

June 9, 2026

MEMORANDUM FOR THE RECORD

From: Joe Barger  
NEPA Coordinator

Subject: Categorical Exclusion Addendum

Project Title: Analytical Laboratory Modernization and Expansion

Location: University of Maine  
Deering Hall  
Grove Street Ext.  
Orono, Maine 04469

The National Institute of Standards and Technology (NIST) is providing a congressionally directed funding grant for the Modernization and Expansion of the Analytical Laboratory at the University of Maine. In compliance with the National Environmental Policy Act (NEPA), NIST conducted an environmental evaluation of this project and prepared a Categorical Exclusion Memorandum dated January 29, 2025 (Attachment A).

NIST was subsequently notified by the University of Maine of two changes in the scope of this project.

The original scope of work for the Analytical Laboratory Project specified that:

“All work would be conducted within the building envelope” and would be “limited to interior work only within Deering Hall.”

The changes in scope include the following:

1. Heating, Air Conditioning and Ventilation (HVAC) equipment will be installed on the first and fifth story roofs of Deering Hall and duct work will be installed on the exterior of Deering Hall (southern face) extending from the first to the fifth floors.
2. An accessible exterior entrance will be installed on the base floor of the single-story section of Deering Hall (eastern face). This will involve:
  - Removal of one existing window,

- Saw cutting the exterior stone clad concrete wall to accommodate a standard door, and
- Internal reworking of steam piping as required for the new entrance.

With exception of the two changes in scope noted above, all remaining work will be conducted within the Deering Hall building envelope.

### **Specific Considerations of this Action and any Extraordinary Circumstances**

The proposed changes in scope for the Analytical Laboratory Project do not significantly change the environmental impact anticipated.

The changes in scope were coordinated with the Maine Historic Preservation Commission and the State Historic Preservation Officer concurred that the changes in scope will not result in adverse impacts to historic properties (Attachment B).

### **Categorical Exclusion**

NIST finds that the changes in scope discussed above will have no impact on the categorical exclusion applied to this project. Department of Commerce Categorical Exclusion A-1 remains applicable to this project.

The proposed project: Analytical Laboratory Modernization and Expansion at the University of Maine remains categorically excluded from the need for further environmental review under NEPA. Any changes to the above project may require additional NEPA review.

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Joe Barger  
NIST NEPA Coordinator

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Date

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Andrew Wright  
NIST Chief Facilities Management Office

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Date

Attachment A, Categorical Exclusion Memorandum, January 29, 2025

January 29, 2025

MEMORANDUM FOR THE RECORD

**From:** Joe Barger  
NEPA Coordinator

**Subject:** Categorical Exclusion  
Record of Environmental Consideration

**Project Title:** Analytical Laboratory Modernization and Expansion

**Location:** University of Maine  
Deering Hall  
Grove Street Ext.  
Orono, Maine 04469

The National Environmental Policy Act (NEPA) and associated implementing regulations (40 CFR Parts 1500-1508) require that all major actions by federal agencies be reviewed with respect to the environmental consequences on the human environment. The National Institute of Standards and Technology (NIST) is providing a congressionally directed funding grant for the Analytical Laboratory Modernization and Expansion project at the University of Maine. Consequently, NEPA and the associated implementing regulations apply to this project.

This memorandum provides a Record of Environmental Consideration and summarizes the determination that the Analytical Laboratory Modernization and Expansion at the University of Maine has been found to be categorically excluded from any further environmental review under NEPA.

**Description of the Action**

This project includes the modernization and expansion of the University of Maine (UMaine) Analytical Laboratory and Soil Testing Service (Maine Analytical Laboratory). The Maine Analytical Laboratory is housed in Deering Hall on the UMaine Campus. Deering Hall's total

size is 50,001 square feet. This project will renovate approximately 5,200 square feet of laboratory space, office space and general storage and support space. All work will be completed within the building envelope (on the fourth floor and basement).

