

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Advanced Test Reactor (ATR) Complex Street Lights Project

SECTION B. Project Description:

The ATR Complex street lighting has been taken out of service and needs to be replaced due to poor condition. An engineering inspection in October 2014 revealed numerous deficiencies with poles, guys, transformers, etc. The system was installed in 1965, is degraded and antiquated, and requires removal and replacement.

The initial phase of the proposed action would remove the old street lights and poles. The work scope for this phase includes the following:

1. Disconnect and remove electrical conductors from Test Reactor Area (TRA)-609 switch gear to oil filled voltage regulators mounted on platform west of TRA-608
2. Remove voltage regulators, transformers, photo cells, conduit, lighting controller and platform
3. Remove overhead cables associated with the street lights
4. Remove street light fixtures and power poles.

The entire street light system would not be replaced. Stand-alone light poles would be installed in various locations dependent on available funding. New light poles are anticipated to be installed along sidewalks rather than roads. Solar powered light-emitting diode (LED) lights would be installed throughout the ATR Complex. Replacement would include the following actions:

1. Identify locations for new solar powered lights
2. Perform subsurface investigation
3. Excavate hole for pole footing
4. Assemble pre-fabricated solar light assembly (light pole, solar panels, battery, fixture, photo cell, motion detector, disconnect switch)
5. Mount light assembly to footing
6. Test light for operability

Project Start Date: July 2015

Project End Date: September 2015

Project Cost: Approximately \$10,000.00

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions – Emissions typical of cutting/grinding/welding are expected. The emissions from this activity are not considered construction of a new stationary emission source. Mobile sources such as generators, welders, and compressors may be used temporarily (less than a year) by subcontractors at the construction site. These sources would be required to meet Idaho Administrative Procedures Act (IDAPA) 58.01.01.625 visible emissions opacity requirements.

Fugitive dust may be generated. All reasonable precautions would be taken to prevent particulate matter from becoming airborne. If dust control methods are required, the method used and frequency applied must be recorded in the project records and would be used to demonstrate compliance with the Idaho National Laboratory (INL) Title V Air Permit.

Disturbing Cultural or Biological Resources - The ATR complex streetlamps, being 50+ years of age, are potentially eligible for nomination to the National Register of Historic Places as a contributing element of the historic landscape of ATR. In addition, TRA-608 and TRA-609 are considered eligible for listing on the National Register of Historic Places and are in the Area of Potential Effect (APE) of the project as described; removal and/or changes of original features, including streetlamps and associated infrastructure, may adversely impact these historic properties. Prior to beginning work, obtain cultural/historical resource review by contacting Christina Olson (526-1692). Approval must be demonstrated by written communication from this organization prior to beginning work, and any instructions contained in the review must be followed.

It is unlikely that excavation activities within fenced facility boundaries would disturb cultural or biological resources. However, discovery of bones or other cultural artifacts during excavation requires an immediate cessation of work and a review by BEA Cultural Resources personnel.

Generating and Managing Waste - All waste generated from this activity will be managed in accordance with laboratory procedures. Pollution prevention/waste minimization will be implemented where economically practicable to reduce the volume and/or toxicity of waste generated. All waste generated will be transferred to Waste Generator Services (WGS) for appropriate disposition. All waste generated from these activities will have an identified disposition path prior to it being generated.

All equipment associated with the street lights are around 1960 vintage and therefore have a potential of containing polychlorinated biphenyl (PCB) paint. The transformers are also known to contain potential PCB oil. Equipment cannot be excessed or recycled and must be disposed of as bulk PCB waste.

DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

Releasing Contaminants – All chemicals typically used in construction/maintenance, if used, will be managed in accordance with laboratory procedures. There is the potential for possible disturbance of suspect PCB paint. Approved work controls will be in place to ensure that no releases occur during project activities.

Using, Reusing, and Conserving Natural Resources - All material will be reused and/or recycled where economically practicable. All applicable waste would be diverted from disposal in the landfill when possible. Project personnel would use every opportunity to recycle, reuse, and recover materials and divert waste from the landfill when possible. The project would 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, and are non-toxic or less-toxic alternatives. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see <https://sftool.gov/green-products/0?agency=7>).

SECTION G. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): 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, B2.1 "Workplace enhancements"

Justification: Project activities are consistent with 10 CFR 1021, Appendix B, B2.1 "Modifications within or contiguous to an existing structure, in previously disturbed or developed area, to enhance workplace habitability (including, but not limited to, installation or improvements to lighting, radiation shielding, or heating/ventilating/air conditioning and its instrumentation, and noise reduction)."

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

Approved by Jack Depperschmidt, DOE-ID NEPA Compliance Officer on: 5/20/2015