

**FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT FOR THE KANSAS CITY NATIONAL SECURITY CAMPUS
(KCNSC) SITEWIDE ASSESSMENT OF BOTTS AND BUILDING 23 OPERATIONS, KANSAS CITY,
MISSOURI
DOE/EA-2167**

Notice: National Nuclear Security Administration

Action: Finding of No Significant Impact (FONSI); Environmental Assessment of KCNSC Botts and Building 23 Operations, Kansas City, Missouri (DOE/EA-2167)

Date: July 26, 2021

1) SUMMARY:

The National Nuclear Security Administration (NNSA) issues this Finding of No Significant Impact (FONSI) on its proposed action to update operations at the Kansas City National Security Campus (KCNSC) Botts Campus, and to provide flexibility to expand, reconfigure and/or move any or all operations within the KCNSC, to include the KCNSC main campus, the Building 23 location, and an additional existing industrial/warehouse space within a two-mile radius of the KCNSC main campus.

The Proposed Action involves the updating of operations at the KCNSC Botts Campus, located at 14520 Botts Road, Kansas City, Missouri, to provide the flexibility to expand, reconfigure and/or move any or all operations within the KCNSC, across the KCNSC main campus, the Building 23 location at 14901 Andrews Road in Kansas City, Missouri, and to an additional facility with approximately 200,000 square feet (SF) of additional industrial/warehouse space within a two-mile radius of the KCNSC main campus; the location of which has not been identified at this time (Figure 1).

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 (1) 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; and (2) a EA for the *Transfer of the Kansas City Plant* (DOE/EA-1947), and supported by a FONSI issued May 1, 2013.

Located approximately one mile east of the KCNSC Botts Campus, Building 23 provides an additional 275,000 SF of leased production space. The transfer of a limited number of operational activities from the KCNSC Botts Campus to Building 23 was reviewed in accordance with NEPA through completion of a Supplemental EA for the *Relocation and Performance of KCNSC Operations in Building 23* (DOE/EA-1592-S1) and supported by a FONSI, issued August 28, 2019. In early 2020, the NNSA decided to make provisions to upgrade current operations at the KCNSC Botts Campus and expand the number and types of operations to occur at Building 23 to address forecasted workloads. The 2019 Supplemental EA for

Building 23 assessed the effects of a limited list of activities to be conducted at Building 23. Because of changes in the current and forecasted workloads to support the NNSA's mission, some of the activity descriptions in the original EA and the Supplemental EA are no longer valid and are addressed as part of this proposed action.

Together, the KCNSC Botts Campus and KCNSC Building 23 support more than 5,000 employees working in several research and development and technical manufacturing disciplines (KCNSC, 2019). The NNSA anticipates a continued increase in workload and production needs requiring additional personnel, as well as research and manufacturing space within the Kansas City area beyond 2026.

The NNSA currently leases the KCNSC Botts Campus property and 275,000 SF within Building 23. To continue to meet their nuclear security mission and maintain manufacturing and process requirements to support national security, the NNSA requires an additional facility with approximately 200,000 SF of production space within a two-mile radius of the KCNSC Botts Campus. At this time, a specific additional facility has not been identified.

The 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 Botts Campus, Building 23, and the surrounding area;
- 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 presented in the 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 Final 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 Final EA or this FONSI contact:

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3) SUPPLEMENTARY INFORMATION:

This Final EA and FONSI reference and expand on the 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 FONSI, issued April 29, 2008; the EA for the *Transfer of the Kansas City Plant* (DOE/EA-1947), and supported by a FONSI issued May 1, 2013; and the Supplemental EA for the *Relocation and Performance of KCNSC Operations in Building 23* (DOE/EA-1592-S1) and supported by a FONSI, issued August 28, 2019. Those documents should be consulted for additional information.

NNSA prepared Final EA (DOE/EA-2167) and published it along with this FONSI on July 26, 2021. Based on the findings in the Final EA, NNSA has concluded that no information has been made available that is inconsistent with a FONSI.

4) PURPOSE AND NEED:

The purpose of the proposed action is to support continued growth, operational capacity, and address current and anticipated Department of Energy (DOE) workloads across NNSA facilities in the Kansas City metropolitan area over the next 5 to 10 years.

