

DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

SECTION A. Project Title: INL Telecommunication Transport Services -TAN/SMC

SECTION B. Project Description and Purpose:

Idaho National Laboratory (INL) Telecommunications Transport Infrastructure includes 220 miles of DOE-owned fiber networks, 50 miles of leased fiber networks, and four Point of Presence dial rooms in buildings averaging 50 years old. Age and other factors make maintenance difficult. INL proposes to purchase telecommunication transport infrastructure operation and management activities from a service subcontractor (i.e., Syringa Wireless) to support connectivity at the Specific Manufacturing Capability (SMC). This service supplies managed telecommunication data transport using state-of-the-art infrastructure.

The proposed action establishes a contract with Syringa Wireless to supply telecommunication transport infrastructure and service at the Test Area North (TAN)/SMC area. The proposal also creates a Right-of-Way (ROW) running from TAN-601 (Telecommunications Manhole 10) and terminating near the new SMC Warehouse (TAN-1617, Figure 1). The route uses in-place conduit, manholes and power poles but requires the subcontractor to bore armored cable underground from TMH 1095 and tie it into the previously installed fiber pedestal box near power pole 9 on circuit 54 for about 400 feet. The buried fiber optic conduit ends near power pole 56-39-10A where the subcontractor will route fiber underground to the dial room as shown in Figure 2. The project then routes the fiber overhead from pole 56-39-11 to pole 56-39-15. The route from pole 56-39-15 to TAN-1617 will either be an overhead connection running from pole 56-39-15 to the east side of the roof of the warehouse or a trench (approx. 2 ft. x 2 ft. x 100 ft.) to the east side of the warehouse where the fiber would be routed through the wall and tied-in. If boring is not possible, fiber would be buried in a trench (2 ft deep for about 500 yds then backfilled). There are not any CERCLA or underground radioactive material area (URMA) concerns with the area between pole 56-39-15 and TAN-1617, and this area was disturbed during construction of the warehouse. The ROW and proposed soil disturbance are located in a previously disturbed area.

The proposed action constructs concrete pads for the modular dial room and a back-up generator owned by Syringa. Following concrete work, INL will gravel the area for parking.

Figure 1. Location of proposed ROW between TAN-601 and TAN-1617.

