



DEPARTMENT OF THE TREASURY  
BUREAU OF ENGRAVING AND PRINTING  
WASHINGTON, D.C. 20228

January 25, 2011

Shane Dettman  
National Capital Planning Commission  
401 9th Street NW  
North Lobby, Suite 500  
Washington, DC 20004

Subject: Environmental Assessment Finding of No Significant Impact  
of the BEP's Proposed Emergency Power Back-Up System

Dear Mr. Shane Dettman:

The Bureau of Engraving and Printing has completed the enclosed Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the Emergency Power Back-up System for the Main and Annex Buildings that consists of two 1000 kilowatt diesel generators to one existing emergency generator. Please provide public notification and publish this EA and FONSI on the National Capital Planning Commission website for a 30-day comment period.

We also request that this project be submitted to the commission for approval on earliest possible date following the comment period.

Thank you for your assistance with this matter. If you have any questions, please call me at 202-874-2048.

Sincerely,

*David Kanha*  
*acting for:*

Neal Mohlmann  
Environmental Quality Officer, BEP

Enclosures



DEPARTMENT OF THE TREASURY  
BUREAU OF ENGRAVING AND PRINTING  
WASHINGTON, D.C. 20228

**DRAFT**

**Finding of No Significant Impact (FONSI) for the  
Emergency Generator Replacement Project**

This action has been reviewed by the Bureau of Engraving and Printing and it has been determined, by the undersigned, that this action will have no significant effect on the human environment.

This finding of no significant impact is based on the attached "Environmental Assessment for Emergency Generator Replacement Project" at the DC Facility. The results of this assessment provide sufficient evidence for the determination that an environmental impact statement is not required.

Copies of this assessment, or additional information pertaining to this action, may be obtained by contacting the Bureau of Engraving and Printing's Office of Environment, Health and Safety at 202-874-3595.

Recommended:

*David Karpman acting for:*

Neal Mohlmann  
Manager, Office of Environment, Health and Safety  
Bureau Environmental Quality Officer

Approved:

*Scott Wilson*

Scott Wilson  
Associate Director (Management)

**Environmental Assessment for  
Emergency Generator Replacement Project  
Bureau of Engraving and Printing DC Facility  
Main and Annex Buildings,  
Department of the Treasury  
January 2011**

**Purpose of and Need For Action**

The BEP is planning a project to upgrade the emergency power system. This project involves the installation of two new 1000 kilowatt (kW) emergency generators in the freight building, and removal of our existing emergency generator located in our trolley turnaround area. The emergency generators will provide power for our critical information technology and security systems in the event of a power outage.

The existing emergency backup system is very old and is too small to provide sufficient power to support all of the security and information technology systems needed and considered to be critical in the event of a power outage. The system is also sized so that BEP can replace, at some point in the near future, if required, two existing diesel fire pumps.

**Project Description**

The proposed project is for the installation of two (2) 1000 kW diesel fueled emergency generators in the Freight Building on the BEP campus. The generators will supply emergency electrical power to the BEP Main and Annex Buildings. The mechanical power output of each of the MTU Onsite Energy 1000-XC6DT2 diesel engine-generator sets is 1495 boiler horse power (bhp). The project also includes the removal of a 400 kW emergency generator.

The Main and Annex Buildings of BEP are located on both sides of 14<sup>th</sup> Street across and adjacent to C Street SW. The Freight Building that will house the two new generators is located next to the Annex Building on the D Street Side. All three buildings are connected by underground tunnels. The installation of the new generators will not impact the appearance of the Freight Building or the surrounding area. The Freight Building was chosen to house the two emergency backup generators and their associated fuel tanks because it contains storage items and therefore it has very limited activity. It is also sufficiently far from other buildings and it is not located in a residential area. It will not cause any noise or emissions that would be noticeable or cause for public concern. Attachments 1 and 2 provide photos of the current and future changes to the Freight Building. No impacts to public drinking water or wastewater services are anticipated.



