

28 October 2022

U.S. Environmental Protection Agency, Region 6
David Garcia
Air and Radiation Division
1201 Elm Street Ste 500
Dallas, Texas 75270

RE: Project Review for the 19th Street Cargo Redevelopment Project, Dallas Fort Worth International Airport, Grapevine, Tarrant County, Texas

Dear Mr. Crossland,

Dallas Fort Worth International Airport (DFW) is requesting your review under the National Environmental Policy Act of 1969 (NEPA) for the proposed construction and operation of two new cargo facilities and the addition of five new cargo aircraft positions located in an area known as the 19th Street Cargo Area located on the west side of DFW Airport, southeast of the intersection of 19th Street and West Airfield Drive (**Attachment A, Figure 1**).

The Federal Aviation Administration (FAA) has determined that an Environmental Assessment (EA) be performed in accordance with the NEPA, the President's Council on Environmental Quality (CEQ) regulations to implement NEPA (40 Code of Federal Regulations [CFR] Parts 1500 to 1508), and the FAA regulations implementing NEPA (44 CFR Part 10). FAA is required to consider potential environmental impacts before funding or approving actions and projects. As part of this process, DFW respectfully requests your preliminary review for compliance with all federal and state laws and regulations including, but not limited to the Clean Air Act (CAA), the Clean Water Act (CWA), the Endangered Species Act (ESA), U.S. Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act (MBTA).

DFW respectfully requests that you provide comments or written concurrence within 30 days from the date of this letter. **Attachment A** contains all figures. All comments or written concurrence with the findings can be sent to **Ms. Sandra Lancaster, DFW Assistant Vice-President Environmental Development Programs** at

3003 South Service Road, EAD Annex, Building A
PO Box 619428
DFW Airport, Texas 75261
(o) 972-973-5573
slancaster@dfwairport.com

PROPOSED ACTION DESCRIPTION

The Proposed Action consists of airside and landside improvements that would create an operationally functional cargo area large enough for B747-8F aircraft to operate as the critical (design) aircraft (modified Aircraft Design Group [ADG] VI) associated with Buildings 1 and 2. The Proposed Action consists of the development of two new cargo buildings and associated landside surface parking and roadway modifications (Buildings 1 and 2), demolition of an existing building, new airside aircraft pavement, pavement and alignment modifications to various taxiways for aircraft ingress/egress, new Air Operations Area (AOA) fencing and access gates, a new fueling station, and all associated necessary utility infrastructure, which includes demolition, relocation, and creation, as necessary for the project. Other anticipated infrastructure includes an underground stormwater collection tank, oil/water separator, and conduit for high-mast lighting. Additionally, the Proposed Action would generate five new widebody aircraft positions for Building 1 and 2 and improve the two existing hardstand positions (**Attachment A, Figure 2**).

Construction is anticipated over 14 months beginning with asbestos abatement, then building demolition, followed by construction of Building 2. Building 1 construction is anticipated to begin during the demolition of the existing building. Abatement and demolition are anticipated to begin in August 2023, with Building 1 construction in October 2023, followed closely by the concurrent construction of Building 2. Operational activities are anticipated to begin in October 2024 for both Building 1 and Building 2.

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Air Quality

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Noise and Noise Compatible Land Uses

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Integrated Environmental Solutions, LLC (IES) prepared a desktop assessment for waters of the United States and protected species habitats on 04 October 2022. The desktop analysis determined that there were no aquatic resources currently within the proposed project area. The U.S. Geological Survey (USGS) topographic map (Grapevine 7.5' Quadrangle 1959, revised 1982) illustrates a subterranean culvert as a dashed purple linear feature in the western region, oriented north-to-south. No blue line features or ponds were identified in the staging area. The 2022 Grapevine 7.5' Quadrangle map illustrates the culvert in similar alignment; however, the dashed line is now blue. DFW has a robust stormwater management program, and a drainage analysis was performed, which indicated the need for below-ground detention to meet the DFW requirements for no net increase in stormwater flows to local downstream natural aquatic resources.

