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Sent: Wednesday, September 16, 2020 2:39 PM

To: Driscoll, Keith J NFG NG MAANG (USA) <keith.j.driscoll.nfg@mail.mil>

Cc: Timmermann, Timothy <Timmermann.Timothy@epa.gov>; Dolan, Jane <Dolan.Jane@epa.gov>; Loughlin, Anni <loughlin.anni@epa.gov>

Subject: Comments on the EA/FONSI for the Multi-Purpose Machine Gun Range at Camp Edwards

Dear Mr. Driscoll:

We are writing to comment on the EA/FONSI for the proposed Multi-Purpose Machine Gun Range at Camp Edwards. Although we offered scoping comments prior to the preparation of the EA we did not receive a copy of the EA/FONSI when it was published. We worked promptly to prepare the comments below when we became aware of the document. We appreciate your willingness to consider our comments as you work to finalize the EA and FONSI for the project.

General Comments

We recommend that additional information be provided in the EA/FONSI to more fully describe the potential environmental impacts associated with the Proposed Action and to support any conclusion reached regarding the magnitude of the expected impacts.

The Proposed Action is for the Massachusetts National Guard (MAARNG) to be able to train with the M249 and M240 (5.56 mm and 7.62 mm) weapons systems; however, Table 2-2 indicates that additional weapons systems and ammunition are proposed to be used on the proposed range.

Recommendation: We recommend that the EA/FONSI list the constituents of the propellants, primers, bullets, and cartridge cases for all weapons systems and bullets (including grenade launcher MK19) proposed for use on the range and why adverse environmental impacts from the use of these weapon systems and ammunition are considered less than significant. list the constituents of tracers, flares, and simulators that are proposed for use on the proposed range and why adverse environmental impacts from these training activities are considered less than significant.

The EA/FONSI would benefit from a more complete description of the baseline and expected contaminant loading of project area soils due to the firing of ammunition on the proposed range.

Recommendation: We recommend that the EA/FONSI describe the baseline and expected contaminant loading of project area soils due to the firing of ammunition on the proposed range. It may be appropriate to summarize and reference the findings from the KD Range Post-DD Confirmatory Geophysical and Soil Investigation performed by IAGWSP in accordance with AO3 and the Training Ranges and Small Arms Ranges Decision Documents.

The June 2020 SEIR explains that the range has been designed and will be designated as a copper ammunition only range. This design parameter was not highlighted in the EA/FONSI.

Recommendation: We recommend that the copper only ammunition designation be highlighted in the EA/FONSI as it bears directly on the potential for environmental impacts from the proposed range. We recommend that the EA/FONSI specifically explain whether this measure will apply to all training devices to be used at the facility. Please note that in a letter dated 8 January 2012 concerning the MAARNG's proposed use of M855A1, 5.56mm, copper ball ammunition (Enhanced Performance Round (EPR)) at Sierra and Tango Ranges, EPA stated that the use of the proposed EPR did not appear to violate the terms of EPA's Administrative Order No. 2. EPA urged MAARNG to complete a full review of all the environmental effects of the bullets, and urged MAARNG to coordinate closely with the EMC on the development and implementation of any further studies and the establishment and implementation of appropriate Operation, Maintenance and Monitoring requirements for range use. It is EPA's understanding that MAARNG has consulted closely with the EMC during the range design process and we recommend that coordination be referenced in the EA/FONSI.

The EA does not include a discussion of hazardous and toxic materials and waste.

Recommendation: We recommend that the EA and FONSI list all hazardous and toxic materials and waste proposed to be used or generated during construction activities, and during training operations and site maintenance.

Specific Comments

Line 562 – Please explain how projectiles would be captured, how these projectiles would be collected and recycled/disposed, and how potential impacts to the environment would be measured and at what frequency.

Line 592 – Please describe the specific components of the antiterrorism and force protection (AT/FP) measures for the proposed range and whether they would result in environmental impacts.

Line 1445 – “Past operations and waste disposal practices have resulted in subsurface contamination in areas near the Impact Area, where the existing KD Range is located. Contaminants include fly ash, bottom ash, waste solvents, waste fuels, herbicides, and transformer oil.” Please explain where these contaminants were detected. “Additionally, seven ground water plumes in the Impact Area are undergoing extraction and treatment. The nearest plume, located on L Range, is approximately 0.5 mile to the east of the KD Range. The plume is being remediated and is unlikely to affect conditions at the KD Range.” EPA notes that the L range plume does not travel in the direction of the KD Range. Please describe the current (baseline) and expected future ground water quality beneath and in the vicinity of the proposed range.

Line 1741 – “Construction of the Preferred Alternative would result in short-term, less-than-significant adverse impacts on groundwater. During land conversion activities, the use of construction equipment and materials could inadvertently release contaminants or toxic materials (e.g., fuel and other petroleum products) into groundwater. Similarly, site maintenance and training operations could lead to the inadvertent release of contaminants, creating a long-term, less-than-significant adverse impact on groundwater. Section 4.12 discusses potential pollution (i.e., from chemicals, fuels, etc.) impacts attributable to the Preferred Alternative and identifies BMPs that would minimize impacts to the extent practicable.” Section 4.12 does not identify the BMPs that would minimize impacts. Please describe the pollution prevention and mitigation measures related to hazardous and toxic materials and waste (HTMW).

Line 1974 – “Under the Preferred Alternative, short- and long-term, less-than-significant adverse impacts associated with HTMW would be anticipated due to minor land conversion activities, as well as maintenance and training operations. The Preferred Alternative would produce minor increases in handling, storage, use, transportation, and disposal of HTMW, resulting from vehicle and equipment during vegetation removal activities and site maintenance. These proposed activities would have potential contamination sources (e.g., diesel fuel, oil, antifreeze, and lubricants). Even without major release events, multiple minor releases could have potential effects to the environment at the proposed firing point locations. Releases over a long period of time could potentially lead to soil and/or groundwater contamination, and thus could require some form of remediation.” Please describe the pollution prevention and mitigation measures for HTMW.

Line 1991 – “In addition, in the event that unexploded ordnance (UXO) or MEC are encountered during construction, an on-call UXO/MEC expert would be contacted immediately for safe handling and removal. This expert would handle all aspects of the removal process to include regulator notification, implementation of safety measures, and removal of such items. The MAARNG would contract an on-call UXO/MEC expert for the duration of the construction phase.” EPA recommends that MAARNG follow

IAGWSP protocols established pursuant to the SDWA Orders for the removal of soils under identified UXO/MEC.

Line 2014 – “Under the Preferred and Reduced-Scale Alternatives, no significant impacts would be anticipated; therefore, no mitigation measures are required to reduce potentially significant adverse impacts.” This statement appears to conflict with information provided in Appendix B - A that a significant mitigation plan has been developed to achieve overall net benefit for all potentially impacted state-listed species for this proposed action and other upcoming major construction activities at Joint Base Cape Cod. See also Appendix E.

Lines 2047 and 2057 – No mention is made of the Operations, Maintenance and Monitoring Plan (OMMP) which would be a requirement of the EMC. We recommend incorporating the OMMP in the discussion.

We appreciate your consideration of our comments on the EA/FONSI. Please contact me with any questions.

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