



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 1 8 2019

REPLY TO THE ATTENTION OF:

Major Joseph Sundy
National Guard Bureau
Air National Guard Readiness Center, NGB/A4AM
3501 Fetchet Avenue
Joint Base Andrews, Maryland 20762-5157

**Re: Project Scoping for Proposed Construction, Renovation, and Demolition of
Facilities at the 115th Fighter Wing, Truax Field, Madison, Dane County, Wisconsin**

Dear Major Sundy:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced project scoping document, which was prepared by the National Guard Bureau (NGB). We are providing comments pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The proposed action involves construction, demolition, and renovation activities at the 115th Fighter Wing facilities at Truax Field. Two alternatives have been provided:

- No Action Alternative. No construction, demolition, or renovation activities would occur at Truax Field.
- Proposed Action. Consists of 27 individual projects at Truax Field, with a total of 25.1 acres of new construction and up to 1.2 acres of new impervious surfaces:
 - Project 1. Construct one canopy covering up to seven R-11 fuel trucks;
 - Project 2. Demolish existing diesel fuel and gasoline tanks in Building B1010 and add new tanks behind Building B1212;
 - Project 3. Replace two existing 100,000-gallon tanks with five new 50,000-gallon jet fuel tanks in same area;
 - Project 4. Construct a new 12,700 square-foot (SF) arm/de-arm pad near the intersection of Taxiways G and F;
 - Project 5. Construct a new gate house, two privately owned vehicle lanes, and one truck lane at the main gate;
 - Project 6. Repave all roads on base (except for Mitchell Street);
 - Project 7. Convert Mitchell Street to a two-lane road (from a 4-lane road), and expand the parking areas to the south in a northward direction;
 - Project 8. Construct an earthen berm southeast of the munitions storage area (MSA) fence would be constructed to provide protection from aircraft artillery;

- Project 9. Construct five 1,000 SF concrete fuel cells onto the existing fuel cell structure (Building B716);
- Project 10. Construct two new MSA igloos to the northeast side of the existing MSA igloos (Buildings B710 and B711);
- Project 11. Convert the 50-foot-wide asphalt taxiway to a 40-foot wide concrete road;
- Project 12. Demolish Buildings B31 and B307, and construct a new parking area in the same location;
- Project 13. Perform internal renovations of Building B500 to create room for a multi-use facility and a new fitness center;
- Project 14. Construct a new 3,400 SF warehouse;
- Project 15. Replace the existing boundary fence with a new 10-foot-high fence;
- Project 16. Perform internal renovations to Building B503;
- Project 17. Demolish two 500 SF unheated enclosed shelter and repave all existing asphalt in the Building B402 complex;
- Project 18. Construct a 15-by-100-foot-wide bay onto the west side of Building B1210 for warm storage;
- Project 19. Construct a 1,500 SF bay on the south side of Building B430, and demolish Building B1206;
- Project 20. Renovate Building B1212 and add new windows;
- Project 21. Construct a 10,500 SF indoor small arms;
- Project 22. Add on 1,800 SF to Building B1212;
- Project 23. Perform road repairs near the front gate of the installation, including on Pierstorff Street to Highway 51 and on Pearson Street to Anderson Street;
- Project 24. Replace pavement and regrade the area around Buildings B1000 and B1001;
- Project 25. Install underground fiber optic communications cable along Wright Street from Mitchell Street to Sloan Street;
- Project 26. Construct a 1,000 SF small arms storage building; and
- Project 27. Add new street lighting on Benson and Becker Streets.

Based on the information provided in the scoping document, we have comments relating to water quality, wetlands, air quality strategies, stormwater management and transportation resiliency, legacy pollution, environmental justice, pollinators and native plant species, energy efficiency, recycling and reuse of construction materials, cumulative impacts, and consultation records, as stated below.

Water Quality

The forthcoming draft environmental assessment (EA) should describe how the proposed action may affect water bodies listed as impaired by the Wisconsin Department of Natural Resources under Section 303(d) of the Clean Water Act and their listing status as impaired. We recommend that this section of the document discuss current impairments, and how the proposed action may affect, either positively or detrimentally, the impairment.

Wetlands

The EA should identify any jurisdictional waters of the United States that may be impacted by dredging or filling activities associated with the project. Please explain how the Clean Water Act Section 404(b)(1) guidelines have been applied with regard to both stream and wetland impacts. The Section 404 (b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative to be selected to address impacts to wetlands, streams, and other waters of the United States. The guidelines also require the sequence of first avoiding, then minimizing, and finally mitigating for any impacts to aquatic resources. Please also provide discussion of proposed mitigation for unavoidable, minimized, wetland and stream impacts (if applicable).

Air Quality Strategies

We recommend NGB consider implementing air quality best management practices (BMPs) during the construction phase of this project. Several recommendations are included in an enclosure entitled, *U.S. Environmental Protection Agency Construction Emission Control Checklist*.