Hazardous Materials and Hazardous Wastes

DFW produced the 2021 Post Response Action Care Report AOC C5 – Northwest Cargo VCP VCP #1461 in May 2022 detailing the results of monitoring associated with the AOC C5 Voluntary Cleanup Program (VCP) in proximity to the proposed project area. The summary of on-going monitoring activities indicates that the Response Action Objectives continue to be met. The PCLE zone and plume have shown a steady decrease since the Response Action Plan (RAP). A Plume Management Zone (PMZ) was established as an institutional control. The current low retarded contaminant velocity for tetrachloroethylene (PCE) indicates that it would take approximately 2,125 years for current PCE concentrations to reach the PMZ boundary; therefore, there is currently no potential threat to receptors, and no potential future threat to receptors. Additionally, Mann-Kendall evaluation shows the plume as stable or decreasing over the last 4 years of sampling activities. Based on the Post Action Response Care being in compliance with applicable regulations, DFW has requested the discontinuation of the Post Action Care activities. Monitoring wells in the northern portion of the project area have shown continuous decreasing level of contaminants and will be decommissioned through the and removed prior to or concurrently with this project. Some monitoring wells in the

southern project area will be relocated as part of this project, as those wells are still necessary to track continuing contaminant levels for the VCP.

Jet fuel lines will be relocated associated with the proposed project. All soil media will be tested for contamination on site and disposed of in accordance with all local, state, and federal regulations. DFW has a robust Spill Contaminant and Countermeasures Plan for all construction activities that occur within the Airport. Additionally, DFW emphasizes reuse and recycling of construction materials where feasible to reduce solid wastes going into local landfills.

Additionally, asbestos containing materials (ACM) were located during inspections in the American Airlines Air Freight Building, which is being demolished as a connected action to the Proposed Action. ACM were located within the wall and ceiling texture, acoustic ceiling tiles, tape and bedding, floor tiles, mastic materials, and pipe lagging mastic. These materials will be abated prior to demolition activities following all DFW, state, and federal requirements. All contaminated materials will be disposed of in accordance with all applicable regulations.

State and Federally Listed and Protected Species

According to the U.S. Fish and Wildlife Service (USFWS), three species, Piping Plover (*Charadrius melodus*), Red Knot (*Calidris canutus rufa*), and Whooping Crane (*Grus americana*) are listed as federally protected (i.e., threatened or endangered) with the potential to occur within Tarrant County. Two of these species are conditionally listed as threatened within Tarrant County on the basis that the proposed project is for wind energy production, Red Knot, and Piping Plover. No federally listed critical habitat for these species is located within the vicinity of the proposed project or staging areas.

The Texas Parks and Wildlife Department (TPWD) lists 11 state protected species that could occur within Tarrant County. Four are also federally listed avian species; however, the Black Rail (*Laterallus jamaicensis*) is only listed by TPWD for Tarrant County. Additionally, species include three mollusks, the black bear (*Ursus americanus*), the alligator snapping turtle (*Macrochelys temminckii*), the Texas horned lizard (*Phrynosoma cornutum*), and the monarch butterfly (*Danaus plexippus*). The review of the Texas Natural Diversity Database (TXNDD) files did not indicate any unique vegetation communities, parks or natural/managed areas within the proposed project or staging areas.

Aerial photography indicates that the survey area is maintained as an **urban matrix** vegetation community. The proposed project area is comprised of paved access lanes, parking lots, and roads with multiple hangars and maintenance buildings across the site. Small, unpaved regions are visible between access lanes, buildings, and roads that are dominated by mowed turfgrasses with scattered landscaping trees to the northwest and southwest. The staging area is a cleared gravel pad surrounded by mowed turfgrasses. No preferred habitat for any listed or candidate species was identified within the proposed project or staging areas.

Migratory Birds

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OTHER AGENCY COORDINATION

DFW is currently in coordination with the Texas Historical Commission (THC) under the Antiquities Code of Texas (ACT), as DFW is an entity of the State of Texas, and under the National Historic Preservation Act (NHPA) of 1966, as amended, specifically, Section 106, to address archeological and above-ground historic resources associated with the project area.

Thank you for your timely review of the enclosed information. If you have any questions, please contact me at 972-973-5573 or via e-mail at slancaster@dfwairport.