The needs to be addressed are:

Current and forecasted increases in production - Since completing the move to the KCNSC Botts Campus location, the NNSA and their onsite manufacturing partner Honeywell Federal Manufacturing and Technologies (Honeywell) have experienced an increase in production needs to fulfill its nuclear security missions. Since 2013, the KCNSC workforce has increased from approximately 2,600 to over 5,000 employees to support the missions. The NNSA has redistributed staff and operations within the KCNSC Botts Campus, leased additional administrative office space across the Kansas City area, and leased approximately 275,000 SF of additional production space within Building 23. Based on current and forecasted workload projections, the NNSA anticipates needing approximately 200,000 SF of additional production space in the vicinity of the existing Kansas City area facilities to support workloads through the next 5 to 10 years.

Expansion of activities to support the NNSA's national security mission – Flexibility to update, share, and relocate manufacturing, warehousing, and administrative operations is needed to address client demands and staffing needs while relieving existing space pressures at the KCNSC Botts Campus to support current and anticipated workloads. New or additional operations and processes, construction of new standalone facilities, or expansion of either the KCNSC Botts Campus or Building 23 not described in this EA, would require an independent review and NEPA determination under applicable Federal and State regulations. Similarly, the acquisition of a new facility within the two-mile radius study area would require DOE NEPA determination under a site-specific NEPA document to determine the effects of the use of that facility on the localized human and natural environment. All permits supporting the expansion of KCNSC operations to that future site would be obtained at that time.

5) DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES:

Proposed Action: To continue to meet the NNSA's nuclear security mission and maintain manufacturing and process requirements to support national security, the NNSA proposes to update operations at the KCNSC Botts Campus, and to provide flexibility to expand, reconfigure and/or move any or all operations within the KCNSC, to include the KCNSC main campus, Building 23 location, and to an additional facility with approximately 200,000 SF of additional industrial/warehouse space within a two-mile radius of the KCNSC main campus. The location of the additional facility has not been identified at this time.

The updated scope of operations that would be conducted at the KCNSC Botts Campus, Building 23, and the additional facility, may include but would not be limited to:

- Electrical and Mechanical Assembly – silicone, epoxy, and other adhesive bonding; non-foam encapsulation; lamination; and fiber optics
- Fabrication and Manufacturing (chemical, mechanical, material preparation) – autoclave operation, ceramic forming and processing, chemical manufacturing, molding, foam processing, furnace and heat-treating oven bake and curing, sieving powders, stereolithography, and thermal processing
- Surface Preparation (chemical and mechanical) – Alodine chemical film, aqueous strip, blasting, cleaning (aqueous, plasma, solvent, and ultrasonic), deburring, vapor degreasing, depotting, chemical etching, and mold-release applications
- Coating and Plating – application of dry film, aerosol, parylene, liquid, and powder coatings; electroless nickel, chrome, and gold plating
- Machining – cutting (acetylene, plasma, wet/dry), drilling, grinding, wet and dry milling, roll milling, sheet metal work, laser cutting and marking
- Testing and Analysis – calibration, inspection, leak-detection, x-ray, and testing of electronics, explosives, kinematics, pressure, and thermal
- Welding, Brazing, and Soldering – electric beam, laser, pulse arc, resistance, and manual

- Support and Miscellaneous – facility maintenance, assembly and disassembly, diesel and gasoline combustion, recycling, janitorial services, packaging, shipping, and personal care
- Administrative and Logistics Support – security, transportation, storage, waste management, and similar support activities

No Action Alternative: Operations currently conducted at the KCNSC Botts Campus and Building 23 would continue with no modification or addition of operating space. Activities programmed to be conducted at Building 23 in the Supplemental EA would proceed under a limited scope as some of them are no longer valid to support the programmed and anticipated workloads; therefore, not satisfying the identified need. The KCNSC Botts Campus facilities were designed with the goal of maximum flexibility in arranging production work to accommodate surges and changes in requirements. Under the no-action alternative, the NNSA would continue to adjust to required workloads but has identified projected shortfalls in space and capabilities required to meet NNSA mission requirements.

The no action alternative would not satisfy the operational needs and is not considered a reasonable alternative. The no action alternative is only carried forward for comparison to the proposed action.

