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Project Number: 2017-7

**ECONOMIC DEVELOPMENT GRANT FOR THE
IMPROVEMENT OF A DILAPIDATED INDUSTRIAL PARK
ENVIRONMENTAL ASSESSMENT AND
FINDING OF NO SIGNIFICANT IMPACT
Unicoi County, Tennessee**

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Proposed Action/Purpose and Need for Action

The Tennessee Valley Authority (TVA) proposes to provide a grant to the Unicoi County Economic Development Board (UCEDB) for the improvement of a dilapidated industrial park, the site of the former Morgan Insulation facility, in Unicoi County, Tennessee (Figure 1). The proposed activities include removal of damaged buildings and associated foundations, properly disposing of all solid and hazardous waste, backfilling and reseeding the cleared areas as appropriate, and repairing site signage.

An integral part of TVA's mission is to promote the economic development of the TVA service area. TVA provides financial assistance to help bring to market new improved sites and facilities within the TVA service area and position communities to compete successfully for new jobs. While future prospects for the site are not known at this time, the primary purpose of this project is to enhance the marketability and facilitate the development of the industrial property.

Decision to be Made

The decision before TVA is whether to provide funding to the UCEDB for the improvement of the dilapidated industrial park on approximately 16 acres. Providing such funding would be consistent with TVA's economic development mission as funding would facilitate the development of the industrial park.

Site Description

The Morgan Insulation property is located on an approximate 16-acre tract of industrial zoned land off of Interstate 26 along the northeastern side of Jonesboro Road. The property is primarily situated in a commercial area; however, 7 acres located in the northeastern half of the property is undeveloped. The project area for the proposed demolition activities is the approximate 9 acres where the buildings are located (Figure 2). The project area contains a large warehouse/manufacturing building with several attached lean-to structures, one metal outbuilding, a storage shed, a guard shack and an office trailer. The project area also contains a large bulk storage tower/silo used for glass and ceramic manufacturing materials. The buildings are metal manufacturing buildings that were constructed circa 1966, with renovations/additions made to those structures in 1972, 1985, 1993 and 1995. Upon closure of the Morgan Insulation facility in 2011, the buildings were subject to metal theft, which left the buildings with structural stability issues, open roof conditions, and water and electrical damage. The project area also lies across the road from a vacant CSX Railroad Terminal and adjacent to the railroad.

Economic Development – Unicoi County Industrial Park Improvement

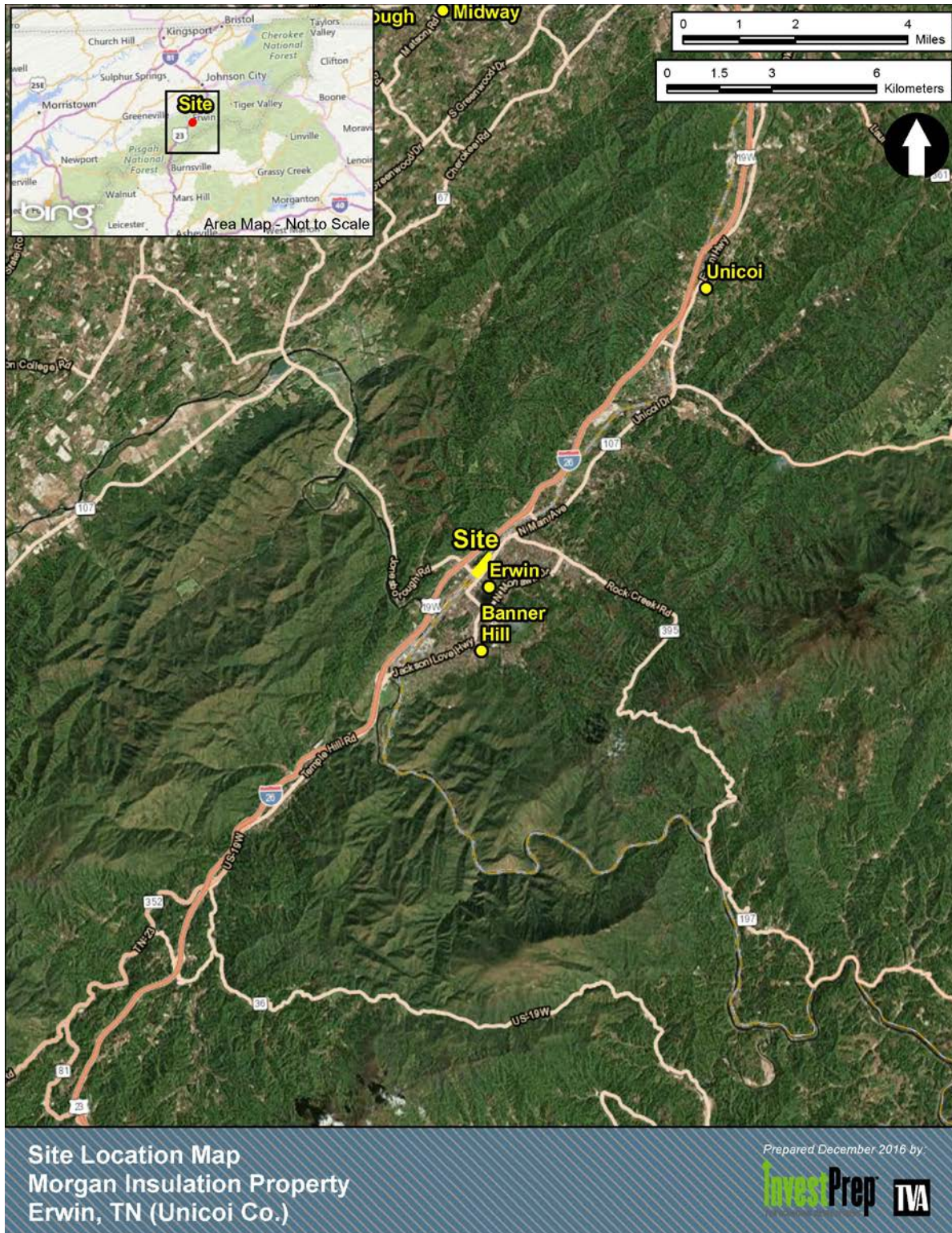


Figure 1 Proposed Project Location Map



Figure 2 Proposed Project Area

Environmental Impacts

TVA has reviewed the proposed project and documented potential environmental impacts related to the project in the attached categorical exclusion checklist (Checklist) (Attachment A). The Checklist identifies the resources present in the project area and documents TVA's determination that the proposal would not significantly affect these resources. Alternatively, TVA reviewed the potential environmental impacts of taking no action. If TVA did not award a grant to Unicoi County, the Morgan Insulation Property would remain in its current condition, and no project related impacts would occur to the resources identified herein. If the UCEDB were to obtain alternate funding and proceed with its current plans to demolish the industrial park, the overall environmental consequences would be similar to those expected from implementing the proposed action.