Sincerely,



Sandra Lancaster
AVP Environmental Development Programs
Dallas Fort Worth International Airport
IES File ref: 03.006.099

ATTACHMENT A

FIGURES

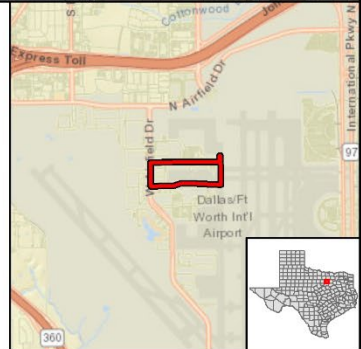
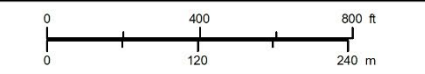
Figure 1 19th Street Cargo Redevelopment Project Site west side of DFW



19th Street Cargo Redevelopment Project, Project Site Map

 Project Site

County: Tarrant
 State: Texas
 Date map created: 10/24/2022
 Source: (c) 2009 Microsoft Corporation and its data suppliers; ESRI Streetmap
 IES Project Ref: 03.006.099



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U.S. Environmental Protection Agency, Region 6
Ronnie Crossland
Land, Chemical, and Redevelopment Division
1201 Elm Street Ste 500
Dallas, Texas 75270

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U.S. Environmental Protection Agency, Region 6
Charles Maguire
Water Division
1201 Elm Street Ste 500
Dallas, Texas 75270

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Donna Huff, Deputy Director
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The Federal Aviation Administration (FAA) has determined that an Environmental Assessment (EA) be performed in accordance with the NEPA, the President's Council on Environmental Quality (CEQ) regulations to implement NEPA (40 Code of Federal Regulations [CFR] Parts 1500 to 1508), and the FAA regulations implementing NEPA (44 CFR Part 10). FAA is required to consider potential environmental impacts before funding or approving actions and projects. As part of this process, DFW respectfully requests your preliminary review for compliance with all federal and state laws and regulations including, but not limited to the Clean Air Act (CAA), the Clean Water Act (CWA), the Endangered Species Act (ESA), U.S. Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act (MBTA).

DFW respectfully requests that you provide comments or written concurrence within 30 days from the date of this letter. **Attachment A** contains all figures. All comments or written concurrence with the findings can be sent to **Ms. Sandra Lancaster, DFW Assistant Vice-President Environmental Development Programs** at

3003 South Service Road, EAD Annex, Building A
PO Box 619428
DFW Airport, Texas 75261
(o) 972-973-5573
slancaster@dfwairport.com

PROPOSED ACTION DESCRIPTION

The Proposed Action consists of airside and landside improvements that would create an operationally functional cargo area large enough for B747-8F aircraft to operate as the critical (design) aircraft (modified Aircraft Design Group [ADG] VI) associated with Buildings 1 and 2. The Proposed Action consists of the development of two new cargo buildings and associated landside surface parking and roadway modifications (Buildings 1 and 2), demolition of an existing building, new airside aircraft pavement, pavement and alignment modifications to various taxiways for aircraft ingress/egress, new Air Operations Area (AOA) fencing and access gates, a new fueling station, and all associated necessary utility infrastructure, which includes demolition, relocation, and creation, as necessary for the project. Other anticipated infrastructure includes an underground stormwater collection tank, oil/water separator, and conduit for high-mast lighting. Additionally, the Proposed Action would generate five new widebody aircraft positions for Building 1 and 2 and improve the two existing hardstand positions (**Attachment A, Figure 2**).

Construction is anticipated over 14 months beginning with asbestos abatement, then building demolition, followed by construction of Building 2. Building 1 construction is anticipated to begin during the demolition of the existing building. Abatement and demolition are anticipated to begin in August 2023, with Building 1 construction in October 2023, followed closely by the concurrent construction of Building 2. Operational activities are anticipated to begin in October 2024 for both Building 1 and Building 2.

AFFECTED RESOURCES OF THE PROPOSED ACTION

Resource area analyses will be undertaken during the NEPA process. Resource areas discussed below include, air quality and climate, noise and noise compatible land uses, stormwater management and surface receiving waters, hazardous materials, state and federally listed and protected species, hazardous materials, historical, architectural, archeological, and cultural resources, natural resources and energy supply, and visual effects, including light emissions. Resource areas that could require mitigative actions after a full analysis of the proposed effects would be air quality and noise and noise-compatible land uses.

