

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: Iona Relay Station Maintenance

SECTION B. Project Description:

This project would periodically perform maintenance related activities in and around an approximate 15 acre area at the Iona Hill Relay Station. Activities would include: maintenance/testing of the emergency generator, facility grounds and road surface repair and upkeep (e.g., grading, snow removal, resurfacing, weed control), building and structure maintenance/repair (e.g., painting, insect control, structural inspection and repair as necessary). Specifically, fire breaks would be established around buildings and structures by removing vegetation and applying sterilant for distances of approximately 10 - 50 feet from the area to be protected. Certain structures (e.g., stabilizing cable anchors) would be periodically inspected for corrosion by removing surrounding earth to a depth of approximately two feet and repairing/replacing as necessary, and installation of anti-bird nesting equipment at tower tops may be performed. Existing fencing would be maintained as necessary and the current barbed wire fence at the facility perimeter may be replaced with a chain linked fence for intrusion prevention purposes as funding becomes available. Various products (e.g., coatings) would be applied as necessary for preservation and fire retardant purposes. Maintenance/replacement of heating, ventilating, and air conditioning (HVAC) air conditioning components and/or the propane aboveground storage tank (AST) may be required, and periodic maintenance/pumping of the portable toilet would be performed. These activities would take place on an as needed basis, likely at an annual frequency. Approximate cost associated with these activities is estimated at \$50 K for perimeter fence replacement and approximately \$5 K per year for the other activities.

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions: These activities have the potential to generate fugitive dust. All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. Some of the reasonable precautions may include, but are not limited to, the following: use of water or chemicals, application of dust suppressants, use of control equipment, and covering of trucks. Fire rated doors may contain asbestos. Doors would be presumed to be asbestos-containing material (ACM) if maintenance/replacement is required and activities/waste would be managed accordingly. Applicable activities associated with the HVAC system involving refrigerant would be performed by certified technicians.

Disturbing Cultural or Biological Resources: These activities have the potential to disturb cultural and/or biological resources. Cultural and biological surveys will be performed as required and clearances obtained prior to initiating activities having this potential.

Generating and Managing Waste: Industrial (nonhazardous, nonradioactive) waste (e.g., vegetation, shrubs, wood, metal) would be generated and potentially hazardous (e.g., pesticide/coating related) waste may be generated. This waste would be managed through Waste Generator Services. Sanitary waste would be managed through a licensed vendor.

Releasing Contaminants: Chemicals such as coatings and pesticides would be applied for their intended purpose in accordance with manufacturer's instructions.

Using, Reusing, and Conserving Natural Resources: All materials will be reused and/or recycled where economically practicable and as accepted by the customer. All applicable waste will be diverted from disposal in the landfill where conditions allow. New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see [http://www.sftool.gov/Green Procurement/Product Category/14](http://www.sftool.gov/Green%20Procurement/Product%20Category/14)). In addition, 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. Removed vegetation will be left at the location where practicable for landfill diversion purposes. Removed materials such as fencing would be excessed or recycled.

SECTION D. Determine the Recommended Level of Environmental Review (or Documentation) and Reference(s): Identify the applicable categorical exclusion from 10 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 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 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 which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

References: 10 CFR 1021, Appendix B to Subpart D items B1.3, "Routine maintenance", B1.11, "Fencing", and B2.5, "Facility safety and environmental improvements".

Justification: The proposed action is consistent with 10 CFR 1021, Appendix B to Subpart D categorical exclusions:

DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

- 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, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). 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, such as lathes, mills, pumps, and presses; (b) Door and window repair or replacement; (c) Wall, ceiling, or floor repair or replacement; (d) Reroofing; (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement; (f) Routine replacement of high-efficiency particulate air filters; (g) Inspection and/or treatment of currently installed utility poles; (h) Repair of road embankments; (i) Repair or replacement of fire protection sprinkler systems; (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces; (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation); (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor; (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 part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor; (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes); (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and (p) Removal of debris."

- B1.11, "Installation of fencing, including, but not limited to border marking, that would not have the potential to significantly impede wildlife population movement (including migration) or surface water flow."

- B2.5, "Safety and environmental improvements of a facility (including, but not limited to, replacement and upgrade of facility components) that do not result in a significant change in the expected useful life, design capacity, or function of the facility and during which operations may be suspended and then resumed. Improvements include, but are not limited to, replacement/upgrade of control valves, in-core monitoring devices, facility air filtration systems, or substation transformers or capacitors; addition of structural bracing to meet earthquake standards and/or sustain high wind loading; and replacement of aboveground or belowground tanks and related piping, provided that there is no evidence of leakage, based on testing in accordance with applicable requirements (such as 40 CFR part 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR part 280, "Technical Standards and Corrective Action Requirements for Owners and Operators of Underground Storage Tanks"). These actions do not include rebuilding or modifying substantial portions of a facility (such as replacing a reactor vessel)."

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: 7/25/2013