## **Alternatives Considered**

A no action alternative has been evaluated. The critical information technology and building security systems do not have enough power to operate during a power outage. The lack of back up energy may cause the loss of critical information technology and will prevent the BEP from effectively protecting the security of the building and its contents. Power is needed to support various security equipment including cameras, badge access readers, and specialized computers in order to maintain a secure facility. No action would continue to put Bureau at risk of losing mission critical information and increasing the security vulnerabilities.

A second scenario considered involved locating the two emergency generators on the roof of the Freight Building. This alternative would have equal efficiency in providing backup power; however the exposure to weather would increase system maintenance requirements and potentially impact the viewshed view for neighboring office buildings and visitors to the area. In addition, in this configuration, noise from operation of the generators would not be abated by building structure. (See Attachment 3 to see the proposed drawing of the generators on the roof of the freight building.)

## **Potential Environmental Impacts**

Attachment 4 provides the complete checklist of the environmental analysis for this project.

### **Air Quality**

Construction will create emissions primarily from heavy construction equipment and vehicle internal combustion exhausts. These emissions and possibly fugitive dust will be typical of any small industrial construction site and are not considered significant.

The BEP is a major source of air pollutants and operates under an existing Title V permit that was issued by the District Department of the Environment (DDOE). The addition of these new generators does not represent a major modification to an existing major source. BEP has received Permits to Construct for each generator (DDOE Permit #'s 6404 and 6405) and meets the emission requirements of District of Columbia Municipal Regulation (DCMR) 20-2 for new diesel fueled generators. DDOE provided notice to the public in the DCMR regarding the BEP's plans to install the two new generators with a 30 day comment period and no comments were received.

Because the new generators are more efficient than the equipment they will replace, a comparative analysis of the air emission shows reductions of:

- particulate matter (PM) (-0.45 tons/year (TPY));

- sulfur oxides (SOx) (-0.43 TPY);
- volatile organic compound (VOCs)/total organic carbon (TOC) (-0.45 TPY); and
- carbon monoxide (CO) (-0.91 TPY).

Net air emissions of nitrogen oxides (NOx) are projected to be +0.09 TPY.

As a result, this project is not expected to cause a significant increase in air emissions from the Bureau. These estimates are based on the two emergency back up generators replacing the existing back up generator and the two diesel fire pumps, and assume each piece of equipment is run for its maximum permitted run time of 500 hours/year. Actual run times are likely to be less than the permitted maximums.

### **Water Quality**

The installation will have no significant effect on wastewater discharge. The diesel storage tanks will be located in double walled tanks inside a building with 100 percent containment. All unloading of diesel will be performed according to BEP procedure 75.00 (4.4.7) 3.2 DC Spill, Control, and Countermeasure Plan (SPCC) to prevent any accidental discharge to storm sewers.

### **Wetlands/Wildlife/Farmlands**

The proposed action is entirely within the existing property line of the BEP. The area of impact is not classified as a wetland or farmland.

### **Transportation**

The construction project would be a typical commercial/industrial project. Traffic during construction is expected to be similar to that which would be generated by any construction project of this size. Some interruptions in traffic from trucks and equipment are expected, but will be minimal due to the location of the project in the Freight Building and access to the building from the parking lot rather than from the public roadway.

### **Historic**

The BEP, while not listed on the National Register of Historic Places, is eligible for listing. However, the Freight Building is not eligible. NHPA Section 106 approval for this project was received on July 22, 2010 from DC State Historic Preservation Office. A copy of the letter is included in Attachment 5.



## **Ambient Noise**

Noise caused during the construction process is expected to be typical for the construction activities related to an industrial building. This installation will include wall removal for equipment delivery and wall replacement. The noise from this activity will be very temporary, lasting only one or two days. Once the wall is replaced most of the noise will occur inside the freight building and will not be audible on the street.

