September 28, 2009

Mr. Michael McCarthy  
City of Philadelphia  
Philadelphia International Airport  
Division of Aviation, Terminal E  
Philadelphia, PA 19153

Re: Philadelphia International Airport  
Environmental Assessment “Form C”  
Airport Fuel Farm Expansion Project  
Environmental Determination

Dear Mr. McCarthy,

Enclosed is one copy of the recently approved (September 25, 2009) Environmental Assessment “Form C” and Finding of No Significant Impact (EA/FONSI) for the Philadelphia International Airport. The Environmental Assessment covers the Airport Fuel Farm Expansion Project.

This Federal environmental approval is a determination by the approving official that the requirements imposed by applicable environmental statutes and regulations have been satisfied by a FONSI. However, it is not an approval of the Federal action approving the funding of eligible items for this project, nor approval of the air space review, or the approval of the revision of the Airport Layout Plan (ALP) to show this project. Rather, such decisions remain with the FAA Harrisburg Airports District Office.

In compliance with Council on Environmental Quality (CEQ) regulations 1501.4(e)(1) and 1506.6, we require that your office make the referenced documents (EA/FONSI w/Signature Page) available to the affected public, and announce such availability through appropriate media in the area. The announcement shall indicate the availability of the document for examination and note the appropriate location of general public access where the document may be found (i.e., your office, local libraries, public buildings, etc.). We request that a copy of such announcement be sent to this office when it is issued.

Your attention is directed to the mitigation measures section that was made a condition of approval of the FONSI. Please be reminded that these measures must be taken by the City in order to meet the terms of the EA/FONSI.
The process of making these environmental determinations is that of a partnership between you, the airport sponsor, and the other contributing parties, both public and private. We thank you for your effort and cooperation.

Please contact our office if you have any questions.

Sincerely,

Charles J. Campbell
Environmental Protection Specialist
Harrisburg Airports District Office

Cc: Lori Pagnanelli
    Oscar Sanchez
    Barry Dubinski
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Location
Philadelphia International Airport (PHL)
Philadelphia, PA

Proposed Federal Action
Approval of attached Environmental Assessment Form C dated September 25, 2009 for the Fuel Farm Expansion Project at PHL.

Project Description (Refer to Section 4, Environmental Assessment)
The City of Philadelphia Division of Aviation (DOA) in association with Philadelphia Fuel Facilities LLC (PFFLLC) proposes to expand the existing Fuel Farm at PHL to expand fuel storage capacity at PHL; see figures and plans in Attachment A. The proposed Fuel Farm expansion involves two 60,000 bbl capacity jet fuel tanks and associated infrastructure (including a dike wall to contain potential fuel spills) built on an approximately 4 acre parcel of mowed open land between the existing PFFLLC tank farm and the abandoned Atlantic tank farm. PFFLLC and the Philadelphia Fuel Committee Member Airlines would lease the 4-acre parcel from the City of Philadelphia.

Purpose And Need (Refer to Section 5, Environmental Assessment)
The purpose of the proposed Fuel Farm Expansion project is to maintain a satisfactory level of service to deliver fuel for passenger aircraft at PHL and to meet predicted future fuel demands resulting from increased flight operations at PHL. The existing fuel tank farm will be expanded and electrical, mechanical, site utilities, controls and security systems updated to allow for modifications to the current in-place facilities and provide needed additional storage capacity for the current and planned fuel usage to serve the aircraft fueling at PHL. The project is needed (considered necessary) to create a more competitive fuel supply environment as the airport grows in activity.

Alternatives (Refer to Section 6, Environmental Assessment)

No Action - Under the ‘no action’ alternative there would be no change in the existing Fuel Farm capacity and operation. Failure to increase the Fuel Farm storage capacity will impact the ability to support current and future demand for fuel storage at PHL. This will negatively impact current and future increases in passenger traffic, number of flights, and operations at PHL and is considered an unacceptable alternative.

Alternatives to Proposed Action - The initial screening evaluated relocating the Fuel Farm to a new location. Each alternative site selected for screening had existing issues that preclude it from being recommended as a new Fuel Farm site. This included proximity to the airport property, land ownership, the need for extensive transmission
lines, and interference with aircraft operations. The availability of approximately 4 acres of Airport property adjacent to the west boundary of the existing Fuel Farm was evaluated (Proposed Action below). The proposed site expansion area can be leased from the City, will not interfere with aircraft operations and is easily connected to the existing system.