6) ENVIRONMENTAL CONSEQUENCES OF PROPOSED ACTION:

The following is a summary of the findings of the Final EA (DOE/EA-2167). For the purposes of discussing the potential effects of the proposed action, the KCNSC Botts Campus and Building 23 are collectively referred to as 'KCNSC facilities' unless separate descriptions are warranted. A two-mile radius 'study area' has been defined for expansion of KCNSC operations to an approximately 200,000 SF existing industrial/warehouse location whose location has not been determined at this time.

Land Use - The proposed action could involve construction of minor improvements within the footprint of the KCNSC Botts Campus and Building 23 property to accommodate stormwater or industrial wastewater collection, additional parking, security systems/fencing, and public road improvements to access the facilities. None of these improvements would change the overall use of the properties and they would remain zoned as they are today. NNSA would maintain compliance with the applicable plans and regulations of governing jurisdictions. No properties of environmental concern are immediately adjacent to either existing KCNSC facility and neither of the Comprehensive Environmental Response, Compensation, and Liability Act of 1976 (CERCLA) sites identified on the former Richards-Gebaur Air Force Base would be affected by the proposed action nor would they affect the continued use of either current KCNSC facility.

The proposed expansion of operations to a new location within the two-mile radius study area would require review of the particular property selected and the environmental impact of construction / building upgrades / improvements required for occupancy and use. At this time, no specific site(s) for expanded operations has been identified. The NNSA would conduct a site-specific analysis of the proposed site,

complete the appropriate level of environmental review, and obtain the required permits to use the site and maintain compliance with applicable regulations. This analysis identified no significant adverse impacts to future land use of the area.

Aesthetics (Visual and Noise) – Minor levels of additional noise would be generated by the changes in operations at the KCNSC facilities. Manufacturing operations would continue to be contained within existing building envelopes. The movement of employees between facilities and access to the facilities by vendors from MO-150, I-49/US 71, and the surrounding road system would generate minor increases in traffic noise in addition to minor temporary increases in noise levels resulting from minor site improvements (e.g., parking expansion, etc.). In the next 5 to 10 years, staff numbers and the number of vendor deliveries may increase to address workload demand. With only minor changes occurring to the exterior of the KCNSC Botts Campus or to Building 23 (possible addition of an industrial wastewater storage and treatment system), minimal visual or aesthetic changes would occur as a result of the proposed action.

The expansion of operations to a new location within the two-mile radius study area could increase noise levels in the vicinity of the proposed site. The NNSA would evaluate the proximity of the site to noise sensitive receptors (if present) and conduct traffic studies, if warranted, to assess the noise generated by the volume of traffic (employee and vendor) forecasted to access the site to support operations.

Air Quality – Under the proposed action, the existing KCNSC facilities are anticipated to continue to generate emissions below the limits defined in the existing NNSA and CenterPoint special case *de minimis* permits and operations would continue to be covered under the existing permits. The expansion of operations may require installation of new/updated emission control units at these facilities, depending on the workload to be supported, to maintain levels under the special case *de minimis* thresholds. The NNSA would continue to monitor air emissions from both facilities to maintain compliance with the permits and any changes in the regulations. If future growth in operations would result in emissions exceeding the current permitted limits, the NNSA would seek to amend the existing permit or request that a new permit be issued by the Missouri Department of Natural Resources (MDNR) in accordance with applicable Federal and State regulations. The upgrade and expansion of operations would not affect the overall attainment status of the area, would not exceed the National Ambient Air Quality Standards (NAAQS), and would maintain compliance with the Statewide Implementation Plan (SIP).

Expansion of operations to a new location within the two-mile radius study area would be evaluated to determine if the existing permits would cover that facility or if a separate facility-specific permit would need to be obtained. The same emissions monitoring protocols conducted at the existing KCNSC facilities would occur at a new facility once it becomes operational. Expanding operations to a new location within the study area would not affect the overall attainment status of the area, would not exceed the NAAQS, and would maintain compliance with the SIP.

Geology and Soils – Minor soil disturbance could occur at any of the facility locations as the result of moving, reconfiguring operations, or minor site alterations that may be required. The NNSA would obtain the appropriate permits and implement sedimentation and erosion control measures, including development of a stormwater pollution prevention plan (SWPPP) to avoid stormwater runoff onto adjacent properties and minimize effects on neighboring water features. The existing KCNSC facilities and the two-mile radius study area are located outside of the New Madrid Seismic Zone. Only minimal ground disturbance would occur at a proposed existing facility location within the two-mile radius to accommodate minor access, parking, and infrastructure improvements to support proposed operations. The NNSA would obtain the appropriate permits and implement sedimentation and erosion control measures, including development of a SWPPP manage stormwater runoff.

Water Resources - All operations would continue to occur within building envelopes, preventing the potential introduction of materials and wastes into surface water and groundwater resources. The proposed action could involve minor soil disturbances to accommodate minor construction, equipment installation, or minor facility renovations. The NNSA would obtain the appropriate permits and implement sedimentation and erosion control measures, including development of a SWPPP to manage stormwater runoff during those activities. Mitigation could be required depending on the level of impact. No impacts to groundwater sources would occur.

Only minimal ground disturbance would occur at a proposed existing facility location within the two-mile radius to accommodate minor access, parking, and infrastructure improvements to support proposed operations. Future facility locations would be assessed for surface water features such as wetlands, stream channels, and floodplains. Field studies would be conducted to support coordination with permitting agencies if minor improvements are proposed at the identified that would require ground disturbance. The NNSA would obtain the appropriate permits and implement sedimentation and erosion control measures, including development of a SWPPP to manage stormwater runoff during those activities.

Biological Resources (Vegetation and Wildlife) - The proposed action would not result in the removal or disturbance of habitat or displacement of resident or migratory wildlife. Minor improvements may be made in areas currently occupied by lawn or paved parking areas at both facility locations to accommodate operations. Improvements may include full or partial fencing of the Building 23 property. Any disruption to wildlife present on or adjacent to either property would be minimal and temporary. Building exteriors and grounds adjacent to areas proposed for improvement would be assessed for the presence of nesting birds. The removal of active nests to facilitate activities would not be allowed to occur until after the young have fledged. There are no federally listed species known to occur on either KCNSC property, therefore the proposed action would have no effect on threatened or endangered species protected under Section 7 of the Endangered Species Act. Only minimal ground disturbance would occur at a proposed existing facility location within the two-mile radius to accommodate minor access, parking,

and infrastructure improvements to support proposed operations, and no vegetation or wildlife habitat would be expected to be removed.

Cultural Resources – The proposed action would not result in land disturbance or deep excavation activities in areas of known archeological deposits or historic/cultural sites. No resources eligible for listing or currently listed on the National Register of Historic Places would be affected by the proposed action; therefore, the proposed action would have no effect on historic properties under Section 106 of the National Historic Preservation Act. Only minimal ground disturbance would occur at a proposed existing facility location within the two-mile radius to accommodate minor access, parking, and infrastructure improvements to support proposed operations. None-the-less, a site-specific assessment of the potential for archeological and historic (non-archeological) resources would be undertaken to support NEPA clearance for a new facility location.

Infrastructure (Utilities and Transportation) – The utilities serving the existing KCNSC facilities have sufficient capacity to support upgraded and expanded operations and no changes are expected to occur. As new workloads are monitored at Building 23, it may become necessary to construct an Industrial Wastewater Pretreatment Facility (IWPF) to address industrial wastewater volumes. The IWPF would be a similarly scaled operation to that present at the KCNSC Botts Campus (occupying approximately 5,000 SF adjacent to Building 23). Construction and operation of the IWPF would have minimal to no effects on the area surrounding Building 23. The approximately 5,000 SF area would be cleared, graded, and a concrete pad established to support the system. Appropriate visual screening and security would be installed in conformance with development codes. The actual location and timing of construction of this improvement will be based on workload and is undetermined at this time.

The NNSA would evaluate any potential proposed existing facility location within the two-mile radius to determine if adequate utility services are provided. Only minor utility improvements would be undertaken to facilitate operations such as the installation of an IWPF if needed.

Employee and supply traffic and materials movement would continue to flow between both facilities using the local roadway system including MO-150, a six-lane highway with ample capacity to accommodate delivery traffic and shift changes. Minor improvements to parking areas at both facility locations may occur to accommodate increases in staff levels as operations expand. No access to the neighboring rail lines is required to support the proposed action.

Other roadways with the two-mile radius also have adequate capacity to support KCNSC facility expansion. The additional site selected would be evaluated by the NNSA to ensure that adequate onsite capacity is available to accommodate employee parking and access by vendors.

Socioeconomic Resources - Additional employees would be hired to support the current and projected workloads anticipated under the proposed action, but at this time, the number of additional employees

needed over the next 5 to 10 years is undetermined. Both KCNSC facilities are located within sparsely populated areas of Kansas City in areas dominated by industrial and commercial employers. The proposed action is focused on existing property/facility acquisition and would not require major construction or facility demolition and, therefore, would not displace any homes or businesses nor result in any changes to surrounding neighborhoods. No changes in travel times by emergency responders would occur and no community facilities would be affected. No disproportionately high impacts to minority or low-income populations would occur as the result of the proposed action.

A future facility would be located in an area supporting industrial/warehouse uses, most likely more distant from the residential neighborhoods prevalent in the northern and eastern parts of the two-mile radius study area. The additional facility may provide additional jobs and indirectly support local businesses in the neighboring area.

Waste Management - The volume of waste generation would increase at the existing KCNSC facilities with the update and expansion of operations. Regardless of the characteristics of the waste stream, management of non-hazardous, hazardous, and small quantities of low-level radioactive waste would continue to occur in the same manner as under current operational levels. All wastes would continue to be categorized and disposed of according to the Federal and State permits held by the NNSA and following applicable Federal, State, and local regulations. At the KCNSC Botts campus and in a possible future facility at Building 23, industrial wastes captured by the IWPF at each site will be disposed of in accordance with applicable regulations. Wastes would be minimized through continued and expanded reuse and recycling efforts.

Currently, very low volumes of low-level radioactive wastes are generated at the KCNSC Botts campus as the result of the use of x-rays. With the upgrade in operations, approximately 40 pounds per year of low-level radioactive wastes are expected to be generated at the KCNSC Botts Campus and Building 23.

Operations at a future industrial/warehouse facility within the two-mile radius study area would also generate various waste streams and the management and disposal of those wastes would occur in the same manner they are addressed the existing KCNSC facilities.

Human Health and Safety - Waste generation rates at all KCNSC facilities would be monitored as operations are expanded for planned increases in manufacturing capacity needed to support forecasted workloads, and waste management operations would be adjusted as needed. Onsite waste management staff would continue to manage waste disposal operations, prepare shipments, and contract with local permitted waste management and recycling contractors for collection and transport of waste to licensed disposal facilities. The existing KCNSC U.S. Department of Transportation (USDOT) Security Plan for the transport of hazardous wastes required under 49 CFR 172.800 would be maintained and amended, as needed, to reflect any change in waste generation.

Only minor changes occurring to the exterior of the KCNCS Botts Campus or to Building 23 (possible addition of an industrial wastewater storage and treatment system). Any associated construction wastes would be managed in accordance with MDNR technical guidance "Managing Construction and Demolition Waste" (MDNR, 2017). Nonhazardous waste would be disposed of at a locally permitted sanitary 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, and if encountered, it would be handled in compliance with applicable regulatory requirements to minimize hazards to worker safety.

The new location would be permitted in the same manner as the existing KCNCS facilities. All wastes generated from a new facility would be managed and disposed of in the same manner as wastes generated at the existing KCNCS facilities. The transport of hazardous wastes from the new location to disposal facilities would be covered under KCNCS's existing USDOT Security Plan.

Cumulative Impacts - The proposed action would result in minor cumulative impacts. Expansion of operations to meet larger volumes of production requirements will result in the hiring of additional employees; minor increases in surface traffic volumes, air emissions, industrial wastewater generation, power usage, and waste generation would occur to support the forecasted workload over the next 5 to 10 years. Overall, the expansion of operations across the existing and proposed KCNCS facilities would result in minimal cumulative impacts.

7) DETERMINATION:

In accordance with NEPA and DOE NEPA implementing regulations (10 CFR Part 1021) and based on the findings in the Final EA, NNSA finds that the update of operations at the KCNCS Botts Campus providing the flexibility to expand, reconfigure and/or move any or all operations within the KCNCS, to include the KCNCS main campus, the Building 23 location, and an additional existing industrial/warehouse space within a two-mile radius of the KCNCS main campus would not constitute a major Federal action that would significantly affect 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 Plant, this 26th day of July 2021

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