

**FINDING OF NO SIGNIFICANT IMPACT
SUPPLEMENTAL ENVIRONMENTAL ANALYSIS FOR THE KCNSC BUILDING 23 RELOCATION,
KANSAS CITY, MISSOURI
DOE/EA-1592-S1**

Notice: National Nuclear Security Administration

Action: Finding of No Significant Impact; Supplemental Environmental Analysis for the KCNSC Building 23 Relocation, Kansas City, Missouri (DOE/EA-1592-S1)

Date: August 28, 2019

1) SUMMARY:

The National Nuclear Security Administration (NNSA) issues this Finding of No Significant Impact (FONSI) on its proposed action to relocate employees and functions that currently occur within Buildings 2, 3 and 4 on the Kansas City National Security Campus (KCNSC) located at 14520 Botts Road, Kansas City, Missouri to another facility located at 14901 Andrews Road in Kansas City, Missouri (**Figure 1**). The Proposed Action involves the lease of additional off-site space to accommodate near-term facility needs while a plan to support the KCNSC's long-term manufacturing requirements is developed. Relocation of a portion of the light manufacturing and warehouse operations that currently occur in Buildings 2, 3, and 4 of the KCNSC would relieve existing space in Buildings 2, 3, and 4 to support the increased workload. The facility proposed for lease, referred to as "Building 23" is located approximately one mile east of the KCNSC main campus.

The previous relocation of the NNSA non-nuclear production and procurement activities from the Kansas City Plant (KCP) located at the Bannister Federal Complex (BFC) to the current facility, the KCNSC was reviewed in accordance with the *National Environmental Policy Act* (42 U.S.C. §§ 4321 *et seq.*; NEPA) through completion of an Environmental Assessment (EA) for the *Modernization of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the Kansas City Plant* (U.S. Department of Energy [DOE]/EA-1592) and was supported by a Finding of No Significant Impact (FONSI), issued April 29, 2008. Section 4.3 of DOE/EA-1592 provides a description of the KCNSC.

The relocation of employees and equipment to another location outside of the KCNSC, was not contemplated in the DOE/EA-1592 under the assumption that the KCNSC facility would accommodate NNSA's needs identified in the 2006 Stockpile Stewardship Management Plan (SSMP). The 2018 SSMP includes a number of additional weapons programs, resulting in a significant increase in the facility's scope of work. As a result of this growth, Buildings 2, 3, and 4 of the KCNSC campus provide insufficient space to support the manufacturing and research and development (R&D) workloads forecasted to support future programs and new technologies.

Supplemental EA (DOE/EA/1592-S1) provided NNSA with the information needed to make an informed decision regarding the impact to the environment associated with the proposed relocation. The

Supplemental EA was prepared to provide the following information to decision makers and other document reviewers:

- The purpose and need for agency action;
- A description of the alternatives considered to the proposed action;
- A description of the affected environment – the KCNSC and the proposed leased property;
- An assessment of potential direct and indirect environmental impacts of the proposed action and the no-action alternative;
- An assessment of the cumulative impacts of the proposed action with past, present, and other reasonably foreseeable actions; and
- A discussion of applicable regulatory requirements related to the proposed action.

Based on the findings in the Supplemental EA, the NNSA has determined that the proposed action is not a major Federal action that would significantly affect the quality of the human environment within the meaning of NEPA. Therefore, the preparation of an Environmental Impact Statement (EIS) is not necessary, and NNSA is issuing this FONSI.

2) FOR FURTHER INFORMATION CONTACT:

Further information, including an electronic copy of the Supplemental EA and this FONSI will be made available on the following website: <https://www.energy.gov/nnsa/national-nuclear-security-administrations-environmental-assessments-and-environmental-impact> or <https://www.energy.gov/nepa/doe-environmental-assessments>

For further information on the NEPA process, other NEPA documents, or to request a hard copy of the Supplemental EA or this FONSI contact:

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3) SUPPLEMENTARY INFORMATION:

This Supplemental EA and FONSI reference and expand on the Environmental Assessment (EA) for the *Modernization of Facilities and Infrastructure for the Non-Nuclear Production Activities Conducted at the Kansas City Plant* (U.S. Department of Energy [DOE]/EA-1592) and was supported by a Finding of No Significant Impact (FONSI), issued April 29, 2008. Those documents should be consulted for additional information.