The proposed project would not involve activities within the 100-year floodplain, and therefore is consistent with Executive Order 11988 (Protection of Floodplains). There would also be no impacts to prime farmland or natural areas as the proposed demolition activities would occur at an industrial site. As stated in the Checklist, implementation of the proposed action could result in minor impacts on aquatic resources, threatened and endangered species (vegetation and aquatic species), and vegetation.

A Phase I Environmental Site Assessment indicated that two catch basins are on the southwestern half of the property for capturing storm water runoff (Tysinger, Hampton & Partners, Inc. 2013). A stream was observed in the northeastern portion of the property; however, it is not within the proposed project area. The Site Assessment also indicated that there are no wetlands on the property; therefore, no wetland impacts are anticipated under the proposed action. Since demolition activities would disturb more than one acre, a construction stormwater permit would be required from Tennessee Department of Environment & Conservation (TDEC). Standard construction best management practices (BMPs), such as erosion control measures, would also be implemented during demolition activities to help reduce surface water quality and aquatic resource impacts. Temporary impacts associated with demolition and erosion would be eventually eliminated as impacted areas are revegetated or otherwise stabilized. All demolition debris would be managed in accordance with all local, state, and federal requirements.

Site demolition would generate some temporary, short-term noise. The property is located in a commercial area and has previously been an operating light industry facility. Therefore, no significant impacts from noise are likely under the implementation of the proposed project. Demolition activities would also generate solid waste materials that would be properly disposed of per state and federal guidelines. Therefore, there would be temporary minor direct, indirect and cumulative solid waste impacts as a result of the proposed action.

As documented in the Checklist, the proposed action could potentially impact terrestrial ecology (Wildlife, threatened and endangered species), hazardous waste, archaeological and historical resources, and air quality. Impacts to these resources were evaluated in further detail. The results of those additional analyses, and TVA's determination that the proposed action would not significantly affect these resources, are summarized in this Environmental Assessment and Finding of No Significant Impact.

Air Quality

Through its passage of the Clean Air Act (CAA), Congress has mandated the protection and enhancement of our nation's air quality resources. National Ambient Air Quality Standards (NAAQS; USEPA 2015) have been established for the following criteria pollutants to protect the public health and welfare:

- sulfur dioxide (SO₂),
- ozone (O₃),
- nitrogen dioxide (NO₂),
- particulate matter whose particles are ≤ 10 micrometers (PM₁₀),
- particulate matter whose particles are ≤ 2.5 micrometers (PM_{2.5}),
- carbon monoxide (CO), and
- lead (Pb).

The primary NAAQS were promulgated to protect the public health, and the secondary NAAQS were promulgated to protect the public welfare from any known or anticipated adverse effects associated with the presence of pollutants in the ambient air (e.g., visibility, crops, forests, soils and materials). A listing of the NAAQS is presented in Table 1.

Ambient air monitors measure concentrations of these pollutants to determine attainment with these standards. Areas in violation of the NAAQS are designated as nonattainment areas and must develop plans to improve air quality and achieve the NAAQS. Unicoi County, Tennessee is currently in attainment with the NAAQS for all criteria air pollutants (USEPA 2017).

Table 1. National Ambient Air Quality Standards

Pollutant	Primary / Secondary	Averaging Time	Level	Form
Carbon Monoxide (CO)	primary	8 hours	9 ppm	Not to be exceeded more than once per year
		1 hour	35 ppm	
Lead (Pb)	primary and secondary	Rolling 3 month average	0.15 µg/m ³ [1]	Not to be exceeded
Nitrogen Dioxide (NO ₂)	primary	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	primary and secondary	Annual	53 ppb [2]	Annual Mean
Ozone (O ₃)	primary and secondary	8 hours	0.070 ppm [3]	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particulate Matter (PM _{2.5})	primary	Annual	12.0 µg/m ³	annual mean, averaged over 3 years
	secondary	Annual	15.0 µg/m ³	annual mean, averaged over 3 years
	primary and secondary	24-hours	35 µg/m ³	98th percentile, averaged over 3 years
Particulate Matter (PM ₁₀)	primary and secondary	24-hours	150 µg/m ³	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO ₂)	primary	1-hour	75 ppb [4]	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	secondary	3-hours	0.5 ppm	Not to be exceeded more than once per year

Source: USEPA 2015

Notes:

1 In areas designated nonattainment for the Pb standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards (1.5 µg/m³ as a calendar quarter average) also remain in effect.

- 2 The level of the annual NO₂ standard is 0.053 ppm. It is shown here in terms of ppb for the purposes of clearer comparison to the 1-hour standard level.
- 3 Final rule signed October 1, 2015, and effective December 28, 2015. The previous (2008) O₃ standards additionally remain in effect in some areas. Revocation of the previous (2008) O₃ standards and transitioning to the current (2015) standards will be addressed in the implementation rule for the current standards.
- 4 The previous SO₂ standards (0.14 ppm 24-hour and 0.03 ppm annual) will additionally remain in effect in certain areas: (1) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards, and (2) any area for which implementation plans providing for attainment of the current (2010) standard have not been submitted and approved and which is designated nonattainment under the previous SO₂ standards or is not meeting the requirements of a SIP call under the previous SO₂ standards (40 CFR 50.4(3)). A SIP call is an USEPA action requiring a state to resubmit all or part of its State Implementation Plan to demonstrate attainment of the require NAAQS.