Noise from routine operation of the generators will occur weekly for about five to ten minutes. The brief weekly operation of the generators will assure that they operate in the event of a power outage. Operation of the generators is limited to less than 500 hours per year. The potential noise impact of this project upon the surrounding areas is considered insignificant. The Freight Building is constructed with heavy concrete walls, which will significantly attenuate mechanical noise from operation of the diesel engines and generators, and mufflers installed on each generator will reduce exhaust system noise.

## **Employment/Economic**

There is not expected to be any permanent affect on employment.

## **Health/Safety**

Once all of the generators are replaced, there will be a net reduction in emissions which will be beneficial. The equipment exhausts from the building will be located away from human foot traffic and the design meets the stack height requirements of the DDOE.

## **Land Use**

The BEP is located in an urban area. The proposed action will not affect recreational land use, open space, wilderness areas, or Indian land. There will be no change in land use as a result of this construction.

## **Environmental Analysis Checklist—See Attachment 4.**

Does the proposed action require further analysis or assessment?

Yes \_\_\_\_\_

No ✓ \_\_\_\_\_

Based on the information presented here, BEP has determined that this action not have a significant or adverse impact on the environment.

Prepared By: L. Cates  
Lillian Cates, PRAS Manager

Date: 1/20/11

Reviewed By: David Kackza  
David Kackza, EMD Manager

Date: 1/24/11

Approved By: David Kackza for:  
Neal Mohlmann  
Bureau Environmental Quality Officer

Date: 1/24/11

This document was prepared in consultation with Eric Bradley, Environmental Program Manager, Department of Treasury, Departmental Offices, and Shane Dettman, AICP, Senior Urban Planner for the National Capital Planning Commission.