Air Quality

Emissions inventories are being created to determine the anticipated emissions from construction activities and on-going operations. Preliminary estimations of construction emissions are indicating that short-term emissions would be below the current 2008 Ozone Standard Serious Non-Attainment 8-hour levels of 50 tons per year (tpy) of nitrogen oxides (NO_x) and volatile organic compounds (VOC). It is anticipated that construction emissions will likely also be below the 2008 Ozone Standard Severe Non-Attainment 8-hour NO_x and VOC thresholds of 25 tpy. DFW has conservatively estimated, but not completed the Aviation Environmental Design Tool (AEDT) modeling, for operational emissions. DFW has estimated that new cargo operations would exceed both the serious and severe *de minimis* thresholds. As the Proposed Action would generate emissions above both the current and future threshold levels, DFW is anticipating undergoing a General Conformity Demonstration with FAA and the Texas Commission on Environmental Quality (TCEQ).

Noise and Noise Compatible Land Uses

An analysis of anticipated noise levels will be undertaken using the AEDT model to determine if significant changes to noise contours would result from increased cargo operations.

Aquatic Resources and Stormwater Management

Integrated Environmental Solutions, LLC (IES) prepared a desktop assessment for waters of the United States and protected species habitats on 04 October 2022. The desktop analysis determined that there were no aquatic resources currently within the proposed project area. The U.S. Geological Survey (USGS) topographic map (Grapevine 7.5' Quadrangle 1959, revised 1982) illustrates a subterranean culvert as a dashed purple linear feature in the western region, oriented north-to-south. No blue line features or ponds were identified in the staging area. The 2022 Grapevine 7.5' Quadrangle map illustrates the culvert in similar alignment; however, the dashed line is now blue. DFW has a robust stormwater management program, and a drainage analysis was performed, which indicated the need for below-ground detention to meet the DFW requirements for no net increase in stormwater flows to local downstream natural aquatic resources.

Hazardous Materials and Hazardous Wastes

DFW produced the 2021 Post Response Action Care Report AOC C5 – Northwest Cargo VCP VCP #1461 in May 2022 detailing the results of monitoring associated with the AOC C5 Voluntary Cleanup Program (VCP) in proximity to the proposed project area. The summary of on-going monitoring activities indicates that the Response Action Objectives continue to be met. The PCLE zone and plume have shown a steady decrease since the Response Action Plan (RAP). A Plume Management Zone (PMZ) was established as an institutional control. The current low retarded contaminant velocity for tetrachloroethylene (PCE) indicates that it would take approximately 2,125 years for current PCE concentrations to reach the PMZ boundary; therefore, there is currently no potential threat to receptors, and no potential future threat to receptors. Additionally, Mann-Kendall evaluation shows the plume as stable or decreasing over the last 4 years of sampling activities. Based on the Post Action Response Care being in compliance with applicable regulations, DFW has requested the discontinuation of the Post Action Care activities. Monitoring wells in the northern portion of the project area have shown continuous decreasing level of contaminants and will be decommissioned through the and removed prior to or concurrently with this project. Some monitoring wells in the

southern project area will be relocated as part of this project, as those wells are still necessary to track continuing contaminant levels for the VCP.

Jet fuel lines will be relocated associated with the proposed project. All soil media will be tested for contamination on site and disposed of in accordance with all local, state, and federal regulations. DFW has a robust Spill Contaminant and Countermeasures Plan for all construction activities that occur within the Airport. Additionally, DFW emphasizes reuse and recycling of construction materials where feasible to reduce solid wastes going into local landfills.

Additionally, asbestos containing materials (ACM) were located during inspections in the American Airlines Air Freight Building, which is being demolished as a connected action to the Proposed Action. ACM were located within the wall and ceiling texture, acoustic ceiling tiles, tape and bedding, floor tiles, mastic materials, and pipe lagging mastic. These materials will be abated prior to demolition activities following all DFW, state, and federal requirements. All contaminated materials will be disposed of in accordance with all applicable regulations.

