



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

DAVID W. SALYERS, P.E.
COMMISSIONER

BILL LEE
GOVERNOR

March 10, 2025

Via <https://www.stb.gov>

Alan Tabachnick
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

Dear Mr. Tabachnick:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on Knoxville & Holston Co., Inc (KXHR)'s Draft Environmental Assessment (Draft EA) for the abandonment of the K&A Belt Line. KXHR previously submitted a combined Environmental and Historical Report that concludes that the quality of the human environment would not be significantly affected as a result of the proposed abandonment of the line. The company has now filed a petition with the Surface Transportation Board seeking exemption from prior approval requirements in connection with the abandonment of the railroad line in Knox County, Tennessee. If the Board grants the exemption, KXHR would be able to salvage the track and other railroad appurtenances and to dispose of the right-of-way.

TDEC is the environmental and natural resource regulatory agency in Tennessee with delegated responsibility from the U.S. Environmental Protection Agency (EPA) to regulate sources of air pollution; solid and hazardous waste; underground storage tanks; and water resources. TDEC has reviewed the Draft EA and offers the following comments regarding the proposed project:

Division of Air Pollution Control

- Air Quality Impacts: Several actions could negatively impact air quality on a short-term basis. TDEC recommends that KXHR evaluate such potential impacts prior to any clearing, demolition, or construction. Such impacts may include, but are not limited to, air pollution from construction equipment, open burning associated with land clearing activities, and fugitive dust. Local air quality conditions are available online at <https://www.airnow.gov/>.
- Idling: Truck traffic associated with construction projects generate emissions of PM, CO, NO₂, SO₂, VOC, and CO₂, and TDEC recommends the operation of trucks with up-to-date emission control technologies and proper maintenance to minimize vehicle and equipment emissions. The Department also recommends the adoption of best practices to minimize vehicle idling to minimize the impact of mobile source emissions on ambient air quality.
- Fugitive Dust: If fugitive dust will be generated from construction activities, TDEC recommends the use of wet suppression or other measures to minimize the generation of fugitive dust.

Division of Solid Waste Management



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Reviews were conducted in internal Tennessee state and federal databases (WasteBin, ECHO/NEPAssist, respectively) with respect to the delineated project site. Review indicated there are numerous hazardous waste generating sites and reported releases within approximately one mile of the proposed project site.

TDEC strongly recommends that any wastes associated with the construction of the proposed project be confined to the limits of the proposed project — construction may include but is not limited to the following: unforeseen damages and repairs, cleanup, grading, excavation, testing of subsurface conditions, confining sediment, surface stabilization, leaks, and spills — must be handled in accordance with the Solid and Hazardous Waste Rules and Regulations of Tennessee. This includes all materials that would be classified as solid and/or hazardous wastes per these chapters.

With respect to the possibility of a legacy solid waste site, TDEC's Solid Waste Management program only dates back to 1972, so there could conceivably be disposal in this area that predates the Division of Solid Waste Management of which no information is available. Any wastes which may be uncovered during this project would be subject to a hazardous waste determination and must be managed appropriately.

Any lead-based paint, asbestos containing material, and PCBs encountered should be disposed of in accordance with all applicable rules and regulations as well as TDEC's Division of Solid Waste Management policy: [Solid Waste Management Program Policy & Guidance Manual](#).

Division of Underground Storage Tanks

Following a review of the map area submitted for review, TDEC determined that there were no active facilities or ongoing petroleum underground storage tank cleanups. However, if any unexpected underground storage tanks are encountered, that contain petroleum, contact the Knoxville Field Office as soon as possible for instructions.

Knoxville Field Office – (865) 594-6035, ask to speak to someone in the Division of Underground Storage Tanks.

For tanks containing hazardous materials other than petroleum you may need to contact TDEC's Division of Remediation or Solid Waste. They can also be reached at the number above.

TDEC appreciates the opportunity to provide comment on the Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed projects or activities contained within. Please contact me should you have any questions regarding these comments.

Sincerely,

[Emma Bartolo \(Mar 6, 2025 12:21 CST\)](#)
Emma Bartolo



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