

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

SECTION A. Project Title: TAN-691 Maintenance & Vehicle Storage Building Construction and Perimeter Fence Extension

SECTION B. Project Description and Purpose:

Revision 3

This revision addresses the construction of a new parking lot closer to the construction site. Subcontractors were parking their personal vehicles south of Nile Ave and walking north, across Nile to access the construction job site. This presented a safety hazard with the coming of winter months as the workers were crossing Nile at peak traffic times, in the dark. A decision was made to build a new gravel parking area closer to the construction site to prevent the workers from crossing Nile. This was considered an emergency safety issue, so in coordination with BEA Environmental Support & Services, DOE, and BEA Cultural Resources, the decision was made to proceed with the work under NEPA emergency actions 10 CFR 1021.343(a) and the area has been previously surveyed by Cultural Resources as documented in BEA-18-38. The parking lot is roughly 150' x 70'. The location of the parking lot can be seen in Figure 8.



FIGURE 8 LOCATION OF PARKING LOT

Revision 2

This revision addresses new proposed locations for excess soil placement. These new locations are proposed because Revision 1 of this EC anticipated the excess soil to be placed east of the berm by the construction site (see Figure 4 in this EC) and now the project plans to add more buildings to this area in the near future. Therefore, the project would prefer to not have to move the soil twice. The project also requests permission for subcontractor employees to be able to park personal vehicles in the area shown in Figure 1 if construction activities safely permit.

The proposed new locations are the same areas that were identified in the Cultural Resource Review Record BEA-19-41, Rev 3, May 27, 2020, for the "Nile Ave and Lincoln Blvd Repair" project (see also EC INL-19-143 R1, July 14, 2020) and Figures 1 and 2. Approximately ¼ of the area shown in Figure 1 is unused, and readily available to accommodate additional fill material.

DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

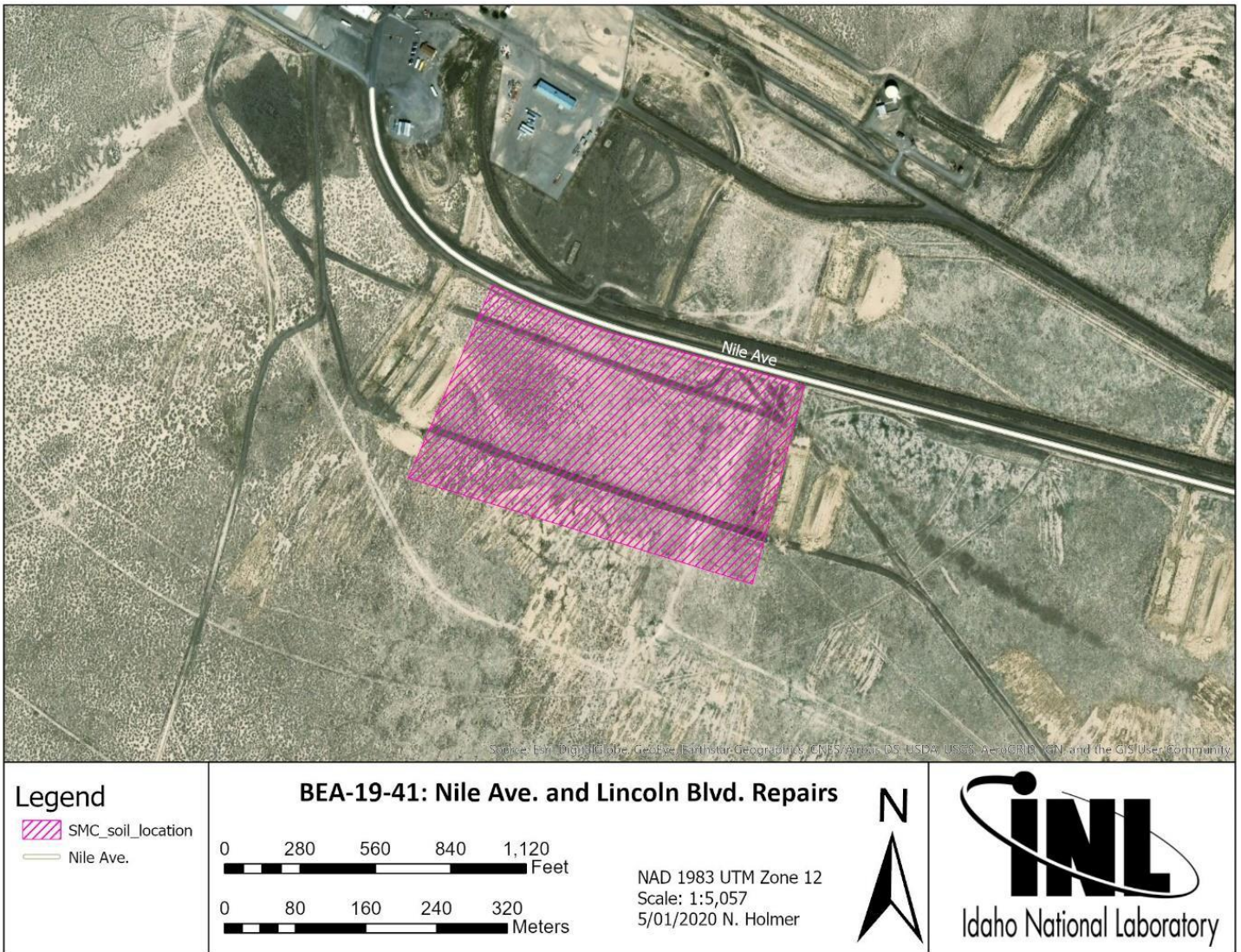


Figure 1 - Proposed Location for Excess Soil Placement [BEA-19-41, Rev. 3, Figure 6]



Figure 2 - Additional Proposed Locations for Excess Soil Placement [BEA-19-41, Rev. 3, Figure 3].

Figure numbering corrections, an update to the ESER contact person, and CRR, MRAAN and NSD references were also made in this second revision.

Revision 1

This revision addresses the proposed installation of a 12' x 40' trailer in a 6,000 ft² area to support construction activities at the Specific Manufacturing Capability (SMC) for the TAN-691 Maintenance & Vehicle Storage Building. The trailer will be setup as an office for a construction field representative (CFR). The trailer will be located east of TAN-1617 (see Figure 3 for proposed location). An engineered gravel pad will be constructed for placement of the trailer and vehicle parking area to support parking for at least 8 vehicles. The trailer will be connected to commercial power and telecommunications. Water and sewer will not be included.



Figure 3 - Proposed Construction Trailer Location

Revision 2

In addition, the project area has a field fence that runs along the south side of Snake Avenue (See Figure 4). **The land north of the field fence is an Underground Radioactive Materials Area (URMA), with the potential to disturb radiological or hazardous contamination.** This proposed action will perform excavation in that area for the following scope:

- a) Placing fence posts for the security fence north of Snake Avenue
- b) Placing underground conduit for facility power
- c) Placing an underground pipeline for potable and fire water systems (the construction trailer will not be connected to water or sewer)
- d) Placing a direct buried cable for communications systems.

All soils removed from the URMA shall remain on the URMA, unless sampled for disposal at the INL landfill.

The project may remove the berm located to the east of the proposed building site as part of the work scope – See Figure 4.

The project will also generate excess soil and proposes to place it on the ground east of the berm.