State and Federally Listed and Protected Species

According to the U.S. Fish and Wildlife Service (USFWS), three species, Piping Plover (*Charadrius melodus*), Red Knot (*Calidris canutus rufa*), and Whooping Crane (*Grus americana*) are listed as federally protected (i.e., threatened or endangered) with the potential to occur within Tarrant County. Two of these species are conditionally listed as threatened within Tarrant County on the basis that the proposed project is for wind energy production, Red Knot, and Piping Plover. No federally listed critical habitat for these species is located within the vicinity of the proposed project or staging areas.

The Texas Parks and Wildlife Department (TPWD) lists 11 state protected species that could occur within Tarrant County. Four are also federally listed avian species; however, the Black Rail (*Laterallus jamaicensis*) is only listed by TPWD for Tarrant County. Additionally, species include three mollusks, the black bear (*Ursus americanus*), the alligator snapping turtle (*Macrochelys temminckii*), the Texas horned lizard (*Phrynosoma cornutum*), and the monarch butterfly (*Danaus plexippus*). The review of the Texas Natural Diversity Database (TXNDD) files did not indicate any unique vegetation communities, parks or natural/managed areas within the proposed project or staging areas.

Aerial photography indicates that the survey area is maintained as an **urban matrix** vegetation community. The proposed project area is comprised of paved access lanes, parking lots, and roads with multiple hangars and maintenance buildings across the site. Small, unpaved regions are visible between access lanes, buildings, and roads that are dominated by mowed turfgrasses with scattered landscaping trees to the northwest and southwest. The staging area is a cleared gravel pad surrounded by mowed turfgrasses. No preferred habitat for any listed or candidate species was identified within the proposed project or staging areas.

Migratory Birds

Affects to migratory birds from the Proposed Actions are expected to be minimal based on the highly urban nature, the proposed use of LED high efficiency lighting, and DFW's ongoing program to monitor for migratory bird nests prior to any construction activities.

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DFW is currently in coordination with the Texas Historical Commission (THC) under the Antiquities Code of Texas (ACT), as DFW is an entity of the State of Texas, and under the National Historic Preservation Act (NHPA) of 1966, as amended, specifically, Section 106, to address archeological and above-ground historic resources associated with the project area.

Thank you for your timely review of the enclosed information. If you have any questions, please contact me at 972-973-5573 or via e-mail at slancaster@dfwairport.



Sandra Lancaster
AVP Environmental Development Programs

Dallas Fort Worth International Airport

CC *Jamie Zech, Air Quality Division*
Cody McClain, Emissions Assessment

IES File ref: 03.006.099

28 October 2022

Texas Commission on Environmental Quality
Coleman Nickum
NEPA Coordinator
PO Box 13087 MC 118
Austin, Texas 78711-3087

RE: Project Review for the 19th Street Cargo Redevelopment Project, Dallas Fort Worth International Airport, Grapevine, Tarrant County, Texas

Dear Mr. Nickum,

Dallas Fort Worth International Airport (DFW) is requesting your review under the National Environmental Policy Act of 1969 (NEPA) for the proposed construction and operation of two new cargo facilities and the addition of five new cargo aircraft positions located in an area known as the 19th Street Cargo Area located on the west side of DFW Airport, southeast of the intersection of 19th Street and West Airfield Drive (**Attachment A, Figure 1**).

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Thank you for your timely review of the enclosed information. If you have any questions, please contact me at 972-973-5573 or via e-mail at slancaster@dfwairport.

Sincerely,



Sandra Lancaster
AVP Environmental Development Programs
Dallas Fort Worth International Airport
IES File ref: 03.006.099

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 4, 2022

Sandra Lancaster
DFW Asst. Vice-President Environmental Development Programs
Dallas Fort Worth International Airport (DFW)
3003 South Service Road, PO Box 619428
DFW Airport, TX 75261

Via: **E-mail**

Re: **TCEQ NEPA Request #2022-206. 19th Street Cargo Redevelopment Project. Tarrant County.**

Dear Ms. Lancaster,

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments:

In accordance with the general conformity regulations in 40 CFR Part 93, this proposed action was reviewed for air quality impact. The proposed action is located in Tarrant County, which is designated nonattainment for the ozone National Ambient Air Quality Standards (NAAQS). Effective November 7, 2022, Tarrant County will be classified as moderate nonattainment for the 2015 eight-hour ozone NAAQS and severe nonattainment for the 2008 eight-hour ozone NAAQS. Volatile organic compounds (VOC) and nitrogen oxides (NOX) are precursor pollutants that lead to the formation of ozone. A general conformity demonstration may be required when the total projected direct and indirect VOC or NOX emissions from an applicable action are equal to or exceed 100 tons per year (tpy) for moderate areas and/or 25 tpy for severe areas. Based on the information provided to the TCEQ, the emissions from this proposed action are expected to exceed the 25 tpy general conformity de minimis threshold and a general conformity determination will be required. The TCEQ looks forward to working with the Dallas Fort Worth International Airport and the Federal Aviation Administration to ensure this proposed action conforms to the applicable state implementation plan.