NNSA prepared Supplemental EA (DOE/EA-1592-S1) and published it along with this FONSI on [DATE]. Based on the findings in the Supplemental EA, NNSA has concluded that no information has been made available that is inconsistent with a FONSI.

4) PURPOSE AND NEED:

The purpose and need for the proposed action is to support the Mission Needs Statement by leasing additional space to accommodate near-term manufacturing requirements at the KCNSC while a long-term solution to provide additional facility space is developed. The proposed action would support the 2018 SSMP which resulted in a significant increase in the facility's scope of work; and would provide additional space to support future programs and new technologies needed to fulfill forecasted workloads.

5) DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES:

Proposed Action: Approximately 275,000 square feet (SF) of an existing 450,000 SF facility would be leased at 14901 Andrews Road, Kansas City, Missouri 64147 (see Figure 1-1). This facility, referred to as "Building 23", would provide additional space to support light manufacturing and warehouse operations, freeing up existing space in Buildings 2, 3 and 4 at the KCNSC facility. The proximity of Building 23 to the KCNSC, approximately one mile to the east, would support efficient operations, mitigate increases to operational costs, and minimize disruption to employee commutes and current work environment.

Approximately 200 employees and numerous pieces of large manufacturing/warehouse equipment would be immediately relocated from Buildings 2, 3 and 4 of the KCNSC to Building 23 at Andrews Road. Over the anticipated timeframe NNSA intends to operate in Building 23, the workforce is projected to grow to an estimated 500 total employees at Building 23. The scope of operations and supporting equipment proposed for relocation is typical of the following light manufacturing activities:

- Transfer press operations: equipment, materials, and processes to support plastic molding
- Mock factory: equipment, materials, and processes to support soldering, hand cleaning, marking, epoxy cover coating, training simulation, metal deburring, and machining
- Equipment, and processes such as re-engineering, prototyping, and testing of electrical and small mechanical components; manufacturing and testing of high voltage power supplies; development and production of electrical and mechanical assemblies; manufacturing and testing
- Refurbishment: equipment, materials, and processes to support Tester and Handling Gear Refurbishment activities
- Production maintenance: equipment, materials, and processes to support the Production Support Maintenance shop activities including part fabrication, welding, soldering, grinding, cutting, a/c repair, pressure relief device testing, pump and motor rebuilding, machine electrical and mechanical component disassembly and repair, circuit board repair, machining, sheet metal fabrication, chemical and spare part storage.

- Logistics, receiving inspection, tool and gage: equipment, materials, and processes to support the Production Support Maintenance shop activities including equipment / material storage, dock operations, material handling and services
- Various ancillary support equipment and activities

No Action Alternative: Operations conducted at the existing KCNSC facility would continue without significant modification. The KCNSC facility is currently over-utilized as the result of an increase in workload that exceeds the planned scope of work developed for the facility when it was commissioned and constructed. The NNSA has already taken steps to optimize operations and output at the KCNSC, including:

- Added second and third work shifts
- Purchased new and additional manufacturing equipment
- Hired 2,000 additional employees to accomplish additional workload
- In 2016, leased additional off-site office space to accommodate 96 office personnel
- In 2017, leased additional off-site office space to accommodate 435 office personnel
- In 2019, leased additional off-site office space to accommodate 400 office personnel

The current facility at KCNSC main campus has insufficient capacity to accomplish the work required to be performed to support the NNSA's Mission, which increases the risk of critical work and production deadlines not being met. As a result, the no-action alternative would not assist NNSA in meeting the purpose and need for the project, nor does it support their forecasted workload or facility mission. The no-action alternative was eliminated from further consideration.