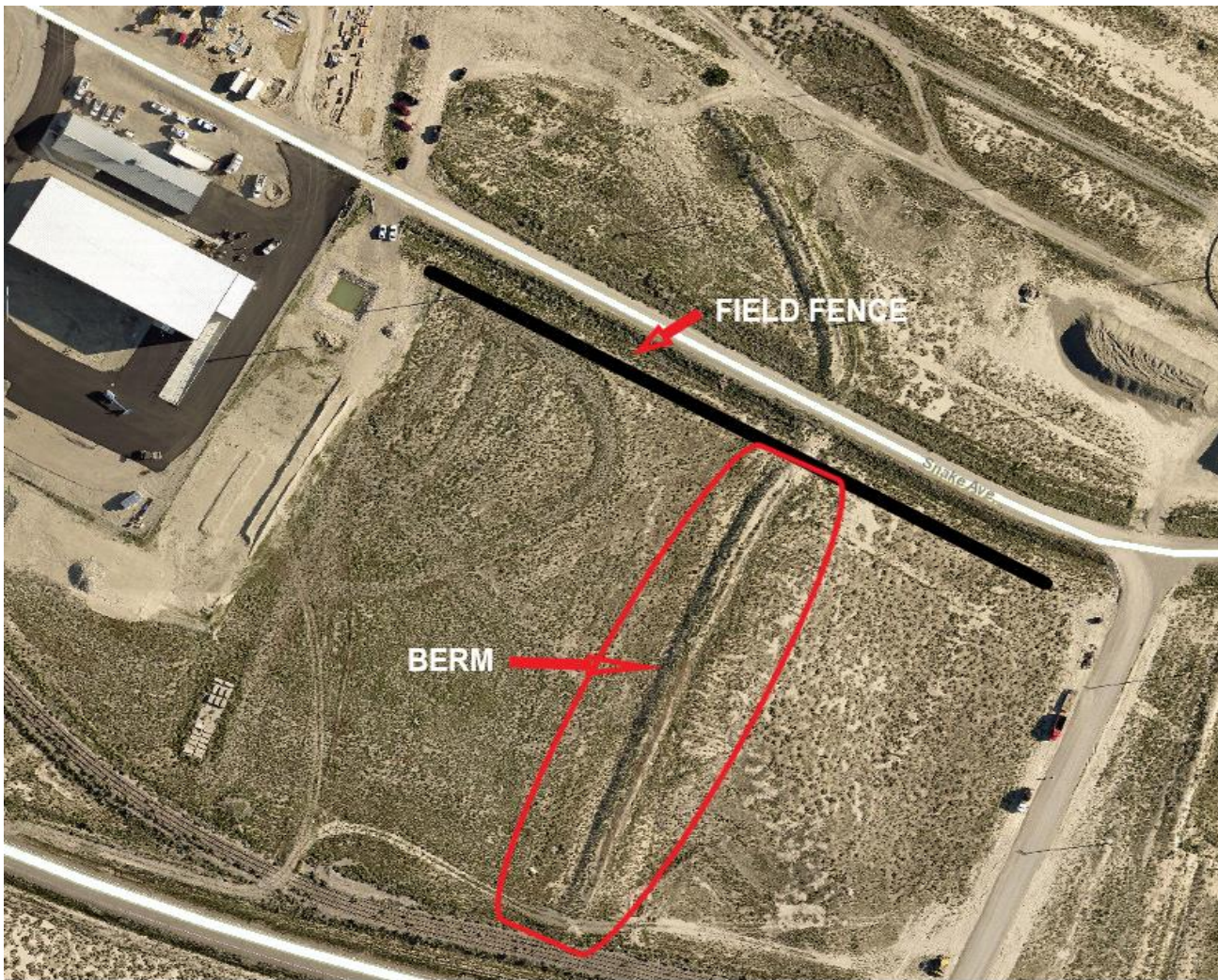


Figure 4 - Location of field fence and berm.

Original EC:

The Specific Manufacturing Capability (SMC) has identified the need for design and construction of a modern maintenance and vehicle storage building in order to better support daily facility operations. A preliminary siting study for the project indicated that SMC did not have suitable space within the existing perimeter to allow for economical construction of the facility. Therefore, the proposed action in this environmental checklist involves the design and construction of a new maintenance and vehicle storage facility as well as the expansion of the perimeter fence at SMC.

The approximate footprint of the building is 15,000 ft² (.34 acres), while the total area of the land to be developed for the fence expansion will be 4.4 acres. In order to expand the fenced area, project personnel are acquiring 8 acres east of TAN-1617, and the remaining 3.6 acres will be developed in future projects. A Geotechnical investigation as well as cultural and biological surveys will be completed in the planned construction area. Figure 5 shows the total footprint of the area that will be developed for this project.

