



## National Environmental Policy Act (NEPA) Determination

### Categorical Exclusion

**Recipient:** Pacific Northwest Hydrogen Association

**State:** Washington, Oregon, Montana

**Project Title:** Pacific Northwest Association Hydrogen Hub

**Funding Opportunity Announcement Number:** DE-FOA-0002779

**Award Number:** DE-CD0000040

**OCED NEPA Control Number:** OCED-0000040-001-CX

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under Department of Energy (DOE) Policy 451.1), I have made the following determination:

#### **CATEGORICAL EXCLUSION APPENDIX, NUMBER, AND 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.)

**B3.1** Site characterization and environmental monitoring: Site characterization and environmental monitoring (including, but not limited to, siting, construction, modification, operation, and dismantlement and removal or otherwise proper closure (such as of a well) of characterization and monitoring devices, and siting, construction, and associated operation of a small-scale laboratory building or renovation of a room in an existing building for sample analysis). Such activities would be designed in conformance with applicable requirements and use best management practices to limit the potential effects of any resultant ground disturbance. Covered activities include, but are not limited to, site characterization and environmental monitoring under CERCLA and RCRA. (This class of actions excludes activities in aquatic environments. See B3.16 of this appendix for such activities.) Specific activities include but are not limited to: (a) Geological, geophysical (such as gravity, magnetic, electrical, seismic, radar, and temperature gradient), geochemical, and engineering surveys and mapping, and the establishment of survey marks. Seismic techniques would not include large-scale reflection or refraction testing; (b) Installation and operation of field instruments (such as stream-gauging stations or flow[1]measuring devices, telemetry systems, geochemical monitoring tools, and geophysical exploration tools); (c) Drilling of wells for sampling or monitoring of groundwater or the vadose

(unsaturated) zone, well logging, and installation of water-level recording devices in wells; (d) Aquifer and underground reservoir response testing; (e) Installation and operation of ambient air monitoring equipment; (f) Sampling and characterization of water, soil, rock, or contaminants (such as drilling using truck-or mobile-scale equipment, and modification, use, and plugging of boreholes); (g) Sampling and characterization of water effluents, air emissions, or solid waste streams; (h) Installation and operation of meteorological towers and associated activities (such as assessment of potential wind energy resources); (i) Sampling of flora or fauna; and (j) Cultural resource (archeological and historic) identification in compliance with 36 CFR part 800 and 43 CFR part 7.

### **Rationale for Determination:**

DOE's Office of Clean Energy Demonstrations (OCED) is proposing to provide funding to Pacific Northwest Hydrogen Association in support of the PNW Hydrogen Hub project (PNWH2). The PNWH2 hub would consist of 8 'nodes' across the Pacific Northwest within the states of Washington, Oregon, and Montana. PNWH2 is proposing facilities for clean H<sub>2</sub> production, liquefaction facilities for distribution, refueling stations for heavy duty transportation, H<sub>2</sub> storage, and dispensing facilities.

At this time, DOE is proposing to provide funding in support of PNWH2 Phase 1 activities which include planning and design activities, information gathering and field work to inform additional DOE NEPA review and a go/no-go decision prior to authorizing federal funding of subsequent project phases. PNW Hydrogen Hub's Phase 1 activities are described below and would be performed by the following projects within the Hub:

- Fortescue Future Industries H<sub>2</sub> Generating Plant and Electrolyzer site
- Synchronus LLC (First Mode) H<sub>2</sub> Fuel Truck site
- Puget Sound Energy H<sub>2</sub> Generating Plant site
- ALA Renewable Energy H<sub>2</sub> Production Facility/Electrolyzer site
- Novo Hydro Development, Inc. H<sub>2</sub> Production Facility
- Mitsubishi Power America H<sub>2</sub> Production Facility Site
- St. Regis Solar H<sub>2</sub> Solar Array/Electrolyzer site
- Air Liquide
- Portland and General Electric Company, Inc. (PGE)

The PNWH2 Phase 1 scope of activities includes preliminary design and engineering, agency coordination for permits and approvals, Tribal engagement, and Community Benefits planning and stakeholder coordination. The following specific activities are proposed:

- Preparation of all the anticipated continuation deliverables (e.g., Project Management Plan, Business Plan, Risk Management Plan, Cybersecurity Plan, and financial modeling).
- Complete preliminary design to meet the 30% engineering requirements.
- Develop environmental documentation in conjunction with DOE.
- Identify project sites and alternative sites to support the NEPA alternatives analysis.
- Continue community and tribal outreach and stakeholder engagement.
- Preparation and submittal of all required reporting.
- Identification of all required permits and begin the permitting process.
- Develop procurement plan and contracting strategy.
- Execute all node specific Community Benefit Plan requirements.

