

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



RECIPIENT: Tufts University

STATE: MA

PROJECT TITLE : Decarbonizing ironmaking using ammonia

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA-0002804	DE-EE0010848	GFO-0010848-001	GO10848

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 dissemination

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 informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)

B1.31 Installation or relocation of machinery and equipment

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

B3.6 Small-scale 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 Tufts University (Tufts) for the design, development, construction, and testing of chemical reactors. Award activities would include design, construction, and testing of chemical reactors to convert iron ore into iron metal using ammonia. Experimental characterization of the solid reaction products would also be performed. These efforts would occur within an existing, dedicated laboratory at Tufts in Medford, Massachusetts.

The project would involve the use and handling of various hazardous materials, including iron ore, iron, ammonia, hydrogen, hydrochloric acid, and cleaning solvents. All such handling would occur in a laboratory setting, with volatile and toxic reagents handled inside of a fume hood with appropriate engineering controls and personal protective equipment. The project would also require high heat, up to 1,000°C, at the same time as flammable gases (i.e., ammonia gas is used inside of a reactor that is heated to 1,000°C). All hazardous materials would be managed in accordance with federal, state, and local environmental regulations. Existing Tufts health and safety policies and procedures would be followed, including employee training, engineering controls, proper protective equipment, monitoring, and internal assessments. Additional policies and procedures would be implemented as necessary as new health and safety risks are identified.

Argon, nitrogen, hydrogen, and trace amounts of ammonia gases would be produced by the project activities in a fume hood and exhausted to the environment through the building air handling system. Ammonia would be scrubbed from the gas effluent by bubbling through a solution of hydrochloric acid. Hydrogen would potentially be captured or flared for safety reasons. The project would trap ammonia with the hydrochloric acid trap at the facility. If the trap fails, there may be a minimal release of ammonia to environment. All emissions are expected to be negligible, and the project facility occurs within a USEPA Attainment Area.

Physical modification of Tufts facilities associated with this project may be needed as new equipment is installed, particularly electrical wiring to provide 240 Volt electrical power to power an X-ray diffractometer and new furnaces. No ground disturbing activities, change in the mission of the existing facilities or outdoor equipment installations would occur as part of this award.

A local electrical permit may be required for electrical wiring modifications. Any and all permits required for the execution of the project at the above-referenced locations would be the responsibility of the recipient.

DOE has considered the scale, duration, and nature of proposed activities to determine potential impacts on resources, including those of an ecological, historical, cultural, and socioeconomic nature. DOE does not anticipate impacts on these resources which would be considered significant or require DOE to consult with other agencies or stakeholders.

NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Industrial Efficiency & Decarbonization Office
NEPA review completed by Chris Akios, 06/25/2024

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:



NEPA Compliance Officer

Date: 6/26/2024

FIELD OFFICE MANAGER DETERMINATION

- ☒ Field Office Manager review not required
☐ Field Office Manager review required

BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO :

Field Office Manager's Signature: _____

Date: _____