The Maine Analytical Laboratory is the most comprehensive lab of its type in New England, providing many critical soil, plant, compost, and manure testing services that are not available in labs in neighboring states. This modernization and expansion project will:

- Bolster Maine's ability to drive research and leadership on per- and polyfluoroalkyl substances (PFAS),
- Enable researchers to carry out work that addresses current and future issues such as food insecurity, climate change, and building local economies to be resilient and adaptable in the face of global change,
- Support conservation efforts and workforce training needed by state agencies and federal partners including U.S. Department of Agriculture Rural Development Service and the Natural Resources Conservation Service, and
- Improve support for the \$681M agricultural industry in Maine

This project will be accomplished in accordance with all applicable state and federal environmental and safety regulations. All applicable regulatory permitting will be obtained.

### **Specific Considerations of this Action and any Extraordinary Circumstances**

#### **- Existing Site**

This project will be limited to interior work only within Deering Hall. Deering Hall is a standard academic, teaching and research building on the UMaine Campus and is the current location of the Maine Analytical Laboratory.

#### **- Endangered Species and Critical Habitats**

This project will solely impact the interior of Deering Hall. No endangered species or critical habitats will be impacted.

#### **- Wetlands, Flooding Potential and Resilience**

The site is located outside of any 100- and 500-year flood hazard areas (FEMA). The renovations planned are valued at less than half the cost of a full building replacement.

- **Stormwater**

This project will solely impact the interior of Deering Hall. No impacts to stormwater are expected.

- **Building Staffing/Utilities**

Staffing and student populations are not expected to increase significantly due to the planned renovations. Utility use (i.e., electricity, natural gas, water, sewer) is not expected to change significantly due to the renovations planned.

Local roadways have capacity for a temporary increase in traffic during construction.

- **Air Quality/Greenhouse Gas Emissions**

Greenhouse Gas emissions are not expected to change significantly due to the renovations planned.

- **Hazardous Materials**

Hazardous materials use and hazardous waste generation are expected to be similar to current operations at Deering Hall. Hazardous wastes are managed in accordance with the UMaine Chemical Waste Management Policy, and State and Federal regulations.

Asbestos and lead based paint have been identified in the construction areas of this project. Any of these materials which may be disturbed during construction will be properly handled and disposed in compliance with State and Federal regulations.

- **Historic/Cultural Significance**

This project will only impact the interior of Deering Hall. No adverse impacts to historic properties are expected. The Maine Historic Preservation Officer concurred with this finding in NIST's letter on 1/8/25 (attached).

- **Environmental Justice**

Due to the nature of the project, no disproportional adverse human health or environmental impacts to overburdened and underserved communities, including minority, Tribal, or low-income populations are expected.

**Effects of the Action**

No significant adverse impacts on the environment are expected from this action.

## Categorical Exclusion

The activities associated with this project fall within the criteria of the following Department of Commerce Categorical Exclusion (CATEX):

A-1 Minor renovations and additions to buildings, roads, airfields, grounds, equipment, and other facilities that do not result in a change in the functional use of the real property (e.g. realigning interior spaces of an existing building, adding a small storage shed to an existing building, retrofitting for energy conservation, or installing a small antenna on an already existing antenna tower that does not cause the total height to exceed 200 feet and where the FCC would not require an environmental assessment or environmental impact statement for the installation). This CE does not apply in instances where the project must be submitted to the National Capital Planning Commission (NCPC) for review and NCPC determines that it does not have an applicable Categorical Exclusion.

This project is considered a minor renovation of a building that does not change the functional use of the real property. The project does not require review by the NCPC.

The proposed activity: Analytical Laboratory Modernization and Expansion at the University of Maine is categorically excluded from the need for further environmental review under NEPA. Any changes to the above project will require additional NEPA review.