The building will be constructed to INL standards for the applicable use-type. The new facility will be named TAN-691 and will be constructed outside of the existing security fence. The building will be used for the storage and maintenance of vehicles, including fork-trucks and man-lifts. A new security fence will be constructed around the facility as part of the construction process so that the property and facility can be annexed into the SMC security perimeter after turnover is complete. The maintenance portion of the building will be electrically heated and will have restroom facilities in accordance with planned occupancy.

In addition, the work scope also involves the following:

- Excavation for foundations and footings
- The use of gravel from INL gravel pits to support asphalt placement; and
- Placement of a septic tank and associated drain field

Conceptual representations of site location and building are shown in Figure 6 and Figure 7.

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

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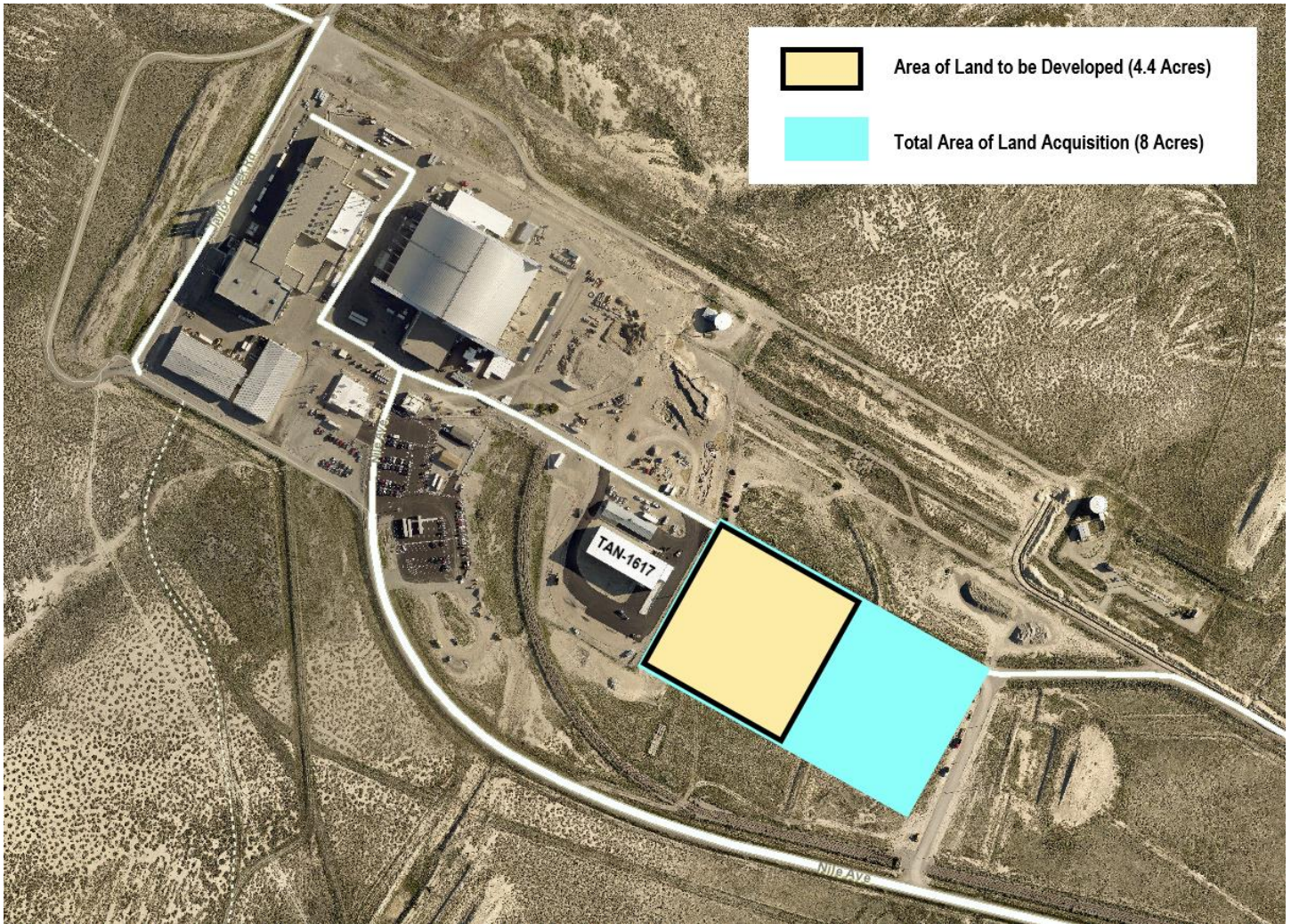