There would be transient air pollutant emissions during the demolition of the dilapidated buildings located within the project area. Air quality impacts from construction activities would be temporary and dependent on both man-made factors (e.g., intensity of activity, control measures) and natural factors (e.g., wind speed, wind direction, soil moisture). Even under unusually adverse conditions, these emissions would have, at most, minor, temporary direct, indirect and cumulative on- and off-site air quality impacts and would not cause exceedance of the applicable NAAQS.

Terrestrial Ecology (Wildlife)

Approximately 9 acres of the project footprint is covered in structures and cleared land covered in loose gravel common in industrial areas. An additional five acres of the property are early successional fields and about 1 acre of the property is a wooded tree line. Wildlife habitats on the property include narrow tree lines, early successional herbaceous fields, grass lawns, and some landscaping shrubs and trees. The buildings themselves may also provide habitat for wildlife. Species likely to use this highly disturbed site are predominantly common terrestrial animal species, and most would be habituated to human activity.

Any wildlife found in the early successional field habitat forested areas, or abandoned buildings would be permanently displaced when structures and landscaped vegetation is removed and replaced. Direct effects of structure and vegetation removal within the project area may occur to some individuals that may be immobile during the time of project activities (i.e. juvenile animals or eggs). This could be the case if project activities took place during breeding/nesting seasons. However, the actions are not likely to affect populations of species common to the area, as similar forested and urban habitat exists in the surrounding landscape.

Project associated disturbances and habitat removal likely would force wildlife to move into surrounding areas in an attempt to find new food sources, shelter, and to reestablish territories. In the event that the surrounding areas are already overpopulated, further stress to wildlife populations could occur to those species presently utilizing these areas as well as those attempting to relocate. However, the proposed project area and surrounding landscape is highly fragmented and influenced by human activity. It includes fragmented forests, residential homes from the town of Erwin, industrial buildings, highways, and county roads. It is unlikely that the species currently occupying habitat surrounding the project footprint would be negatively impacted by the influx of new residents.

A February 2017 review of the TVA Regional Natural Heritage database indicated there are 12 caves within 3 miles of the project footprint. The closest cave is 0.3 mile from the project footprint. The proposed actions would have no effect on the listed caves in the area.

Nineteen migratory birds of conservation concern have been identified by the US Fish and Wildlife Service (USFWS) as potentially being impacted by the proposed actions. Bald eagle, black-billed

cuckoo, blue-winged warbler, Canada warbler, fox sparrow, golden-winged warbler, Kentucky Warbler, Loggerhead Shrike, Louisiana waterthrush, olive-sided flycatcher, peregrine falcon, prairie warbler, red crossbill, red-headed woodpecker, rusty blackbird, short-eared owl, wood thrush, worm-eating warbler, and yellow-bellied sapsucker all have the potential to occur in this region. The project area may offer a small amount of poor quality habitat for loggerhead shrike, prairie warbler, short-eared owl, and yellow-bellied sapsucker. Based on the low quality of the habitat, the small amount of that habitat, the substantial disturbance in this area that has already occurred due to previous activities on-site, and the active railroad tracks and paved roads surrounding the project footprint, none these species are likely to use the action area. Migratory bird populations are not likely to be impacted by the proposed actions.

Threatened and Endangered Species

A review of the TVA Regional Heritage database on February 13, 2017, resulted in three state-listed species (Allegheny woodrat, common raven and peregrine falcon), and one federally listed species (northern long-eared bat) within three miles of the project area. One additional federally listed species (gray bat) is known from Unicoi County, Tennessee. In addition, the USFWS has determined that the federally listed Carolina northern flying squirrel and Indiana bat have the potential to occur throughout Unicoi County, Tennessee, though no records are known from this County (Table 2).

Table 2 Federal and State-Listed Terrestrial Animal Species located within Unicoi County, Tennessee and other species of conservation concern documented within three miles of the Project Area¹

Common Name	Scientific Name	Federal Status ²	State Status ² (Rank ³)
Birds			
Common raven	<i>Corvus corax</i>	--	T(S2)
Peregrine falcon	<i>Falco peregrinus</i>	PS:LE	E(S1B)
Mammals			
Allegheny woodrat	<i>Neotoma magister</i>	--	D(S3)
Carolina northern Flying Squirrel ⁵	<i>Glaucomys sabrinus coloratus</i>	LE	E(S1)
Gray bat ⁴	<i>Myotis grisescens</i>	LE	T(S2)
Northern long-eared bat ⁴	<i>Myotis septentrionalis</i>	LT	E(S3)
Indiana bat ⁵	<i>Myotis sodalis</i>	LE	E(S1S2)

¹ Source: TVA Regional Natural Heritage Database 2/13/2017; USFWS Information for Planning and Conservation (<http://ecos.fws.gov/ipac/>), accessed 2/13/2017.

² Status Codes: E = Endangered; LE = Listed Endangered; LT = Listed Threatened; PS = Partial Status; T = Threatened.

³ State Ranks: S1 = Critically Imperiled; S2 = Imperiled, S3 = Vulnerable.

⁴ Federally listed species known from Unicoi County, Tennessee, but not within three miles of the project action area.

⁵ Federally listed species that the USFWS has determined that has the potential to exist county-wide, though no records are currently known from Unicoi County, Tennessee.

In Tennessee the common raven is known only from the mountains of eastern Tennessee. The few nests observed in this region have all been on cliffs or narrow ledges, typically with overhanging rocks (Nicholson 1997). One nesting record of this species exists approximately 1.6 miles from the project area. No common ravens or suitable habitat for this species was observed within the project action area during a March 8, 2017 field survey. Therefore, the common raven would not be impacted by the proposed actions.

Peregrine falcons typically nest on inaccessible rocky cliff ledges with protective overhangs or man-made structures such as ledges of city buildings (Nicholson 1997, Natureserve 2015). One historical nesting record of this species occurs approximately 1.6 miles from the project area. No peregrine falcons or suitable habitat for this species was observed within the project action area during a field survey on March 8, 2017. The proposed action would not impact peregrine falcon.

