

From: [Jacobs, Kira](#)
To: [Downing, Jane](#); [Springborg, Denise](#); [Belaval, Marcel](#)
Subject: FW: MAARNG SSA request - email 1 of 3
Date: Friday, September 10, 2021 3:17:03 PM

Keith called this afternoon to let me know these are coming. He's sending three emails. This is email #1, the formal request for EPA review.

-----Original Message-----

From: Driscoll, Keith J NFG NG MAANG (USA)
<keith.j.driscoll.nfg@mail.mil> Sent: Friday, September 10, 2021 3:08 PM
To: Jacobs, Kira <Jacobs.Kira@epa.gov>
Cc: Porter, Matthew N COL USARMY NG MAARNG (USA) <matthew.n.porter.mil@mail.mil>; Pinaud, Leonard (DEP) <leonard.pinaud@state.ma.us>; Shannon, David W LTC USARMY NG MAARNG (USA) <david.w.shannon3.mil@mail.mil>
I> Subject: MAARNG SSA request

Good afternoon Kira-

The Massachusetts Army National Guard (MAARNG) is proposing to construct a Multi-Purpose Machine Gun (MPMG) range at its Camp Edwards facility located on Massachusetts' Cape Cod (Barnstable County). The MAARNG has consulted with the Environmental Protection Agency (EPA) about this action through the Massachusetts Environmental Policy Act and National Environmental Policy Act processes. Additionally, EPA personnel have been participated in various aspects of project development and design.

Camp Edwards lies above the Sagamore Lens Sole Source aquifer. The MAARNG requests the EPA to conduct a Sole Source Aquifer review for Phase 1 of this proposed project (8 lanes 800 meters). Based upon ongoing public concern about this project and a perceived potential to impact the aquifer it is in the mutual interest of MAARNG and the public to have this review conducted.

All MAARNG actions on Camp Edwards are subject to Chapter 47 of the Acts of 2002. This state legislation was established to protect the aquifer and its recharge zone formalized as the Upper Cape Water Supply Reserve. It prioritizes military use and training while ensuring all activities within the Reserve are compatible with the natural resource purposes of water supply and wildlife habitat protection. Chapter 47 is enforced by the Commonwealth's Environmental Management Commission (EMC), implemented through formally established Environmental Performance Standards, and overseen by an independent Environmental Officer, a Science Advisory Council made up of relevant subject matter experts, and a Community Advisory Council representing citizens and interest groups. The MAARNG has worked with the EMC's

Environmental Officer throughout planning, design, and permitting of the MPMG Range to ensure compliance with Chapter 47 of The Acts of 2002 and the Environmental Performance Standards.

The MAARNG looks forward to working with the EPA on the SSA review. I will be sending follow up emails with the additional information you had requested in your email dated 8 September 2021. If you have any questions please feel free to contact me at any time.

Thank you.

Keith J. Driscoll NEPA/MEPA Manager
Massachusetts Army National Guard 339-202-3980

From: [Jacobs, Kira](#)

To: [Downing, Jane](#); [Springborg, Denise](#); [Belaval, Marcel](#)

Subject: FW: MA ARNG Funding, Phasing and BMP/Mitigation - Email 2 of 3

Date: Friday, September 10, 2021 3:17:50 PM

Attachments: MAARNG MPMG Phase 1.pdf

MPMG SEIR CHPT 5.pdf

-----Original Message-----

From: Driscoll, Keith J NFG NG MAANG (USA) <keith.j.driscoll.nfg@mail.mil> Sent: Friday, September 10, 2021 3:09 PM

To: Jacobs, Kira <Jacobs.Kira@epa.gov>

Cc: Porter, Matthew N COL USARMY NG MAARNG (USA) <matthew.n.porter.mil@mail.mil>; Pinaud, Leonard (DEP) <leonard.pinaud@state.ma.us>; Shannon, David W LTC USARMY NG MAARNG (USA) <david.w.shannon3.mil@mail.mil> Subject: Funding, Phasing and BMP/Mitigation

Hello Kira-

As for the scope and funding of the project, the MAARNG is currently funded from National Guard Bureau for an 8 lane, 800 meter range (Phase I) with a budget of 11.5 million for design and construction. Phase II which consists of extending two middle lanes out to 1500 meters is not funded so it will have to be programmed and budgeted through National Guard Bureau at a future date. I have attached a pdf of the drawing that outlines the scope of Phase I.