Figure 5 - Total Area of Land Acquisition vs. Area of Land to be Developed

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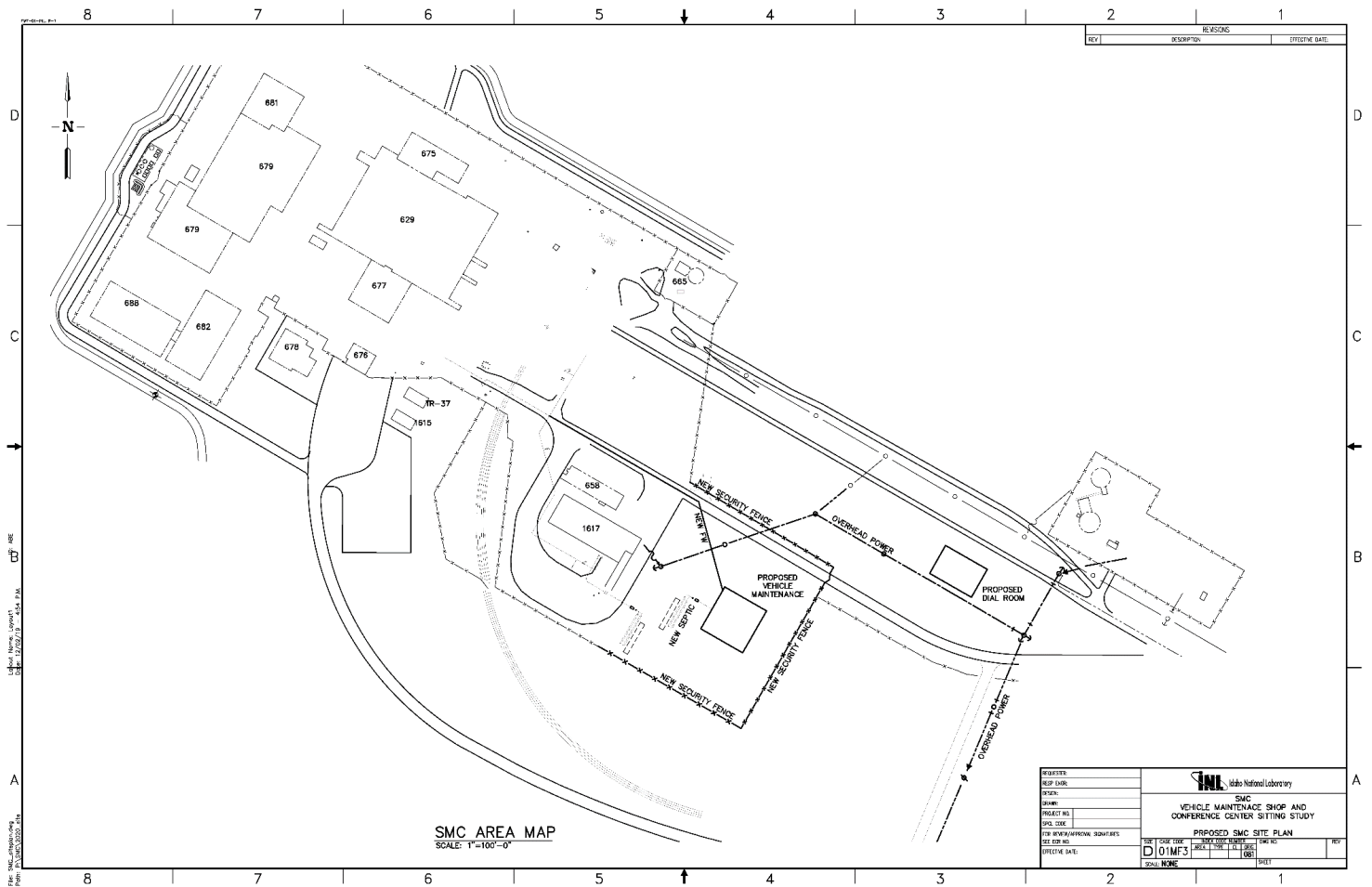


