

# **Appendix A**

## **Figures**

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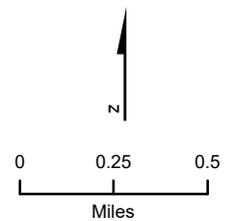
\\novoton\GIS\GISData\Commercial\Southeast\Tennessee\UPS - Oakhaven\MXD\Figure 1 - Location Map.mxd kcchipman



**Legend**

 Project Area

Map Date: 6/10/2019  
Source: ESRI 2016



**Figure 1**  
**Project Location**  
UPS - Oakhaven Hub  
Facility Expansion  
Memphis, Tennessee

\\novetondis\GIS\data\Commercial\Tennessee\UPS - Oakhaven\MXD\Figure 2 - Site Location.mxd bpawling



**Memphis International Airport**

VICINITY MAP



**Site Location**

**Legend**

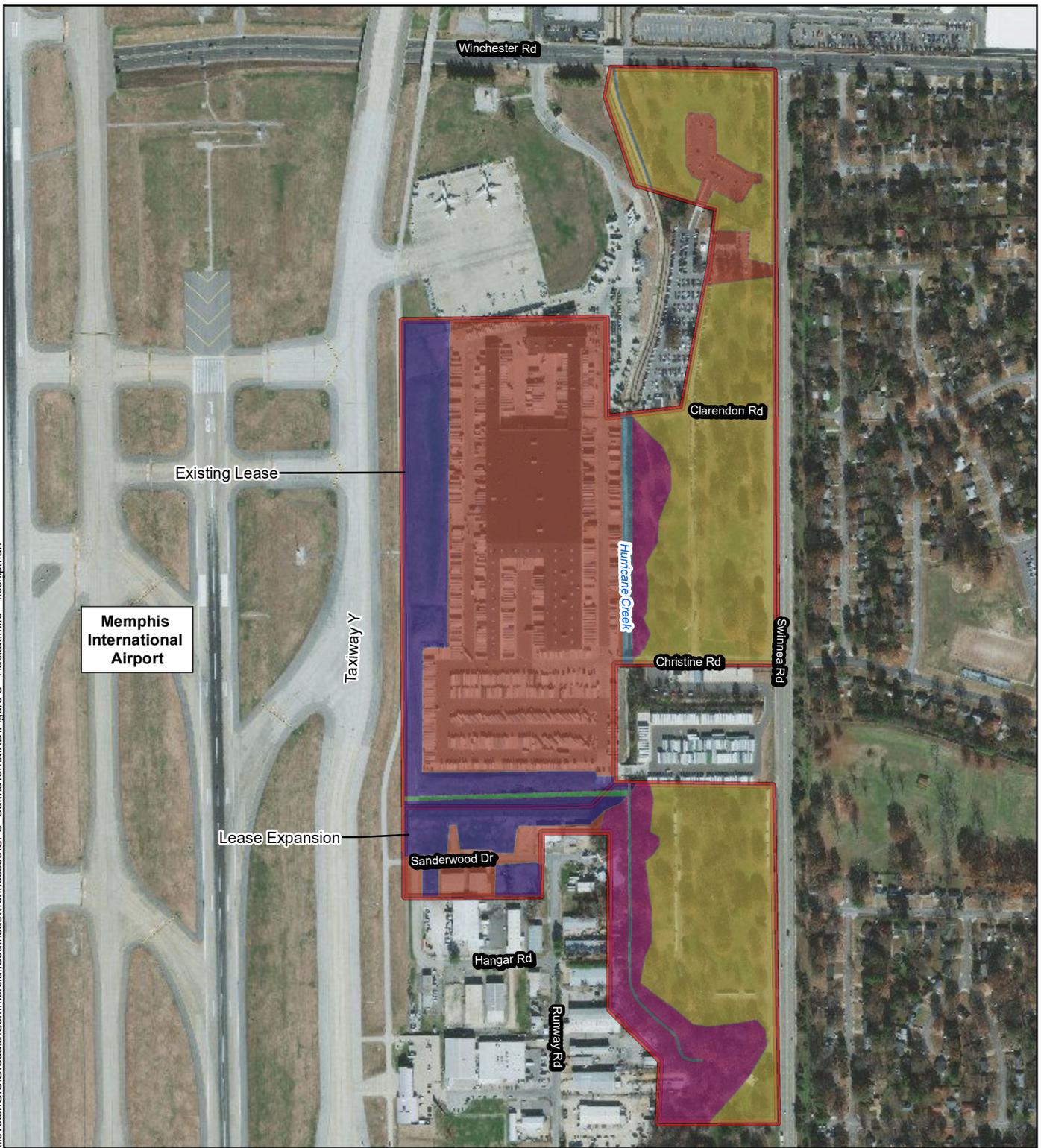
- Project Area
- Parking Area (General Arrangement)
- Building Addition
- Demo Area
- Existing UPS-Oakhaven Distribution Center
- Vegetated Landscape Buffer (100-ft)
- Riparian Buffer (30-ft)
- Stream

**Figure 2**  
**Proposed Project**  
 Proposed UPS - Oakhaven Hub  
 Facility Expansion Project  
 Memphis, Tennessee

Map Date: 7/2/2019  
 Source: ESRI 2016



\\novaton\GIS\GISData\Commercial\Southeast\Tennessee\UPS - Oakhaven\MXD\Figure 3 - Habitat.mxd kccchipman