Allegheny woodrats are found on rocky cliffs or tallus slopes. They can also be found in abandoned quarries, mines, and occasionally abandoned buildings, but generally avoids humans (Natureserve 2015). No Allegheny woodrats were observed during field and building surveys on March 8, 2017. Allegheny woodrat would not be impacted by the proposed actions.

Carolina northern flying squirrels inhabit coniferous and mixed forests with an abundance of standing and down snags where they occupy cavities, underground burrows and leaf nests. Habitat for this species is restricted to high elevation mountains of the Appalachians (between 4,000 and 5,000 feet), concentrated along the North Carolina/Tennessee border (Austin et al 1990). No records of this species are known from Unicoi County. No Carolina northern flying squirrels or suitable habitat for this species was observed within the project action area during a field survey on March 8, 2017. The proposed building demolitions would not affect Carolina northern flying squirrel.

Gray bat inhabits caves throughout the year, migrating among different caves across seasons (Brady et al. 1982, Tuttle 1976). During summer, bats disperse from colonies at dusk to forage for insects over streams, rivers and reservoirs (Harvey 1992). One mist net record of a gray bat exists approximately 3.5 miles from the project area.

Indiana bat hibernates in caves during winter and inhabits forest areas around these caves for swarming (mating) in the fall and staging in the spring, prior to migration to summer habitat. During summer, Indiana bats roost under exfoliating bark, and within cracks and crevices of trees, typically located in mature forests with an open understory and a nearby source of water. Indiana bats are known to change roost trees frequently throughout the season, yet still maintain site fidelity, returning to the same summer roosting areas in subsequent years (Pruitt and TeWinkel 2007, Kurta et al. 2002). Although Unicoi County is within the range of this species, no records of this species are known from this county. The proposed project area does not occur in any known summer or winter habitat for Indiana bat (USFWS 2015a).

The northern long-eared bat (NLEB) predominantly overwinters in large hibernacula such as caves, abandoned mines, and cave-like structures. During the fall and spring they utilize entrances of caves and the surrounding forested areas for swarming and staging. In the summer, NLEBs roost individually or in colonies beneath exfoliating bark or in crevices of both live and dead trees. Roost selection by NLEB is similar to Indiana bat; however, it is thought that NLEBs are more opportunistic in roost site selection. This species also is known to roost in abandoned buildings and under bridges. NLEBs emerge at dusk to forage below the canopy of mature forests on hillsides and roads, and occasionally over forest clearings and along riparian areas (USFWS 2014). The USFWS has determined that this species has the potential to occur in Unicoi County, Tennessee (USFWS 2014, 2015a, 2015b). The closest known record of NLEB is approximately 1.6 miles away from the Cherokee National Forest. The proposed project area does not occur in any known summer or winter habitat for northern long-eared bat (USFWS 2015a). As previously noted, no caves would be affected by the proposed actions. A small amount of foraging habitat and drinking water for all three bat species exists on the northeast border of the proposed project area over a small ephemeral stream. The small amount of forested habitat on the property does offer suitable summer roosting habitat for Indiana bat and NLEB. No vegetation removal would occur in the 7

acres of natural space on the northeastern portion of the parcel. All state and federal laws must be followed regarding impacts to this body of water. Any impacts to this stream are not likely to impact foraging bats due to the small amount of habitat and ephemeral nature of the stream.

Surveys of the buildings proposed for demolition were conducted on March 8, 2017. No bats or evidence of previous use by bats was observed in these buildings. These surveys suggest that at the moment any potential use of these buildings by bats would be limited to temporary roosting of individuals moving through the area. However, due to the accessibility and structure of the buildings, future use of this building by colonies of bats cannot be ignored. Therefore, TVA's grant to UCEB would include the following condition: If demolition of the structures is not completed by April 2018, UCEDB will have the buildings resurveyed for gray, Indiana and northern long-eared bats by a trained bat biologist to ensure that demolition activity does not affect those bats, or contact USFWS for further guidance prior to the demolition. With the implementation of this condition, TVA determined that the proposed actions would have no direct, indirect or cumulative impacts to gray bats, NLEBs or Indiana bats.

Hazardous Waste

A July 2016 survey indicated that asbestos containing material is present in the buildings proposed for demolition. Prior to demolition, a 10-day demolition notice would be required to be submitted to TDEC and other appropriate regulatory authorities. The UCEDB would also need to obtain an asbestos demolition or removal permit. BMPs would be implemented to control asbestos emissions. These include removing all asbestos-containing materials, adequately wetting all regulated asbestos containing materials, sealing the material in leak-tight containers and disposing of the asbestos containing waste material as expediently as practicable. These BMPs are designed to minimize the release of asbestos fibers during building demolition, waste packaging, transportation and disposal. With the implementation of the BMPs and 10-day demolition notice, any direct, indirect or cumulative effects related to hazardous waste associated with the proposed demolition activities are expected to be minor. Additional analysis of hazardous waste is described within the Checklist (Attachment A).

Archaeological and Historical Resources

TVA determined the archaeological Area of Potential Effects (APE) to be the existing footprint of the industrial facilities proposed for removal (Figure 2). The proposed actions would not involve any new construction and would not impact the viewshed of any standing historic structures or buildings. TVA completed a desktop review of the APE to determine if there would be an effect on any archaeological or architectural resources as a result of the proposed demolition. No documented archaeological sites are located within or adjacent to the proposed APE.

A review of the available historic topographical maps shows no structures within the APE between 1904 and 1966. The earliest structures were constructed in approximately 1966, with renovations/additions in 1972, 1985, 1993 and 1995. All of the existing structures within the APE are simple metal manufacturing buildings, and are not considered eligible for the National Register of Historic Places (NRHP), based on a lack of historic importance or architectural significance. Based on the lack of documented archaeological and architectural resources, and the extensive construction disturbances within the APE, TVA finds that the proposed actions would have no effect on historic properties eligible for, or listed, on the NRHP. In a letter dated March 20, 2017, the Tennessee State Historic Preservation Officer concurred with TVA's determination (Attachment B).

Pursuant to 36 CFR § 800.3(f)(2) of the regulations of the Advisory Council on Historic Preservation implementing the National Historic Preservation Act, TVA consulted with federally recognized Indian tribes regarding historic properties within the APE that may be of religious and cultural significance to the tribes. TVA received a comment from the Shawnee Tribe, which concurred with TVA's no effect determination (Attachment B).