We recommend the environmental assessment address actions that will be taken to prevent surface and groundwater contamination.

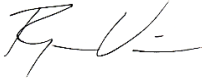
The management of industrial and hazardous waste at the site including waste treatment, processing, storage and/or disposal is subject to state and federal regulations. Construction and Demolition waste must be sent for recycling or disposal at a facility authorized by the TCEQ. Special waste authorization may be required for the disposal of asbestos containing material.

The Remediation Division understands that this project is in the area known as Northwest Cargo Area of Concern (AOC) C5, Voluntary Cleanup Program No. 1461. This area was affected by a release of chlorinated solvents to groundwater. A Conditional Certificate of Completion was issued for this AOC on June 26, 2015, with conditions to monitor and maintain the Plume

Management Zone. Over years of monitoring, the plume has been stable. It is recommended that the monitoring wells be maintained throughout construction and operation of the project.

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA coordinator at (512) 239-2619 or NEPA@tceq.texas.gov

Sincerely,

A handwritten signature in black ink, appearing to read "R. Vise". The signature is fluid and cursive, with a horizontal line extending from the end.

Ryan Vise,
Division Director
External Relations

From: [Rae Lynn Schneider](#)
To: [Jamie Zech](#); [Cody McClain](#); donna.huff@tceq.texas.gov; John.MacFarlane@faa.gov; [Drissi, Sana \(FAA\)](#)
Cc: [Samuel Tan](#); [Lancaster, Sandra](#); [Peppers, Madison](#); [Chitsinde, Esther](#); [Lloyd, Kristine](#)
Subject: Dallas Fort Worth International Airport - Notification of Draft EA and Draft General Conformity Determination - 19th Street Cargo Redevelopment Project
Date: Monday, October 2, 2023 3:22:00 PM
Attachments: [Public Notification for 19th Street 10.2.2023.pdf](#)

Good Afternoon All,

Dallas Fort Worth International Airport (DFW) would like to provide notification that a Draft Environmental Assessment (DEA) and Draft Clean Air Act (CAA) General Conformity Determination (GCD) for the 19th Street Cargo Redevelopment Project are available for review and comment. The digital version of the DEA with the Draft GCD (Appendix G) can be found at <https://www.dfwairport.com/business/about/publications/>. The comment period for the DEA and Draft GCD closes on 31 October 2023. We would appreciate any comments that you might have be sent to publiccomment@dfwairport.com with 19th Street Cargo Redevelopment Project in the subject line. I have attached the public notice that ran in the Dallas Morning News and Fort Worth Star Telegram on 01 October 2023. If you have any problems accessing the documents via the website, just let me know and I can provide a direct link through a file sharing system.

Rae Lynn Schneider, PMP

Integrated Environmental Solutions, LLC
301 W Eldorado Parkway, Ste. 101
McKinney, Texas 75069
972-562-7672 (o) 214-284-4147 (m)
rschneider@intenvsol.com

From: [Rae Lynn Schneider](#)
To: garcia.david@epa.gov; donaldson.guy@epa.gov; riley.jeffrey@epa.gov; John.MacFarlane@faa.gov; [Drissi, Sana \(FAA\)](#)
Cc: [Peppers, Madison](#); [Lancaster, Sandra](#); [Samuel Tan](#); [Chitsinde, Esther](#); [Lloyd, Kristine](#)
Subject: FW: Dallas Fort Worth International Airport - Notification of Draft EA and Draft General Conformity Determination - 19th Street Cargo Redevelopment Project
Date: Monday, October 2, 2023 3:28:00 PM
Attachments: [Public Notification for 19th Street 10.2.2023.pdf](#)

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