U.S. Department of Energy
Categorical Exclusion Determination Form

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Proposed Action Title: Form Energy, Inc. -- Aqueous Sulfur Systems for Long-duration Grid Storage

Program or Field Office: Advanced Research Projects Agency - Energy

Location(s) (City/County/State): Cambridge, MA; Somerville, MA; Pittsburgh, PA; Blacksburg, VA

Proposed Action Description:

AMENDED NEPA DETERMINATION: (See attached Original and Amended Programmatic Determinations, dated 11/30/2018 & 1/7/2019, respectively). This Amended Determination follows the approval of a new team member and milestone modifications to support the project team's small-scale, research and development activities to develop a long-duration (>10 h rated duration) energy storage system that leverages the low cost and high abundance of sulfur and manganese, deployed in an aqueous platform. Specifically, the project team will leverage Carnegie Mellon University's technical contributions to complete anode, cathode, electrolyte and cell integration development and test a prototype cell. If successful, the team will deliver a low-cost fuel cell that achieves over 70% energy efficiency at a fixed power density of ≥ 25 mW/cm2 considering a ≥ 35 Wh/L energy density for active solutions.

Project activities will be conducted at existing facilities at Form Energy, Inc. (Somerville, MA); MIT (Cambridge, MA); Virginia Tech. (Blacksburg, VA); and Carnegie Mellon University (Pittsburgh, PA) designed for the applicable activities. Project tasks continue to fit within the class of actions identified under the DOE Categorical Exclusion identified below and do not involve any extraordinary circumstances that may affect the significance of the environmental effects of the project. This assessment was based on a review of the proposed scope of work and the potential environmental impact of the project. Project tasks will be conducted in accordance with established safety and materials/waste management protocols and pursuant to applicable Federal, State, and local regulatory requirements.

Categorical Exclusion(s) Applied:

B3.6 - Small-scale research and development, laboratory operations, and pilot projects

For the complete DOE National Environmental Policy Act regulations regarding categorical exclusions, including the full text of each categorical exclusion, see Subpart D of 10 CFR Part 1021.

Regulatory Requirements in 10 CFR 1021.410(b): (See full text in regulation)

☑ The proposal fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D.

To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, 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 facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

☑ There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal.

☑ The proposal has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

Based on my review of the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1B), I have determined that the proposed action fits within the specified class(es) of action, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

NEPA Compliance Officer: GEOFFREY GOODE Digitally signed by GEOFFREY GOODE Date: 2021.06.15 14:15:47 -04'00' Date Determined:

(This form will be locked for editing upon signature)