Figure 6 - Proposed Building Site for TAN-691

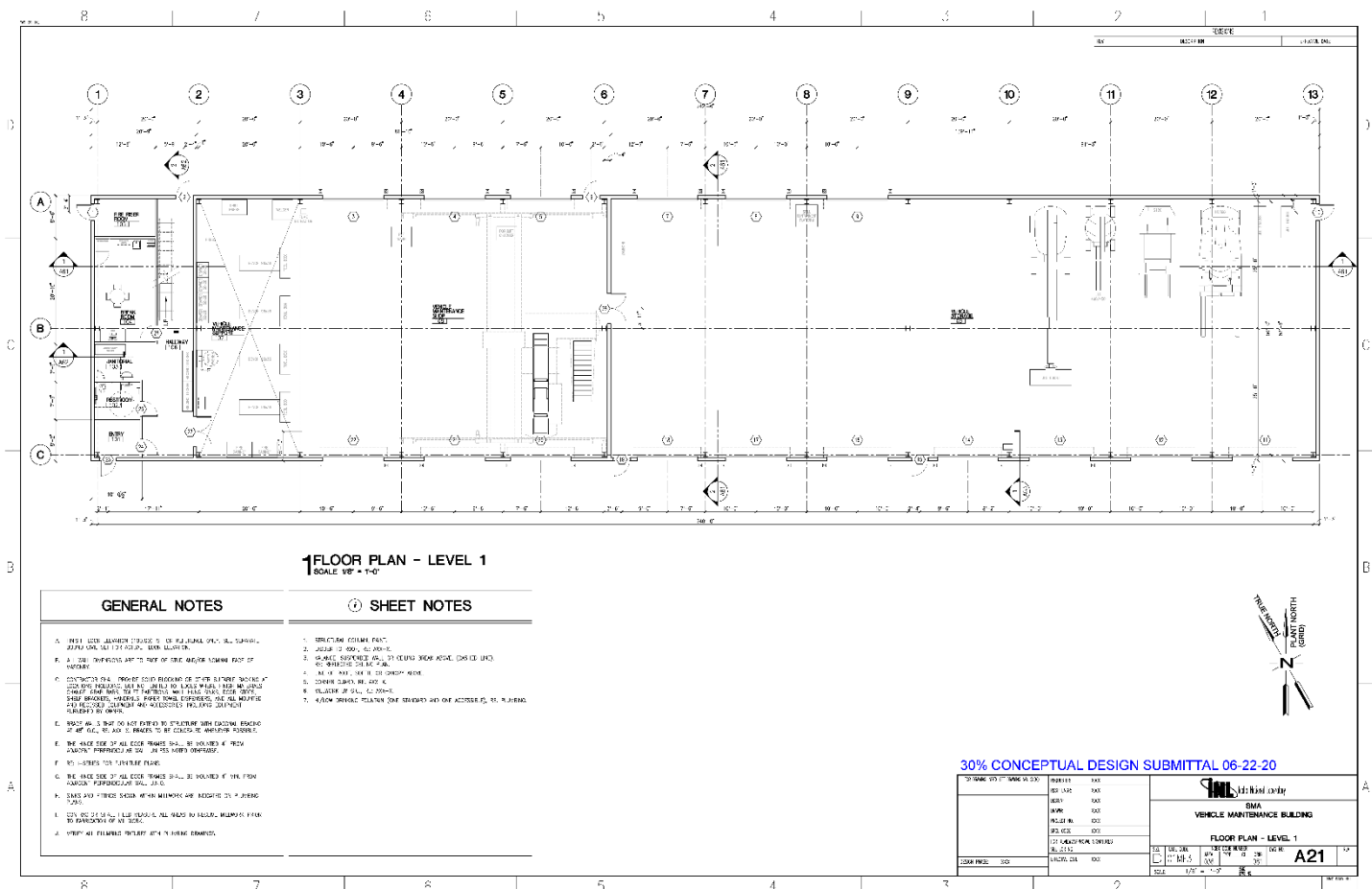


Figure 7 - TAN-691 Conceptual Designs

SECTION C. Environmental Aspects or Potential Sources of Impact:

