February 11, 2011

MEMORANDUM FOR NEPA FILE

FROM: MARK LUSK NEPA DOCUMENT MANAGER

SUBJECT:Supplement Analysis for the Saft America, Inc. Electric Drive
Vehicle Battery and Component Manufacturing Initiative
Application, Jacksonville, Florida (DOE/EA-1711)

New Information: Proposed Minor Change to Saft America, Inc. Proposed Project

Location: Saft America, Inc. Plant at the Cecil Commerce Center, near Jacksonville, Florida, in Duval County

Proposed By: Saft America, Inc.

1. Introduction

This proposed project was one of 30 projects DOE selected for financial assistance on August 5, 2009 under funding opportunity announcement DE-FOA-0000026, *Recovery Act – Electric Drive Vehicle Battery and Component Manufacturing Initiative*. DOE's Proposed Action would provide \$95.5 million in financial assistance in a cost-sharing arrangement with Saft America, Inc. (Saft). The total cost of the proposed project is estimated at \$191 million.

The original proposed project, as analyzed in DOE/EA-1711, includes construction and operation of a high-volume manufacturing plant at the Cecil Commerce Center, near Jacksonville, in Duval County, Florida. The new facility would manufacture advanced lithium-ion cells and batteries for military hybrid vehicles, aviation, smart grid support, broadband backup power, and energy storage for renewable energy.

2. NEPA Analysis to Date

The National Energy Technology Laboratory (NETL) completed its environmental review for Saft's proposed project under the Electric Drive Vehicle Battery and Component Manufacturing Initiative. An environmental assessment (DOE/EA-1711) was prepared in accordance with the Council on Environmental Quality's *National Environmental Policy Act* (NEPA) regulations (40 CFR Parts 1500 to 1508) and DOE NEPA implementing regulations (10 CFR Part 1021).

The EA analyzed the potential environmental impacts of providing funding to Saft America, Inc. for the construction and operation of a high-volume manufacturing plant to build advanced lithium-ion cells and batteries. Based on the analyses in the EA, DOE determined that providing funding to Saft, and the applicant's proposed project, would result in no significant adverse impacts to the human environment. This decision is documented in the attached Finding of No Significant Impact (FONSI) and is supported by the EA. Although the proposed project would increase air emissions and require a new air permit, the incremental changes would not be significant and the project proponent would be required to adhere to all permit requirements during construction and operations. All other environmental impacts analyzed in the EA would be negligible. Based on the analysis in the EA, DOE determined that providing funding to Saft America, Inc., and Saft's proposed project, would result in no significant adverse impacts to the human environment. DOE issued the Final EA and Finding of No Significant Impact (FONSI) on March 16, 2010.

3. Description of the Project

Saft America, Inc. decided that an additional 4,500 square feet of office space needs to be added to the building planned to be constructed at the Cecil Commerce Center near Jacksonville, Florida. This additional space would be added internally as a second tier above a portion of the factory at the front of the two-story tall building. The new space would also include additional restrooms for the staff that would occupy this space.

- 4. Analysis
- The EA analyzed potential impacts for constructing a new building for the manufacturing of advanced batteries for a variety of advanced applications. The changes proposed by Saft would occur within the originally proposed footprint and would not represent additional impacts to any of the resource areas evaluated in the EA.
- The proposed minor expansion would result in no significant change to the analysis of socioeconomic impacts. However, an additional small number of staff would be anticipated. Also, a small number of additional temporary construction workers may be needed for this work, with a similar small increase in the deliveries needed for construction materials.
- The proposed minor expansion would result in no change to the analysis of utilities, energy and materials impacts. This would be a minor expansion of the existing building's size to accommodate additional office space. No additional manufacturing would be performed in this area and, therefore, no change in the usage or type of raw materials or products made at the site would be anticipated.
- The proposed minor expansion would result in only minor change to the analysis of waste management impacts. A small additional amount of construction debris may be generated but would be managed as needed.
- The proposed minor expansion would result in only minor change to the analysis of occupational health and safety impacts. Additional construction-related injuries could occur during work at this location.

5. Findings

The changes proposed by Saft America, Inc. would occur within the footprint of the originally proposed facility and would not significantly change the analysis of impacts for any of the resource areas evaluated in the EA. DOE has therefore determined that the proposed changes to the project fall within the scope of the analyses documented in the EA completed in March 2010. DOE has further determined that the potential impacts that may be associated with Saft's proposed project, as well as the proposed

minor changes to that project, have been adequately evaluated by the EA and the Finding of No Significant Impact issued on March 16, 2010 is still valid for this project. Therefore, a supplement to the EA, or any other additional NEPA analysis, is not needed at this time.

DISTRIBUTION: P. Detwiler H. Hinkle S. Taylor M. Lusk Original to NEPA File (451) Attachment A

Proposed Floor Plan for 2nd Story Office Space Saft America, Inc., Jacksonville, FL

