

# Record of Categorical Exclusion for

Cellink Factory 2 (CX-027973)

## Description of Categorically Excluded Action:

The US Department of Energy (DOE) is deciding whether to provide an Advanced Technology Vehicle Manufacturing program (ATVM) loan to Cellink to produce their innovative battery harnesses at an existing facility in Georgetown, TX. Cellink's battery harnesses will achieve significant weight, thermal, and cost benefits in advanced technology vehicles. Cellink has applied for a loan in response to the ATVM Loan Program established pursuant to Section 136 of the Energy Independence and Security Act of 2007, as amended, which provides for loans to eligible automobile manufacturers and component suppliers for projects that reequip, expand, and establish manufacturing facilities in the United States to produce light-duty vehicles and components that provide meaningful improvement in fuel economy, and for engineering integration costs associated with such projects.

The project consists of Cellink installing its manufacturing equipment into an approximately 300,000 square foot building located on a 20.96-acre parcel at 110 Wittera Way, Georgetown, Texas. A private developer owns the property and is currently constructing the building and all the necessary utilities to support operations. Cellink entered a long-term lease on December 14, 2021 and plans to install equipment upon building completion in October 2022. At full capacity, the facility will produce approximately [REDACTED] of its flex harnesses annually. Cellink will install and make the following building improvements over a 51-month period to outfit the facility with 25 manufacturing lines.

### Equipment:

- Roll to Roll Laminator
- Metal Working Tool
- Polymer Patterning Tool
- Depanel (circuit board production line tool)
- Weld cell

### Building Improvements:

- Building HVAC System
- Reinforce areas of existing floor with additional concrete
- Power and plumbing needs for equipment usage inside the building
- Construction of office and storage space within building

Cellink's modifications would not change the existing building footprint or utility connections. Cellink will outfit the completed building, which they are leasing from the building owner, with their own equipment in order to produce their flex harnesses. Cellink's flex harnesses provide for the electrical interconnection, monitoring, and fusing of battery cells and electronic devices in advanced technology vehicles. Their products are

designed to enable significant weight, thermal, and cost reductions compared to conventional electrical wiring.

Raw material inputs to produce the battery harnesses include aluminum foil, copper foil, as well as a proprietary combination of films, insulation, and liners. Power will be delivered from the grid via existing utility connections constructed by the property developer. Raw materials will be delivered via truck to the Georgetown, TX facility.

The Project will create approximately 165 full time jobs during the 4-year construction period, and more than 1,200 permanent jobs once all manufacturing lines are complete. As part of its workforce staffing plan, CelLink is: (1) working with local military bases in the Austin area to recruit transitioning veterans; (2) starting an internship program in August 2022 with Georgetown High School, (3) actively recruiting from Texas State Technical College; and (4) is engaged with the Georgetown Workforce Development Alliance to recruit local workers.

### **Number and Title of Categorical Exclusion:**

The actions being proposed under this ATVM loan for the CelLink Project are consistent with and are covered by DOE categorical exclusions in 10 CFR 1021, Appendix B1.31 for installation or relocation of machinery and equipment at the Georgetown, Texas facility. CelLink's Project would not increase the footprint or height of the building, or have the potential to cause any changes to the type and magnitude of environmental impacts.

### **B1.31 Installation or Relocation of Machinery and Equipment**

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

### **Regulatory Requirements defined in 10 CFR § 1021.410 (b):**

The proposed loan and related actions described above were subjected to an environmental due diligence review by DOE Loan Programs Office (LPO) staff to ensure they are consistent with the specific category of actions (categorical exclusion) contained in Appendix B of 10 CFR Part 1021 and the conditions for applying categorical exclusions specified in Section 410 of Part 1021. To ensure that the requirements of Appendix B were met, LPO Environmental Compliance (EC) staff reviewed numerous project-related documents obtained between November 2021 and September 2022, participated in several conference calls with CelLink staff to ensure a complete understanding of the activities

associated with the production process, and performed a site visit to the CelLink facility in Georgetown, TX on August 23, 2022.


The environmental due diligence review determined that there is no controversy regarding the potential impacts of the proposed CelLink project, and that the actions associated with the loan guarantee would not adversely affect any physical, biological, or socio-cultural resources at the facility or surrounding environment.

The Comment section below is provided for any necessary clarifications concerning the findings listed above. Signature by CelLink’s designated representative in the Corporate Validation section is an indication of CelLink’s concurrence with the findings and determinations presented above.

**Comment:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Corporate Validation:**

Name and Title (Print): Kevin Coakley, CEO

Signature:  Date: April 14, 2023

**Determination:**

Based on my review of information conveyed to me and in my possession concerning the actions associated with the proposed ATVM loan described above, as NEPA Compliance Officer (as prescribed by DOE Policy Directive 451.1), I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Appendix B of 10 CFR 1021 described above, and are hereby categorically excluded from further review under the National Environmental Policy Act (42 USC 4321, as amended).

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Signature  
Todd Stribley  
Environmental Compliance Director  
Loan Programs Office

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Date