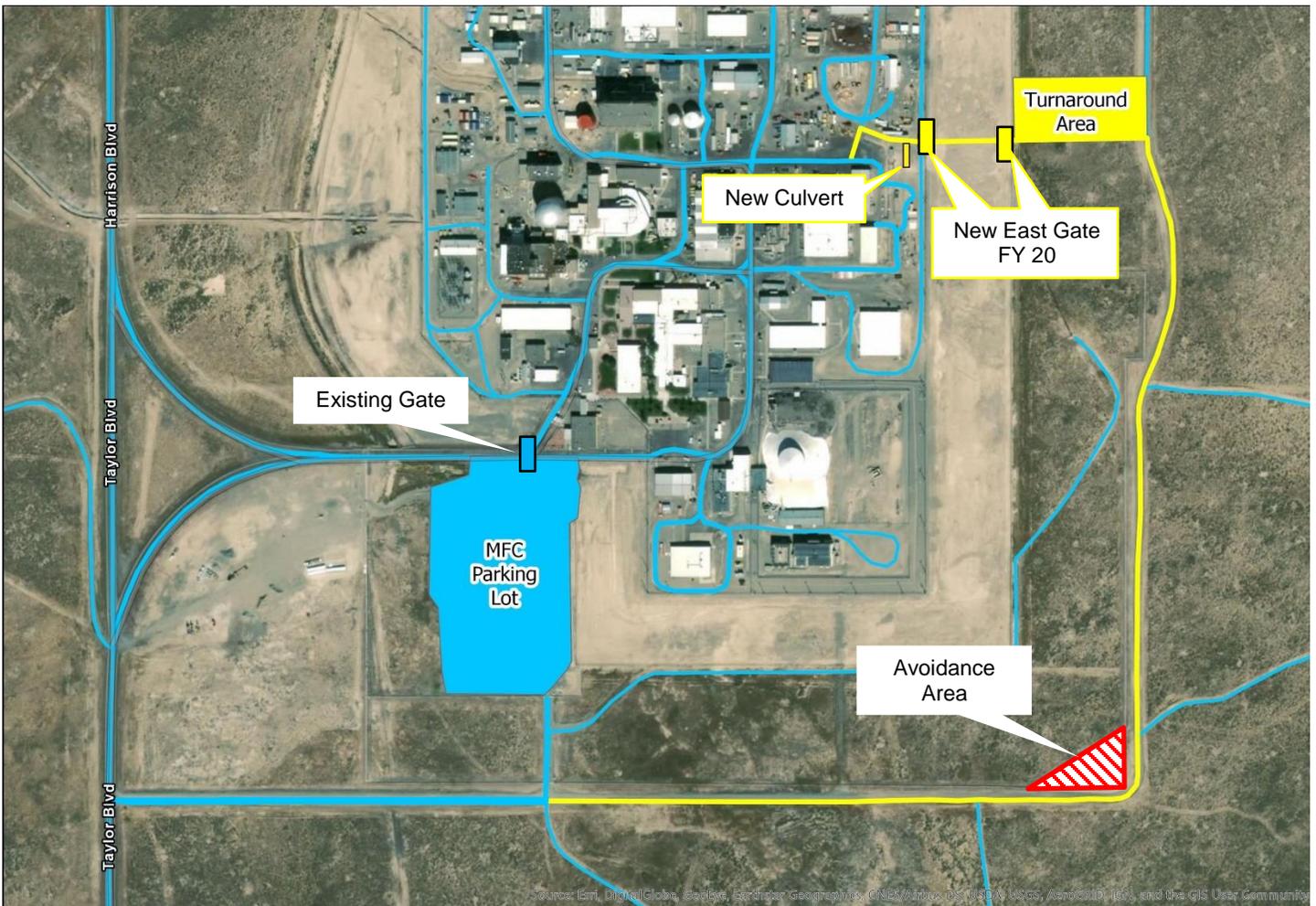
It is possible that the subcontractor may install temporary fueling and diesel exhaust fluid tanks to fuel construction vehicles and equipment.

Fill material would be obtained from the Monroe Gravel Pit on the Idaho National Laboratory (INL) Site for road widening.

Figure 1 identifies the estimated location of the east security guard gate and the perimeter road access.

