RECORD OF CATEGORICAL EXCLUSION DETERMINATION

Project ID No. Multiple

Title: Hydrogen Sulfide Scavenger BOA

Description: Subcontractor shall provide all materials, equipment, supplies, personnel, and transportation required to: (1) furnish hydrogen sulfide scavenger, (2) injection (pumping) equipment and operators for scavenger application, and (3) analytical/technical support at the BC and WH SPR sites for removal of hydrogen sulfide from crude oil delivered to commercial storage terminals.

Subcontractor is not required to provide installation of header piping between the pumping equipment and the point of scavenger injection. SPR site personnel will unload/reload the pumps from the subcontractor vehicles. The Government will provide drain tubs for catching scavenger draining from connection hoses.

Regulatory Requirements: NEPA Implementing Procedures (10 CFR 1021)

10 CFR 1021.410 (Application of Categorical Exclusions)

(a) The actions listed in Appendices A and B of Subpart D are classes of actions that DOE has determined do not individually or cumulatively have a significant effect on the human environment (categorical exclusions).

(b) To find that a proposal is categorically excluded, DOE shall determine the following:

(1) The proposed action fits within a class of actions that is listed in Appendix A or B of Subpart D;

(2) There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal; and

(3) The proposal is not "connected" (40 CFR 1508.25(a)(1)) to other actions with potentially significant impact, is not related to other proposed actions with cumulatively significant impacts (40 CFR 1508.25(a)(2)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

Appendix B (Categorical Exclusions Applicable to Specific Agency Actions)

The proposed action must not:

- 1. Threaten a violation of statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders.
- 2. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions.
- Disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and /natural gas products that preexist in the environment such that would be uncontrolled or unpermitted releases; or
- 4. Adversely affect environmentally sensitive resources.

Categorical Exclusion to be applied: <u>B5.2</u>

Modifications to existing pump and piping configurations (including manifolds, metering systems, and other instrumentation on such configurations conveying materials). Covered modifications would not have the potential to cause significant changes to design process flow rates or permitted air emissions.

Electronic approval via NEPA Workflow Approved by SPRPMO NEPA Compliance Officer 08/29/14 . Determination Date