PMC-ND

(1.08.09.13)

# U.S. DEPARTMENT OF ENERGY OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY NEPA DETERMINATION



**RECIPIENT:** University of Houston STATE: TX

**PROJECT** Application Resilient Ammoxidation of Small Hydrocarbons (R-ASH) Using Forced Dynamic Operation

TITLE: for Maximal Flexibility

**Funding Opportunity Announcement Number Procurement Instrument Number** NEPA Control Number CID Number

DE-FOA-0002252 DE-EE0009410 GFO-0009410-001

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Policy 451.1), I have made the following determination:

### CX, EA, EIS APPENDIX AND NUMBER:

Description:

**A9** Information gathering, analysis, and

Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and dissemination informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)

B3.6 Smallscale research and development, laboratory operations. and pilot projects

Siting, construction, modification, operation, and decommissioning of facilities for smallscale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment.

## Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide funding to the University of Houston to design a technologically and economically viable catalytic reactor concept and process using forced dynamic operation for ondemand and on-site production of acrylonitrile from a variety of fossil and renewable feedstocks. The proposed project would be completed over three Budget Periods (BPs), with a Go/No-Go decision point in between each BP. This NEPA review is applicable to all three BPs.

Proposed project activities by location are listed below:

University of Houston - Houston, TX

· kinetic measurement of propylene ammoxidation; temporal analysis of bench scale reactors at ambient pressure, assessment of catalyst lifetime

Idaho National Laboratory - Idaho Falls, ID

• transient kinetic characterization of ammoxidation catalysts, temporal analysis of measurements of temperature and concentration in lab scale reactors, data analysis and processing

University of Virginia - Charlottesville, VA

· Catalysts synthesis, measurement of dynamic oxygen storage capacity, spectroscopic characterization, catalyst deactivation studies and reactor scale up

Pacific Northwest National Laboratory - Richland, WA

Operando and in situ spectroscopic analysis, materials preparation and data analysis

KX2 Development - Sugar Land, TX

• techno-economic analyses, market research, development of commercialization plans and conceptual reactor design

Project activities would involve the use and handling of flammable and toxic materials (e.g. industrial chemicals, compressed gases and solvents) in controlled laboratory environments. The University of Houston and its project partners would observe all applicable environmental, health, and safety laws and regulations. Any risks associated with the handling of these materials would be mitigated through adherence to established health and safety policies and procedures. Protocols would include personnel training on the use of personal protective equipment, engineering controls including chemical storage cabinets and fume hoods, monitoring and internal assessments. All waste products would be disposed of by licensed waste management service providers. No modifications, new permits, or change in the use, mission, or operation of any facility would be required.

Any work proposed to be conducted at a federal facility may be subject to additional NEPA review by the cognizant federal official and must meet the applicable health and safety requirements of the facility.

## NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Advanced Manufacturing Office
This NEPA determination does not require a tailored NEPA Provision
NEPA review completed by Diana Heyder, 3/11/2021

#### FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the Rationale above) 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 proposed action that may affect the significance of the environmental effects of the proposal.

The proposed action 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.

The proposed action is categorically excluded from further NEPA review.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature:	Signed By: Casey Strickland  NEPA Compliance Officer	Date:	3/12/2021
FIELD OFFICE MANAGER DETERMIN	ATION		
<ul><li>✓ Field Office Manager review not require</li><li>✓ Field Office Manager review required</li></ul>	d		
BASED ON MY REVIEW I CONCUR WI	TH THE DETERMINATION OF THE NCO:		
Field Office Manager's Signature:		Date:	
	Field Office Manager		