Figure 1. Proposed changes compared to existing features

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Existing Features

Proposed Modifications

0 0.05 0.1 Miles



Spoils from clearing and grubbing will be distributed to fill low-lying areas near the MFC complex and within project areas of "No-Man's Land". The areas identified for spoil placement (Figures 2 & 3) will require a cultural resource review of the area before the topsoil is placed. The areas identified for spoils placement is located to the West of Taylor Boulevard and South of the T3 road. This area will also require a nesting bird survey for soil and vegetation disturbance from April 1 to September 1 for compliance with the Migratory Bird Treaty Act. Revegetation with native seed may be required on areas where the topsoil is placed. Contact Jackie Hafila @ 208-227-9031 for revegetation determination.

Figures 2, 3, and 4 identify areas for excess spoils placement.

Figure 2. Excess Topsoil Placement Area 1



Figure 3. Excess Topsoil Placement Area 2



Figure 4. Aerial View of Excess Topsoil Placement Areas 1 and 2



**SECTION C. Environmental Aspects or Potential Sources of Impact:**

**Air Emissions**

Air Emissions - Fugitive dust may be generated while widening the road and during use of the road. All reasonable precautions would be taken to prevent particulate from becoming airborne, including spraying down the roads with water and periodically applying a dust and erosion-control product.

Activities addressed by this EC have the potential to contribute to air emissions from the operation of fuel burning equipment and use of construction equipment. If mobile sources (equipment) will be used temporarily, they must meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emission opacity requirements. An APAD must be completed for the emergency diesel generator.

**Discharging to Surface-, Storm-, or Ground Water**

Project activities have the potential to contaminate waters of the United States (U.S.) or groundwater through storm water discharges. However, an increase in the volume, velocity, or temperature of storm water discharges is not anticipated.

A state of Idaho permitted septic system pumping company shall be used when pumping septic tanks, comfort stations, and/or portable toilets. Wastewater pumped from these systems at the INL Site shall be disposed of at the CFA Sewage Treatment Plant or other approved INL Site sanitary wastewater facility. The permitted septic system pumping company must have the disposal facility (e.g., CFA Sewage Treatment Plant) on their Idaho Health Department approved list of disposal locations. In addition, the INL sanitary wastewater facility manager must be contacted 24-hours prior to discharging to their facility. Contact the PEL for assistance.

**Disturbing Cultural or Biological Resources**

The area to be disturbed are historic properties (i.e., properties eligible for listing on the National Register of Historic Places). Changes to original features may adversely will affect historic properties. Prior to implementation of any projects under this EC, a cultural resource review must be completed. Contact INL Cultural Resource Management Office (CRMO) at [grp-crmo@inl.gov](mailto:grp-crmo@inl.gov) to initiate cultural resource review.

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Activities will involve vegetation removal and soil disturbance and may require pesticide application conducted on areas with native or naturalized vegetation.

Disturbance of the area may impact migratory birds and bird nests on the INL Site.

### Generating and Managing Waste

The project activities may generate industrial (non-hazardous, non-radioactive) wastes typical of construction activities, such as scrap metal, conduit, wire, cable, concrete, and packaging material. Scrap metal will be diverted from landfill disposal and recycled where practical. Potential waste materials will be evaluated for waste minimization prior to generation, and industrial waste generated during proposed activities will be evaluated for recycling opportunities prior to disposal at the INL Landfill Complex.

All solid waste will be managed by WGS using approved laboratory procedures.

### Releasing Contaminants

Typical construction chemicals such as fuels, lubricants, adhesives, concrete, concrete cure, asphalt, etc., will be used and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures. When dispositioning surplus chemicals, project personnel must contact the facility Chemical Coordinator for disposition instructions.

Herbicides may be applied on areas where the roadway will be expanded.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility Environmental Staff. If the Environmental Staff cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

### Using, Reusing, and Conserving Natural Resources

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.

**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)).

**References:** National Environmental Policy Act (NEPA) Implementing Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, Items B1.15 "Support Buildings" B1.31 "Installation or Relocation of Machinery and Equipment", and B1.32 "Traffic Flow Adjustments"

**Justification:** The proposed activities are consistent with CX B1.15 "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10 of this appendix."

B1.31 "Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.", and

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CX B1.32 "Traffic flow adjustments to existing roads (including, but not limited to, stop sign or traffic light installation, adjusting direction of traffic flow, and adding turning lanes), and road adjustments (including, but not limited to, widening and realignment) that are within an existing right-of-way and consistent with approved land use or transportation improvement plans."

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

Approved by Jason Sturm, DOE-ID NEPA Compliance Officer on: 5/14/2020