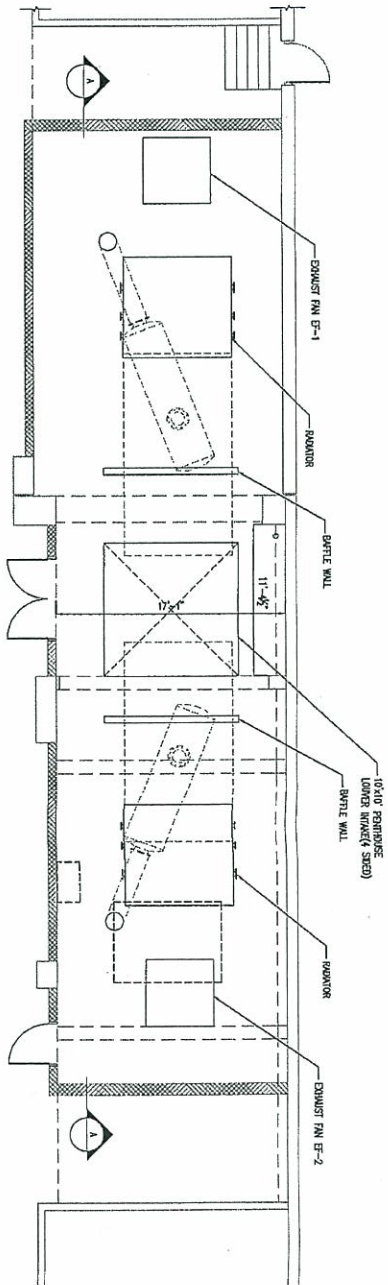




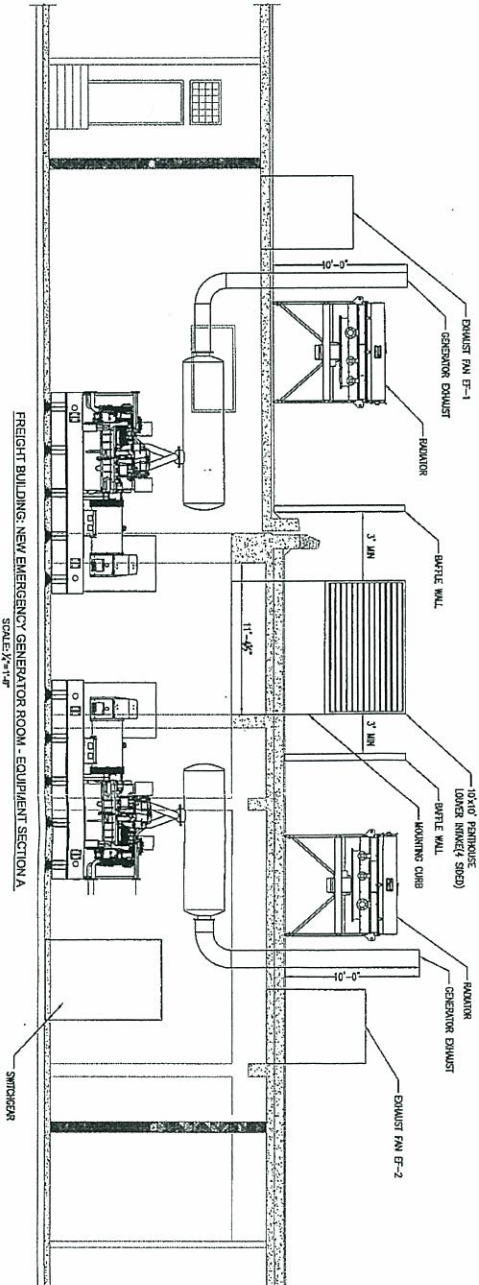




# Attachment 3 Drawing of Alternate Option to Put Generators on Roof of Freight Building



FREIGHT BUILDING-NEW EMERGENCY GENERATOR ROOM - EQUIPMENT PLAN  
 SCALE: 1/4"=1'-0"



C:\Temp\Drawing\Acad\3d\3d00\CONRAD BYAC E3.dwg  
 May 14, 2010 - 8:52am

 Pepco Energy Services 400 K Street Arlington, VA 22202 (703)231-1800	 WR&A WHITMAN, ROBERTS & ASSOCIATES, LLP 1100 North Glebe Road, Suite 200 Arlington, VA 22202	 SA Structural Analysis



Attachment 5  
Section 106 Approval

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICE



DC STATE HISTORIC PRESERVATION OFFICE  
SECTION 106 REVIEW FORM

**TO:** Ms. Charnell Abrams, COTR, Bureau of Engraving and Printing, Office of Facilities Support

**ADDRESS:** 14<sup>th</sup> & C Street, SW Washington, DC 20228 Via Email: [charnell.abrams@bep.gov](mailto:charnell.abrams@bep.gov)

**CC:** Mr. Gregory Mucci; Whitman Requardt & Associates; Via Email: [gmucci@wrallp.com](mailto:gmucci@wrallp.com)

**PROJECT NAME/DESCRIPTION:** Bureau of Engraving and Printing- Emergency Power Backup for the Main and Annex Building

**PROJECT ADDRESS/LOCATION DESCRIPTION:** 14<sup>th</sup> and D Streets SW, Washington, DC

**DC SHPO PROJECT NUMBER:** 10-312

The DC State Historic Preservation Office (DC SHPO) has reviewed the above-referenced federal undertaking(s) in accordance with Section 106 of the National Historic Preservation Act and has determined that:

This project will have **no effect** on historic properties. No further DC SHPO review or comment will be necessary.

There are **no historic properties** that will be affected by this project. No further DC SHPO review or comment will be necessary.

This project will have **no adverse effect** on historic properties. No further DC SHPO review or comment will be necessary.

This project will have **no adverse effect** on historic properties **conditioned** upon fulfillment of the measures stipulated below.

**Other Comments / Additional Comments** (see below):

Based upon a review of the most recent project plans, the DC SHPO understands that all of the proposed equipment will be located within the existing BEP Freight Building and that the only visible alterations will consist of approximately five new louvers and two horizontal exhaust vents on the south side of the building. Therefore, the DC SHPO has determined that this undertaking will have "no adverse effect" on historic properties and that no further consultation will be required.

