



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

JUN 13 2006

Mr. David McInerney  
Paulus, Sakolowski, and Sartor, LLC.  
67A Mountain Boulevard Extension  
P.O. Box 4039  
Warren, New Jersey 07059

Dear Mr. McInerney:

The Environmental Protection Agency (EPA) has reviewed the Federal Aviation Administration's (FAA) Draft Environmental Assessment (DEA) to release 139 acres of surplus airport property at the Millville Municipal Airport. This property will then become an integral part of the Thunderbolt Raceway New Jersey Motorsports Park. The Motorsports Park will be a 708-acre, multi-faceted motorsports complex with a 4.1-mile road circuit raceway, 3/4-mile Tri-Oval raceway, an all terrain vehicle track, a college preparatory Motorsports Academy, several hotels and motels, a country club and clubhouse, multiple restaurants, villas or condo style guest houses and a conference center designed to accommodate the automotive industry and fans.

**Comments:**

Based upon our review of the DEA, EPA has the following concerns:

**Sole Source Aquifer:** The project is located above the New Jersey Coastal Plain Aquifer System, a designated sole source aquifer, which is susceptible to contamination due to the highly permeable nature of the soil. The DEA must fully evaluate the potential for petroleum products, motor fluids, and other contaminants from the project to affect the aquifer.

- The volumes of oil and petroleum product dripping from cars, recreational vehicles, and trucks parked on grass must be quantified, and potential impacts to the aquifer assessed.
- Discuss all other possible aquifer contaminants that might be used in the operation of the Motorsports Park, such as fire fighting foam, and their possible impacts to the aquifer.
- Describe the pre-treatment methods to be used on water captured by storm drains before it is deposited in the drainage basins. Provide maps showing the location of storm drains and pretreatment equipment.
- Describe methods to capture oil or petroleum product spills at any of the tracks that will minimize or avoid contamination to the aquifer from an emergency spill.
- Provide locations and descriptions of all petroleum product storage facilities and spill containment plans for those facilities.

### **Air Quality:**

- The correct air quality designation for Cumberland County is moderate non-attainment for the eight-hour ozone standard. The one-hour ozone standard is no longer applicable.
- Both NO<sub>x</sub> and VOC are precursors of ozone and should be considered in the analysis. The applicable annual threshold values are 100 tons for NO<sub>x</sub> and 50 tons for VOC.
- The air quality assessment for NEPA should include emissions from construction and operation of the motorsports complex, the airport and other sources in the area; the general conformity analysis only needs to consider emissions from the construction phase of the overall motorsports complex.
- Please include a table showing each year of construction, the associated emissions of NO<sub>x</sub> and VOC, and the comparison to the general conformity de minimis thresholds.
- Passenger car emissions should be calculated using emission factors from EPA's MOBILE 6.2 model. Note that racecar emission factors are not included in the model. For the racecar emissions, please provide a justification for the method chosen; i.e., provide the basis for doubling the light-duty vehicle emission rates.
- Emissions from construction vehicles, kart vehicles, and off-road motorcycles should be calculated using EPA's NONROAD model. Please clarify whether the off-road motorcycles are specifically manufactured for competition (not subject to emission controls and not explicitly able to be modeled) or if they are standard off-road motorcycles (subject to controls and included in the NONROAD model).
- EDMS is capable of modeling piston and turboprop aircraft and contains a number of those aircraft within its database; therefore, it is not necessary to determine an equivalent number of jets for modeling purposes. Please list the types of aircraft assumed/modeled (manufacturer and model if available) and use EDMS to determine the emissions from single- and multi-engine piston and turboprop aircraft.

### **Noise:**

- While the DEA includes separate noise evaluations for the Motorsports Park and the Municipal Airport, the noise from these two sources must be evaluated cumulatively to obtain the actual future noise levels for the area.

- The NJ Motorsports Park sound assessment (Attachment H) should provide aerial maps that delineate baseline noise levels contours for the three noise examples, both measured and projected.
- It appears that the sound assessment considered sound levels from a “motorcross” type track (V.I.M.) and a NASCAR type track (N.H.I.S.) separately. If the NJ Motorsports Park will be running simultaneous races at both those tracks (and others), the noise generated from all simultaneous races must be estimated. Furthermore, as the Motorsports Park website shows that motorcycles will also race at the facility, estimates of noise levels from motorcycles should also be evaluated.
- Describe the construction and map the placement of the noise attenuation barriers at the “lightbulb” turn, and at the southern area of the project site. Describe how these will attenuate noise from the project.

**Utilities:**

- On page 5-38, the DEA states that the City of Millville will extend potable water and sanitary sewer service to the site. The expected water usage, as well as sewage and gray water production for the entire Motorsports Park should be quantified. EPA recommends that water usage be quantified by type of use (e.g., potable water, recreation, greens keeping). A letter from the City of Millville verifying that it has both the water and sewage capacity to handle the Motorsports Park must be provided.
- Please describe all solid waste disposal, including waste from car maintenance.

**Indirect and Cumulative Impacts:**

- The DEA does not provide sufficient information on the indirect impacts of the project. For example, there is no discussion about the expected increase in local traffic from both the Motorsports Park and the ancillary facilities. While the traffic analysis (Attachment R) does include traffic to the hotels, restaurants, and conference center, it does not include the spectator traffic going to the park. Also, describe expected vehicle routes to the park, and evaluate whether traffic volumes will affect the existing traffic patterns in the area.
- The Draft EA provides no information on cumulative effects as required by 40 CFR 1508.7. Cumulative effects are those effects that result from incremental impacts of a proposed action when added to other past, present, and reasonably foreseeable future actions, regardless of which agency or person undertakes such actions.

- EPA understands that the City of Millville is planning an expansion of the Airport Industrial Park northeast of the project. The impacts of this project should be included in an assessment of cumulative impacts.

**General Comments:**

- All reports should be dated.
- Attachment R – Traffic Assessment: The report introduction states that an air quality analysis was performed; however it does not appear to be contained in the attachment. Also, the MOBILE 6 model should be used for all air quality analysis, not MOBILE 5.A.

Thank you for giving EPA the opportunity to comment on the DEA. We appreciate that the document considers the future use of the transferred property; however, the DEA does not contain enough information to demonstrate and support a finding of no significant impact, especially with regard to the New Jersey Coastal Plain Sole Source Aquifer or to air quality. Should you have any questions about our comments, please call Lingard Knutson of my staff, at 212-637-3747.

Sincerely yours,



Grace Musumeci, Chief  
Environmental Review Section  
Strategic Planning Multi-Media Programs Branch