As part of completing the Massachusetts Environmental Policy Act process we were required to complete a Notice of Project Change and a Single

Supplemental Environmental Impact Report (SEIR). Within the SEIR the MAARNG was required to outline the BMP's/Mitigation measures for the both construction and operation of the MPMG. These measures were summarized in Chapter 5 of the SEIR (attached) and ultimately approved by the Secretary of Energy and Environmental Affairs on 17 July 2020. The complete SEIR is a document that is too large to email but it can be found at the following Massachusetts National Guard Environmental and Readiness Center website

(<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.massnationalguard.org%2FERC%2Fpublications.htm&data=04%7C01%7CDowning.Jane%40epa.gov%7Cc6561c6f66af4f6b441908d9748fabd1%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637668982692396810%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCi6Mn0%3D%7C1000&psdata=kmTIM1KcQQFLIzhOBaqAEkLmSbui0JbbB4%2FjZegjmzo%3D&reserved=0>).

If you have issues accessing any of the documentation please let me know and I will set up a drop box.

I hope the information that I have sent is enough to get started. Please let me know if you have any questions or if I have missed anything and I will get back to you as soon as I can.

Thank you.

Keith J. Driscoll

NEPA/MEPA Manager Massachusetts Army National Guard 339-202-3980

From: [Jacobs, Kira](#)
To: [Downing, Jane](#); [Springborg, Denise](#); [Belaval, Marcel](#)
Subject: FW: Draft OMMP and supporting documentation - Email 3 of 3
Date: Friday, September 10, 2021 3:23:42 PM
Attachments: [Fwd Non-DoD Source Initial Draft MPMG OMMP \(5.42 MB\).msg](#)
[Draft MPMG OMMP 01152021.doc](#)
[Chapter 47 of the Acts of 2002 formatted.pdf](#) [Environmental Performance Standards April 2017.pdf](#) [Range Development EMC and EPS process.pdf](#)
[Mobility of Lead and Antimony in Shooting Range Soils.pdf](#) [MPMG Well Modeling.jpg](#)

-----Original Message-----

From: Driscoll, Keith J NFG NG MAANG (USA) <keith.j.driscoll.nfg@mail.mil> Sent: Friday, September 10, 2021 3:09 PM
To: Jacobs, Kira <Jacobs.Kira@epa.gov>
Cc: Porter, Matthew N COL USARMY NG MAARNG (USA) <matthew.n.porter.mil@mail.mil>; Pinaud, Leonard (DEP) <leonard.pinaud@state.ma.us>; Shannon, David W LTC USARMY NG MAARNG (USA) <david.w.shannon3.mil@mail.mil> Subject: Draft OMMP and supporting documentation

Hello Kira-

Attached is the draft Operations, Maintenance, and Monitoring Plan (OMMP) along with an email to staff and the Environmental Management Commission, Environmental Officer (EMC EO) coordinating this draft OMMP. Within the draft OMMP are comments and text that is in red. These items and the draft OMMP need to be finalized and approved by the EMC EO in accordance with Chapter 47, EPS's, EPS 19 and the associated range development process for the EMC (Attached).

For groundwater monitoring we have been working with the Impact Area Groundwater Study Program (IAGWSP) via the Army Corp of Engineers to model and determine the appropriate wells for groundwater monitoring at the MPMG range (Attached). Monitoring well MW-474S can be used for firing line monitoring and MW-60S can be used for down range monitoring. This is pending review, comment, and approval of the EMC EO.

Along with the EMC, Science, and Community Advisory Councils the EMC formed an Ad Hoc Committee of the Science Advisory Council specifically deal with the question of range monitoring and the associated chemistry there in. As an example at legacy ranges antimony was detected in lysimeters above the OMMP action levels and was trending upwards. In coordinating with the Ad Hoc experts and having research conducted by the Cold Regions Research Lab (attached) it was determined that antimony was being mobilized in legacy soil by pH adjusting amendments. Amendments had already been halted at the advice of the Ad Hoc Committee.

The above work along with refinements in range management activities (e.g. vegetation, bullet pocket maintenance, etc) results in constant review, improvement and updates to OMMPs.

As background and for supporting documentation from the IAGWSP see the 2014 Small Arms Investigation Report (https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fjbcc-iagwsp.org%2Fcomments%2Fsmall_arms_ranges_ir.pdf&data=04%7C01%7CDowning.Jane%40epa.gov%7C9023230ee4474238430808d974904787%7C88b378b367484867ac976aacbeca6a7%7C0%7C0%7C637668986207158116%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&reserved=0) as required by the USEPA AO2 and the supporting 2015 Decision Document for this Operable Unit.

There will be one more follow up email with funding information and the BMP's as committed to in the MEPA documentation for this action.

Keith J. Driscoll NEPA/MEPA Manager
Massachusetts Army National Guard 339-202-3980