



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

DAVID W. SALYERS, P.E.  
COMMISSIONER

BILL LEE  
GOVERNOR

February 5, 2020

**Via Electronic Mail to [wdwhite0@tva.gov](mailto:wdwhite0@tva.gov)**

Attn: W. Douglas White, NEPA Specialist  
Tennessee Valley Authority  
400 West Summit Hill Drive, WT 11B-K  
Knoxville, TN 37902

Dear Mr. White:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority (TVA) Phase 2 East Region Consolidation at the Norris Properties Site *Draft Environmental Assessment (EA)*, which evaluates security updates needed to bring the facility into compliance with current TVA security measures and protocols. The Phase 2 East Region Consolidation Draft EA also addresses additional consolidation related actions including renovations of various structures that may be necessary, and which were unknown at the time of the Phase 1 assessment. According to TVA, these actions are necessary for completion of the planned consolidation effort based on TVA's ongoing evaluation of the condition of the existing facilities and program needs. Actions considered in detail within the Draft EA include:

- **Alternative A – No Action Alternative** – Under the No Action Alternative, TVA would continue with the previously evaluated Phase 1 actions as described in the Revised Phase 1 EA and the additional actions evaluated under the first SEA and second SEA pending completion of that environmental review. No additional changes would occur at the Engineering Lab beyond the activities identified in those documents.
- **Alternative B – Phase 2 Engineering Lab Modification** – Under this alternative, TVA would complete consolidation of portions of TVA operations to the Engineering Lab located in Norris, Tennessee. TVA anticipates consolidation activities to begin in early 2020 and possibly last through 2021. This alternative would include a number of site improvements, modifications of site security measures, and renovations to buildings on-site.<sup>1</sup>

TDEC has reviewed the Draft EA and provides the following comments:

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<sup>1</sup> For more information on specific activities identified by TVA, please see pages 13-20 of the Draft EA document.

## **Cultural and Natural Resources**

TDEC believes the Draft EA adequately addresses potential impacts to cultural and natural resources within the proposed project area.<sup>2</sup>

## **Air Resources<sup>3</sup>**

The proposed project includes building demolition and renovation activities, and both asbestos and lead are mentioned as present on-site. If asbestos removal or demolition is planned to occur additional consideration should be given to ensure that demolition related emissions are minimized, that any asbestos containing material (ACM) is identified and managed properly during demolition and that the appropriate notifications be provided prior to any renovation/demolition activity.<sup>4</sup> TDEC encourages TVA to include these considerations in the Final EA.

TDEC recommends that should open burning be considered for disposal of wood wastes generated from the proposed project, alternatives to open burning, including chipping, composting or grinding of wood waste, be evaluated first. If open burning is selected for wood waste disposal TVA should consider implementing a smoke management plan, not burning on air quality alert days, and coordinating burning with other agencies (local and State air pollution control agencies, forestry agencies and local fire departments). TDEC encourages TVA to include discussion relating to these considerations in the Final EA.

## **Solid Waste**

TDEC recommends that the Final EA consider and explicitly reflect that any wastes associated with such activities in Tennessee be managed in accordance with the Solid and Hazardous Waste Rules and Regulation of the State of Tennessee (TDEC DSWM Rule 0400 Chapters 11 and 12, respectively).

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.

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<sup>2</sup> This is a state-level review only and cannot be substituted for a federal agency Section 106 review/response. Additionally, a court order from Chancery Court must be obtained prior to the removal of any human graves. If human remains are encountered or accidentally uncovered by earthmoving activities, all activity within the immediate area must cease. The county coroner or medical examiner, a local law enforcement agency, and the state archaeologist's office should be notified at once (Tennessee Code Annotated 11-6-107d).

<sup>3</sup> No permitted air contaminant sources are mentioned as being demolished, relocated or newly constructed on-site. If any new sources are to be constructed, please contact TDEC's Division of Air Pollution Control air permitting program for information and assistance in receiving any needed air permits. For more information, please visit <https://www.tn.gov/environment/program-areas/apc-air-pollution-control-home/apc/permit-air-home.html>.

<sup>4</sup> For more information on TDEC's Asbestos Demolition or Renovation Notification requirements, please visit <https://www.tn.gov/environment/program-areas/apc-air-pollution-control-home/apc/asbestos-information/notification-of-asbestos-demolition-or-renovation.html>.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew Taylor', with a stylized flourish at the end.

Matthew Taylor

Senior Policy Analyst, Office of Policy and Sustainable Practices

Tennessee Department of Environment and Conservation

[Matthew.K.Taylor@tn.gov](mailto:Matthew.K.Taylor@tn.gov)

(615) 532-1291

cc: Kendra Abkowitz, PhD, TDEC, OPSP  
Daniel Brock, TDEC, DOA  
Lacey Hardin, TDEC, APC  
Lisa Hughey, TDEC, DSWM  
Tom Moss, TDEC, DWR  
Stephanie Williams, TDEC, DNA