UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

11 December 2013

Edward P. Gallagher, Major
Administrative Officer
Departments of the Army
Massachusetts Army National Guard Training Site
Camp Edwards
Camp Edwards, MA 02542-5003

RE: Supplemental Environmental Project (SEP) Completion Report, Consent Agreement and Final Order (CAFO), Docket No. SDWA 01-2012-0021

Dear Major Gallagher: EPA has received and reviewed the Supplemental Environmental Project (SEP) Completion Report, Consent Agreement and Final Order (CAFO), Docket No. SDWA 01-2012-0021 and provides the following comments which are attached. Based upon EPA's review of the document, EPA has concluded in accordance with Paragraph 57 of the CAFO that the project has been completed satisfactorily.

Respondent shall provide EPA with a revised SEP Completion Report in accordance with the attached comments within 30 days of receipt of these comments.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Lynne A. Jennings

Lynne A. Jennings
MMR Team Leader

Cc: M. Begley/EMC
J. Dolan
T. Conway

SDMS Doc ID 549586

EPA COMMENTS ON SUPPLEMENTAL ENVIRONMENTAL PROJECT (SEP) COMPLETION REPORT, CONSENT AGREEMENT AND FINAL ORDER (CAFO), DOCKET NO. SDWA 01-2012-0021

1) Detailed description of the SEP as implemented, par 1 – It is indicated that Figure 2 is a photograph of the area after impervious surface removal. This photograph is an aerial view of the SEP impervious surface removal areas. Please provide a representative number of photographs to document the post-removal baseline conditions for monitoring purposes (to be conducted consistent with the grassland management provisions of the relevant Installation Integrated Natural Resource Management Plan).

2) Detailed description of the SEP as implemented, par 2 - Please provide documentation of the inspection of the work area by an experienced natural resources specialist that was conducted prior to initiating work in an area. Please describe whether any measures were proposed to ensure that impacts were avoided, minimized or mitigated.

3) Detailed description of the SEP as implemented, par 2 - Please summarize the results of the meeting to discuss the SEP implementation to date, issues encountered, and issues anticipated with the remaining acres of impervious surface removal.

4) Detailed description of the SEP as implemented, par 3 – Please indicate that the 14.4-acre area will be monitored and maintained consistent with the grassland management provisions of the relevant Installation Integrated Natural Resource Management Plan ("INRMP"), whether it be the Camp Edwards INRMP or the 102nd I W INRMP.

5) List of itemized costs for implementing the SEP – Enclosure 2 to the SEP Completion Report includes the cost by each yearly quarter for personnel and fuel, and an Application and Certification for Payment for the disposal costs. The CAFO, Paragraph 52, states that quarterly reports will include copies of invoices documenting funds spent towards completion of the SEP. The reports shall be submitted to EPA by the 30th day of the month following each quarter (January, April, July, October). Invoices for every load of impervious surface removed off-site were not included in the Completion Report. EPA requested via email on 24 October 2013 that copies of these invoices be provided to the Agency. This documentation was submitted on 25 October 2013.

6) As you may be aware, EPA conducted an inspection on 23 October 2013 of the area of the UTES facility where the reclaimed materials from the project had been stockpiled and where a portion remained. You indicated in a letter dated 21 November 2013 that it is estimated that there is approximately 1600 tons of excavated SEP material remaining at the UTES, and that this material will be sent for offsite reclamation and recycling. MAARNG deemed that the disposal costs should be part of the SEP costs; that being the case, the disposal would be part of the SEP, for purposes of completion of the SEP. MAARNG indicated in an email dated 9 December 2013 that all primary SEP material had been removed from the UTES area.

7) Description of any SEP operating problems encountered and the solutions thereto – EPA conducted an inspection of the SEP impervious surface removal area on 23 October 2013 and notes that several concrete pads/foundations remain in the area. Please provide a description of this material in the report.

8) Personnel Costs – It appears from the documentation provided that personnel provided screening support and oversight of the impervious surface removal from the UTES facility during the period 3 – 6 September 2013. Please explain why personnel costs were incurred during the period 9 – 12 September 2013 and 20 – 22 September 2013.