6) ENVIRONMENTAL CONSEQUENCES OF PROPOSED ACTION:

The following is a summary of the findings of the Supplemental EA (DOE/EA-1592-S1). Under the resource categories of land use, climate, geology, soils, groundwater hydrology, surface water hydrology, flora and fauna, air quality and permitting, historical and cultural resources, and aesthetics, no effects or very minor effects may occur as a result of the proposed action because either the resources are not present or no construction or land disturbance activities will occur (refer to Table 3-3 of the DOE/EA 1592-S1).

Impacts would occur in the following categories and were evaluated in the Supplemental EA: Socioeconomic Resources, Stormwater and Industrial Wastewater, and Waste Management.

Socioeconomic Resources: The KCNSC would continue to contribute substantially to the socioeconomics of the region by employing approximately 4,500 people.

Environmental Justice, Income, and Employment - Under the proposed action, approximately 200 employees will be initially relocated from the KCNSC to Building 23 within an existing

industrial campus one-mile east of the KCNSC. To meet the forecast workload, the number of employees at Building 23 would increase from 200 to 500 over the next five years. Immediate relocation of employees to Building 23 would vacate space at the KCNSC to allow the NNSA to carry out plans to hire additional employees to be located at the KCNSC, thereby maintaining the current employment at KCNSC in the near-term. The number of employees at the KCNSC would be expected to increase over time based on current workload projections. Because Building 23 is located within an industrial area, no significant adverse impacts from relocation and operations at Building 23 are expected and no disproportionately high impacts to minority or low-income populations would occur.

Health and Human Safety – No building demolition will occur at either facility. Limited building interior and exterior renovation activities will occur at Building 23 to support the relocated operations. Human health and safety impacts to the general public for Building 23 operations would be the same as those of current KCNSC operations. The existing tenant within Building 23 has constructed a floor to ceiling fire rated separation wall to protect other building occupants in the event of a fire in the NNSA-leased space. Activities occurring at Building 23 will not include all of the same functions as those that occur at KCNSC. Those activities and supplies that will not occur at Building 23 include:

- Uncovered outdoor use or storage of materials
- Energetic materials (explosives) such as those shipped United States Department of Transportation (DOT hazard class 1.1 through 1.6)
- No direct shipments to Building 23, all directed through main facility
- Use or storage of powdered materials associated with additive manufacturing
- Use or storage of beryllium, beryllium-containing alloys, and beryllium-containing compounds, or lead (other than soldering)
- Use or storage of hydrofluoric acid (HF), Apocure-601-Bismaleimide (APO-BMI), or cyanide
- Use of open beam x-rays or Class 3B/4 lasers
- Use or generation of unbound engineered nano-particles
- Use or storage of asbestos; all forms (CAS 1332-21-4)
- Use or storage of chlorodiphenyls (Poly Chlorinated Biphenyls, PCBs, such as CAS 53469-21-9 (42%) and CAS 11097-69-1 (54%)); 4,4'-Methylene bis(2-chlorobenzeneamine) (MOCA) (CAS 101-14-4); or 4,4'-Methylenedianiline (MDA) (CAS 101-77-9)
- Radioactive/radiological materials without Senior Management/NNSA approval [NOTE: Any use of radioactive/radiological materials would require a detailed radiological survey, which could lead to additional investigations (i.e., a Multi-Agency Radiation Survey and

Site Investigation Manual/Multi-Agency Radiation Survey and Assessment of Materials and Equipment [MARSSIM/MARSAME] Site Investigation) and DOE Order 458.1 Radiation Protection of the Public and the Environment requirements may be required when releasing the facility and equipment back to unrestricted use.]

