



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

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Via Electronic Mail to christine_vitt@nashintl.com

Attn: Christine Vitt, AVP, Strategic Planning and Sustainability
Metropolitan Nashville Airport Authority
One Terminal Drive, Suite 501
Nashville, TN 37214

Dear Ms. Vitt:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Metropolitan Nashville Airport Authority (MNA) Draft Environmental Assessment (EA) for the *Implementation of the Nashville International Airport (BNA) Vision*. BNA Vision is a comprehensive plan designed to enable BNA to meet the needs of increased growth in the region and accommodate rapidly increasing numbers of passengers flying into and out of BNA. Key features of the BNA Vision proposal include a new International Arrivals Building (IAB); expansion and improvement of the terminal, including the ticketing lobby and baggage claim areas; expansion and improvements of Concourses A, B, and D; construction of a new parking garage and transportation center; construction of new onsite hotel; new airport administrative building; and on-airport road circulation modifications.

Actions considered in detail within the Draft EA include:

- **Alternative A – Proposed Action** – MNA has developed the Proposed Action, which includes expanding the existing terminal building and the development of Concourse T, which would house the permanent IAB. The proposed action also includes modifications and/or expansions of other concourses, ticketing lobby, and baggage services; a multi-modal station; a new landside hotel; additional parking and transportation improvements; and use of support areas.¹
- **Alternative B – No Action Alternative** – Under the No Action Alternative, no improvements or changes to the existing terminal building, concourses, parking, or other ancillary facilities at BNA would occur. Therefore, implementation of the No Action Alternative would not expand facilities, update airport design or systems, enhance efficiency, improve accessibility, or improve passenger and aircraft movement. As such, the No Action Alternative would not meet MNA's Purpose and Need for the Proposed Action. As described in Section 2 of the Draft EA, by 2035 the population of the Greater Nashville Area is expected to surpass 2.5 million people and corresponding passenger traffic through BNA is projected to grow from approximately 12 million passengers per year today to 20 million passengers per year, a 67 % increase. The current configuration of the terminal and concourses would remain as they are today and continue to

¹ Table 3.4-1 of the Draft EA outlines specific elements of the Proposed Action.

restrict aircraft and passenger movement. With increased passenger loading, inefficiencies will occur, crowding and congestion will increase and accessibility will decline. Finally, continually increasing maintenance and operational costs (e.g., utilities, cleaning, heat and cooling, and general maintenance) would continue.

TDEC has the following comments regarding the proposed action and its alternatives.

Air Resources

The Draft EA calculates the estimated construction emissions associated with the Proposed Action. However, there are differences between Table 4.5-4 on Page 4-14 and Table 3 on Page 10 of 13. Table 4.5-4 shows an estimated 7-year construction schedule while Table 3 indicates an 8-year construction schedule. TDEC recommends that this inconsistency be corrected in the Final EA.

There is no information presented in the Draft EA quantifying changes or increases in emissions based on the number of aircraft landing or taking off from BNA that would be associated with the successful implementation of the BNA Vision, even though changes in air traffic are likely due to increased passenger arrivals and departures.² TDEC recommends the Final EA consider emissions increases associated with increased air traffic.

Water Resources

The Draft EA discusses activities which will require coverage under Tennessee's General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Construction Activities (CGP) and an associated Storm Water Pollution Prevention Plan (SWPPP), as construction activities will exceed one acre of land disturbance.³ Additionally, an Aquatic Resource Alteration Permit(s) (ARAP) will be necessary for the encapsulating of the tributaries of Sims Branch and potentially other activities discussed within the Draft EA.⁴ The Draft EA indicates that the Merten's Hole wetlands that is proposed to be filled in will be compensated for by purchasing credits from the Wetlands Mitigation Bank and that any land disturbance activities in any undisturbed areas will be evaluated for wetlands. TDEC acknowledges the inclusion of these items in the Draft EA and recommends they be included in the Final EA.

Solid Waste Management

The Draft EA notes that lead concentrations were detected within painted components (i.e. piping) at the site. The Draft EA also indicated that paint debris management (e.g. containment, characterization, and disposal) will be done in accordance with all federal and state regulatory requirements. In addition to the aforementioned Rules and Regulations of the State, TDEC has a policy entitled, "Management and Disposal of Lead-Based Paint Debris," that may be referenced.⁵ TDEC recommends that the Final EA reflect practices and procedures as encourage by the "Management and Disposal of Lead-Based Paint Debris" policy.

² Page 3-20: "As described in Section 2, by 2035 the population of the Greater Nashville Area is expected to surpass 2.5 million people and corresponding passenger traffic through BNA is projected to grow from approximately 12 million passengers per year today to 20 million passengers per year, a 67 % increase."

³ For more information on NPDES Stormwater Construction Permitting please visit

<http://www.tn.gov/environment/article/permit-water-npdes-stormwater-construction-permit>.

⁴ For more information on the ARAP program please visit <https://www.tn.gov/environment/article/permit-water-aquatic-resource-alteration-permit>.

⁵ Division of Solid Waste Management policies can be found SWM Policies can be found in the SWM Policy Manual at <http://www.tn.gov/environment/article/sw-solid-waste-policy-manual>.

TDEC recommends the Final EA explicitly reflect that any wastes associated with construction and operations at the site of the Proposed Action must be handled in accordance with the Solid and Hazardous Waste Rules and Regulations of the state. This includes all materials that would be classified as solid and/or hazardous wastes per these chapters.⁶

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



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cc: Kristi Ashley, Federal Aviation Authority
Lacey Hardin, TDEC, APC
Lisa Hughey, TDEC, DSWM
Tom Moss, TDEC, DWR

⁶ Reference the TDEC Solid Waste Management Rule 0400 Chapter 11 for Solid Waste and Chapter 12 for Hazardous Waste <http://sos.tn.gov/effective-rules>, for applicable Rules and Regulations of the State