Mitigation Measures

The UCEDB would be required to obtain a construction stormwater permit from TDEC. Due to the presence of asbestos material, a 10-day demolition notice would also be required to be submitted to TDEC prior to demolition of the proposed structures and an asbestos demolition or removal permit would also be obtained.

Due to potential future use of buildings by endangered bats prior to the demolition of those buildings, TVA's grant to UCEB would include the following condition:

- If demolition of the structures is not completed by April 2018, UCEDB will have the buildings resurveyed for gray, Indiana and Northern long-eared bats by a trained bat biologist to ensure that demolition activity does not affect those bats, or contact USFWS for further guidance prior to the demolition.

Conclusion and Findings

Based on the findings in this Environmental Assessment, we conclude that the proposed action to provide funding to the UCEDB for the improvement of the dilapidated industrial park would not be a major federal action significantly affecting the environment. Accordingly, an environmental impact statement is not required.



May 5, 2017

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Attachments

Attachment A - Categorical Exclusion Checklist for Proposed TVA Actions

Attachment B – Tennessee State Historic Preservation Officer and Federally Recognized Tribes Correspondence

Attachment A – Categorical Exclusion Checklist 36239

Categorical Exclusion Checklist for Proposed TVA Actions

Categorical Exclusion Number Claimed	Organization ID Number	Tracking Number (NEPA Administration Use Only) 36239
Form Preparer Dana M Vaughn	Project Initiator/Manager Billy L Adams	Business Unit ED - Economic Development
Project Title InvestPrep Grant Demolition of Dilapidated Industrial Park in Unicoi, TN		Hydrologic Unit Code
Description of Proposed Action (Include Anticipated Dates of Implementation) For Proposed Action See Attachments and References		<input type="checkbox"/> Continued on Page 3 (if more than one line)
Initiating TVA Facility or Office		TVA Business Units Involved in Project ED - Economic Development
Location (City, County, State) Unicoi, TN, 101 2nd Street or 101 Jonesborough Road Also on Tax Assessor's listing as 105 Jonesboro Road (023K-A-001.00)		

Parts 1 through 4 verify that there are no extraordinary circumstances associated with this action:

Part 1. Project Characteristics

Is there evidence that the proposed action...	No	Yes	Commitment	Information Source for Insignificance
1. Is major in scope?	X			Vaughn, Dana M. 03/16/2017
2. Is part of a larger project proposal involving other TVA actions or other federal agencies?	X			Vaughn, Dana M. 03/16/2017
* 3. Involves non-routine mitigation to avoid adverse impacts?	X		No	Vaughn, Dana M. 03/16/2017
4. Is opposed by another federal, state, or local government agency?	X			Vaughn, Dana M. 03/16/2017
* 5. Has environmental effects which are controversial?	X			Vaughn, Dana M. 03/16/2017
* 6. Is one of many actions that will affect the same resources?		X		For comments see attachments
7. Involves more than minor amount of land?	X			Vaughn, Dana M. 03/16/2017

*If "yes" is marked for any of the above boxes, consult with NEPA Administration on the suitability of this project for a categorical exclusion.

Economic Development – Unicoi County Industrial Park Improvement

Part 2. Natural and Cultural Features Affected

Would the proposed action...	No	Yes	Permit	Commitment	Information Source for Insignificance
1.Potentially affect endangered, threatened, or special status species?	X		No	No	For comments see attachments
2.Potentially affect historic structures, historic sites, Native American religious or cultural properties, or archaeological sites?		X	No	No	For comments see attachments
3.Potentially take prime or unique farmland out of production?	X		No	No	For comments see attachments
4.Potentially affect Wild and Scenic Rivers or their tributaries?	X		No	No	Vaughn, Dana M. 03/16/2017
5.Potentially affect a stream on the Nationwide Rivers Inventory?	X		No	No	Vaughn, Dana M. 03/16/2017
6.Potentially affect wetlands?	X		No	No	For comments see attachments
7.Potentially affect water flow, stream banks or stream channels?	X		No	No	Vaughn, Dana M. 03/16/2017
8.Potentially affect the 100-year floodplain?	X		No	No	For comments see attachments
9.Potentially affect ecologically critical areas, federal, state, or local park lands, national or state forests, wilderness areas, scenic areas, wildlife management areas, recreational areas, greenways, or trails?	X		No	No	Vaughn, Dana M. 04/24/2017
10.Contribute to the spread of exotic or invasive species?	X		No	No	For comments see attachments
11.Potentially affect migratory bird populations?	X		No	No	For comments see attachments
12.Involve water withdrawal of a magnitude that may affect aquatic life or involve interbasin transfer of water?	X		No	No	Vaughn, Dana M. 03/16/2017
13.Potentially affect surface water?		X	Yes	No	For comments see attachments
14.Potentially affect drinking water supply?	X		No	No	Vaughn, Dana M. 03/16/2017
15.Potentially affect groundwater?	X		No	No	Vaughn, Dana M. 03/16/2017
16.Potentially affect unique or important terrestrial habitat?	X		No	No	For comments see attachments
17.Potentially affect unique or important aquatic habitat?	X		No	No	Vaughn, Dana M. 03/16/2017