**Memphis International Airport**

Existing Lease

Lease Expansion

VICINITY MAP



Site Location

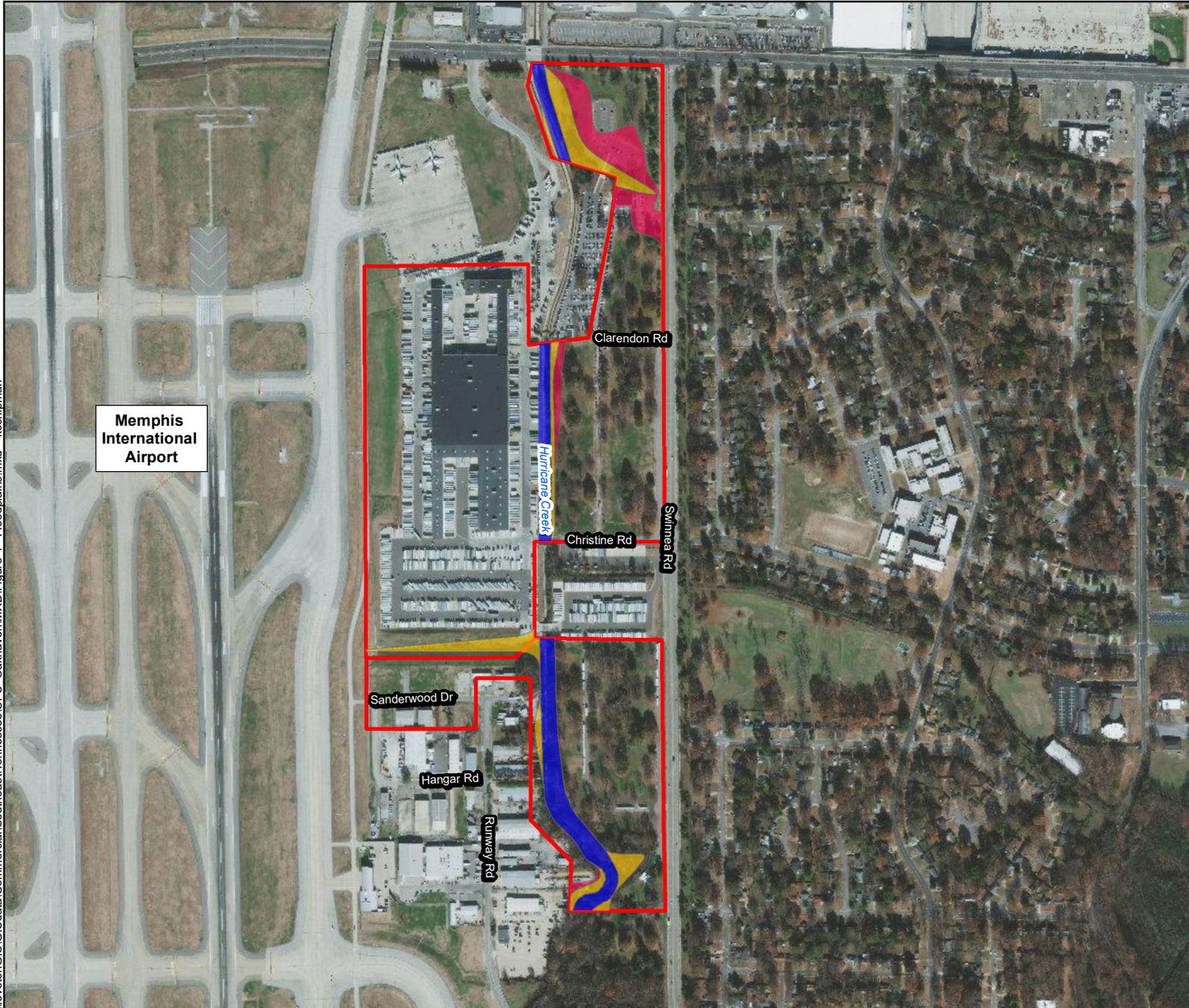
**Legend**

-  Project Area
-  Developed
-  Drainage to Hurricane Creek
-  Hurricane Creek
-  Landscaped Parkland
-  Mowed and Maintained
-  Riparian Forest

**Figure 3**  
**Habitat Areas**  
 Proposed UPS - Oakhaven Hub  
 Facility Expansion Project  
 Memphis, Tennessee

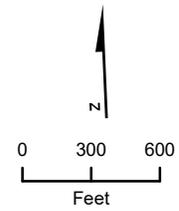
Map Date: 7/1/2019  
 Source: ESRI 2016





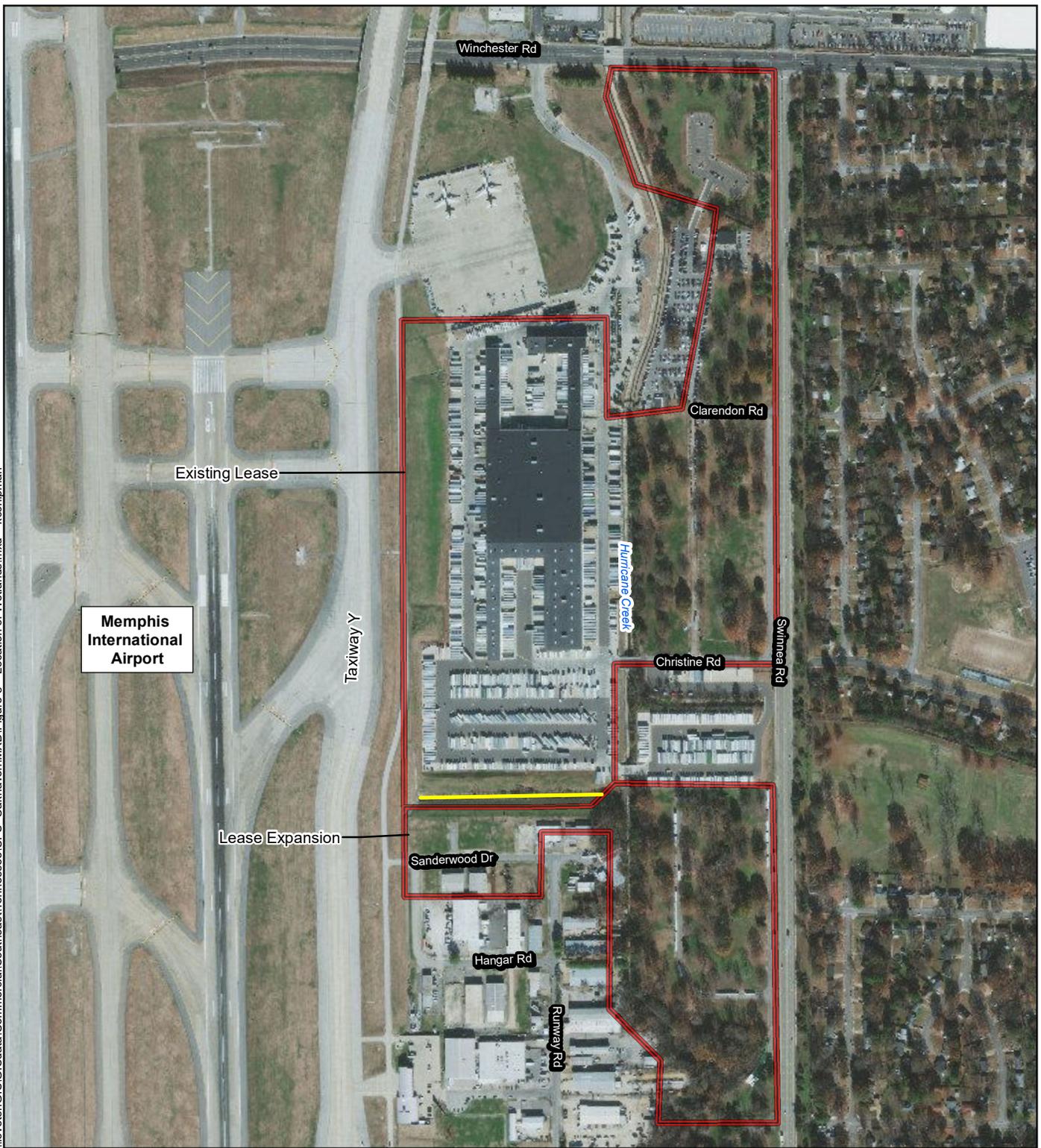
- Legend**
- Project
  - 1% Annual Chance Floodplain
  - 2% Annual Chance Floodplain
  - Regulated Floodway

