

PMC-ND

(1.08.09.13)

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

**RECIPIENT:** Togiak Natives Limited**STATE:** AK

**PROJECT TITLE:** Togiak Heat Recovery Project

<b>Funding Opportunity Announcement Number</b>	<b>Procurement Instrument Number</b>	<b>NEPA Control Number</b>	<b>CID Number</b>
DE-FOA-0002032	DE-IE0000126	GFO-0000126-001	

**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 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.)

**B5.14 Combined heat and power or cogeneration systems** Conversion to, replacement of, or modification of combined heat and power or cogeneration systems (the sequential or simultaneous production of multiple forms of energy, such as thermal and electrical energy, in a single integrated system) at existing facilities, provided that the conversion, replacement, or modification would not have the potential to cause a significant increase in the quantity or rate of air emissions and would not have the potential to cause significant impacts to water resources.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide funding to Togiak Natives Limited (TNL) for the construction of a heat recovery system between the Alaska Village Electric Cooperative Power Plant and four city buildings (Water Treatment Plant, City Office, City Shop, and Library) in Togiak, Alaska. The new system would recover heat from Power Plant operations that would be transferred by underground insulated glycol piping to end users. The system would tie into the existing heating systems using heat exchangers, control mechanisms, and any required upgrades to the existing buildings hydronic system.

Heavy equipment would be used during project construction and would be operated by trained, certified construction personnel. Approximately 900 linear feet of trench would be excavated to install the heat recovery pipeline. Trenches would be approximately 4 feet deep and 8 feet wide. Confined space entry may be required depending on the depth of the trench during installation of the pipeline loop. If needed, trench boxes and personnel trained and certified in confined space entry using the proper personal protective equipment would install the pipeline loop. Licensed plumbers would install the heat recovery system at the Power Plant and connect the pipeline to the heat exchangers. Construction site access would be limited to project personnel and site safety meetings would occur daily. All personnel would have the ability to stop work anytime unsafe situations are noted. Existing health and safety policies and procedures are in place and would be followed. All pipeline connections would be tested for leaks prior to the completion of installation. End user integration at each building would include circulation pumps, brazed plate heat exchangers, valves, a BTU meter, and additional controls to ensure heat from the buildings heating systems do not backfeed into the heat recovery system.

Activities would occur within the 100-year floodplain to existing facilities and homes within the community as minor modifications to improve environmental conditions but would not provide increased capacity that would support increased floodplain development. Most of the improvements would occur below grade which would not impact flood flows within the floodplain. Project activities would not occur near cultural sites and none of the buildings involved are listed or eligible to be listed on the National Register of Historic Places. The Indian Health Service (IHS) and the Alaska Native Tribal Health Consortium (ANTHC) completed environmental reviews and determinations for these activities including consultation with the Alaska SHPO who concurred with a finding of no historic properties affected

on June 4th, 2019. Although no historic resources are known to occur near the project location, DOE will require the following as part of best management practices for the project: If during project activities the recipient or their staff encounters any cultural material (i.e. historic or prehistoric), all activities must cease in the vicinity of the discovery immediately. The recipient must inform ANTHC, the Alaska SHPO and the DOE Project Officer of the discovery so that an evaluation of the discovery can be completed prior to continuing work.

DOE also conducted a review of potential issues relating to other resources of concern and found no effects that would be expected to result from project activities.

## NEPA PROVISION

DOE has made a final NEPA determination.

Include the following condition in the financial assistance agreement:

If during project activities the Recipient or their staff encounters any cultural material (i.e. historic or prehistoric), all activities must cease in the vicinity of the discovery immediately. The recipient must inform ANTHC, the Alaska SHPO and the DOE Project Officer of the discovery so that an evaluation of the discovery can be completed prior to continuing work.

Notes:

Office of Indian Energy Policy and Programs  
This NEPA determination requires a tailored NEPA provision.

## 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:



Casey Strickland

NEPA Compliance Officer

Date:

8/8/2019

## 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: \_\_\_\_\_  
Field Office Manager

Date: \_\_\_\_\_