

PMC-ND

(1.08.09.13)

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

**RECIPIENT:** BrightSource Energy**STATE:** CA**PROJECT  
TITLE:** Coatings for SP Lifetime

<b>Funding Opportunity Announcement Number</b>	<b>Procurement Instrument Number</b>	<b>NEPA Control Number</b>	<b>CID Number</b>
DE-FOA-0002243	DE-EE0009332	GFO-0009332-001	

**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.)

**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 funding to BrightSource Energy to develop a procedure to test concentrated solar power (CSP) receiver coatings which experience impacted performance over time. The test procedure will be validated through laboratory and field testing. The project would be completed over three Budget Periods (BPs) with a Go/No-Go Decision Point between each BP. This NEPA review is applicable to all three BPs.

The project team would develop the test suite, build the apparatus for performing the test, develop the modeling tools, and design the sub-scale receiver that would be used for field testing. The model developed would be used to predict aging due to factors such as metal oxidation, material structural changes, extreme temperatures, and erosion by sand and wind. Sample coatings not employed in CSP plants as well as those from active CSP plants would be tested and results would be used to verify the model. A sub-scale receiver would be designed and assembled to be used for field testing of the test apparatus. The test suite and model would be finalized and disseminated for use by other industry and research parties.

Proposed project activities would include data collection and analysis, computer modeling, and design and fabrication of the sub-scale receiver and the testing apparatus. BrightSource Energy would oversee the project. National Renewable Energy Laboratory (NREL), Brayton Energy, and DLR (Institute for Solar Research) would be subrecipients. BrightSource labs in Jerusalem, Israel would prepare coating samples and test at various conditions (heat, humidity, etc), and characterize using metallographic techniques. NREL would conduct experiments with water vapor and sunlight. Brayton would fabricate a small test article and send to an existing DLR solar facility in Almeria, Spain for testing. Tube sections used for testing would be installed at DLR and removed upon completion of the project. No additional modifications, new permits, or change in the use, mission, or operation of any facility would be required.

Project activities would involve the use and handling of hazardous chemicals. Any risks associated with the handling

of these materials would be mitigated through adherence to established health and safety policies and procedures. Protocols would include the use of personal protective equipment, chemical hoods, and exhaust systems. All waste products would be disposed of by licensed waste management service providers. BrightSource Energy and its project partners would observe all applicable Federal, state, and local health, safety, and environmental regulations.

Any work proposed to be conducted at a federal facility may be subject to additional NEPA review by the cognizant federal official and must meet the applicable health and safety requirements of the facility.

## NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Solar Energy Technologies Office

This NEPA determination does not require a tailored NEPA provision.

Review completed by Shaina Aguilar on 3/16/21.

## 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.

DOE has determined that work to be carried out outside of the United States, its territories and possessions is exempt from further review pursuant to Section 5.1.1 of the DOE Final Guidelines for Implementation of Executive Order 12114; "Environmental Effects Abroad of Major Federal Actions."

The proposed action is categorically excluded from further NEPA review.

## SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature: \_\_\_\_\_

  
NEPA Compliance Officer

Date: 3/17/2021

## 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: \_\_\_\_\_