Stormwater Management and Transportation Resiliency

One-hundred-year storm events are occurring with increasing frequency. The number of storm events occurring with greater intensity is also increasing. The National Climate Assessment¹ finds that in the Midwest, extreme heat, heavy downpours, and flooding will affect infrastructure. We recommend that NGB account for increased storm frequency and intensity in the design of this project to help ensure the health and safety of the public by using appropriate airport-specific stormwater management designs. See EPA's adaptation resource center for more information on adaptation strategies that may benefit this project.¹

Legacy Pollution

Polyfluoroalkyl substances (PFAS) are known to be present in groundwater at Truax Field, and existing structures that may be demolished or renovated are likely to contain lead paint, polychlorinated biphenyl (PCB) material, and asbestos. We recommend testing occur for each of these substances, and remediation (and appropriate disposal) be conducted if these substances are known or discovered during renovation or demolition activities. The EA should document the presence of these contaminants in the project areas and describe what actions are planned to address them, consistent with federal and state regulatory requirements. Since the proposed project includes removal and replacement of fuel storage tanks, NGB should assess whether any soil contamination exists associated with these tanks. The EA should describe any known contamination, any future sampling and analysis planned, and NGB's intent to remove and replace these tanks consistent with Federal and State regulatory requirements governing underground and above-ground storage tanks.

Environmental Justice

Communities with environmental justice (EJ) concerns are located near Truax Field. Executive Order 12898 directs Federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their actions on minority and/or low-

¹ See: <https://www.epa.gov/arc-x>

income populations. Tools are available to assist the project team in their EJ analysis for the EA. The Inter-agency Workgroup for EJ released a report entitled, “Promising Practices for EJ Methodologies in NEPA Reviews.” The report includes examples of methodologies used across the Federal government for EJ analyses in the NEPA process. In addition, EPA released “EJ SCREEN,” which is a publicly-available mapping tool designed to screen for potential impacts to communities living with or vulnerable to EJ concerns. Our EJ recommendations follow:

- Include a detailed community outreach strategy aimed at gaining local input from all communities that would be affected and specify targeted activities to reach low income and/or minority communities. Describe how input would be used to inform project development.
- Clearly describe baseline conditions and potential impacts to each community that would be affected, including unincorporated communities. Identify any important community facilities that could be displaced and effects on community cohesion and character, among other community impacts.
- Identify low income and/or minority populations that may be impacted by the proposed project. Compare percentages of low income and/or minority residents in the project area to an appropriate reference community to determine whether the project could have disproportionately high and adverse effects. Include clear maps and summary tables.
- Consider the “Promising Practices for EJ Methodologies in NEPA Reviews”² report. Discuss its applicability to this project and any best practices utilized from the report.
- Use EPA’s “EJ SCREEN”³ tool to screen for potential impacts to communities living with or vulnerable to EJ concerns.
- Provide specific measures to avoid, minimize, and mitigate any anticipated adverse impacts to communities.
- Ensure that the project would not have disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

The EA should also describe ongoing outreach planned throughout the NEPA process and project implementation. Plans to address any disproportionate adverse impacts to environmental justice communities should be included and committed to in the EA.

Pollinators and Native Plant Species

We encourage NGB to implement the 2014 Presidential Memorandum (PM) entitled, “Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators⁴,” which responds to evidence of steep declines in certain pollinator populations. Pollinators are critical contributors to our nation’s economy, food system, and environmental health. Vegetation within the project area can provide much needed habitat for pollinators, providing food, shelter, and connections to other patches of habitat. Maintenance staff and landscape designers can all take steps to improve the quality of vegetation to benefit pollinators, steps that can also reduce costs,

² See: Environmental Justice Interagency Working Group “Promising Practices for EJ Methodologies in NEPA Reviews” is available at: <https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews>

³ See: EPA’s EISCREEN Environmental Justice and Mapping Tool is available at: <https://www.epa.gov/eiscreen>

⁴ See: www.whitehouse.gov/briefing-room/presidential-actions/presidential-memoranda

maintain public safety, and improve public good will. We recognize that any habitat that is created or preserved at or near the airport must conform to Air National Guard Instruction 32-1023 and FAA practices to minimize the risk of wildlife hazards to aircraft.

Energy Efficiency

For new and renovated structures, we encourage the use of energy-efficient and/or sustainable building materials, such as south-facing skylights and windows, motion-sensored lighting, Energy Star certified windows and doors, and installation of renewable energy sources. Section 438 of the Energy Independence and Security Act provides examples of how to integrate energy efficiency into Federal projects.

Recycling and Reuse of Construction Materials

We recommend reuse or recycling of used construction material, to the maximum extent possible.

Cumulative Impacts

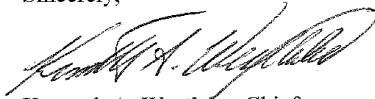
NGB should consult with the Dane County Regional Airport to determine if any proposed Airport actions may affect the proposed NGB project cumulatively. Similarly, the EA should describe cumulative impacts associated with the proposed F-35 beddown project that is being proposed at Truax Field.

Consultation Records

EPA recommends attaching to the EA inter-agency consultation documents regarding historic resources (Wisconsin Historical Society), wetlands and streams (U.S. Army Corps of Engineers), and Federal and state threatened and endangered species (U.S. Fish and Wildlife Service and the Wisconsin Department of Natural Resources). We also recommend including a list of agency contacts in the EA.

We are available to discuss these comments at your convenience. Please feel free to contact Mike Sedlacek of my staff at 312-886-1765, or by email at sedlacek.michael@epa.gov.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Encl: U.S. Environmental Protection Agency Construction Emission Control Checklist

U.S. Environmental Protection Agency
Construction Emission Control Checklist

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease. We recommend NGB consider the following protective measures and commit to applicable measures in the EA:

Mobile and Stationary Source Diesel Controls

- Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.
- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest U.S. EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.
- Consider requiring the following best practices through the construction contracting or oversight process:
 - Establish and enforce a clear anti-idling policy for the construction site.
 - Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
 - Use electric starting aids such as block heaters with older vehicles to warm the engine.
 - Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Repower older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric

vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.).

- Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.
- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.