- Progress feedstock agreements and offtake commitments.
- Process hazard assessment.
- Traffic analysis.
- Load flow study with utility company.
- Land title research and other due diligence activities.
- Prepare record of surveys and legal descriptions.
- Desktop analysis environmental screening / critical area assessment.
- Develop direct and indirect project Area of Potential Effects (APE) in conjunction with DOE.
- Desktop review of cultural resources databases.

The following Phase 1 site characterization activities, by project, are proposed:

**Fortescue Centralia, WA**

The following field surveys are proposed:

- Geotechnical survey for soil and groundwater sampling using a drill rig/vehicle within the project site (293 acres), which is a former mine site.
- Wetland delineation to be conducted via field reconnaissance survey.
- Archaeological/cultural resource surveys to be conducted via field reconnaissance survey and shovel testing along a defined grid.
- Threatened and endangered species surveys to be conducted via field reconnaissance survey.
- Baseline monitoring of existing conditions to be conducted via field sampling.

**Synchronous - Centralia, WA**

All activities surveys and assessments described below would take place on previously disturbed soil within the TransAlta Centralia Mine and include:

- Wetland delineation via field reconnaissance survey.
- Archaeological/cultural resource surveys via field reconnaissance survey and shovel testing along a defined grid.
- Threatened and endangered species surveys via field reconnaissance survey.
- Development of a stormwater management plan.

**ALA Renewable Energy, LLC and H-Tech, LLC –Ferndale, WA**

Field work would be conducted at two proposed sites located on industrial land, site option #1 (125 acres) and site option #2 (113 acres) forest, shrub community. Field work would consist of:

- Wetland delineation via field reconnaissance survey. Archaeological/cultural resource surveys via field reconnaissance survey and shovel testing along a defined grid.
- Threatened and endangered species surveys via field reconnaissance survey.
- Critical areas assessment would be conducted via desktop and field reconnaissance survey.

**Air Liquide –Boardman, WA**

Site assessments at multiple sites in the Port of Morrow would include:

- Boundary and topographical survey
- Aerial mapping
- Geotechnical analysis, including geotechnical drilling via drill rig on a 25 acre previously graded/disturbed industrial site. Sampling would include electrical resistivity and laboratory testing.
- Underground survey to identify utilities via ground penetrating radar (no ground disturbance).
- Phase 1 Environmental Site Assessment.

**Mitsubishi Power Americas, Inc. (H2 Production Facility Site) – Boardman, OR**

The following field surveys would be conducted:

- Site visits field reconnaissance survey to identify and gather data would be conducted.
- Soil sampling/geotechnical work to be completed via drill rig/vehicle on a previously disturbed approximately 5-acre industrial site.

**Portland and General Electric Co. (Combined Cycle Power Plant Site) and Williams – Boardman, OR**

The following field surveys would be conducted:

- Site visits field reconnaissance survey to identify and gather data are proposed to be conducted.
- Soil sampling/geotechnical work to be completed via drill rig/vehicle on a previously disturbed approximately 20-acre industrial site.

**St Regis Solar – Mill Creek Road, St Regis, MT**

- Field reconnaissance survey on a previously cleared approximately 120-acre site along the Clark Fork River.

DOE does not anticipate adverse impacts to sensitive resources as a result of the proposed activities.

**Consultations (Section 106 NHPA, Section 7 ESA, etc.):** None required at this time. See “Notes” below for preliminary Section 106 compliance requirements.

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 1501.9(e)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.1(g)(3)) 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.

A portion of the proposed action is categorically excluded from further NEPA review.

**Notes:** This categorical exclusion applies to those activities listed above for information gathering, analysis and dissemination; as well as the specifically described site characterization and environmental monitoring activities. Any changes to the project activities or location are subject to additional NEPA review by DOE and are not authorized for federal funding unless and until the Contracting Officer provides written authorization on those additions or modifications.

All cultural resource identification activities (e.g., archaeological, historic above ground, historic visual assessments) must be completed in accordance with applicable guidelines and standards provided by the State Historic Preservation Office (SHPO) and the Secretary of the Interior's Identification Standards. Coordination with DOE is required to establish an APE and scope of effort (i.e., research design) **prior to** geotechnical surveys and cultural resource field investigations. DOE will initiate Section 106 consultation **prior to** geotechnical surveys and cultural resource field investigations in order to support coordination with SHPO, Tribes, and other Section 106 consulting parties.

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

OCED NEPA Compliance Officer Signature:

Date: