

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Power Management Transmission and Distribution Line Maintenance

SECTION B. Project Description and Purpose:

The Power Management organization at Idaho National Laboratory (INL) needs to test and possibly treat power poles and structures, replace poles and structures in poor condition, and inspect and potentially replace other components (e.g., anchors, insulators, cross-arms, wire, etc.) associated with the power distribution system at the INL Site. The following activities will be conducted in 2017:

- 1) 1. Test and treat - Test and treat involves removal of soil to a depth of about 18" and a radius about 6" around poles or structures. After inspection, the pole may then be treated by placement of a physical barrier (wrap) to prevent degradation. Soil is then replaced around the pole or structure. Test and treat will be conducted in 2017 on West Loop structures 190-230.
- 2) 2. Pole or anchor removal and replacement - Pole replacement is performed by hydraulic removal of the structure from an approximate depth of 6' - 8'. A new pole is then placed in the old hole, or a new hole is augered in the vicinity (approximately 5') for placement of the new pole. Anchor replacement is accomplished by pulling the anchor or cutting at grade. New anchor(s) are then installed (at ~ 45 degrees) in the vicinity (within approximately 2') by screwing to an approximate 6' - 7' depth, or drilling (if rock is encountered) to a depth of approximately 2'. This activity will be performed in 2017 on the following structures:
 - West Loop transmission poles 118 and 148
 - Circuit 44 poles 3, 56, 71, 72, 79-9, 79-12, 84, 87, 90, 99, 110, 114, 118, 120, 121, 123, 124
 - East Loop structures 175 and 199.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

The potential for air emissions exists through activities including but not limited to: operation of fuel burning equipment, cleaning and/or decontamination work, use of maintenance products, disturbing asbestos, and generating fugitive dust.

Disturbing Cultural or Biological Resources

Soil disturbing activities such as sand removal (upper surface of T-25), test and treat (approximately 18" depth around poles/structures), pole/anchor inspection and replacement (installation/removal in soil), or work in the vicinity of buildings constructed on the INL prior to 1970 (e.g., EBR-1) have the potential to impact cultural resources. Interaction with biological resources (e.g., vegetation, birds, nests, leks) could also result in disturbance during work activities.

Generating and Managing Waste

Industrial (non-hazardous, non-radioactive) waste such as wood, metal, wire insulation, etc. would be generated. Asbestos waste may be generated if maintenance is required on asbestos containing equipment. Hazardous and PCB waste may be generated as a result of chemical use, lead shielded cable, and/or activities involving pre-1982 paints, wire pulling compound, dielectric fluid, etc. All waste would be managed under the direction of Waste Generator Services (WGS).

Releasing Contaminants

Although not anticipated, spills of maintenance products, petroleum, etc. may occur. The Spill Notification Team and Environmental Support would be notified in the event of a spill.

Using, Reusing, and Conserving Natural Resources

Materials such as wood and metal generated by work activities would be reused and/or recycled as 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

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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, B1.3 "Routine maintenance", B4.6 "Additions and modifications to transmission facilities", and B4.10 "Removal of electric transmission facilities".

Justification: Activities are consistent with 10 CFR 1021, Appendix B, 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, localized vegetation...control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements... 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...

(e) ...electrical utility...repair or replacement...

(g) Inspection and/or treatment of currently installed utility poles...

(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 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;

(n) Routine calibration and testing of facility components, subsystems, or portable equipment (such as...transformers, capacitors...);

(o) Routine decontamination of the surfaces of equipment...(by such activities as wiping with rags...), and removal of contaminated intact equipment and other material...; and

(p) Removal of debris."

B4.6 "Additions or modifications to electric power transmission facilities within a previously disturbed or developed facility area. Covered activities include, but are not limited to, switchyard rock grounding upgrades, secondary containment projects, paving projects, seismic upgrading, tower modifications, load shaping projects (such as installation and use of flywheels and battery arrays), changing insulators, and replacement of poles, circuit breakers, conductors, transformers, and crossarms."

B4.10 "Deactivation, dismantling, and removal of electric transmission facilities (including, but not limited to, electric powerlines, substations, and switching stations) and abandonment and restoration of rights-of-way (including, but not limited to, associated access roads)."

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: 10/02/2016