Map Date: 7/1/2019  
Source: ESRI 2016, FEMA



**Figure 4  
Floodplains**  
UPS - Oakhaven Hub  
Facility Expansion  
Memphis, Tennessee

\\loveton\GIS\GISData\Commercial\Southeast\Tennessee\UPS - Oakhaven\MXD\Figure 5 - Location of Wetlands.mxd kochipman



VICINITY MAP



Site Location

**Legend**

- Linear Wetland
- Project Area

**Figure 5**  
**Location of Wetlands**  
Proposed UPS - Oakhaven Hub  
Facility Expansion Project  
Memphis, Tennessee

Map Date: 7/1/2019  
Source: ESRI 2016





## **Appendix B**

### **Air Emissions Inventory Report**

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# **Air Emissions Inventory Report**

## **Introduction**

This Air Emissions Inventory (AEI) was prepared as part of National Environmental Policy Act (NEPA) documentation for the UPS-Oakhaven expansion project. Emissions were estimated from activities, associated with the proposed action that would generate direct and indirect emissions during demolition and construction activities and operational phase. The project would not increase airside capacity, as UPS is not adding flight activities under the proposed action; therefore, there would be no impacts on air quality from additional aircraft. However, the proposed action would increase ground vehicle activity resulting in some impacts on air quality. Currently, there are 180 UPS vehicles operating on the site and this is expected to grow to 280 UPS vehicles. In addition, there are 700 employee parking spaces onsite. Within a 24-hour period, 1,400 employee vehicles come and go to the site, using those 700 parking spaces. Employee parking would expand to 1,000 parking spaces with up to 1,800 employee vehicles coming and going to the site in a 24-hour period.

This AEI is provided as an appendix to the Environmental Evaluation (Short Form Environmental Assessment) for this project. The AEI is intended to satisfy the air quality requirements established by NEPA. The analysis herein was performed to evaluate environmental consequences of the project with respect to air quality.

## **Regulatory Applicability**

The NEPA Implementing instructions for Airport Actions (Order 5050.4B) developed by U.S. Department of Transportation's Federal Aviation Administration (FAA) provides Significant Impact Thresholds for resource categories in Table 7-1 (FAA 2006). Shelby County, TN, is in attainment with all National Ambient Air Quality Standards (NAAQS), though it is in maintenance status for 2008 Ozone and carbon monoxide (CO). The emissions inventory was prepared to determine whether or not the project would cause or contribute to a violation of the NAAQS for criteria air pollutants and any significant impact for greenhouse gases (GHGs).

The General Conformity Rule requires that any federal action meets the requirements of a SIP or Federal Implementation Plan. More specifically, CAA Conformity is ensured when a federal action does not cause a new violation of the NAAQS; contribute to an increase in the frequency or severity of violations of NAAQS; or delay the timely attainment of any NAAQS, interim progress milestones, or other milestones toward achieving compliance with the NAAQS. The General Conformity Rule applies only to federal actions in non-attainment or maintenance areas.

The General Conformity Rule (40 CFR 93.153) presumes that a project conforms with the State Implementation Plan (SIP) if it is an exempted activity or project emissions are considered de minimis. This project does not meet the definition of actions that are exempt under the General Conformity Rule (40 CFR 93.153(c)(2)). Consequently, it was necessary to calculate emissions of ozone precursors, nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOC), and CO to determine whether or not the emissions were below the thresholds established by attainment status. Emissions below these threshold values are considered de minimis and insignificant with

respect to SIP conformity. In addition to the maintenance area criteria air pollutants (ozone and CO), particulate emissions (PM<sub>10</sub>/PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and GHGs were calculated as part of this AEI.

### **Air Emissions Inventory Assumption and Inputs**

An air quality analysis was conducted using the Airport Construction Inventory Tool (ACEIT), version 1.0. A Level 1 assessment, which provides a conservative estimate, was performed to determine if detailed program inputs were required to refine the data. Emissions sources during the demolition/construction phase include worker commutes, on-site motorized vehicle use, use of trucks for delivery of supplies and removal of debris, fugitive dust generated by demolition and construction activities, and evaporative/volatilization emissions generated by asphalt paving activities.

ACEIT consists of two main emission factor models which are the EPA's non-road equipment emissions model (NONROAD) and the Motor Vehicle Emissions Simulator (MOVES). As the name implies, NONROAD provides emission factors for equipment typically used for non-road (off-road) purposes, including construction activities. In contrast, MOVES is used to develop emissions inventories and emission factors for on-road vehicles. Both exhaust and fugitive (e.g., evaporative) emission factors were developed using these models for non-road construction equipment and on-road vehicles that were incorporated into ACEIT.

Fuel characteristics and associated emission factors are influenced by region, season and ambient temperature. ACEIT uses the project location, the season in which the proposed action will occur, and the prevailing ambient temperatures to determine applicable emission factors. The ACEIT database contains regional data by county, including Shelby County, TN. Emissions were calculated on an annual basis to represent air quality throughout the demolition and construction period. The regulatory *de minimis* thresholds are in terms of annual emissions (tons per calendar year). It is assumed that all demolition and construction activities will occur in the year 2020 for the purpose of this AEI. Average monthly temperatures were obtained from the U.S. Climate Data website (US Climate Data 2019).

Emissions from the demolition and construction activities were calculated based on building dimensions, parking lot dimensions and the costs of the project activities. A Level 1 assessment uses default values for fuel type and equipment, based on construction activity categories. The following ACEIT Project Types were selected to correspond with each activity: Demolition – Building; Parking Lot; and Building. The “Building” Project Type is further defined by the size of the structure to be constructed. Selection was made based on the most representative size of the four available categories. In addition, indirect emissions for the operational phase were calculated by using ACEIT generated emissions factors for gasoline vehicles and diesel trucks for the projected increase in their use. Vehicle emissions from gasoline engines for 400 employees commuting to the site (30 miles round trip) and diesel engines for 100 UPS trucks (40 miles round trip) are included in emissions for operational phase.

Equipment types for demolition activities included excavators, pickup trucks, skid-steer loaders, generator sets, and dump trucks, all fueled by diesel. Equipment types for construction activities included the aforementioned equipment, as well as backhoes, fork trucks, material delivery vehicles, lifts, cranes, and equipment associated with concrete construction. ACEIT also includes vehicle emissions from gasoline engines for construction employees commuting to the job site and assumes 30-mile round trips. Ceiling and roof thickness were assumed to be 2 feet in order to calculate open space height.

ACEIT calculates emissions for non-road, on-road and fugitive emissions. Construction equipment typically falls under the category of non-road sources, while on-road sources include employees commuting to and from work and material transport trucks operating on highways and roadways. Fugitive emissions are those that do not pass through a stack, vehicle exhaust pipe, or similar opening and are separated into two broad categories in the ACEIT program: dust (particulate matter) and evaporative/volatilization emissions. The source of emissions is primarily equipment/vehicle exhaust (non-road and on-road) for this project; fugitive emissions consisted primarily of fugitive dusts and evaporative/volatilization emissions from paving activities.