Part 3. Potential Pollutant Generation

Would the proposed action potentially (including accidental or unplanned)...	No	Yes	Permit	Commitment	Information Source for Insignificance
1.Release air pollutants?		X	Yes	No	For comments see attachments
2.Generate water pollutants?	X		No	No	Vaughn, Dana M. 03/16/2017
3.Generate wastewater streams?	X		No	No	Vaughn, Dana M. 03/16/2017
4.Cause soil erosion?		X	Yes	No	For comments see attachments
5.Discharge dredged or fill materials?		X	No	No	For comments see attachments
6.Generate large amounts of solid waste or waste not ordinarily generated?		X	Yes	No	For comments see attachments
7.Generate or release hazardous waste (RCRA)?	X		No	No	For comments see attachments
8.Generate or release universal or special waste, or used oil?	X		No	No	For comments see attachments
9.Generate or release toxic substances (CERCLA, TSCA)?	X		No	No	Vaughn, Dana M. 03/16/2017
10.Involve materials such as PCBs, solvents, asbestos, sandblasting material, mercury, lead, or paints?		X	Yes	No	For comments see attachments
11.Involve disturbance of pre-existing contamination?	X		No	No	For comments see attachments
12.Generate noise levels with off-site impacts?	X		No	No	For comments see attachments
13.Generate odor with off-site impacts?	X		No	No	Vaughn, Dana M. 03/16/2017
14.Produce light which causes disturbance?	X		No	No	Vaughn, Dana M. 03/16/2017
15.Release of radioactive materials?	X		No	No	Vaughn, Dana M. 03/16/2017
16.Involve underground or above-ground storage tanks or bulk storage?	X		No	No	For comments see attachments
17.Involve materials that require special handling?		X	Yes	No	For comments see attachments

Environmental Assessment and Finding of No Significant Impact

Part 4. Social and Economic Effects

Would the proposed action...	No	Yes	Permit	Commitment	Information Source for Insignificance
1.Potentially cause public health effects?	X			No	Vaughn, Dana M. 03/16/2017
2.Increase the potential for accidents affecting the public?	X			No	Vaughn, Dana M. 03/16/2017
3.Cause the displacement or relocation of businesses, residences, cemeteries, or farms?	X			No	For comments see attachments
4.Contrast with existing land use, or potentially affect resources described as unique or significant in a federal, state, or local plan?	X			No	For comments see attachments
5.Disproportionately affect minority or low-income populations?	X			No	Vaughn, Dana M. 03/16/2017
6.Involve genetically engineered organisms or materials?	X			No	Vaughn, Dana M. 03/16/2017
7.Produce visual contrast or visual discord?	X			No	Vaughn, Dana M. 03/16/2017
8.Potentially interfere with recreational or educational uses?	X			No	Vaughn, Dana M. 03/16/2017
9.Potentially interfere with river or other navigation?	X		No	No	Vaughn, Dana M. 03/16/2017
10.Potentially generate highway or railroad traffic problems?	X			No	Vaughn, Dana M. 03/16/2017

Part 5. Other Environmental Compliance/Reporting Issues

Would the proposed action...	No	Yes	Commitment	Information Source for Insignificance
1.Release or otherwise use substances on the Toxic Release Inventory list?	X		No	Vaughn, Dana M. 03/16/2017
2.Involve a structure taller than 200 feet above ground level?	X		No	Vaughn, Dana M. 03/16/2017
3.Involve site-specific chemical traffic control?	X		No	Vaughn, Dana M. 03/16/2017
4.Require a site-specific emergency notification process?	X		No	Vaughn, Dana M. 03/16/2017
5.Cause a modification to an existing environmental permit or to existing equipment with an environmental permit or involve the installation of new equipment/systems that will require a permit?	X		No	Vaughn, Dana M. 03/16/2017
6.Potentially impact operation of the river system or require special water elevations or flow conditions??	X		No	Vaughn, Dana M. 03/16/2017
7.Involve construction or lease of a new building or demolition or renovation of existing building (i.e. major changes to lighting, HVAC, and/or structural elements of building of 1000 sq. ft. or more)?		X	No	For comments see attachments

Parts 1 through 4: If "yes" is checked, describe in the discussion section following this form why the effect is insignificant. Attach any conditions or commitments which will ensure insignificant impacts. Use of non-routine commitments to avoid significance is an indication that consultation with NEPA Administration is needed.

An EA or EIS Will be prepared.

Based upon my review of environmental impacts, the discussion attached, and/or consultations with NEPA Administration, I have determined that the above action does not have a significant impact on the quality of the human environment and that no extraordinary circumstances exist.

Therefore, this proposal qualifies for a categorical exclusion under Section 5.2. _____ of TVA NEPA Procedures.

Project Initiator/Manager Billy L Adams		Date 04/25/2017
TVA Organization ED	E-mail bladams@tva.gov	Telephone

Environmental Concurrence Reviewer

Ashley Pilakowski 04/25/2017

Signature

Preparer Closure

Dana M Vaughn 04/25/17

Signature

Other Environmental Concurrence Signatures (as required by your organization)

Signature

Signature

Economic Development – Unicoi County Industrial Park Improvement

<i>Signature</i>	<i>Signature</i>
Other Review Signatures (as required by your organization)	
Dana M Vaughn	04/24/2017
<i>Signature</i>	<i>Signature</i>
<i>Signature</i>	<i>Signature</i>
<i>Signature</i>	<i>Signature</i>

Attachments/References

Description of Proposed Action Continued from Page 1
 TVA proposes to provide a grant to the Unicoi County Economic Development Board for the demolition and disposal of a dilapidated industrial park; the former Morgan Insulation facility. TVA funding would be used to demolish the existing industrial buildings, including slabs and foundations; as well as, disposal costs, and backfilling and seeding the impacted areas. The buildings are metal manufacturing buildings that were constructed in approximately 1966 with renovations/additions in 1972, 1985, 1993 and 1995. The properties do not have any particular historic event or circumstances associated with the structures or the land, are not associated with any individual of historic importance, and the structures do not have any particular architectural significance or unique construction characteristics. No substantial trees are present to be removed, but some shrubbery and a few decorative evergreens near the office remain on the property.