Air Emissions

Construction of the building will involve emissions from vehicles and fugitive dust. The maintenance area of the building will have one vehicle exhaust system (snorkel) that will vent to the outside of the building. The building will also have an emergency generator to prevent freezing in the fire riser room in case of extended power outages. An APAD will be required for the emergency generator.

Discharging to Surface-, Storm-, or Ground Water

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.

Note: Cultural Resource Review Records have been documented per BEA-19-41 and BEA-20-18, however these do not clear future project activities (i.e. new building construction) identified in the revised scope.

There is the potential for this work to impact vegetation and for project personnel to interact with various wildlife 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 wherever possible. A Biological Resource Review will be arranged within two weeks of the initiation of any activities that might disturb soil or vegetation as well as following project activities. The Biological Resource Review is intended to document the condition of the site prior to

DOE-ID NEPA CX DETERMINATION

Idaho National Laboratory

project activities and following project activities. A nesting bird survey is included with the Biological Resource Review for actions occurring between April 1 and October 1 per compliance with the Migratory Bird Treaty Act.

Disturbing Cultural or Biological Resources

Construction waste will be generated. The facility (TAN-691) will generate waste associated with vehicle storage and maintenance once it is placed into service. Examples include, oil, antifreeze, transmission fluid, brake fluid, air conditioning refrigerants, spent parts cleaners and rags, aerosol cans, light bulbs, lead acid and lithium batteries, etc. All waste will be turned over and managed by Waste Generator Services (WGS).

This project has the potential to generate large quantities of excess soil. Environmental, Cultural and Biological resource personnel will determine locations (out of storm water corridor, limited sage brush disturbance, previously disturbed areas, etc.) to place this soil.

Generating and Managing Waste

Construction waste will be generated. The facility (TAN-691) will generate waste associated with vehicle storage and maintenance once it is placed into service. Examples include, oil, antifreeze, transmission fluid, brake fluid, air conditioning refrigerants, spent parts cleaners and rags, aerosol cans, light bulbs, lead acid and lithium batteries, etc. All waste will be turned over and managed by Waste Generator Services (WGS).

This project has the potential to generate large quantities of excess soil. Environmental, Cultural and Biological resource personnel will determine locations (out of storm water corridor, limited sage brush disturbance, previously disturbed areas, etc.) to place this soil.

Releasing Contaminants

The TAN-691 facility will not generate radiological waste. The contaminants that may be released will be in the form of hydrocarbons, petroleum based chemicals and chemicals associated with the maintenance of equipment (see Generating and Managing Waste above).

CERCLA areas are located near the proposed trailer. 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 excavating 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.

Note: The Notice of Soil Disturbance is documented in NSD-2020-043 (NSD not required).

The proposed trailer is not within the established INL storm water corridor and does not have potential to discharge to waters of the U.S.

Using, Reusing, and Conserving Natural Resources

The waste oil and lead acid batteries generated as part of normal vehicle maintenance shall be recycled to the greatest extent 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 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 to subpart D, items B1.11, "Fencing," B1.15, "Siting, construction or modification, and operation of support buildings and support structures," and B1.24, "Property transfers."

Justification: Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, items 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;"

B1.15 "Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated and modular buildings) within or contiguous to an already developed area (where active utilities and currently

DOE-ID NEPA CX DETERMINATION
Idaho National Laboratory

used roads are readily accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.5, B6.6, and B6.10 of this appendix;" and

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 under 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."

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

Approved by Jason L. Anderson, DOE-ID NEPA Compliance Officer on: 03.09.2022