**Proposed Action** – Expanding the storage capacity of the existing Fuel Farm complex at PHL was evaluated. The proposed expansion site, approximately 4 acres of mowed open land, is located directly adjacent to the west boundary of the existing Fuel Farm. The proposed expansion involves two 60,000 barrel capacity jet fuel tanks and associated infrastructure to be built on ground (see attached plan). The proposed site expansion area can be leased from the Airport, will not interfere with aircraft operations and is easily connected to the existing system. This alternative is considered the Preferred Alternative. There are no other reasonable alternatives to the proposed action.

**Discussion**
The attached Short Environmental Assessment (EA) Form C addresses the effect of the proposed project on the quality of the human and natural environment, and is made a part of this finding. The following impact analysis presentation highlights the more thorough analysis presented in the EA.

**Environmental Impacts** [Refer to Section 9, Subsections (1) through (25) in the EA]
The impacts of the proposed federal action on noise, compatible land use, social, induced socioeconomic, air quality, water quality, Department of Transportation (DOT) Section 303/4(f), historic, architectural, archeological and cultural resources, biotic communities, endangered and threatened species, wetlands, floodplains, coastal zone, coastal barriers, wild and scenic rivers, prime and unique farmland, energy supply and natural resources, light emissions, solid waste, construction, hazardous sites/materials, environmental justice, and cumulative impacts were evaluated in the EA. It is the FAA's finding that the proposed action will not have any significant effect on any of the above noted categories which cannot be mitigated.

The following categories are resources or issues that had unique or special concerns that were addressed in the Environmental Assessment. These and all other categories are discussed in Section 9 of the attached Environmental Assessment.

**Air Quality** [refer to Section 9, Subsection (5) in the EA]
PHL is located in areas designated as moderate non-attainment for the 8-hour ozone standard and non-attainment for particulate matter equal to or less than 2.5 micrometers in aerodynamic diameter (PM2.5). A quantification of air emissions related to the construction of the hydrant fueling system was conducted to evaluate the need to complete a formal general conformity determination. The results of the air emission analysis indicated that for construction of the proposed project the emissions for VOC (volatile organic compounds), NOx (nitrogen oxides), and PM2.5 were less than the de minimis thresholds which would require a general conformity analysis. Therefore, no further air quality analysis was required.
Floodplain [Refer to Section 9, Subsection (12) in the EA]
The proposed action would take place in the 100-year floodplain. DOA is working with agencies to ensure that the proposed project complies with applicable federal, state and local regulations and policies for construction in floodplains. Implementation of the proposed action will not result in changes in existing elevations or an increase in impervious surface in the floodplain. The natural and beneficial values of the floodplain would not be affected. In conclusion, there would be no significant cumulative impacts to the floodplain.

Coastal Zone Management Program [refer to Section 9, Subsection (13) in the EA]
The Pennsylvania Coastal Resource Management (CRM) Program has determined that the activities associated with the proposed Fuel Farm Expansion project are consistent with Pennsylvania’s CZM Program with conditions. Construction on the project is not to begin prior to the Department’s Southeast Regional Office (SERO) review and approval of an Erosion and Sedimentation Control Plan and a Post-Construction Stormwater Management Plan. Also, an amendment or waiver for NPDES Permit for Stormwater Discharges Associated with Construction Activities will be needed prior to construction. This condition is necessary in order to ensure that this project will be undertaken in a manner consistent with CRM’s enforceable policies 3.1: Fisheries Management and 9.2: Intergovernmental Coordination/Water Quality.

Construction Impacts [Refer to Section 9, Subsection (20) in the EA]
Ambient noise levels are expected to increase during construction. However, the site is located within the envelope of an airport and there are no residences or other noise sensitive areas near the proposed project location. Construction activities can cause impacts, resulting solely from and limited to, the construction period. They are distinct in that they are temporary in nature, and their degree of adversity generally diminishing as work concludes. Using best management practices (BMPs) and other proven procedures, the project can be implemented without appreciable temporary impacts, while maintaining compliance with all local, state, and federal ordinances and regulations. In all cases, FAA Advisory Circular (AC) 150/5370-10C entitled, "Standards for Specifying Construction of Airports," and specifically Item P-156 "Temporary Air and Water Pollution, Soil Erosion, and Siltation Control," and Advisory Circular 150/5320 5C "Surface Drainage Design" would be complied with.

Public Involvement (Refer to Section 11 in the EA)
A Notice of Public Availability of the Environmental Evaluation Form “C” (Short EA) and FONSI will be published in the Philadelphia Enquirer.