**JOSEPH  
BARGER**

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Joe Barger  
NIST NEPA Coordinator

1/30/25

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Date

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VAUGHN**

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Robert C. Vaughn  
NIST Chief Facilities Management Officer

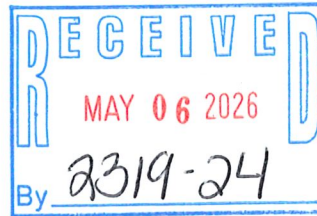
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Date



Attachment B. Maine SHPO Correspondence, 1/30/26 and 5/6/26





6 May 2026

Mr. Kirk F. Mohney,  
State Historic Preservation Officer  
Maine Historic Preservation Commission  
55 Capitol Street  
65 State House Station  
Augusta, Maine, 04333-0065

Re: Analytical Laboratory Modernization & Expansion  
at the University of Maine, Orono, ME

Dear Mr. Mohney:

NIST is continuing consultation for the Analytical Laboratory Modernization and Expansion (Deering Hall) located at the University of Maine, Orono, ME. We previously consulted with your office on December 23, 2024, regarding the initial interior renovation, and again on January 16, 2026, regarding the installation of roof-mounted HVAC and exterior ductwork. Your office provided concurrences of **No Adverse Effect** for both submittals received on January 27, 2025, and February 02, 2026, respectively.

We are now submitting a third update to the Scope of Work (SOW) regarding a necessary life-safety egress modification on Deering Hall's eastern facade.

**Updated Project Description:** The new updated SOW includes the creation of a new accessible exterior entrance on the base floor of the single-story section on the eastern façade (see figure 1). To facilitate this, the following work is proposed:

- Removal of one existing window.
- Saw-cutting the exterior stone-clad concrete wall to enlarge the vertical opening to accommodate a standard door height.
- Internal reworking of steam piping as required for the new entrance configuration.

We have determined that this modification will result in **No Adverse Effect** to historic properties, based on the following factors:

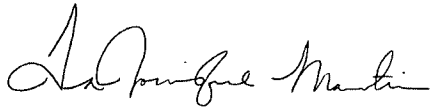
1. **Code Compliance & Life Safety:** This alteration is required to rectify a non-compliant "dead-end corridor" condition. Per *MUBEC Building Code 2021, Section 1020.5*, dead-end corridors may not exceed 20 feet where more than one exit is required. This new egress point is the most direct solution to ensure occupant safety and meet statutory requirements (see figure 3).
2. **Tier Three Status:** According to the University of Maine Historic Preservation Master Plan, this structure is classified as a *Tier Three* building. This designation indicates a lower degree of architectural significance and integrity due to its utilitarian character and previous alterations. The building is a non-contributing resource located outside the campus historic district (see figure 9).
3. **Lack of Visual Impact (Viewshed):** The proposed work is confined to the eastern facade, which is not within the viewshed of the University of Maine campus historic district (see enclosed map). There will be no indirect or cumulative effect on the setting or character of the nearby historic district.
4. **Established Precedent:** The building has successfully undergone similar modifications in the past, specifically on the southern facade where a basement-level window was previously converted into a door (see figure 5 & 6). The proposed work follows this established pattern of functional adaptation.

Given that this is a Tier Three, non-contributing resource and the work is a localized, code-driven modification with no visibility from the historic district, NIST maintains a finding of **No Adverse Effect**.

In accordance with Section 106 of the National Historic Preservation Act, we would appreciate being notified of your concurrence and/or comments within 30 days of the date of this letter. Should you have any questions, concerns, or desire for further information, please do not hesitate to reach out to me, Ms. TaJonique Martin, FPO (Acting) at TaJonique.Martin@nist.gov. Thank you for your attention to this matter.

We look forward to your concurrence with this finding, please let us know.

In advance, thank you.



TaJonique Martin, Historic Preservation Architect  
Federal Preservation Officer (Acting)

- Enclosure:
- 1) LBA Drawing Set - Analytical Laboratory - Interior Photos
  - 2) Deering Hall – Historic Plans
  - 3) University of Maine Historic Excerpts
  - 4) University of Maine Historic District Campus Map

As proposed, the project will not adversely affect historic properties. Pursuant to 800.5 (c), if no consulting parties object to this finding within the 30-day review period, the project may proceed, as proposed, unless resources are discovered during project implementation pursuant to 800.13.

*Kristin A. Mahoney*  
State Historic Preservation Officer

Date: 5/12/26

Figure 1:

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