### AEI Inventory Results

The Level 1 assessment resulted in emissions less than the *de minimis* thresholds for all NAAQS criteria emissions. Emissions were calculated for ozone precursors (NO<sub>x</sub> and VOC) and CO to determine if the emissions were *de minimis*. Particulate matter (PM<sub>10</sub>/PM<sub>2.5</sub>), SO<sub>2</sub> emissions and GHGs were also calculated. The ACEIT output data are available electronically for review and show detailed emissions calculations and inputs specific to each activity, as well as emission factors and activity rates. Estimates were produced for emissions from engine-powered construction equipment, worker commutes, material transport, fugitive dust during demolition and construction, and evaporative/volatilization sources. ACEIT default emission factors originate from several sources including EPA’s NONROAD model; EPA’s MOVES model; AP-42, 5th Edition (EPA 1995); and, engineering experience.

The calculated emissions for ozone precursors (NO<sub>x</sub> and VOCs), CO, PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub> were below the applicable General Conformity *de minimis* thresholds established by the Clean Air Act (40 CFR 93.853(b)), as shown in Table 1 below. The analysis conducted was a conservative estimate of emissions, intended to capture the greatest potential for impact.

**Table 1. De Minimis Thresholds and Emission Inventory Results**

	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>
<i>De Minimis</i> Threshold <sup>1</sup>	100	100	100	100 <sup>2</sup>	100 <sup>2</sup>	100 <sup>2</sup>
Construction Phase Emissions	23.23	73.98	30.88	5.28	1.19	0.15
Operational Phase Emissions	5.44	0.01	11.79	0.28	0.27	0.03
CO – carbon monoxide NO <sub>x</sub> – nitrogen oxides PM <sub>10</sub> – particulate matter less than 10 microns in diameter PM <sub>2.5</sub> – particulate matter less than 2.5 microns in diameter						

SO<sub>2</sub> – sulfur dioxide  
 TPY – tons per year  
 VOC – volatile organic compounds  
<sup>1</sup> 40 CFR 93.153(b)(2) – Standards for maintenance areas  
<sup>2</sup> Thresholds for particulate are shown for demonstration purposes. Shelby County is in attainment for PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>2</sub>.

The calculated emissions for GHGs were below the reference point provided in CEQ Guidance (CEQ 2014), as shown in Table 2.

**Table 2. GHGs Inventory Results and Reference Point**

	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e <sup>1</sup>
Reference Point <sup>2</sup>	--	--	--	25,000
Construction Phase Emissions	14,601	0.34	0.07	14,631
Operational Phase Emissions	3,234	0.47	0.08	3,269

CO<sub>2</sub> – carbon dioxide  
 CH<sub>4</sub> – methane  
 N<sub>2</sub>O – nitrous oxide  
<sup>1</sup> CO<sub>2</sub>e – carbon dioxide equivalent (CO<sub>2</sub>e Emissions = (CO<sub>2</sub> Emissions \* CO<sub>2</sub> GWP) + (CH<sub>4</sub> Emissions \* CH<sub>4</sub> GWP) + (N<sub>2</sub>O Emissions \* N<sub>2</sub>O GWP)  
 GWP – Global Warming Potential (CO<sub>2</sub> GWP = 1; CH<sub>4</sub> GWP = 25; N<sub>2</sub>O GWP = 298)  
<sup>2</sup> CEQ Revised Draft Guidance on Greenhouse Gas Emissions in NEPA Reviews, December 2014. This guidance was issued as final on August 2016 and then withdrawn for further consideration by EO13783 on March 2017.

**Conclusions**

The air regulatory review conducted for the proposed action determined that the project is not an exempted action under the General Conformity Rule (40 CFR 93.153(c)(2)). Consequently, an air quality analysis was performed to determine if emissions of ozone precursors and carbon monoxide were below the General Conformity Rule’s threshold values for these pollutants (40 CFR 93.153(b)) and, thus presumed to conform. The air quality analysis, performed using the FAA’s ACEIT program, determined that the projected emissions were below threshold values. The project is presumed to conform with the SIP and, therefore, will not cause or contribute to a violation of the 8-hour ozone or CO NAAQS. In addition, projected GHGs emissions are considered insignificant.

**References**

U.S. Environmental Protection (EPA). "Compilation of Air Pollutant Emission Factors (AP-42), 5th Edition." 1995.

Federal Aviation Administration (FAA). "National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions (Order 5050.4B)." 2006.

The Council on Environmental Quality (CEQ). “Revised Draft Guidance on Greenhouse Gas Emissions in NEPA Reviews” December 2014.

U.S. Climate Data. *Version 2.3* 2019.  
<http://www.usclimatedata.com> (accessed June 11, 2019).

**Appendix C**  
**Agency Consultation**

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**Consultation Letters were sent to the following Agencies:**

- Tennessee Historical Commission State Historic Preservation Office
- United States Army Corps of Engineers - Memphis District
- Tennessee Department of Environment & Conservation
  - Division of Water Resources
  - Division of Solid Waste Management
  - Division of Underground Storage Tanks
- U.S. Fish and Wildlife Service
- Tennessee Wildlife Resources Agency Region 2
- Shelby County Health Department
- Memphis and Shelby County - Office of Planning and Development



2491 Winchester Road, Suite 113  
Memphis, TN 38116-3856  
P: 901-922-8000  
F: 901-922-8099  
[flymemphis.com](http://flymemphis.com)

June 12, 2019

Josh Whitehead, Planning Director  
Memphis and Shelby County  
Office of Planning and Development  
City Hall 125 North Main Street-Suite 468  
Memphis, Tennessee 38103-2084

RE: UPS-Oakhaven Hub Facility Expansion Project at the Memphis International Airport

~~JOSH -~~  
Dear Mr. Whitehead:

United Parcel Service (UPS) is proposing to expand their Oakhaven, Tennessee Hub Facility at the Memphis International Airport (MEM) (Figure 1). The Federal Aviation Administration (FAA) is the lead federal agency, the Memphis-Shelby County Airport Authority (MSCAA) is the sponsor, and UPS is the applicant for the proposed project. UPS is preparing an Environmental Evaluation (Short Form Environmental Assessment), in accordance with the National Environmental Policy Act, to identify and evaluate potential impacts to resources and to incorporate public comment.

The UPS facility at MEM handles package/parcel shipping and receiving operations. On-site operations include customer service, package drop-off and pick-up, loading and unloading of container trailers, and package sorting. Existing operations also includes the landing of three to four aircraft on a daily basis. The current UPS active area is approximately 122 acres with 100 operational acres and the balance of 22 acres is vegetation. The proposed project is to expand the existing UPS facility to the south by leasing an additional 26 additional acres of land from MSCAA (Figure 2). Within this new area UPS plans to expand existing buildings, demo two existing buildings, and remove approximately 22 acres of vegetation to create additional shipping trailer container parking. The project also includes the construction of additional shipping trailer and employee parking on the existing UPS leased site.