Given that the effects of the project are minor, that there is no known controversy concerning the Proposed Action or substantial interest in holding a public hearing, that there is no statutory requirement to hold a public hearing, and that no other agency with
jurisdiction over the action has requested a hearing, the FAA determined that a public meeting or hearing is not warranted.

**Mitigation Measures** *(Reference to Section 10 in the EA)*

There will be no significant impacts to the environment. Mitigation will include adherence to BMPs as required of the contractor to ensure compliance with the policies of FAA Advisory Circular (AC) 150/5370-10B and specifically Item P-156.

All necessary permits will be obtained for both the construction and operation of the facility. All disturbances will be in accordance with local, state, and federal regulation.

**Consistency with Community Planning** *(Refer to Section 9, Subsection (21)(c) in the EA)*

The FAA finds that the proposed action is consistent with current planning efforts in the vicinity of the Airport.

**Conclusion and Approval:**

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information, I find the proposed Federal action is consistent with existing national environmental policies and objectives of Section 101 (a) of the National Environmental Policy Act of 1969 (NEPA). I also find the proposed Federal action will not significantly affect the quality of the human environment or include any condition requiring consultation pursuant to Section 102(2)(C) of NEPA. As a result, FAA will not prepare an EIS for this action.

Recommended:

Charles J. Campbell  
Environmental Protection Specialist  
Harrisburg ADO  

Approved:

Lori K. Pagnanelli  
Manager, Harrisburg ADO  

Disapproved:

Lori K. Pagnanelli  
Manager, Harrisburg ADO  

Date  
Date  
Date
ENVIRONMENTAL EVALUATION FORM "C"
(Short Environmental Assessment)
for
AIRPORT DEVELOPMENT PROJECTS

~ Aviation in Harmony with the Environment ~

FEDERAL AVIATION ADMINISTRATION
EASTERN REGION
AIRPORTS DIVISION

Airport Name: Philadelphia International Airport
Proposed Project: Fuel Farm Expansion Project

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

Responsible FAA Official: [Signature] Date: 9/25/04

FAA EASTERN REGION AIRPORTS DIVISION
ENVIRONMENTAL EVALUATION FORM "C"
FOR SHORT ENVIRONMENTAL ASSESSMENTS

Final 3/22/99 Form C
14. FAA DECISION:
Having reviewed the above information, certified by the responsible airport official, it is the FAA decision that the proposed project(s) of development warrants environmental processing as indicated below.

☑ The proposed development action has been found to qualify for a **Short Environmental Assessment**.

☐ The proposed development action exhibits conditions that require the preparation of a detailed **Environmental Assessment (EA)**.

☐ The following additional documentation is necessary for FAA to perform a complete environmental evaluation of the proposed project:

________________________________________________________________________
________________________________________________________________________
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________________________________________________________________________
________________________________________________________________________

*Action Reviewed/Recommended by:*

[Signature]

(FAA Environmental Specialist)

[Date]

9-22-09

*Approved:*

[Signature]

(FAA Approving Official)

[Date]

9-22-09

* The above FAA approval only signifies that the proposed development action(s), as described by the information provided in this Evaluation Form, initially appears to qualify for the indicated environmental processing action. This may be subject to change after more detailed information is made known to the FAA by further analysis, or though additional federal, state, local or public input, etc.

Final 3/22/99 Form C
ENVIRONMENTAL EVALUATION FORM “C”
(Short Environmental Assessment)
for
AIRPORT DEVELOPMENT PROJECTS

~ Aviation in Harmony with the Environment ~

FEDERAL AVIATION ADMINISTRATION
EASTERN REGION
AIRPORTS DIVISION

Airport Name: Philadelphia International Airport
Proposed Project: Fuel Farm Expansion Project

This Environmental Assessment becomes a Federal document when evaluated and signed by the responsible FAA official.

Responsible FAA Official: 0/L/KP  Date: 9/25/09

FAA EASTERN REGION AIRPORTS DIVISION
ENVIRONMENTAL EVALUATION FORM “C”
FOR SHORT ENVIRONMENTAL ASSESSMENTS

Final 3/22/99 Form C
Note: This page to be completed by FAA only

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____________________________________________________________________________________

*Action Reviewed/Recommended by:

[Signature]

(FAA Environmental Specialist)  9-22-09  Date

*Approved:  9-25-09  Date

[Signature]

(FAA Approving Official)

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Final 3/22/99 Form C