

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

SECTION A. Project Title: USG #105

SECTION B. Project Description and Purpose:

USG#105 has requested the use of the INL desert site and surrounding areas to conduct research and RF testing on various UHF/VHF transceivers to better understand and examine their operational characteristics in an open-air environment. A variety of fixed and mobile radios will be deployed and tested across the INL desert to obtain direct and spurious RF emissions by Customer-built data recording devices.

All Customer-based site activities will occur between September 8th and September 21st, 2019.

Pre-test and Post-test activities will occur between August 19th and October 4th. The following locations will be utilized:

Description	Latitude	Longitude
ARA-632	43°31'30.44"N	112°49'37.56"W
Birch Creek	44°03'42.80"N	112°51'55.98"W
Cell Site 6	43°32'0.09"N	112°49'48.53"W
CFA-699	43°31'55.72"N	112°56'42.96"W
EBR-1	43°31'14.96"N	112°59'57.86"W
Four Corners	43°59'16.16"N	112°43'50.44"W
Gate-3	43°32'3.20"N	112°58'59.57"W
HFTB	43°31'18.22"N	112°53'50.26"W
Mound	43°30'6.28"N	113° 3'26.82"W
Ramp at Railway	43°37'26.52"N	112°55'27.40"W
TAN Dial Room	43°50'49.87"N	112°42'8.12"W
TAN Fire Station	43°50'46.18"N	112°42'23.89"W
UAV Field	43°35'55.90"N	112°54'23.28"W
WRRTF	43°49'51.70"N	112°41'28.43"W

At EBR-1, CFA-699, Tan Fire Station, Tan Dial Room and WRRTF an OE254 Very High Frequency / Ultra High Frequency VHF/UHF antenna will be deployed. The OE254 is a monopole antenna that requires 12" guy stakes to support the guy wires that keep the mast erect. Grounding is required for operation and will be facilitated with existing ground rods. Other portable omni antennas will be used at these locations and deployed on a camera tripod that does not require ground stakes or any ground penetration. All antennas and tripods will fall on disturbed areas.

The Customer will outfit their vehicles with radio transceivers and portable generators. Motor vehicle use will be restricted to established roads. Customer vehicles will park near the OE254 locations and Customer test teams will connect their transceivers to the antennas via RF transmission lines. On the rear of the Customer vehicles there will be a hitch mount rack that supports a portable generator. This configuration allows for various stationary and mobile transceiver configurations to be tested. Where applicable AC power will be obtained from buildings to minimize the RF noise from portable generators.

Customer test teams will utilize the existing buildings/infrastructure at CS6, CFA-699, and the HFTB. A work trailer and supporting generator will be placed at the UAV Field for Customer test teams to work out of. Customer vehicles will visit Birch Creek, Four Corners, Gate-3, Mound and the Ramp at Railway.

Portable restrooms will be placed at the following locations: CS6, Gate-3, Mound, Ramp at Railway, Tan locations, UAV Field and WRRTF. The portable restrooms will be tied down using 12" guy stakes and rope.

All environmental Aspects, Work Activities, Conditions and Requirements identified in this EC reflect the proposed scope of work for this effort. Prior approval will be obtained through a CERCLA Notice of Soil Disturbance before any soil disturbance occurs. If the installation of ground-rods is required a subsurface investigation will be performed. Any anomalies shall be reported to the N&HS Program Environmental Lead. No fixed potable/wastewater utilities will be provided.

The Customer shall be permitted to fuel generators with the use of safety glasses and nitrile gloves upon receiving a fueling safety brief. WTB personnel will be available to assist the Customer test team with fueling and installation activities which require INL qualifications/certifications. The INL Fire Marshal has established requirements for mitigation and control of portable generator fire hazards, including but not limited to: defining buffer areas around any heat producing equipment (the transmitter/receiver and generator), no smoking, fire extinguisher(s), shovel, comms (radio/cell), allowing generators to cool prior to refueling, and placement of generators in secondary containments to prevent drips/spills.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Air emissions from portable electrical generators are regulated by the EPA and the State of Idaho and are therefore exempt from permitting.

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Disturbing Cultural or Biological Resources

Project activities have the potential to impact biological and cultural resources. Sagebrush disturbance is not anticipated. Mowing is prohibited unless approved by biological resources personnel and will be minimized to the extent possible. Motor vehicle use will be restricted to established roads.

Generating and Managing Waste

Activities will generate industrial waste (e.g., common office trash). All Solid Waste will be managed by WGS.

Using, Reusing, and Conserving Natural Resources

Recyclable materials such as paper, plastic, and metal will be recycled to the extent practicable.

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: 10 CFR 1021, Appendix B to Subpart D, item B3.11 "Outdoor tests and experiments on materials and equipment components"

Justification: The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D categorical exclusion B3.11, "Outdoor tests and experiments for the development, quality assurance, or reliability of materials and equipment (including, but not limited to, weapon system components) under controlled conditions. Covered actions include, but are not limited to, burn tests (such as tests of electric cable fire resistance or the combustion characteristics of fuels), impact tests (such as pneumatic ejector tests using earthen embankments or concrete slabs designated and routinely used for that purpose), or drop, puncture, water-immersion, or thermal tests. Covered actions would not involve source, special nuclear, or byproduct materials, except encapsulated sources manufactured to applicable standards that contain source, special nuclear, or byproduct materials may be used for nondestructive actions such as detector/ sensor development and testing and first responder field training."

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: 9/11/19