PMC-ND

(1.08.09.13)

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



RECIPIENT:Brayton Energy STATE: NH

PROJECT Development of Integrated Thermal Energy Storage Heat Exchangers for Concentrating Solar Power

TITLE: **Applications**

Funding Opportunity Announcement Number Procurement Instrument Number NEPA Control Number CID Number DE-FOA-0001697 DE-EE0008382 GFO-0008382-001

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

CX, EA, EIS APPENDIX AND NUMBER:

Description:

A9 Information gathering,

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 analysis, and 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 **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 research and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a development, 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 is proposing to provide federal funding to Brayton Energy to design a full-scale integrated thermal energy storage heat exchanger and related test articles. During the project Brayton Energy (Brayton) would demonstrate a heat exchanger technology that can be integrated with fixed-position thermal energy storage (TES) media. The project would be completed in two phases conducted over two budget periods (BP). BP1 would include integrated heat exchanger design, engineering analysis, and risk mitigation tests. BP2 would include heat exchanger validation testing.

Project activities, including engineering and design, risk mitigation and validation testing, would be conducted at Brayton Energy's facility in Hampton, NH and Echogen Power Systems' sCO2 test loop in Akron, OH. Modifications to the sCO2 test loop would be required to accommodate this project, however no modification to the structure (indoor or outdoor) would be required. In addition, Argonne National Laboratory would provide technical advice to Brayton during the course of the project.

The project would involve the use and handling of various hazardous materials, including metals and industrial solvents, and high temperature and high pressure fluids. All such handling would occur in-lab, and follow existing hazardous material handling and disposal practices. All hazardous materials would be managed in accordance with federal, state, and local environmental regulations. Safety containment and ventilation would be used for testing at elevated pressures and temperatures. Existing corporate health and safety policies and procedures would be followed, including employee training, proper protective equipment, engineering controls, monitoring, and internal assessments. Additional policies and procedures would be implemented as necessary if new health and safety risks are identified.

Both facilities where project activities would be completed are designed for this type of work and would utilize standard equipment; therefore no new permits, additional licenses and/or authorizations, or modifications to existing permits would be necessary. No ground disturbing activities, no changes in operation of existing facilities, and no

installation of equipment outdoors would occur for project activities. DOE does not anticipate any impacts to resources of concern due to the proposed activities of the project.

Any work proposed to be conducted at a DOE laboratory may be subject to additional NEPA review by the cognizant DOE NEPA Compliance Officer for the specific DOE laboratory prior to initiating such work. Further, any work conducted at a DOE laboratory must meet the laboratory's health and safety requirements.

Based on the review of the proposal, DOE has determined the proposal fits within the class of action(s) and the integral elements of Appendix B to Subpart D of 10 CFR 1021 outlined in the DOE categorical exclusion(s) selected above. DOE has also determined that: (1) there are no extraordinary circumstances (as defined by 10 CFR 1021.410(2)) related to the proposal that may affect the significance of the environmental effects of the proposal; (2) the proposal has not been segmented to meet the definition of a categorical exclusion; and (3) the proposal is not connected to other actions with potentially significant impacts, related to other proposals with cumulatively significant actions, or an improper interim action. This proposal is categorically excluded from further NEPA review.

NEPA PROVISION

DOE has made a final NEPA determination for this award

Insert the following language in the award:

If the Recipient intends to make changes to the scope or objective of this project, the Recipient is required to contact the Project Officer, identified in Block 15 of the Assistance Agreement before proceeding. The Recipient must receive notification of approval from the DOE Contracting Officer prior to commencing with work beyond that currently approved. If the Recipient moves forward with activities that are not authorized for Federal funding by the DOE Contracting Officer in advance of a final NEPA decision, the Recipient is doing so at risk of not receiving Federal funding and such costs may not be recognized as allowable cost share.

Note to Specialist:

Solar Energy Technologies Program
This NEPA Determination requires a tailored NEPA provision.
Review completed by Kristin Kerwin 8/21/2018

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature:		Signed By: Kristin Kerwin	Date:	8/21/2018
		NEPA Compliance Officer		
FIELD OFFICE MANAGER DETERMINATION				
	Field Office Manager review required			
NCO REQUESTS THE FIELD OFFICE MANAGER REVIEW FOR THE FOLLOWING REASON:				
	Proposed action fits within a categorical exclusion but involves a high profile or controversial issue that warrants Field Office Manager's attention. Proposed action falls within an EA or EIS category and therefore requires Field Office Manager's review and determination.			
BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO:				
Field Office Manager's Signature:			Date:	
Field Office Manager				