A 100-foot buffer of vegetation will remain along Swinnea Road to the east and Winchester Road to the north.

The project is needed because the current facility requires more space for package processing due to warehousing and logistics growth in the Memphis area.

We are requesting consultation with you for this project, as we are proposing to expand the UPS-Oakhaven facility located in Shelby County. Attachment A contains of list of other agencies consulted on this project.



2491 Winchester Road, Suite 113  
Memphis, TN 38116-3856  
P: 901-922-8000  
F: 901-922-8099  
[flymemphis.com](http://flymemphis.com)

**UPS-Oakhaven Hub Facility Expansion Project at the Memphis International Airport**

**June 12, 2019**

**Page 2**

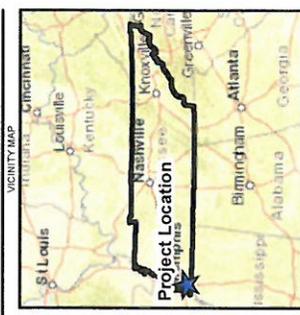
Your response within 30 days from the date of receipt of this letter would be greatly appreciated. Please forward written comments to the attention of John Wright, UPS Project Manager, 3675 Swinnea Road, Memphis, Tennessee 38118. Questions may be directed to Mr. Wright at 901-573-3495 or [johnwright@ups.com](mailto:johnwright@ups.com). Thank you for your assistance with this project.

Sincerely,

James Hay, Director of Development  
Memphis-Shelby County Airport Authority

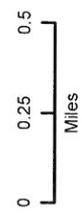
Attachments

Cc: John Wright, UPS Project Manager  
Stephen Cseplo, East Region Project Coordinator



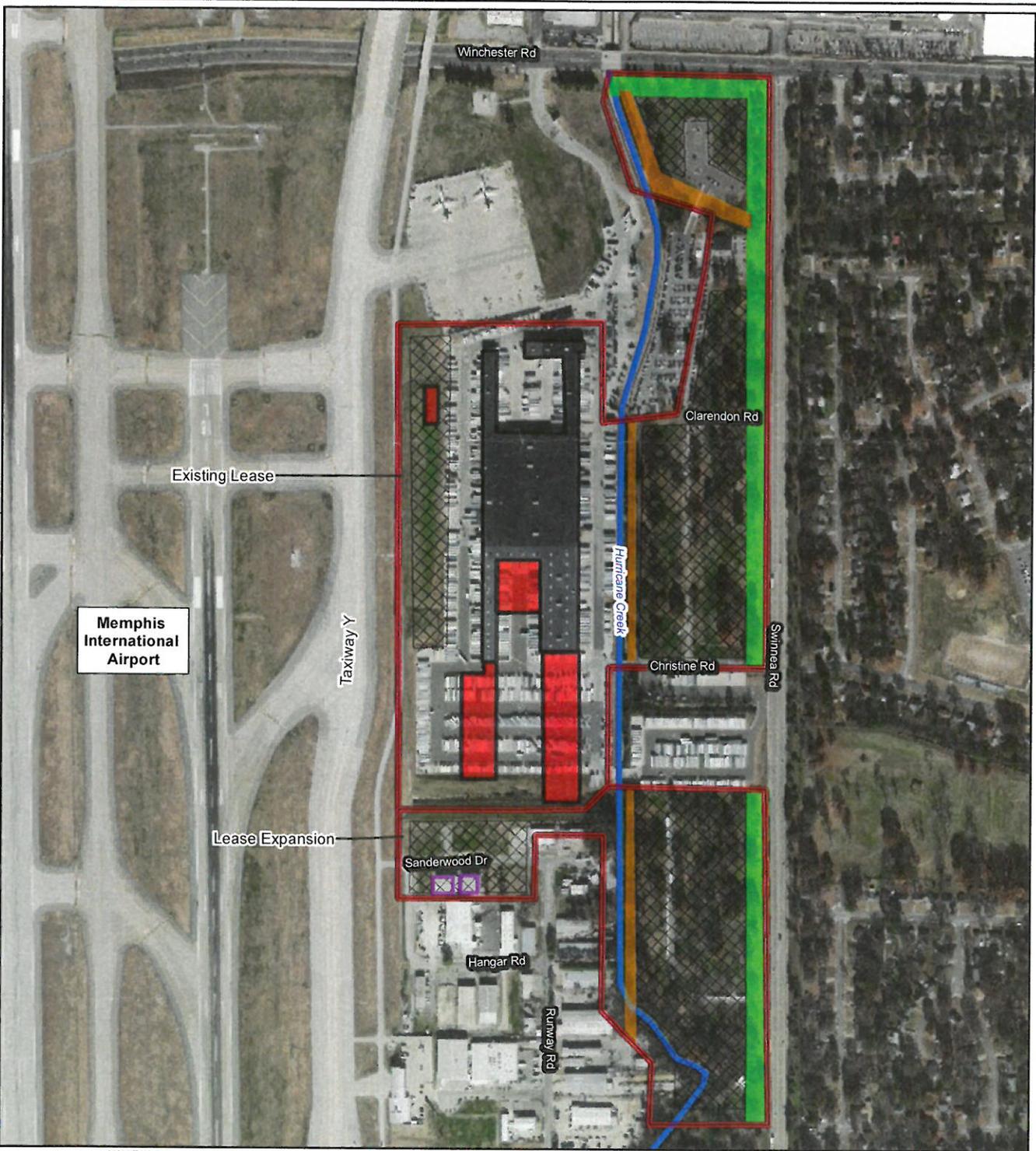
**Legend**  
 Project Area

Map Date: 6/10/2019  
 Source: ESRI, 2016



**Figure 1**  
**Project Location**  
 UPS - Oakhaven Hub  
 Facility Expansion  
 Memphis, Tennessee

\\loveton\GIS\GISData\Commercial\Southeast\Tennessee\UPS - Oakhaven\MXD\Figure 2 - Site Location\_Port.mxd kschipman



**Memphis International Airport**

VICINITY MAP



- Legend**
- Project Area
  - Parking Area
  - Building Addition
  - Demo Area
  - Existing UPS-Oakhaven Distribution Center
  - Vegetated Landscape Buffer
  - Riparian Buffer
  - Stream

**Figure 2**  
Proposed UPS - Oakhaven Hub  
Facility Expansion Project  
Memphis, Tennessee

Map Date: 6/10/2019  
Source: ESRI 2016



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From: Harrison, Sarah <[sarah\\_harrison@fws.gov](mailto:sarah_harrison@fws.gov)>  
Date: June 20, 2019 at 3:03:27 PM EDT  
Subject: [EXTERNAL] 2019-CPA-0552 Memphis International Airport, UPS-Oakhaven Hub Facility Expansion, Shelby County  
To: WRIGHT JOHN W (DEN3JXW) <[johnwright@ups.com](mailto:johnwright@ups.com)>  
Cc: Robbie Sykes <[robbie\\_sykes@fws.gov](mailto:robbie_sykes@fws.gov)>

CAUTION! This email originated outside of the organization. Please do not open attachments or click links from an unknown or suspicious origin.