CEC General Comment Listing

1.	Unicoi - 2016 Application_Part 5 of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 5 of 5.pdf	02/03/2017	3,876.59 Bytes
2.	Unicoi - 2016 Application_Part 4 of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 4 of 5.pdf	02/03/2017	3,541.87 Bytes
3.	Unicoi - 2016 Application_Part 3b of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 3b of 5.pdf	02/03/2017	2,585.33 Bytes
4.	Unicoi - 2016 Application_Part 3a of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 3a of 5.pdf	02/03/2017	2,119.41 Bytes
5.	Unicoi - 2016 Application_Part 2 of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 2 of 5.pdf	02/03/2017	1,700.83 Bytes
6.	Unicoi - 2016 Application_Part 1b of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 1b of 5.pdf	02/03/2017	2,385.90 Bytes
7.	Unicoi - 2016 Application_Part 1a of 5		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi - 2016 Application_Part 1a of 5.pdf	02/03/2017	2,189.55 Bytes
8.	Morgan Insulation Property - Aerial		
	By: Dana M Vaughn	02/03/2017	
	Files: Morgan Insulation Property - Aerial.pdf	02/03/2017	1,589.74 Bytes
9.	Morgan Insulation Property - Location		
	By: Dana M Vaughn	02/03/2017	
	Files: Morgan Insulation Property - Location.pdf	02/03/2017	2,166.77 Bytes
10.	Morgan Insulation Property - Topo		
	By: Dana M Vaughn	02/03/2017	
	Files: Morgan Insulation Property - Topo.pdf	02/03/2017	1,079.60 Bytes
11.	Unicoi Redevelopment Concept		
	By: Dana M Vaughn	02/03/2017	
	Files: Unicoi Redevelopment Concept.pdf	02/03/2017	793.85 Bytes

Environmental Assessment and Finding of No Significant Impact

12.	Unicoi Site Boundaries By: Dana M Vaughn Files: Unicoi Site Boundaries.JPG	02/03/2017 02/03/2017	112.91 Bytes
13.	Environment Site Assessment April 22 2013_Part 5 of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 5 of 5.pdf	02/03/2017 02/03/2017	1,693.45 Bytes
14.	Environment Site Assessment April 22 2013_Part 4b of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 4b of 5.pdf	02/03/2017 02/03/2017	2,766.87 Bytes
15.	Environment Site Assessment April 22 2013_Part 4a of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 4a of 5.pdf	02/03/2017 02/03/2017	2,573.61 Bytes
16.	Environment Site Assessment April 22 2013_Part 3 of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 3 of 5.pdf	02/03/2017 02/03/2017	345.76 Bytes
17.	Environment Site Assessment April 22 2013_Part 2b of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 2b of 5.pdf	02/03/2017 02/03/2017	1,641.26 Bytes
18.	Environment Site Assessment April 22 2013_Part 2a of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 2a of 5.pdf	02/03/2017 02/03/2017	1,566.69 Bytes
19.	Environment Site Assessment April 22 2013_Part 1 of 5 By: Dana M Vaughn Files: Environment Site Assessment April 22 2013_Part 1 of 5.pdf	02/03/2017 02/03/2017	2,092.58 Bytes

CEC Comment Listing

Part 1 Comments

6. Per the 2001 Generic EA for Selected Economic Development Activities, the impacts from TVA's action, when considered in light of other development activities, would be minor and insignificant.
By: Dana M Vaughn 03/16/2017

Part 2 Comments

1. Impacts to Threatened and Endangered Terrestrial Animal species have been evaluated and are presented in the Environmental Assessment.
By: Elizabeth B Hamrick 03/20/2017
2. TVA finds the undertaking will have no effect to historic properties (see attached) "CEC36239_UnicoiIndustrialParkDemolition_68953_Section106.pdf" for supporting documentation.
By: Michaelyn S Harle 03/28/2017
Files: Consultation letters.pdf 04/06/2017 2,274.91 Bytes
CEC36239_UnicoiIndustrialParkDemolition_68953_Section 03/28/2017 1,793.71 Bytes
106.pdf
3. The proposed action is for the demolition of an existing dilapidated industrial site, which will be prepped for future rebuild. Proposed activities occur on land that has been developed since the 1960's. Therefore, there is no potential for the proposed action to take prime or unique farmland out of production.
By: Dana M Vaughn 03/16/2017
8. The project is outside the 100-yr floodplain.
By: Dana M Vaughn 03/16/2017
10. Based on field survey of the action area and review of the proposed actions, the proposed project would not contribute to the spread of exotic or invasive terrestrial animal species.
By: Elizabeth B Hamrick 03/20/2017
11. Impacts to migratory bird populations have been evaluated and are presented in the Environmental Assessment.
By: Elizabeth B Hamrick 03/20/2017
13. Standard construction BMPs, such as erosion control measures, would reduce environmental impacts to the point that no special mitigation measures would be required, and temporary impacts associated with construction and erosion would be eventually eliminated as impacted areas are revegetated or otherwise stabilized.
By: Dana M Vaughn 03/16/2017
16. Impacts to important or unique terrestrial habitats have been evaluated and are presented in the Environmental Assessment.
By: Elizabeth B Hamrick 03/20/2017
6. No wetlands have been identified on the subject property. A nearby pond/wetland feature is located 0.10 miles away. Standard construction BMPs, such as erosion control measures, would prevent any potential impacts to nearby water features.
By: Dana M Vaughn 03/16/2017
Files: NWI map.pdf 03/16/2017 1,386.50 Bytes

Part 3 Comments

Economic Development – Unicoi County Industrial Park Improvement

1. Asbestos containing material is present in subject buildings. A 10-day demolition notice will be submitted to TDEC and best work practices used to control asbestos emissions. Work practices often involve removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable, as the regulation explains in greater detail. These work practice standards are designed to minimize the release of asbestos fibers during building demolition or renovation, waste packaging, transportation and disposal.

