## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 1 of 2

EC Document No.: DOE-ID-INL-13-024

SECTION A. Project Title: Idaho National Laboratory (INL) Road Sign Installation/Maintenance

## SECTION B. Project Description:

The proposed action is to install new and repair/replace existing road signs and delineator/reflector poles as needed near paved roads and Priority 1 and 2 unpaved roads (as defined in Environmental Checklist (EC) Idaho National Engineering Laboratory (INEL)-02-024) throughout the INL as part of routine maintenance and to improve traffic safety. This includes roads located outside of and within developed areas at Central Facilities Area (CFA) and Critical Infrastructure Test Range Complex (CITRC), and roads outside the facility fences at Advanced Test Reactor (ATR) Complex, Radioactive Waste Management Complex (RWMC), Test Area North (TAN) and Materials and Fuel Complex (MFC). This EC does not cover work at in-town locations or on priority 3 and 4 roads. The proposed action would include removing and replacing sign posts, replacing weathered/broken signs, changing signs on the same post, installing new signs, and installing new and replacing existing delineator/reflector poles. This work would be performed as needed and would be ongoing throughout the year. Installation of new road signs could change the flow of traffic on existing roads (e.g., stop sign replaced with a yield sign, speed limit changes, moving caution signs for better visibility, etc.). However, activities that would alter the flow of traffic outside the scope of sign installation, e.g., adjusting the direction of traffic flow, adding turning lanes, widening and/or realigning roads, is not analyzed in this environmental checklist. This EC is only specific to road signs and delineator/reflector poles and does not cover construction of new roads/bypass roads and does not cover redirecting traffic to other existing roads. The majority of the signs would be located on the shoulder of the roads within the mowed areas required by the INL Wildland Fire Management Implementation Plan. Hand tools or an auger would be used to dig/drill the holes (approximately 1 square foot (sq. ft.) disturbed).

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

<u>Air Emissions</u> - An auger or hand tools would be used to drill/dig post holes. Some fugitive dust would be generated during drilling, installation, and sign relocation activities. Fugitive dust generation must be minimized in accordance with the methods specified in Rules for the Control of Air Pollution in Idaho (IDAPA 58.01.01.650-651). Steps taken to control fugitive dust at the INL Site (such as application of water suppressants) must be recorded in the project records. The date, time, location, and amount/type of suppressant must be recorded to demonstrate compliance with the INL Title V Air Permit. Operation of fuel burning equipment would also result in minor releases of regulated pollutants.

<u>Disturbing Cultural or Biological Resources</u> - The proposed action would disturbed roadside soils within the mowed zone near the edge of roads when installing sign posts and delineator/reflector poles. The Cultural Resource Office (Brenda Pace or alt., 526-0916) would be contacted for clearance prior to disturbing any soil due to artifacts/historic sites being near INL roads. Cultural Resources would not need to be contacted if using the existing post/delineator/reflector holes or if replacing signs on existing posts. A Biological Resource review/breeding bird survey would not be required if soil disturbance is within the yearly mowed areas required by the INL Wildland Fire Management Implementation Plan. If activities are outside these mowed areas, or if there are shrubs present and/or vegetation over 10" in height, Biological clearance would be necessary (contact Gonzales-Stoller, Jackie Hafla, 227-9031). Facility craft personnel would survey the area for bird nests and cultural artifacts prior to disturbing the soil. If nests or artifacts are suspected or discovered, personnel would stop work and notify Environmental Support for consultation with Gonzales-Stoller and the Cultural Resource Management office. Very small amounts of vegetation may be disturbed (1 sq. ft. area) while digging post holes. Existing post holes would be used when practical. Revegetation should not be necessary and is impractical due to the minimal disturbance. Weed control would be completed as necessary and as a part of the routine maintenance spraying program in accordance with Plan (PLN)-611 "INL Noxious Weed Plan."

<u>Generating and Managing Waste</u> - Small amounts of non-hazardous waste in the form of concrete, wood, cardboard, etc., would be generated. Metal signs and posts would be sent to recycle bins at CFA. All waste would be disposed of in appropriate recycling containers at INL facilities or in the INL Landfill Complex through Waste Generator Services (WGS). Project personnel would incorporate waste minimization measures by using reusable materials where practical.

<u>Releasing Contaminants</u> - Maintenance chemicals such as concrete, caulk, lubricants, and fuel may be used. Chemicals would be approved for use and tracked in the Comply Plus Chemical Management System. Project personnel would apply spill prevention/minimization measures during chemical use and storage.

<u>Using, Reusing, and Conserving Natural Resources</u> - Fuel would be used in vehicles while traveling to and from the project locations. Project personnel would carpool and/or use alternative fuel vehicles when appropriate. Project personnel would incorporate waste minimization measures by using reusable materials and recycling where practical.

New equipment will meet either the Energy Star or Significant New Alternatives Policy (SNAP) requirements as appropriate (see http://www.sftool.gov/GreenProcurement/ProductCategory/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.

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.

## DOE-ID NEPA CX DETERMINATION Idaho National Laboratory

Page 2 of 2

EC Document No.: DOE-ID-INL-13-024

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" and B1.32 "Traffic flow adjustments."

**Justification:** Project activities described in this EC are consistent with 10 CFR 1021, Appendix B to Subpart D, items B1.3 and B1.32 "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 with operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements..." and "[t]raffic flow adjustments to existing roads (including, but not limited to, stop sign or traffic light installation..."

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: 9/27/2013