

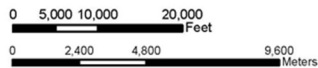
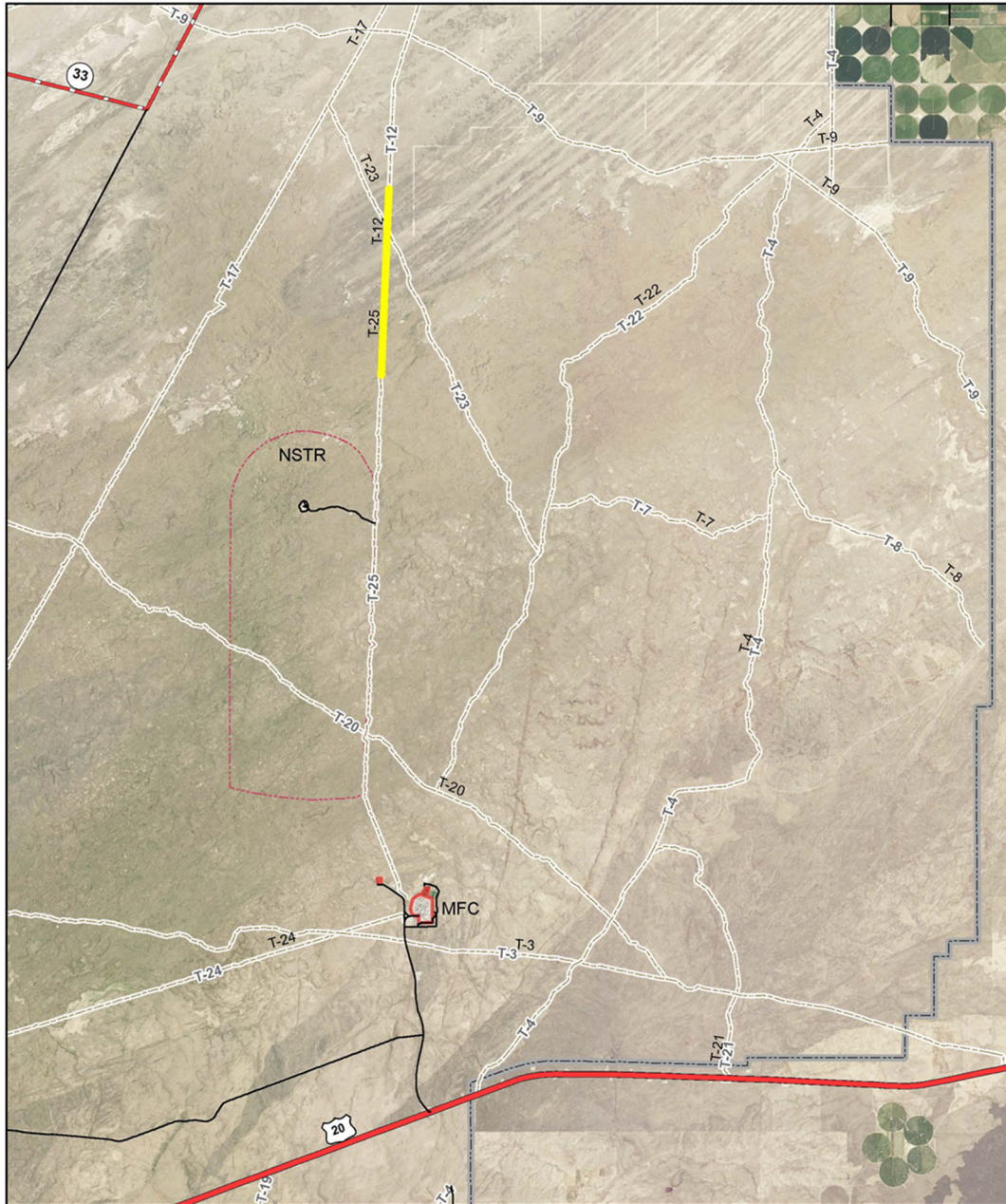
# DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

**SECTION A. Project Title:** T-25 Sand Removal

**SECTION B. Project Description and Purpose:**

The T-25 provides an emergency evacuation route to the north for personnel at the National Security Test Range (NSTR) at the Idaho National Laboratory (INL) Site if normal evacuation to the south is not possible. Approximately 3.19 miles of the road between power poles 203 and 229 are blocked by wind-blown sand covering the road. The sand needs to be removed so that personnel can evacuate the NSTR in the event of an emergency. Figure 1 shows the location of the drifting sand on the T-25 Road.

Figure 1. Location of blowing sand on the T-25 road north of the NSTR.



Date Drawn: 05/01/2017  
Path: \\Section 106 Projects\FY 2017 Section 106 Reviews  
\\BEA-17-36 T-25 Sand Removal\GIS  
File Name: T-25 Sand.mxd

- Legend**
- Area with Drifting Sand
  - INL Boundary



# DOE-ID NEPA CX DETERMINATION

## Idaho National Laboratory

The T-25 road is classified as a priority 3 unpaved road. Priority 3 roads at the INL Site are maintained as passable, but are not graded. The proposed action is to remove sand from the roadway using a front end loader or similar equipment. Sand will be removed in a manner to avoid damage or disturbance to vegetation in the center and on the sides of the roadway, and no expansion of the width of the roadway will occur. A dump truck will haul removed sand to the landfill stockpile for future use. Vehicles performing this work will turn around within 200 feet of power poles to limit the impacts of vehicle traffic on soils and plants to previously disturbed areas immediately around power lines, and the number of areas used as turnarounds will be minimized.

Areas not specifically mentioned in this Environmental Checklist (EC) that are identified for sand removal will require revision of this EC. In addition, sand removal in subsequent years will require preparation of project specific ECs. The project and facility management will work with Cultural and Biological Resource Personnel to designate turnaround areas and other areas needed to complete the proposed action. Work activities will be confined to these identified areas.

### **SECTION C. Environmental Aspects or Potential Sources of Impact:**

#### **Air Emissions**

Fugitive dust may be generated during excavation and grading activities.

Emissions from machinery and equipment exhaust are expected.

#### **Disturbing Cultural or Biological Resources**

Project activities will remove soil and have the potential to impact vegetation, compact soils, and damage soil structure. Indirect effects could include soil erosion and reduced soil productivity. Erosion of disturbed soils would be greatest during and immediately after ground disturbance.

Project activities will be within the width of the current roadway and will avoid disturbing vegetation in the center of the two-track road. Disturbance of ground used for turnarounds have the potential to disturb both cultural and biological resources.

#### **Generating and Managing Waste**

Removed sand will be placed in the stockpile at the CFA landfill for future use.

#### **Using, Reusing, and Conserving Natural Resources**

Transportation activities would involve using fossil fuels and release of greenhouse gases.

### **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:** National Environmental Policy Act (NEPA) Implementing Procedure, Final Rule, " 10 CFR 1020 Appendix B to Subpart D," Categorical Exclusions B1.3 "Routine maintenance" and B2.5 "Facility safety and environmental improvements."

**Justification:** The proposed activities are consistent with 10 CFR 1021, Appendix 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

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

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)
- p) Removal of debris;"

and, CX 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 265, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities" and 40 CFR 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 Jason Sturm, DOE-ID NEPA Compliance Officer on: 9/20/2017