December 16, 2016

Via Electronic Mail to Kristi.Ashley@FAA.gov
Attn: Kristi Ashley, Environmental Specialist
Memphis Airports District Office
Federal Aviation Administration
2491 Winchester Road, Suite 113
Memphis, TN 38116

Dear Ms. Ashley:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the FedEx Express (FedEx) FedEx MEMH Relocations Project # 8648976 (Draft Short Form EA) prepared by the Federal Aviation Administration (FAA). The applicant, FedEx, proposes to deconstruct or demolish 19 outdated structures at the Memphis International Airport in Memphis, TN. Most existing concrete pads for the structures would remain in place and be used for operational staging, which may include trucks, trailers, containers, tugs, cargo, equipment, etc., as needed. A new facility for maintenance of ground support equipment would be constructed on the site of one of the buildings to be demolished.

Actions considered in detail within the Draft Short Form EA include:

- Proposed Action Alternative – The Project would consist of the deconstruction or demolition of 19 outdated structures totaling approximately 452,000 square feet (sq. ft.) of development. A new 8,500 sq. ft. facility for maintenance of ground support equipment will be constructed on the site of one of the demolished buildings. The net effect of deconstruction/demolition and new construction will be a reduction of 443,500 sq. ft. of overall developed square footage at the airport.

- No-Action Alternative – Under the No Action Alternative the demolition, deconstruction, and new construction activities described previously would not occur, and the efficiency and safety improvements of the proposed action would not be realized.

TDEC’s Division of Underground Storage Tanks (UST) has reviewed the Draft Short Form EA and identified three active underground storage tanks in the project area (Facility ID 9-792140, 9-792231, and 9-792707). Before any Underground Storage Tanks are moved or disturbed the TDEC Memphis Field Office should be notified. If one of the active tanks is damaged during demolition or construction, notification must be provided to the Memphis Field Office Underground Storage Tank Division within 72 hours and appropriate remedial actions must be taken immediately.¹ UST recommends that this be noted in the Final Short Form EA.

¹ Contact Jeff Phillips with the Memphis Field Office Underground Storage Tank Division at (901) 371-3032
TDEC’s Division of Water Resources (DWR) has reviewed the Draft Short Form EA and comments that demolition and construction activities associated with the proposed action alternative are not covered under the existing FedEx individual stormwater permit (TN0067351) or Stormwater Pollution Prevention Plan (SWPP). Prior to commencement of demolition and construction activities, this project must submit a completed and signed Notice of Intent (NOI) for Construction Activity - Stormwater Discharges to the Division of Water Resources. A site-specific SWPPP must also be developed and submitted with the NOI. DWR recommends that these requirements be noted in the Final Short Form EA.

TDEC’s Division of Solid Waste Management (SWM) has reviewed the Draft Short Form EA and provides the following comments regarding the proposed action.

- All asbestos-containing materials (ACM) generated as a result of the project must be disposed of at an approved disposal facility. TDEC SWM has two policies which detail asbestos disposal requirements in the State of Tennessee. SWM recommends that this consideration be included in the Final Short Form EA.

- The Draft Short Form EA identifies the presence of Universal Waste in buildings targeted for deconstruction and demolition activities. Handling of all Universal Waste must be performed in accordance with applicable Universal Waste Requirements. Any Universal Waste not handled in accordance with the Universal Waste regulations must be managed as a solid waste, and a hazardous waste determination must be made to assess whether the waste meets the definition of a hazardous waste. Furthermore, the table found on page 44 in Section 4.4 “Hazardous Waste” identifies “Lighting Ballasts” with the potential hazard of “PCB or Petroleum” listed along with the designation of “Universal Waste”. The state of Tennessee does not include PCB or Petroleum contaminated wastes as Universal Waste. SWM recommends these considerations be included in the Final Short Form EA.

TDEC’s Division of Air Pollution Control (APC) has reviewed the Draft Short Form EA and provides the following comments regarding the proposed action.

- Page 8 of the Draft Short Form EA should be revised to reflect that the Memphis ozone non-attainment area was reclassified to attainment on July 25, 2016. APC recommends that this consideration be included in the Final Short Form EA.

- Data presented in the table on page 9 of the Draft Short Form EA does not include estimates for fugitive dust emissions (PM2.5 or PM10) that could result from the demolition activities proposed. The table and subsequent discussion do not identify the sources of the anticipated emissions; Appendix D only identifies anticipated emissions by building. Additionally, estimates for project emission results differ between the table provided on page 9, and Table 2 in Appendix D, found on page 79 of the document. APC recommends all discrepancies in data be resolved or discussed in the Final Short Form EA.

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2 Information for Construction Activity - Stormwater Discharge permitting in Tennessee can be found at https://www.tn.gov/environment/article/permit-water-stormwater-permitting-program.

3 The Solid Waste Policies pertaining to Asbestos disposal are pm118 (non-friable asbestos) and pm043 (friable asbestos), which can be found in the SWM Policy Manual at http://www.tn.gov/environment/article/sw-solid-waste-policy-manual.


5 Reference TDEC SWM Rule 0400-12-01-03(b), http://sos.tn.gov/effective-rules.

• It is recommended that ordinary dust control measures be employed to mitigate any dust emissions generated. These measures may include wetting by water spray any areas likely to generate fugitive dust during on site excavation activities as needed. The total amount of uncontrolled dust generated by the proposed demolition and construction activities are not quantified in the submittal. APC recommends that this consideration be included in the Final Short Form EA.

• Page 17 identifies TDEC – APC as the reviewing authority for all notifications for asbestos demolition and renovation projects. However, all notifications for asbestos demolition and renovation projects in Shelby County must be submitted to the Shelby County Health Department – Air Pollution Control Program. APC recommends that this revision be included in the Final Short Form EA.

• Should any land clearing activities or disposal of brush or trees/tree limbs occur, APC prefers that wood waste be disposed of by chipping, grinding, or composting rather than open burning. However, if open burning does occur during site preparation and construction, open burning regulations should be followed. APC recommends that detailed clearing activities, total amount of areas where soils are to be disturbed, and associated impacts be addressed in the Final Short Form EA.

TDEC appreciates the opportunity to comment on this Draft Short Form 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,

Kendra Abkowitz, PhD
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c:
Lacey Hardin, TDEC, APC
Lisa Hughey, TDEC, SWM
Tom Moss, TDEC, DWR
Michelle Pruett, TDEC, UST

7 Dust emissions generated by such activities can vary substantially depending on levels of activity, specific operations, and prevailing meteorological conditions. These emissions are likely to be short term and temporary in nature.
8 More information on notifications for asbestos demolition and renovation projects in Shelby County can be found at http://www.shelbycountytn.gov/index.aspx?NID=931.