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Mr. Wright,

U.S. Fish and Wildlife Service (Service) personnel have reviewed the Memphis International Airport correspondence dated June 12, 2019, regarding the proposed expansion of the UPS-Oakhaven Hub Facility at the Memphis International Airport in Shelby County, Tennessee. The proposed project would expand the existing UPS facility to the south by leasing an additional 26 acres. UPS plans to expand existing buildings, demo two existing buildings and remove approximately 22 acres of vegetation to create additional container parking. Your correspondence requested information regarding potential impacts to federally threatened and endangered species. In response, the Service offers the following comments.

Information available to the Service does not indicate that federally threatened and endangered species or designated critical habitat occur within the impact area of this project, therefore the Service does not anticipate that any federally listed species would be impacted by the proposed action. Based on the best information available at this time, we believe that the requirements of the Fish and Wildlife Coordination Act and section 7 of the Endangered Species Act of 1973, as amended, are fulfilled. Obligations under section 7 of the Act must be reconsidered if (1) new information reveals impacts of the action that may affect listed species or critical habitat in a manner not previously considered, (2) the action is subsequently modified to include activities which were not considered during this consultation, or (3) new species are listed or critical habitat designated that might be affected by the action.

Please feel free to contact me if you have any questions or concerns regarding this information.

Sincerely,

Sarah Harrison

--

Sarah Harrison

Fish & Wildlife Biologist

USFWS Tennessee Field Office

446 Neal Street

Cookeville, TN 38501

Phone: 931-528-6481 ext. 222

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

From: Whitehead, Josh [<mailto:Josh.Whitehead@memphistn.gov>]  
Sent: Friday, June 14, 2019 12:10 PM  
To: WRIGHT JOHN W (DEN3JXW) <[johnwright@ups.com](mailto:johnwright@ups.com)>  
Cc: Saliba, Norman <[Norman.Saliba@memphistn.gov](mailto:Norman.Saliba@memphistn.gov)>  
Subject: [EXTERNAL] FW: scanned on a bizhub from novatech.

CAUTION! This email originated outside of the organization. Please do not open attachments or click links from an unknown or suspicious origin.

=====  
John:

I rec'd the attached letter in the mail; my only comment is that this proposal may require a zoning entitlement(s), which would be processed by my dept. I believe my colleague Chip Saliba, copied here, has been in communication with agents of yours with regard to this process.

Thank you,

Josh Whitehead, AICP  
Planning Director/Administrator  
Memphis and Shelby County  
Office of Planning and Development  
City Hall, 125 N. Main St., Ste. 476  
Memphis, TN 38103  
p: (901)636-6601; f: (901)636-6603  
Visit our website.

-----Original Message-----

From: [copier@memphistn.gov](mailto:copier@memphistn.gov) [<mailto:copier@memphistn.gov>]  
Sent: Friday, June 14, 2019 11:09 AM  
To: Whitehead, Josh <[Josh.Whitehead@memphistn.gov](mailto:Josh.Whitehead@memphistn.gov)>  
Subject: scanned on a bizhub from novatech.

this document was scanned on a konica minolta bizhub from novatech! please do not reply to this address.

From: Leland Hares <[Leland.Hares@tn.gov](mailto:Leland.Hares@tn.gov)>  
Date: June 21, 2019 at 10:35:16 AM EDT  
Subject: [EXTERNAL] Oakhaven Hub Expansion Project  
To: WRIGHT JOHN W (DEN3JXW) <[johnwright@ups.com](mailto:johnwright@ups.com)>

CAUTION! This email originated outside of the organization. Please do not open attachments or click links from an unknown or suspicious origin.

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Mr. Wright: At the request of Mr. Herb Nicholson I am responding to the letter from Mr. James Hay with the Memphis Shelby County Airport Authority. After checking our records we have no issues or concerns with the proposed expansion.

[[cid:image005.png@01D0ACF8.2E087F00](#)]

Leland Hares, P.G.

Geologist

TDEC/Division of Solid Waste Management

Memphis Field Office

8383 Wolf Lake Drive

Bartlett, TN 38133

901-371-3013

Leland.hares@tn.gov <<mailto:Leland.hares@tn.gov>>

We value your feedback! Please complete our customer satisfaction survey <[https://nam05.safelinks.protection.outlook.com/?url=https%3A%2F%2Fstateoftennessee.formstack.com%2Fforms%2Ftdec\\_customer\\_svs&data=02%7C01%7Ctlayfield%40eaest.com%7Cf7a2e54414a84fae506308d6f65faf64%7C037230a09aa24474a7fd1ffe5d8e4bfc%7C0%7C0%7C636967288169151811&reserved=0](https://nam05.safelinks.protection.outlook.com/?url=https%3A%2F%2Fstateoftennessee.formstack.com%2Fforms%2Ftdec_customer_svs&data=02%7C01%7Ctlayfield%40eaest.com%7Cf7a2e54414a84fae506308d6f65faf64%7C037230a09aa24474a7fd1ffe5d8e4bfc%7C0%7C0%7C636967288169151811&reserved=0)>



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**MEMPHIS ENVIRONMENTAL FIELD OFFICE**  
8383 WOLF LAKE DRIVE  
BARTLETT, TN 38133-4119  
PHONE (901) 371-3000 STATEWIDE 1-888-891-8332 FAX (901) 371-3170

June 27, 2019

Mr. John Wright  
UPS Project Manager  
3675 Swinnea Road  
Memphis, Tennessee 38118

RE: Environmental Inquiry- UPS-Oakhaven Hub Facility Expansion Project at Memphis International Airport

Dear Mr. Wright:

The Division of Underground Storage Tanks (Division) has reviewed the June 12, 2019 environmental inquiry for the referenced location. A review of our records indicates that there is a former underground storage tank site within the designated area relative to the Division. The site is the former Anglin Drywall, Inc., 2811 Sanderwood Drive, Memphis, Tennessee 38118, facility ID 9-790038.

If you have any questions about this letter, please do not hesitate to contact me at (901) 371-3032.

Tell us how we're doing! Please take 5-10 minutes to complete our customer survey form at <https://www.tn.gov/environment/about-tdec/contact-tdec-customer-service-form.html>

Sincerely,

A handwritten signature in blue ink that reads "R. Jeff Phillips".

R. Jeff Phillips

Division of Underground Storage Tanks

C: Memphis Field Office file  
Mr. James Hay, Director of Development, Memphis-Shelby County Airport Authority,  
2491 Winchester Road, Suite 113, Memphis, Tennessee 38116



LEE HARRIS  
MAYOR

# SHELBY COUNTY HEALTH DEPARTMENT

ALISA R. HAUSHALTER, DNP, RN, PHNA-BC  
DIRECTOR

BRUCE RANDOLPH, MD, MPH  
HEALTH OFFICER



**Public Health**  
Prevent. Promote. Protect.

July 12, 2019

John Wright  
UPS Project Manager  
3675 Swinnea Road  
Memphis TN 38118

RE: UPS-Oakhaven Hub Facility Expansion Project at the Memphis International Airport

The Pollution Control Section of the Shelby County Health Department is the enforcement authority for federal, state and local regulations regarding air quality within Shelby County. Currently, Shelby County is in attainment for all National Ambient Air Quality Standards (NAAQS). Shelby County is a Maintenance Area for the 2008 ozone NAAQS.

