

From: [Driscoll, Keith J NFG \(USA\)](#)
To: [Downing, Jane](#); [Baganha, Paulo A CW3 USARMY NG MAARNG \(USA\)](#)
Cc: [Springborg, Denise](#); leonard.pinaud@state.ma.us
Subject: RE: Comments on the draft MPMG Monitoring Plan
Date: Friday, July 1, 2022 12:01:46 PM

Thanks Jane.

The MAARNG has received the comments and will forward them on to the Team for review.

Thank you. You have a nice weekend as well.

Keith

From: Downing, Jane <Downing.Jane@epa.gov>
Sent: Friday, July 1, 2022 11:31 AM
To: Driscoll, Keith J NFG (USA) <keith.j.driscoll.nfg@army.mil>; Baganha, Paulo A CW3 USARMY NG MAARNG (USA) <paulo.a.baganha.mil@army.mil>
Cc: Springborg, Denise <Springborg.Denise@epa.gov>; leonard.pinaud@state.ma.us
Subject: [Non-DoD Source] Comments on the draft MPMG Monitoring Plan

Hi Paulo/Keith (please share with others)

Appreciate yesterday's call with all parties on the upcoming test fire and site visit.

We are now providing comments on the draft Monitoring Plan for the proposed MPMGR.

In general, we acknowledge the draft plan in its goal to be more clear and detailed on the identification of contaminants of concern and proposed activities.

As described on our recent call, our comments provided in the attached document reflect the goal of conducting proposed range maintenance and monitoring to minimize contaminant release and mobility. Yesterday this goal was shared by all parties. To that end, we offer significant changes to the plan, with some of the general comments provided below.

- The monitoring plan should aim to minimize contaminant releases and mobility to the extent feasible. Specific recommended changes reflect that goal, including more frequent range maintenance, additional contaminant sampling, and enhanced BMP plans.
- The action levels, particularly the soil action levels, are high. EPA will be evaluating new options for the media action levels. More comments to come.
- Instead of tying range maintenance to action level exceedances which are not expected, EPA requests semiannual automatic range maintenance, and more frequently as determined by EMC EO. This will also provide clarity around the range use and maintenance schedule, and contractor assistance.
- If the proposed MPMGR is constructed, baseline monitoring across all media, including components of the semiannual monitoring referenced in this plan, will be necessary after construction as a point as comparison against future use and sampling. Additional mention of this is needed in the Monitoring Plan or the OMMP.
- In addition to the evaluation of action levels, including soils, EPA is evaluating the

proposed list of Contaminants of Potential Concern and Contaminants of Concern against the mass balance list of ammunition components and historical sampling results of ranges. More comments will be forthcoming.

We look forward to continued exchange of information and coordination, including the upcoming site visit during which we can continue discussions over the attached comments.

For the next two weeks, I will be out of the virtual office. Denise Springborg will be the acting technical contact, including planning for the site visit.

That's it for now
Enjoy the weekend
Jane

Jane Downing
Chief, Drinking Water and Municipal Assistance Branch
EPA Region 1
617-918-1571