**BY:** \_\_\_\_\_  
C. Andrew Lewis  
Senior Historic Preservation Specialist

**DATE:** July 22, 2010

**Attachment 4**



**Office of Environment, Health and Safety  
Environmental Analysis  
Emergency Power Back-up System for the Main and Annex Buildings**

**SECTION I-PROJECT INFORMATION**

<b>Date:</b> 1/11/2011	<b>Personnel:</b> <input type="checkbox"/> In-House <input checked="" type="checkbox"/> Contractor	<b>Project No. #</b> RFP-09-00012
<b>Location:</b> Freight Building		<b>Contract No.</b>
<b>Contracting Officer:</b> Rick German <b>Phone:</b> 4-3248	<b>COTR:</b> Charnell Abrams <b>Phone:</b> 4-3463	<b>OEHS Contact:</b> Lillian Cates <b>Phone:</b> 4-3595

**Description of Project:** The Emergency Power Back-up System for the Main and Annex Buildings consists of two (2) 1000 kilowatt diesel generators manufactured by MTU Onsite Energy that will be housed in the Freight Building. This will replace 1 emergency back up generator. The new generators will provide back up energy for the main computer room, emergency lighting and certain security systems.

**Environmental**

YES	NO	N/A	<u>Air Quality</u>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will construction adversely affect ambient air quality due to dust, vehicle emissions, open burning, etc.?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will industrial activity related to this project result in a significant increase or decrease in air emissions?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Does the proposed action conform to State Implementation Plans?
<u>Water Quality</u>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project result in wastewater or other pollutants being discharged into any body of water?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project require a discharge permit?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will contaminated water runoff from the construction site be allowed to enter storm sewers?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the temperature of the surrounding water be raised by discharges resulting from construction?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is there potential for an accidental release of oil or any hazardous or toxic material into the storm sewer?
<u>Wetlands/Wildlife/Farmlands</u>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project result in the loss of any wetlands or farms?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is the project likely to impact on any rare or endangered species?

**Other**

YES	NO	N/A	<u>Transportation</u>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project involve a significant increase in vehicle traffic on local streets or highways during construction?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project require re-routing of traffic?
<u>Historic</u>			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is the project site located in an area of archeological, cultural or historical significance?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the archeological or historical site or structure be altered by the project?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is the structure eligible for listing with the National Register of Historic Places?
<u>Noise</u>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will construction significantly increase ambient noise levels?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will operations following the completion of the project significantly increase ambient noise levels?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will construction or operations include equipment with unusual noise characteristics?
<u>Economic</u>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project result in a significant increase in the local community population?
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Is there a shortage of support facilities (hospitals, schools, shopping centers)?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project result in an increased load on utilities (sewage, water, electric)?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project have a significant effect on the economic activity of the area?
<u>Health &amp; Safety</u>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the public be exposed to hazardous areas?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project require the storage, treatment, handling or disposal of hazardous waste?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project require the use of explosives?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Will the storage of fuel be required?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the construction or operation result in significant safety risks for employees or the public?
<u>Land Use</u>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is the proposed use of the project site inconsistent with land use in the area?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Does the project conflict with local zoning ordinances?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Will the project require the relocation of private residences or business?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is the proposed architecture inconsistent with the surrounding architecture or landscape?

**Impacts**

None	Potential Minor	Potential Significant		None	Potential Minor	Potential Significant	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Air Quality</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ambient Noise
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Economic
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Wetland/Wildlife/Farms	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Health & Safety
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Land Use

**Mitigating Factors**

The new generators are installed to act as back up in the event of a fire or electrical outage. The generators will replace an existing generator and will run more efficiently. They will require clean air construction and operating permits from the District of Columbia Department of the Environment. The replacement generators will be larger than the existing ones, however, they will be more efficient and the routine maintenance test runs will be shorter. This will not have any significant impacts on the environment.



## Attachment 4