The Department has reviewed the information provided in your letter of June 12, 2019. It is clear there will be no direct or indirect emissions associated with the project approaching the de minimus levels identified at 40 CFR 93 §153 which would require a formal conformity determination. Further, it appears this project does not include any stationary sources of air emissions that would need to receive a minor source permit from this office prior to the project beginning.

Please note there is a local general duty clause to take reasonable measures to minimize fugitive dust during construction activities. Also, this office enforces the asbestos NESHAP regulations regarding demolition activities, so please check with the office prior to beginning any building demolition project.

If you need further information regarding this matter, please contact my office at (901)222-9599.

Sincerely,

Robert Rogers, P.E.  
Manager, Pollution Control

## Mission

*To promote, protect and improve the health and environment of all Shelby County residents.*

---

814 Jefferson Avenue ♦ Memphis, TN 38105 ♦ 901 222-9000 ♦ [www.shelbytnhealth.com](http://www.shelbytnhealth.com)



**TENNESSEE HISTORICAL COMMISSION**  
**STATE HISTORIC PRESERVATION OFFICE**  
2941 LEBANON PIKE  
NASHVILLE, TENNESSEE 37243-0442  
OFFICE: (615) 532-1550  
[www.tnhistoricalcommission.org](http://www.tnhistoricalcommission.org)

June 25, 2019

Mr. James Hay  
Memphis-Shelby County Airport Authority  
2491 Winchester Road, Suite 113  
Memphis, TN 38116-3856

RE: FAA / Federal Aviation Administration, UPS-Oakhaven Hub Facility Expansion Project at the Memphis International Airport, Memphis, Shelby County, TN

Dear Mr. Hay:

In response to your request, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings. The Advisory Council on Historic Preservation has codified procedures for carrying out Section 106 review in 36 CFR 800 (Federal Register, December 12, 2000, 77698-77739).

After considering the documentation submitted, it is our opinion that there are no National Register of Historic Places listed or eligible properties affected by this undertaking. We have made this determination because either: no National Register listed or eligible Historic Properties exist within the undertaking's area of potential effects, the specific location, size, scope and/or nature of the undertaking and its area of potential effects precluded affects to Historic Properties, the undertaking will not alter any characteristics of an identified eligible or listed Historic Property that qualify the property for listing in the National Register, or it will not alter an eligible Historic Property's location, setting or use. We have no objections to your proceeding with your undertaking.

If your agency proposes any modifications in current project plans or discovers any archaeological remains during the ground disturbance or construction phase, please contact this office to determine what further action, if any, will be necessary to comply with Section 106 of the National Historic Preservation Act. If you are applying for federal funds, license or permit, you should submit this letter as evidence of consultation under Section 106 to the appropriate federal agency, which, in turn, should contact us as required by 36 CFR 800. If you represent a federal agency, you should submit a formal determination of eligibility and effect to us for comment. You may direct questions or comments to Casey Lee (615) 253-3163.

Sincerely,

E. Patrick McIntyre, Jr.  
Executive Director and  
State Historic Preservation Officer

EPM/cjl



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

July 8, 2019

Mr. John Wright  
UPS Project Manager  
3675 Swinnea Road  
Memphis, TN 38118

re: Memphis International Airport – UPS Oak Haven Hub Expansion – Revised Comments  
Shelby County, TN

Dear Mr. Wright:

Staff within the Division of Water Resources have reviewed the UPS expansion project for the Memphis International Airport. We are in agreement that there will be no significant environmental impact related to this project. The proposed project will consist expanding existing buildings, demolishing two buildings and the removal of 22 acres of vegetation. The project will require a construction stormwater permit (CGP) as it will result in the disturbance of well more than one acre of total land area. Division staff have confirmed that Hurricane Creek is a concrete lined channel through the project area such that a hydrologic determination performed by a certified hydrologic professional will not be required. It does appear that an Aquatic Resources Alteration Permit (ARAP) will be required for the alteration to a tributary of Hurricane Creek.

Also, FYI, even though Hurricane is concrete, an arap would be required to alter it as well.

If you have any further questions, I will be glad to try to assist you. You may reach me at (615) 532-0170 or [tom.moss@tn.gov](mailto:tom.moss@tn.gov).

Sincerely,

Thomas A. Moss  
Environmental Review Coordinator  
Compliance and Enforcement Unit

cc: Joellyn Brazile, Manager, DWR Memphis Environmental Field Office

From: Rob Todd <[Rob.Todd@tn.gov](mailto:Rob.Todd@tn.gov)>

Date: July 17, 2019 at 12:40:23 PM EDT

Subject: [EXTERNAL] UPS-Oakhaven Hub Facility Expansion Project at the Memphis International Airport

To: WRIGHT JOHN W (DEN3JXW) <[johnwright@ups.com](mailto:johnwright@ups.com)>

CAUTION! This email originated outside of the organization. Please do not open attachments or click links from an unknown or suspicious origin.

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Mr. Wright:

Your environmental review request was referred to me since I handle all environmental reviews for the Tennessee Wildlife Resources Agency. We have reviewed the information that you provided regarding the UPS-Oakhaven Hub Facility Expansion Project at the Memphis International Airport and provides the following comments. It is our understanding that the proposed project includes the removal of 22 acres of vegetation to create additional shipping trailer and employee parking on the existing UPS leased site. Since the project will require the clearing of trees and since we share authority with the U.S. Fish and Wildlife Service on the Indiana Myotis (*Myotis sodalist*) and the Northern Long-eared Bat (*Myotis septentrionalis*), we request that you consult with the USFWS Cookeville, Tennessee Field Office regarding potential impacts to these listed species; and will defer to the opinion of the U.S. Fish and Wildlife Service's Cookeville Field Office regarding potential impacts to the state and federally endangered bats due to the proposed project. Otherwise, we do not anticipate adverse impacts to state listed species under our authority due to the proposed construction.

Thank you for the opportunity to review and comment on this proposed project. If I may be of further assistance, please contact me.