Transportation and Infrastructure – With the one-mile separation between facilities, changes in commuting time of employees would be nominal. Employee traffic would be split over two working shifts per day. Existing parking areas, roadways, and utilities that service the site have adequate capacity to support the initial and anticipated workforce and facility operations over the lease period. KCNSC employees may use available parking at Building 23 and would be transported via shuttle to and from the KCNSC main campus. All primary shipping (incoming supplies to the facility and outgoing products to customers) will occur from KCNSC. No direct receipt of shipments from other sources would occur at Building 23. No freight rail connection is needed to support the uses within Building 23.

Stormwater and Industrial Wastewater: The activities proposed at Building 23 would generate effluents from manufacturing and maintenance operations; however, these effluents would be containerized and be disposed of in accordance with applicable regulations. There will be no industrial wastewater discharges into the existing sanitary sewer system; no industrial wastewater permit is required. No ground disturbance or increase in the amount of existing impervious cover would occur initially. Depending on the number of employees added in the coming years, minor expansion of parking areas may be needed to accommodate additional employees. Site stormwater would be managed by the swales, ditches, and detention facilities already developed and present on the site. A site-specific No Exposure Certification would be pursued for Building 23 in lieu of a formal National Pollutant Discharge Elimination System (NPDES) permit. Administrative controls would be implemented to ensure compliance with the certification.

Waste Management: Total quantities of waste generated from all operations at the KCNSC and Building 23 may increase by approximately 20 percent above current generation rates, due to the planned increases in manufacturing capacity supported by the relocation. Onsite waste management staff (employed by the KCNSC Management and Operations (M&O) contractor) would be housed at Building 23 and would conduct waste management operations and coordination. Onsite staff would also prepare shipments and contract with local permitted waste management and recycling contractors for collection and offsite waste management. All wastes generated at Building 23 would be transported directly to a licensed disposal facility. The KCNSC has an existing DOT Security Plan for the transport of hazardous materials, as required under 49 CFR 172.800; the proposed action would be covered under this existing KCNSC plan. Minimal amounts of construction waste generated during renovation of the Building 23 would be managed in accordance with guidance provided in Missouri Department of Natural Resources (MDNR) technical bulletin “Managing Construction and Demolition Waste” (MDNR, 2017). Nonhazardous

waste would be disposed of at a locally permitted sanitary landfill such as the Johnson County [Kansas] Landfill or, if available, a local landfill permitted solely for construction-type debris. Minimal hazardous waste is anticipated to be encountered or generated during renovation of Building 23. If encountered, any hazardous waste would be handled in compliance with applicable regulatory requirements. These measures would minimize hazards for worker safety.

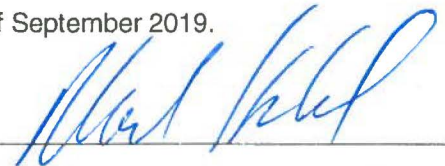
The operations conducted within Building 23 would be classified by the US Environmental Protection Agency (EPA) as a Large Quantity Generator (LQG) of hazardous waste and would be required to obtain an EPA Identification number. An LQG is defined as an entity that generates more than 1,000 kg (kilograms) of hazardous waste per month or more than one kg of acutely hazardous waste per month. A containment pad would be constructed within the existing facility structure to store hazardous waste. This pad would be removed upon termination of NNSA operations at Building 23. Work equipment, processes, or activities that involve radioactive materials would only be allowed within Building 23 under the conditions outlined in the above section on Health and Human Safety.

Cumulatively significant impacts: No cumulative impacts would result from the proposed action.

7) DETERMINATION:

In accordance with NEPA and DOE NEPA implementing regulations (10 CFR Part 1021); and based on the findings in the Supplemental EA, NNSA finds that the relocation of employees and equipment to a new facility is not a major Federal action significantly affecting the quality of the human environment within the meaning of NEPA. Therefore, the preparation of an EIS is not required and NNSA is issuing this FONSI for the proposed action.

Issued at the Kansas City National Security Campus, this 6th day of September 2019.



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