



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
ONE CONGRESS STREET SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

14 January 2011

Colonel Richard V. Crivello
Post Commander MAANG
Camp Edwards MA 02542-5003

Re: EPA Pilot Period extension for Juliet, Kilo, and Tango Ranges thru 31 December 2011

Dear COL Crivello,

On 28 January 2009, the Environmental Protection Agency (EPA) modified the Scope of Work ("SOW") to Safe Drinking Water Act Administrative Order SDWA I-97-1030 ("AO2"), adding a new Appendix C entitled "Revised Limited Authorization for Lead Ammunition Training" (RLALAT). The RLALAT authorized the MANG to fire lead ammunition at T (Tango), J (Juliet), and K (Kilo) Ranges as limited pilot projects. Specifically, the RLALAT extended a previous authorization to fire lead ammunition at T (Tango) Range, and authorized firing lead ammunition at the J (Juliet) and K (Kilo) Ranges, through December 31, 2009, in each case with an accompanying pollution prevention plan and environmental monitoring program. On 3 December 2009, the MANG requested that EPA extend the pilot period for Juliet, Kilo and Tango Ranges through 31 December 2011 to allow time to complete the construction and environmental monitoring requirements. On 12 January 2010, EPA granted the request and extended Appendix C's authorized pilot period for firing lead ammunition at Juliet, Kilo, and Tango Ranges for one year through 31 December 2010, specifying that the conditions for operation of Juliet, Kilo, and Tango Ranges would remain in accordance with the 28 January 2009 EPA approval letter and Appendix C to the AO2 SOW, except as modified by a schedule update.

In a letter dated 3 December 2010, the MANG requested that the Environmental Protection Agency extend the pilot period for Juliet, Kilo and Tango Ranges again, through 30 March 2012 or until such time that an appropriate data set regarding soil and water monitoring can be established for review by the EPA. The MANG explained that an extension was needed due to incomplete range construction such as STAPP system installation delays, site drainage construction delays, and installation of lysimeters being delayed as a result of a site drainage issue. According to the MANG, the delays were the result of material availability, weather, and funding issues. The MANG also provided a summary of actions conducted during 2010, and explained that results of a recent round of soil, pore water, and groundwater samples from all three ranges was expected to be available in December 2010, and that a further round of sampling would be conducted in June 2011.

Paragraph II.G of Appendix C provides that the RLALAT may be modified by the EPA Technical Project Coordinator upon written notice. By this letter, EPA hereby extends Appendix C's authorized pilot period for firing lead ammunition at Juliet, Kilo, and Tango Ranges for one additional year through 31 December 2011. The conditions for operation of Juliet, Kilo, and Tango Ranges shall remain in accordance with the 28 January 2009 EPA approval letter and Appendix C to the AO2 SOW, except as modified by the following schedule update:

1. The MANG shall submit the results of, and a report regarding, the most recent round of soil, pore water, and groundwater sampling to EPA no later than 15 February 2011.
2. The MANG shall conduct an additional round of soil, pore water, and groundwater sampling at Juliet, Kilo, and Tango Ranges no later than 30 June 2011.
3. The MANG shall submit the results of, and a report regarding, the above-described sampling to EPA no later than 31 August 2011.

This approval may be revoked or suspended at any time for failure to comply with the approval conditions, the range plans, or should monitoring indicate the potential for damage to the sole source aquifer.

Sincerely,



Lynne A. Jennings
MMR Team Leader

cc: Michael Ciaranca, E&RC
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