



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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OFFICE OF THE
REGIONAL ADMINISTRATOR

September 5, 2019

Keith J. Driscoll
NEPA/MEPA Manager
Massachusetts National Guard
2 Randolph Road
Hanscom AFB, MA 01731-3001

RE: Scoping Comments for the Environmental Assessment for the Multi-Purpose Machine Gun Range, Camp Edwards, Massachusetts

Dear Mr. Driscoll:

This letter is provided in response to your August 7th request for input regarding key issues that should be addressed in the Environmental Assessment (EA) for the proposed Multi-Purpose Machine Gun Range at Camp Edwards. According to your letter the project will create a modern small arms range that will support mission training and allow soldiers to meet weapons qualifications requirements. The range is proposed on land leased from the Commonwealth of Massachusetts on an existing area referred to as the Known Distance (KD) Range.

We appreciate the opportunity to comment in advance of the preparation of the EA for the project. Our comments below provide background information and suggestions regarding potential environmental issues relevant to the proposed action that we recommend be considered as you work to develop the EA.

The KD Range has been subject to investigation and cleanup under Section 1431(a) of the Safe Drinking Water Act (SDWA), 42 USC § 300i(a), as amended, and two Administrative Orders (AOs) concerning response actions issued thereunder (U.S. Environmental Protection Agency Region 1 (EPA) AO SDWA 1-97-1019 (AO1) and AO SDWA-1-2000-0014 (AO3)). The Administrative Record containing key supporting documents from the investigation and cleanup is available at the Impact Area Groundwater Study Program Office (IAGWSPO), 1807 West Outer Road, Camp Edwards, MA. Mr. Shawn Cody is the point of contact for that information and he can be reached at 339-202-9370.

The final cleanup remedy under AO3 for the KD Range is contained in two (2) separate Decision Documents (DD). The February 2019 Training Areas Operable Unit DD (KD West is one of 36 sites or locations contained within this DD) presents the selected remedy for the KD West Range. The selected action for KD West was data review and/or confirmatory soil sampling and geophysical screening. Details of these proposed actions are contained in Appendix F to the DD. These actions are ongoing and the findings memo for all Training Areas post-DD work will be

prepared in 2020. The need for Land Use Controls (LUCs) will be determined after completion of the investigations as described in the Decision Document.

The September 2015 Small Arms Ranges (SAR) DD (KD East is one of 40 locations contained within this DD) presents the selected remedy for the KD East Range. The selected action for KD East was confirmatory soil sampling and potential removal actions. Details of these proposed actions are contained in Appendix D to the DD. These actions have been completed and the findings memo for all SAR post-DD work is currently being drafted. LUCs have been established in the DD to protect groundwater monitoring wells and other environmental sampling equipment on and around the small arms ranges.

EPA established use restrictions at the KD Range in May 1997 with the issuance of AO2 (SDWA I-97-1030), but those restrictions were lifted in May 2017 when EPA issued a Final Response to a 31 August 2016 Massachusetts National Guard (MANG) Request to modify the AO2 Scope of Work ("SOW"). EPA modified Sections II.A.1.a and Section II.A.1.f of the SOW to not prohibit firing of lead ammunition or other "live" ammunition at small arms ranges at or near the Training Range and Impact Area to the extent those actions receive approval and oversight from the Environmental Management Commission (EMC) in accordance with the Environmental Performance Standards.

- The authorization was conditioned upon continued compliance with all conditions established by the EMC.
- The authorization was conditioned upon MANG requesting and then receiving funds necessary to ensure compliance with the approved Operations, Maintenance, and Monitoring Plan.
- The authorization does not extend to any other ammunition or training device.
- The proposed use of this ammunition or training device was authorized only to the extent it does not interfere with the completion of investigation and cleanup activities.
- This decision will be reviewed as appropriate, but no less often than every five years. The purpose of the review is to revisit the appropriateness of the decision in providing adequate protection of human health. The scope of the review will include, but is not limited to, the following questions: are the ranges operating as designed (i.e., monitoring or maintenance); have any of the cleanup standards changed since the decision; and is there any new information that would warrant modifying or withdrawing the decision? If appropriate, additional actions (including, if necessary, reopening the decision) may be required as a result of these reviews. EPA retained all its enforcement authorities pursuant to existing Administrative Orders.

Your letter also describes that the proposed project "...includes a process for selection of pollution prevention strategies and best management practices through the joint coordinated review efforts of the Environmental Management Commission, the United States Environmental Protection Agency and the Massachusetts Department of Environmental Protection." As such, the EMC should continue to be consulted during the range design and development process, including the selection of pollution prevention strategies and best management practices that will be codified in an Operations, Management, and Maintenance Plan (OMMP) for the Multi-Purpose Machine Gun Range. These strategies and practices should also be developed to adhere

to the conditions described above. It may also be a worthwhile exercise for the EA to consider how the adaptive management strategies employed during the Juliet, Kilo, Tango and Sierra Range pilot periods might apply to development and use of the KD Range.

Thank you for the opportunity to offer comments in advance of your work to prepare the EA. Please contact me at 617-918-1025 with any comments or questions. We look forward to reviewing the EA when it is available.

Sincerely,



Timothy Timmermann
Director, Office of Environmental Review

cc:

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