PMC-ND

(1.08.09.13)

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

RECIPIENT: Summit Nanotech USA Corporation **STATE:** CO

PROJECT TITLE : Enhancing Operational Efficiency in Direct Lithium Extraction through an Advanced Water Recovery System

Notice of Funding Opportunity Number	Procurement Instrument Number	NEPA Control Number	CID Number
DE-FOA-0003155	DE-EE0011726	GFO-0011726-001	EE11726

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:

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 federal funding to Summit Nanotech USA Corporation (Summit) to test and scale up their prototype water recovery system, which utilizes lithium-containing brines.

The design, development, and fabrication activities related to the water recovery system scale up, along with the system testing, would take place at Summit's research and development facility in Lafayette, Colorado. Albermarle Corporation (Albermarle) would supply eluate assays to help Summit determine brine chemical composition and characteristics. Albermarle would also extract and ship raw, already-extracted brine samples from their facility in Magnolia, Arkansas facility to Summit's Colorado headquarters. None of the award activities occurring at any of the facilities would require new permits, licenses, or authorizations.

Project efforts would include the handling, transport, and disposal of brine, which presents hazardous risks, primarily related to environmental concerns such as groundwater contamination. Brine storage and transportation would adhere to safety protocols, including spill containment, DOT-certified containers, and EPA-certified transporters. All project personnel would be trained to handle wastes, wear proper personal protective equipment, and follow safe work practices. The project would incorporate a waste disposition strategy that includes hauling off all liquid wastes from natural brine to prevent introduction of trace metals or hazardous compounds into the City of Lafayette water system.

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 within the scope of this current NEPA Determination that would be considered significant or require DOE to consult with other agencies or stakeholders.

NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Advanced Materials and Manufacturing Technologies Office
NEPA review completed by Chris Akios, 7/13/2026

FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B and C of DOE's NEPA Implementing Procedures (June 30, 2025). To fit within the classes of actions listed in Appendix B to 10CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures.

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.

The proposed action is categorically excluded from further NEPA review.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature: Electronically Signed By: Kristin Kerwin Date: 7/13/2026

NEPA Compliance Officer

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: _____

Field Office Manager