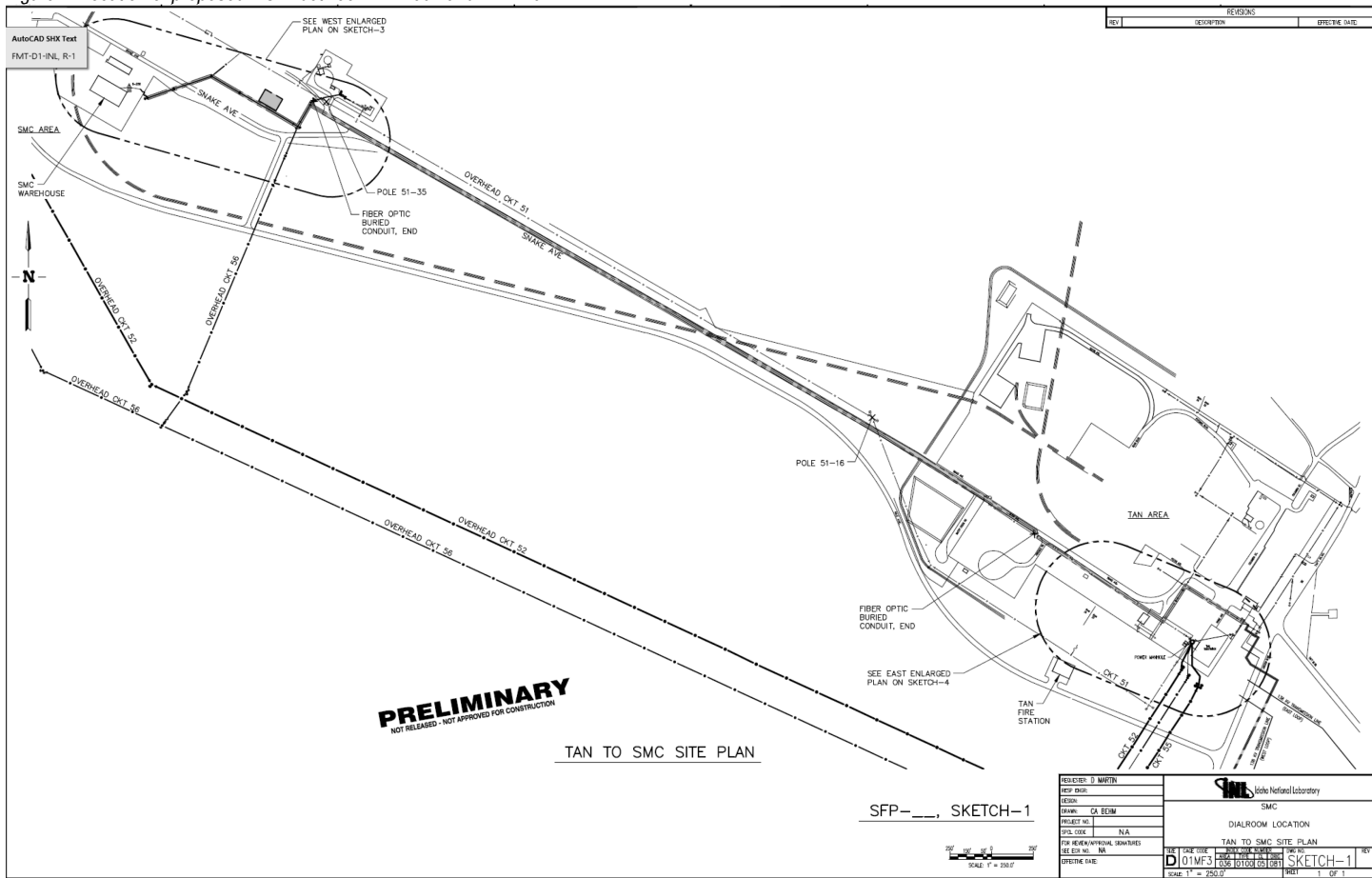
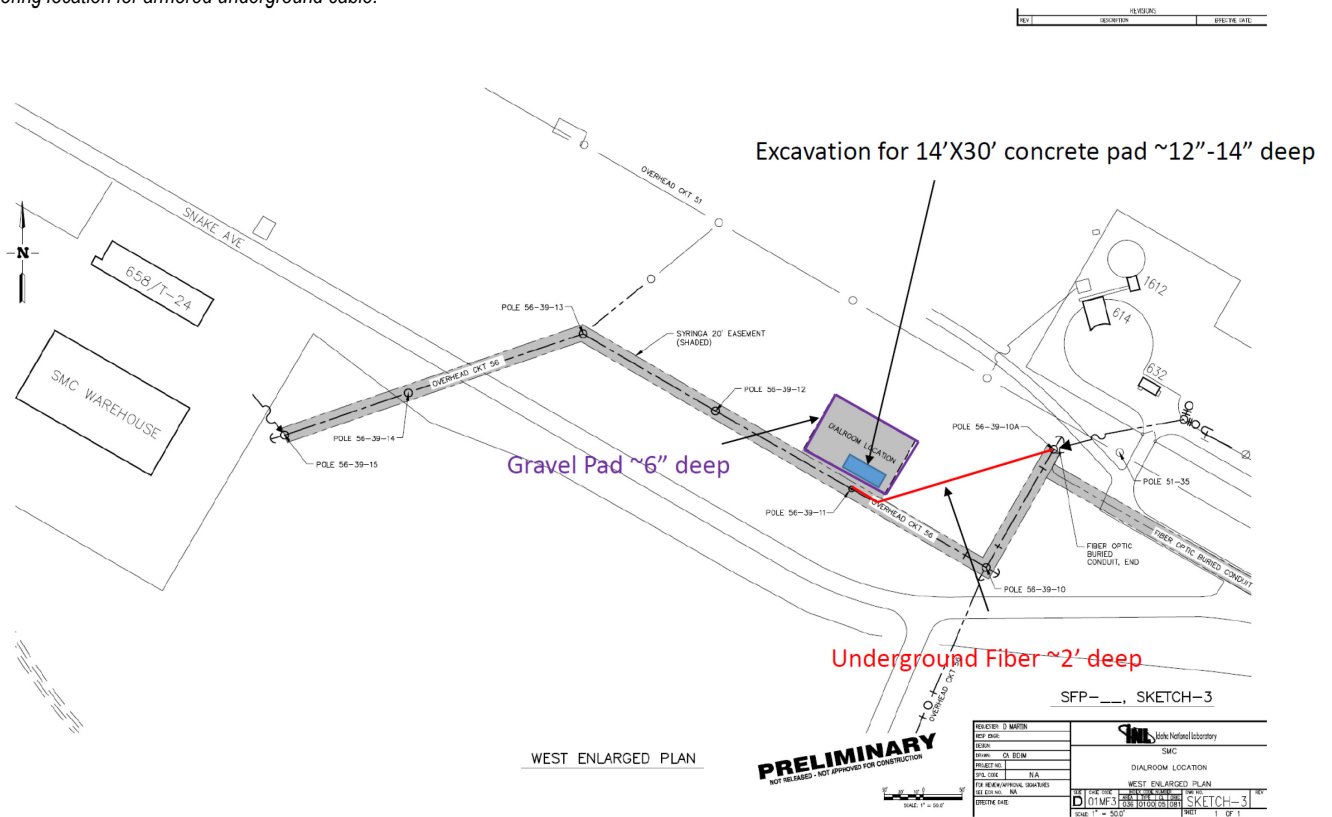


Figure 2. Boring location for armored underground cable.



SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Fugitive dust and emissions from mobile equipment may be generated during boring activities. All reasonable precautions will be taken to control fugitive dust. If control methods are needed, the subcontractor will document the method used in their daily logbooks.

Syringa Wireless will be responsible for any pre-construction permits or permit exemption determinations, maintenance, operational requirements, recordkeeping and other regulatory requirements associated with the proposed emergency diesel generator.

Disturbing Cultural or Biological Resources

Prior to locating equipment, cultural resource surveys and/or clearance in writing from the Cultural Resource Management (CRM) office must be completed to verify potential cultural resources will not be impacted. Project activities will be organized to minimize impacts to any culturally sensitive materials identified during these surveys. Contact the INL CRM office to arrange for a cultural resource review. Impacts to any identified resources would be minimized using existing roadways, placing equipment in previously disturbed areas whenever possible, and avoiding ground disturbance in any sensitive areas. If objects of potential archaeological or historical significance (e.g., arrowheads, flints, bones, etc.) are encountered during project activities, personnel must discontinue disturbance in the area and contact the CRM office.

There is the potential for this work to impact desert vegetation and for project personnel to interact with various animal species. The potential for impact will be minimized by the short duration, small footprint, infrequent access to equipment, and the commitment of the project to use existing roadways and previously disturbed areas whenever possible. Within two weeks of the initiation of any activities that might disturb soil or vegetation, an ecological

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evaluation including a nesting bird survey must be completed would be completed from April 1 to October 1 in order to comply with the Migratory Bird Treaty Act. Revegetation with native seed is required on areas that show extensive vegetation removal or soil disturbance. Jackie Hafla (208-227-9031) should be contacted two weeks prior to beginning work to arrange for biological resource review.

If the proposed action disturbs vegetation, project personnel must contact Jackie Hafla (208-227-9031) before the project starts. Environmental Surveillance, Education, and Research (ESER) Contractor personnel must survey the disturbed area to estimate the amount of sagebrush (if any) and native vegetation that will require restoration. The project must maintain funding for restoration efforts, which could occur in one or more subsequent fiscal years. Contact Jackie Hafla (525-9358).

Generating and Managing Waste

Project activities are expected to generate only minor amounts of uncontaminated industrial waste. The small amount of waste that may be generated could include uncontaminated garbage such as plastic water bottles or other miscellaneous waste. "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. All waste generated would be transferred to WGS for appropriate disposition. All waste generated from an activity will have an identified disposition path prior to it being generated.

Releasing Contaminants

CERCLA areas are located near the project. Project personnel will notify the Fluor Idaho CERCLA NSD coordinator to have an NSD determination completed prior to starting work. Unexploded ordinance sites are not applicable to areas within the TAN/SMC boundary. Radiological control personnel will be onsite when boring activities (URMA area) occur, however contamination is not expected, and soil waste will be minimal. If contamination is discovered, stop work and contact the CERCLA NSD Coordinator or the CERCLA PEL for further instructions.

The project is not within the established INL storm water corridor and doesn't have potential to discharge to waters of the U.S.

A generator supply tank will be necessary to provide fuel to the emergency generator. This tank will be owned and operated by Syringa Wireless. Construction chemicals such as fuels, lubricants, adhesives, etc. will be used and owned by the Syringa Wireless during project activities.

Using, Reusing, and Conserving Natural Resources

Typical construction chemicals such as fuels, lubricants, adhesives, etc., will be used while installing the trailers and will be submitted to chemical inventory lists with associated Safety Data Sheets (SDSs) for approval in the vendor data system prior to use. The Facility Chemical Coordinator will enter these chemicals into the INL Chemical Management Database. All chemicals will be managed in accordance with laboratory procedures.

Although not anticipated, there is a potential for spills when using chemicals or fueling equipment. In the event of a spill, notify facility environmental staff. If environmental staff cannot be contacted, report the release to the Spill Notification Team (208-241-6400). Clean up the spill and turn over spill cleanup materials to WGS.

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 Procedures, Final Rule, 10 CFR 1021, Appendix B to Subpart D, B1.24 "Property transfers" and B4.7 "Fiber optic cable."

Justification: The proposed activities are consistent with CXs B1.24 "Transfer, lease, disposition, or acquisition of interests in personal property (including, but not limited to, equipment and materials) or real property (including, but not limited to, permanent structures and land), provided that other reasonably foreseeable uses (1) there would be no potential for release of substances at a level, or in a form, that could pose a threat to public health or the environment and (2) the covered actions would not have the potential to cause a significant change in impacts from before the transfer, lease, disposition, or acquisition of interests," and B4.7 "Adding fiber optic cables to transmission facilities or burying fiber optic cable in existing powerline or pipeline rights-of-way. Covered actions may include associated vaults and pulling and tensioning sites outside of rights-of-way in nearby previously disturbed or developed areas."

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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: February 6, 2020