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CX Posting No.: <u>DOE-ID-INL-10-013</u>

Project Title: Relocation of National and Homeland Security New Generation Wireless Test Bed Equipment and

SECTION B. Project Description:

SECTION A. Project Title: Relocation of National and Homeland Security New Generation Wireless Test Bed Equipment an Personnel

This activity is to relocate and consolidate Battelle Energy Alliance, LLC (BEA) National and Homeland Security (NHS) New Generation Wireless Test Bed (NGWTB) program personnel and equipment from Critical Infrastructure Test Range Complex (CITRC) to Central Facilitis Area (CFA). This activity also includes relocating the antenna field from vicinity Power Burst Facility (PBF)-641 to the vicinity of PBF-620 Cell Site 9 area. The Remote Testing Monitoring Facility will be relocated from the vicinity of Gate 3 to the Cell Site 9 area. The Cell Site 9 area near PBF-620 is previously disturbed soil and asphalt.

NGWTB personnel will move from PBF-641 into CFA-1609 and CFA-699. To accommodate that move, some personnel in CFA-699 will move to CFA-668. Electrical and telecommunications modifications will be required in CFA-668 as well. NGWTB equipment currently stored in PBF-623 will be relocated to CFA-661. NGWTB personnel will pack, move, setup, and test the NGWTB electronic equipment. In addition, the propane tank located at CFA-666 will be relocated to CFA-661. Three propane heaters and associated piping will also be removed from CFA-666 and reinstalled in CFA-661.

Construction subcontractors will reconfigure existing cubicle partitions and non-structural hardwalls in CFA buildings CFA-1608, CFA-1609, and CFA-699 to accommodate NHS personnel and equipment. No new equipment is anticipated for the buildings; rather, modifications to the buildings for reconfiguration will consist of non-structural hardwall partitions (metal studs and sheetrock) with electrical convenience outlets and lighting. Fire protection system modifications will consist of adding four sprinkler heads in CFA-1609 to account for hardwall reconfiguration. Air-conditioning systems to cool the NGWTB electronic equipment will be NHS-government furnished equipment (GFE) and installed by BEA subcontractors. Electrical power will be run to the air-conditioning systems, to telecommunications racks, and to convenience outlets in relocated wall partitions. Electronic data cable (fiber and copper) will be run to telecommunications racks and to relocated wall partitions.

The relocation involves moving BEA personnel from existing buildings at CFA to make room for the NGWTB personnel, re-configuring cubicle partitions and non-structural hardwall partitions, moving personnel and electronic equipment from PBF-641 and PBF-623 to CFA, and setting up and testing equipment. Personnel equipment includes desks, chairs, computers, furniture, and phones. Programmatic equipment to be relocated includes projectors and screens, support gear, electronic equipment and air-conditioning systems for that equipment. Reconfiguration will include running data cable and electrical service to the equipment and programmatic engineering as required. BEA crafts will relocate existing equipment, cubicle partitions, and furniture.

Estimated Start Date: May, 2010.

Estimated Completion Date: September, 2010

SECTION C. Environmental Aspects / Potential Sources of Impact:

Air Emissions - The modifications to CFA-699 may require removal of some Asbestos Containing Material (ACM) in the form of ACM floor tile, ACM ceiling tile, and ACM cove base and adhesive. If the modifications require the ACM to be disturbed, appropriately trained asbestos workers will be used. These workers will use removal methods (e.g., adequately wet) that meet all regulatory requirements. Subcontractors will be required to submit proof of training through the vendor data system prior to disturbing any asbestos. Removal methods will be documented in a Job Safety Analysis (JSA), an asbestos abatement plan, or both. An Asbestos Removal Notification form will be filed by BEA prior to asbestos abatement activities. Subcontractors will bring non-road equipment such as generators, compressors, and welders that will be required to meet the visible emission/opacity requirements identified in Idaho Administrative Procedures Act (IDAPA) and the INL Tier I Air Permit. This equipment will not be onsite for greater than a year because the project will only last an estimated 5 months. If NGWTB operation personnel use generators that will be left in one place for longer than a year, an Air Permitting Applicability Determination will be required. Certified Refrigeration Technicians will be used when working with refrigerant systems. Facility Management will track any changes/additions to their buildings.

Disturbing Cultural/Biological Resources - Internal building modifications such as removal and relocation of hard walls will take place in CFA-699 which is on the Idaho National Laboratory (INL) Historic Building List. Project personnel will contact the Cultural Resource Management (CRM) office prior to construction to see if there will be any requirements associated with these modifications. The antenna field and the Remote Testing Monitoring Facility will be relocated to existing parking/laydown areas at PBF-620 cell site 9. Cultural and ecological clearances will be required prior to starting the project.

Generating and Managing Waste - Typical Construction industrial waste will be generated in the form of drywall, scrap wire, scrap conduit, packaging material, scrap wood, Resource Conservation and Recovery Act (RCRA) empty containers, etc. Hazardous waste is not anticipated, however waste from adhesives, paints, etc., could be generated. All waste will be characterized, stored, and disposed at the direction of Waste Generator Services.

Releasing Contaminants - Construction chemicals such as fuels, lubricants, paints, adhesives, etc., will be used during the project. The subcontractor will be required to submit an initial chemical inventory list with associated material safety data sheets (MSDS's) prior to starting the project. The vendor data schedule will also require submittal of quarterly and final chemical inventory lists. The Construction Chemical Coordinator will enter these chemicals into the INL Comply Plus chemical tracking system. All spills will be reported to the Construction Field Representative and the INL Spill Notification Team. The subcontractor will be required to have spill control equipment on site. A propane tank that will be relocated from CFA-666 to CFA-661 will have it's location changed in the INL Tank Inventory Database.

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SECTION D. Determine the Level of Environmental Review (or Documentation) and Reference(s): Identify applicable categorical exclusion from 10 CFR 1021, Appendix B, give the appropriate justification and the approval date.

Note: 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, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment 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) adversely affect environmentally sensitive resources. 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.

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, B1.31 and B2.1
Justification: The justification for this project is improved efficiency and workplace conditions through relocation and consolidation of equipment and personnel. The work appears to be appropriately covered by B1.31 "Relocation of machinery and equipment" and B2.1 "Modifications of an existing structure to enhance workplace habitability"
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 5/24/2010.