Additionally, diesel fuel burned in heavy equipment will cause a very minimal amount of air pollutants that will be of no environmental consequence. In addition, standard construction BMPs, such as dust control, would reduce environmental impacts to the point that no special mitigation measures would be required, and temporary impacts associated with construction and erosion would be eventually eliminated as impacted areas are revegetated or otherwise stabilized.
By: Dana M Vaughn 03/16/2017
 4. Per the 2001 EA, the level of land disturbance associated with minor infrastructure improvements is typically only temporary and causes only minor increases in soil erosion, which can be effectively controlled with standard appropriate BMPs such as placement of hay bales, silt fences, and measures to reestablish suitable vegetative cover.
By: Dana M Vaughn 03/16/2017
 5. The developer will purchase commercial fill for backfilling and grading of the disturbed area.
By: Dana M Vaughn 03/16/2017
 6. The proposed action will include the demolition and disposal of a large warehouse/manufacturing building with several attached lean-to structures, one metal out-building, a storage shed, a guard shack and an office trailer. All solid waste will be disposed of per local, State, and Federal regulations.
By: Dana M Vaughn 03/16/2017
 7. The subject property is unoccupied and not listed as a regulated generator of hazardous waste through RCRA.
By: Dana M Vaughn 03/16/2017
 8. A Phase I and Limited Phase II was conducted on the subject property by ENVIRON International Corporation. The results were provided in a report dated February 2006. Phase II activities were concentrated on the following areas: 1) former tar pit, 2) former on-site waste disposal area, and 3) area of stained soil. The former tar pit investigation consisted of the collection of soil samples via the installation of soil borings. The results did not indicate the presence of tar or any adverse impacts to the soils. The former on-site waste disposal area investigation consisted of the excavation of five tests pits approximately one to five feet below ground surface. The results indicated the presence of waste RCF. Analytical results did not indicate any adverse impacts to the soil. The area of stained soil investigation consisted of the collection of one surficial soil sample for the analysis of PCBs. The results did not indicate any PCBs in the soils. The results of the 2006 Phase I and Limited Phase II did not identify any potentially significant issues at the site.
By: Dana M Vaughn 03/16/2017
 10. Buildings were inspected in July 2016 and asbestos containing materials were identified. Approximately 450 SF of sheet vinyl will need to be removed; as well as other materials. An EPA approved landfill will be used for disposal. Transformers which were installed since 2000, were present on site; however, they have been removed and tested for PCBs. According to the February 2006 Phase I and limited Phase II report, a letter from Erwin Utilities to Vesuvius stated that oil samples from all five transformers were submitted for PCB analysis; none were found to contain PCBs. Additionally, PCBs were not detected in the surficial soil samples.
By: Dana M Vaughn 03/16/2017
 11. The Phase I and limited Phase II reports did not identify any pre-existing contamination.
By: Dana M Vaughn 03/16/2017
 12. The demolition will occur on industrial zoned property that has operated as manufacturing facilities. Noise generated from demolition will be short term and will not result in off-site impacts.
By: Dana M Vaughn 03/16/2017
 16. The Phase I and limited Phase II report stated that there are no current or former USTs and the site is not listed in the TDEC UST data base. The February 2006 Phase I and limited Phase II report listed several ASTs; however, the April 2013 Phase I report stated that only 1 AST was present during the time of inspection. The observed tank is estimated to have a 6,000-gallon capacity and is of fiberglass construction. The AST previously stored colloidal silica. The AST appeared to be empty at the time of the site inspection. The State of Tennessee has no requirements regarding AST registration.
By: Dana M Vaughn 03/16/2017
 17. The Town of Erwin has indicated that the drums and other materials observed in the 2013 Phase I report, are no longer present on the property. The following items were observed on the property: numerous oil containers, paint, catalyzed epoxy, lacquer thinner, bonding primer, coolant, condenser coil renovator, calcium chloride, milube, phosphoric acid, ammonium hydroxide, hydrochloric acid, denatured alcohol, magnesium phosphate solution, and unknown/unlabeled containers. Additionally, several 55-gallon drums were observed. Two of the drums appeared to contain silica beads, four contained water and an unknown solid and one contained an unknown solid. If any unlabeled containers and drums remain, they should be tested to verify classification as special waste or hazardous waste and disposed of according to local, State and Federal regulations. Additionally, lighting and other universal waste must be disposed of according to local, State and Federal regulations.
By: Dana M Vaughn 03/16/2017
- Part 4 Comments
3. The proposed action is being undertaken to position the Town of Erwin in a position to make the property more marketable for future industrial development.
By: Dana M Vaughn 03/16/2017

Environmental Assessment and Finding of No Significant Impact

4. The property is currently zoned for Industrial development.
By: Dana M Vaughn 03/16/2017

Part 5 Comments

7. The proposed action involves a TVA Economic Development InvestPrep Grant for demolition of a dilapidated industrial facility owned by the Town of Erwin.
By: Dana M Vaughn 03/16/2017

CEC Permit Listing

Part 2 Permits

13. National Pollutant Discharge Elimination System Permit (402 Clean Water Act)
By: Dana M Vaughn 03/16/2017

Part 3 Permits

1. Asbestos Demolition or Removal Permit
By: Dana M Vaughn 03/16/2017
4. National Pollutant Discharge Elimination System Permit (402 Clean Water Act)
By: Dana M Vaughn 03/16/2017
6. Asbestos Demolition or Removal Permit
By: Dana M Vaughn 03/16/2017
10. Asbestos Demolition or Removal Permit
By: Dana M Vaughn 03/16/2017
17. Solid Waste Handling/Landfill Permit
By: Dana M Vaughn 03/16/2017

CEC Commitment Listing

Attachment B – Tennessee State Historic Preservation Officer and Federally Recognized Tribe Correspondence



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

March 20, 2017

Mr. Clinton E. Jones
Tennessee Valley Authority
Biological and Cultural Compliance
400 West Summit Hill Drive
Knoxville, TN 37902

RE: TVA / Tennessee Valley Authority, Investprep Grant Demolition of Dilapidated Industrial Park, ,
Unicoi County, TN

Dear Mr. Jones:

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 applicant 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, we concur 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. You may direct questions or comments to Jennifer M. Barnett (615) 741-1588, ext. 105. This office appreciates your cooperation.

Sincerely,

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

EPM/jmb

Harle, Michaelyn S

To: Ezzell, Patricia Bernard
Subject: RE: TVA Investprep Grant Demolition of Dilapidated Industrial Park in Unicoi County, Tennessee

From: Tonya Tipton [<mailto:tonya@shawnee-tribe.com>]
Sent: Thursday, March 23, 2017 4:37 PM
To: Ezzell, Patricia Bernard
Subject: TVA Investprep Grant Demolition of Dilapidated Industrial Park in Unicoi County, Tennessee

TVA External Message. Please use caution when opening.

This letter is in response to the above referenced project.

The Shawnee Tribe's Tribal Historic Preservation Department concurs that no known historic properties will be negatively impacted by this project.

We have no issues or concerns at this time, but in the event that archaeological materials are encountered during construction, use, or maintenance of this location, please re-notify us at that time as we would like to resume consultation under such a circumstance.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Tonya Tipton
Shawnee Tribe