Robert Todd  
Fish & Wildlife Environmentalist  
Tennessee Wildlife Resources Agency  
Ellington Agricultural Center  
5107 Edmondson Pike  
Nashville, TN 37211  
Office: 615-781-6572  
Cell: 931-881-8240  
Fax: 615-781-6667  
Email: [rob.todd@tn.gov](mailto:rob.todd@tn.gov)<<mailto:rob.todd@tn.gov>>  
[TWRA Logo]



**DEPARTMENT OF THE ARMY**  
**MEMPHIS DISTRICT CORPS OF ENGINEERS**  
167 NORTH MAIN STREET B-202  
MEMPHIS, TENNESSEE 38103-1894

July 12, 2019

Ms. Jennifer Morrison  
Brophy-Heineke & Associates, Inc.  
2978 Shelby Street  
Bartlett, Tennessee 38134

Dear Ms. Morrison:

This is in response to your correspondence in which you requested an approved jurisdictional determination (AJD), on behalf of United Parcel Service (UPS), of a concrete-lined drainage channel associated with the Oakhaven Distribution Facility Expansion Project. The property is located within the boundaries of the Memphis International Airport in Shelby County, Tennessee, as shown on the enclosed map. Based on the information submitted to our office and a site visit conducted by Ben Pitcock and Mitch Elcan of my staff on May 23, 2019, it is our AJD that the drainage channel located on the property is not considered waters of the United States; therefore, a Section 404 permit is not required to conduct the proposed project on the subject parcel of property.

The basis for our AJD is available on our website at the following address: <http://www.mvm.usace.army.mil/About/Offices/Regulatory/JurisdictionalDeterminations.aspx>. This AJD is valid for five years from the date of this letter, unless new information warrants revision of the determination before the expiration date or the District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.

This letter contains an approved jurisdictional determination for your subject site. If you object to this determination, you may request an administrative appeal under Corps of Engineers regulations at 33 CFR Part 331. Enclosed you will find a Notification of Appeal Process and Process and Request for Appeal (RFA) form. If you request to appeal this determination you must submit a completed RFA form to the Mississippi Valley Division at the following address:

Appeals Review Officer  
Mississippi Valley Division  
P.O. Box 80  
Vicksburg, Mississippi 39181-0080

In order for an RFA to be accepted by the Corps of Engineers, the Corps of Engineers must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5 and that it has been received by the division office within 60 days of the date of the

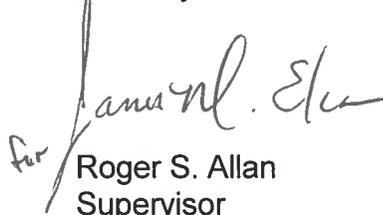
RFA. It is not necessary to submit an RFA form to the division office if you do not object to the determination in this letter.

This determination has been conducted to identify the limits of the Corps of Engineer's Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985. If you or your tenant are United States Department of Agriculture (USDA) program participants, or anticipate participation in the USDA program, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service, prior to starting work.

The Memphis District Regulatory Branch is committed to providing quality and timely service to our customers. In an effort to improve customer service, we invite you to complete a Customer Service Survey found at [http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey). Your comments, positive or negative, will not affect any current or future dealings with the Corps of Engineers.

If you have any questions, please contact Ben Pitcock at (901) 544-3468 and refer to File No. MVM-2019-143.

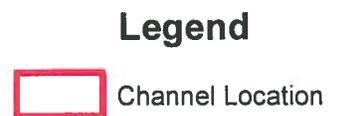
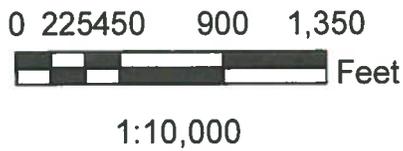
Sincerely,

A handwritten signature in black ink, appearing to read "Roger S. Allan". The signature is written in a cursive style with a large initial "R".

Roger S. Allan  
Supervisor  
Regulatory Branch

Enclosures

# UPS Oakhaven Distribution Facility Expansion Channel Location Map



## NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL

Applicant: United Parcel Service		File Number: MVM-2019-143	Date: 7/12/2019
Attached is:			See Section below
	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)		A
	PROFFERED PERMIT (Standard Permit or Letter of permission)		B
	PERMIT DENIAL		C
X	APPROVED JURISDICTIONAL DETERMINATION		D
	PRELIMINARY JURISDICTIONAL DETERMINATION		E

**SECTION I -** The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at [http://www.usace.army.mil/cecw/pages/reg\\_materials.aspx](http://www.usace.army.mil/cecw/pages/reg_materials.aspx) or Corps regulations at 33 CFR Part 331.

**A: INITIAL PROFFERED PERMIT:** You may accept or object to the permit.

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **OBJECT:** If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

**B: PROFFERED PERMIT:** You may accept or appeal the permit

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **APPEAL:** If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

**C: PERMIT DENIAL:** You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

**D: APPROVED JURISDICTIONAL DETERMINATION:** You may accept or appeal the approved JD or provide new information.

- **ACCEPT:** You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- **APPEAL:** If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

**E: PRELIMINARY JURISDICTIONAL DETERMINATION:** You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

**SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT**

**REASONS FOR APPEAL OR OBJECTIONS:** (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

**ADDITIONAL INFORMATION:** The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

**POINT OF CONTACT FOR QUESTIONS OR INFORMATION:**

If you have questions regarding this decision and/or the appeal process you may contact: Gregg Williams  
USACE – Memphis District  
Regulatory Branch  
167 North Main Street B-202  
Memphis, Tennessee 38103-1894  
(901) 544-0736

If you only have questions regarding the appeal process you may also contact: Administrative Appeals Review Officer  
USACE – Mississippi Valley Division  
P.O. Box 80  
Vicksburg, MS 39181-0080  
(601) 634-5820

**RIGHT OF ENTRY:** Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

<hr/> Signature of appellant or agent.	Date:	Telephone number:
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**DEPARTMENT OF THE ARMY**  
MEMPHIS DISTRICT CORPS OF ENGINEERS  
167 NORTH MAIN STREET B-202  
MEMPHIS, TENNESSEE 38103-1894

June 27, 2019

Mr. John Wright  
UPS Project Manager  
3675 Swinnea Road  
Memphis, Tennessee 38118

Dear Mr. Wright:

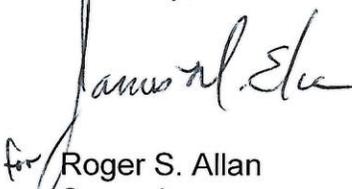
In response to your request for comment regarding the proposed United Parcel Service expansion located at the Memphis International Airport in Memphis, Shelby County, Tennessee.

The Corps of Engineers has been in contact with Jennifer Morrison of Brophy-Heineke & Associates, Inc. regarding a request for a jurisdictional determination for the proposed project site. The Memphis District Regulatory Branch will continue to work with Ms. Morrison to ensure these requests are handled in a timely manner.

The Memphis District Regulatory Branch is committed to providing quality and timely service to our customers. In an effort to improve customer service, we invite you to complete a Customer Service Survey found at [http://corpsmapu.usace.army.mil/cm\\_apex/f?p=regulatory\\_survey](http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey). Your comments, positive or negative, will not affect any current or future dealings with the Corps of Engineers.

If you have questions, please contact Ben Pitcock at (901) 544-3468 and refer to File No. MVM-2019-143.

Sincerely,

  
for Roger S. Allan  
Supervisor  
Regulatory Branch

Enclosures