DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

CX Posting No.: DOE-ID-INL-17-056 R1

SECTION A. Project Title: Temporary Wind Tower and Ambient Air Monitoring

SECTION B. Project Description and Purpose:

Revision 1:
This revision addresses some additional activities not addressed in the original EC. Off-road vehicles (such as gators) will be utilized on the T-roads to monitor sensors.
Two species of plants will be utilized for spectral sampling and analysis. The species are tobacco and brassica and will be used in two locations. The first location is on T-3 adjacent the wind tower at approximately 43.59N -112.80W. This location will include a total of 48 plants in individual pots with 24 of each type. The second location is at the High Frequency Test Bed at approximately 43.52N -112.89W. This location will include a total of 12 plants in individual pots with 6 of each type. The pots will be placed on an elevated platform for approximately 2 weeks and require daily watering. No fencing will be required to keep animals away.
Eight seismic sensors will also be used. Three of the sensors are a can-type sensor (1 1/2" x 12") and the other five are a trench-type sensor (4' x 6' x 12"). These sensors will be placed in the vicinity of PBF-622. The exact placement will be determined with the assistance of biological and cultural personnel in an effort to avoid biological and cultural resources.

Original EC:
This activity will erect a small portable wind monitoring tower and deploy a trailer-mounted air sampling/monitoring system. The wind monitoring tower is a small trailer-mounted unit with a telescoping mast. The portable tower uses solar panels to charge onboard batteries. The mast will be anchored using concrete blocks as ground anchors to avoid the use of ground stakes. The tower will be located off of the T-3 road at approximately 43.58873 N, -112.74636 W. An alternate location is 43.59169N, -112.764790 W. These areas have been previously disturbed by the Jefferson fire; negative impact to sagebrush is not anticipated.

The air sampling and monitoring trailer will house air monitoring and sampling equipment. Air samples may be subjected to in-line analysis or gas collection for analysis at other locations, both at INL and customer locations. No wastes, except exhaust air samples, are anticipated from the in-line analysis equipment. Analysis at other locations would take place under separate existing ECs. The trailer may be located anywhere along the length of T-3, between the junction with T-24 and the junction with Lincoln Blvd, where it may remain for a period of days. It may be moved to a new location during that period of days. It will then be moved to a location on a paved road for another sampling period. Sampling will alternate between locations over an approximate one-week period. Sampling activities are expected to take place 2-3 times per year for a number of years. The sampling trailer is powered by two small portable gasoline generators. Unattended generator operation may require creation of a 30-50 ft mowed buffer zone. Prior to any mowing, the area must be surveyed for breeding birds (during the breeding bird season) and for cultural resources. The two proposed locations are not within the Sage Grouse Conservation Area, not within 0.6 mi of a Sage Grouse Lek, and are outside of known Ordnance areas. The sampling unit may be accompanied by a small motor home or camp trailer to use while attending the generator(s) and sampling unit. The western portions of T-3 transit CERCLA site ORD-03. While the sampling unit and personnel accommodations unit will remain on T-3, sampling personnel must obtain Explosives Recognition training in accordance with CERCLA requirements.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions
Portable and mobile generators will emit contaminants. All generators will be temporary, in place for less than one year.

Disturbing Cultural or Biological Resources

Concrete blocks will be required to tether the tower. This will avoid the use of stakes and the associated subsurface investigation. Both Biological (Jackie Hafla, 227-9031) and Cultural (Suzann Henrikson, 526-2985) reviews must take place prior to using T-3, T-17, or other two-track road.
If it is found that sagebrush will be disturbed, the project will be added to the sagebrush disturbance tracking spreadsheet. Contact Jenifer Nordstrom
(526-8119) if it is found that sagebrush disturbance will occur to begin revising this EC. Mowing to create a fire-defensible space may be required. A nesting bird survey will be required if the mowing takes place between 1 Apr and 1 Sept. Contact Jackie Hafla, at least two weeks in advance at 525-9358.
Digging in the CITRC area will require cultural resources and RadCon personnel to be present during excavation. Mowing will require a cultural resources review prior to mowing. Contact Nicholas Holmer at 526-0760 at least two weeks in advance.

Generating and Managing Waste

Common office trash waste is expected. Common/cold waste will be disposed in approved dumpsters. Any solid waste will be managed by Waste Generator Services (WGS). All plant material, including pots, shall be bagged and disposed to a solid waste landfill as directed by WGS. No plant material may be disposed of at the test site locations.
Grey water and black water from the motorhome/camp trailer may be discharged at the CFA sewage treatment plant (STP) or any other authorized dump station. Wastewater may not be discharged at any other location. Contact Kent Harwood (208 526-6784) prior to discharging to the CFA STP for permission and location to discharge. For other INL on-site STPs contact the facility manager.

Using, Reusing, and Conserving Natural Resources

All applicable waste will be diverted from disposal in the landfill when possible. Project personnel will use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project will practice sustainable acquisition, as appropriate and practicable, by procuring construction materials that are energy efficient, water efficient, are bio-based in content, environmentally preferable, non-ozone depleting, have recycled content, or are non-toxic or less-toxic alternatives. New equipment will meet either the Energy Star or SNAP requirements as appropriate (see http://www.sftool.gov/GreenProcurement).

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 B3.1 "Site Characterization and Environmental Monitoring."

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, item B3.1 "Site characterization and environmental monitoring (including, but not limited to, siting, construction, modification, operation, and dismantlement and removal or otherwise proper closure (such as of a well) of characterization and monitoring devices, and siting, construction, and associated operation of a small-scale laboratory building or renovation of a room in an existing building for sample analysis). Such activities would be designed in conformance with applicable requirements and use best management practices to limit the potential effects of any resultant ground disturbance. Covered activities include, but are not limited to, site characterization and environmental monitoring under CERCLA and RCRA. (This class of actions excludes activities in aquatic environments. See B3.16 of this appendix for such activities.) Specific activities include, but are not limited to:

a) Geological, geophysical (such as gravity, magnetic, electrical, seismic, radar, and temperature gradient), geochemical, and engineering surveys and mapping, and the establishment of survey marks. Seismic techniques would not include large-scale reflection or refraction testing;
b) Installation and operation of field instruments (such as stream-gauging stations or flow-measuring devices, telemetry systems, geochemical monitoring tools, and geophysical exploration tools);
c) Drilling of wells for sampling or monitoring of groundwater or the vadose (unsaturated) zone, well logging, and installation of water-level recording devices in wells;
d) Aquifer and underground reservoir response testing; e) Installation and operation of ambient air monitoring equipment;
e) Sampling and characterization of water, soil, rock, or contaminants (such as drilling using truck- or mobile-scale equipment, and modification, use, and plugging of boreholes);
f) Sampling and characterization of water effluents, air emissions, or solid waste streams;
g) Installation and operation of meteorological towers and associated activities (such as assessment of potential wind energy resources); i) Sampling of flora or fauna; and
1. j) Archeological, historic, and cultural resource identification in compliance with 36 CFR part 800 and 43 CFR part 7."

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: 8/14/19