



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
ENVIRONMENTAL MANAGEMENT COMMISSION
Building 1204, Camp Edwards, MA 02542-5003
(508) 968-5127 Telephone (508) 968-5128 Facsimile

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**Notice of a Proposed Adjustment to the Massachusetts Military Reservation
Environmental Performance Standards and Request for Public Comment.**

PROJECT MUNICIPALITY: Bourne, Sandwich
PROJECT WATERSHED: Cape Cod
EOEA NUMBER: 5834
PROJECT PROPONENT: The Massachusetts National Guard

The Environmental Performance Standards are the standards included in the final Environmental Impact Report (EOEA # 5834) regarding the activities on the northern 15,000 acres of the Massachusetts Military Reservation known as Camp Edwards and the Upper Cape Water Supply Reserve, land owned by the Commonwealth in Barnstable County. The Environmental Performance Standards were promulgated under sections 61 to 62H, inclusive, of Chapter 30 of the General Laws and certified by the Secretary of Environmental Affairs on July 16, 2001. Pursuant to Massachusetts General Law Chapter 47 of the Acts of 2002, Section 10, the following is a notice of a proposed adjustment of the Environmental Performance Standards.

This notice is based on the attached request by Massachusetts National Guard, for an adjustment to the Environmental Performance Standards regarding the use of the small arms ranges and lead ammunition.

In accordance with M.G.L. Chapter 47, the Environmental Management Commission may adjust the Environmental Performance Standards based upon sound and accepted scientific analysis, monitoring data and other relevant information. The proponent of any adjustment bears the burden of justifying the proposed adjustment and demonstrating that the proposed adjustment is protective of the drinking water supply and wildlife habitat. As noted above, the proposed adjustment is attached and additional information on the proposed adjustment and the small arms ranges within the Upper Cape Water Supply Reserve can be found on the Web at: www.eandrc.org, by clicking on "Camp Edwards Small Arms Range Information."

The Commission welcomes any interested parties to provide any pertinent information concerning the proposed adjustment. All relevant information will be considered in the review of the proposed adjustment. The Commission will consider all written comments submitted within 35 days after the publication of this notice in order to decide whether and how best to adjust the Environmental Performance Standards pursuant to M.G.L. Chapter 47. To obtain further information regarding this notice, please contact the Environmental Management Commission at (508) 968-5127.

All written comments should be submitted by May 16, 2007 to:

The Environmental Management Commission
Building 1204
West Inner Road
Camp Edwards, MA 02542-5003.

If the Commission determines that the proposed adjustment is warranted and does not significantly reduce or it improves the standard of environmental protection, it may make an adjustment to the Environmental Performance Standard effective on a date determined by the Commission.



DEPARTMENTS OF THE ARMY AND AIR FORCE
MASSACHUSETTS NATIONAL GUARD ENVIRONMENTAL AND READINESS CENTER
BUILDING 1204, WEST INNER ROAD
CAMP EDWARDS, MASSACHUSETTS 02542-5003

REPLY TO
ATTENTION
OF

28 March 2007

Environmental and Readiness Center

Environmental Management Commission
ATTN: Environmental Officer, Mr. Mark Begley
Building 1204
West Inner Road
Camp Edwards, MA02542-5003

Subject: Massachusetts Army National Guard proposed adjustment to the Environmental Performance Standards - Small Arms Range (SAR) Performance Standard

Dear Mr. Begley,

Enclosed is the Massachusetts Army National Guard's (MAARNG) proposed adjustment to the Environmental Performance Standards (EPSs) that were originally developed and approved during the Guard's Final Environmental Impact Review process in 2001.

As discussed to at the Environmental Management Commission (EMC) meeting 14 March 2007 the MAARNG is proposing the following the changes to the EPSs. The proposed adjustment is reflective of the MAARNG requirement to improve small arms training at Camp Edwards, MA, while being protective of the environment. The changes to the EPSs modify the restriction on the use of lead ammunition in the General Environmental Performance Standard and add a new Small Arms Ranges (SAR) Environmental Performance Standard, number 19.

Though the propose change to the EPSs does modify the restriction of using lead ammunition, the change to the EPSs does not reduce the protection to the 15,000 acre training area also known as the Upper Cape Water Supply Reserve (Reserve). To ensure continued protection of the Reserve with compatible military training, the MAARNG has developed a new EPS to specifically oversee the training on Small Arms Ranges. Before a small arms range can be used with lead ammunition, an operational and maintenance plan must be developed and approved by the EMC or their staff; as well as the EPA Region 1, due to requirements of the EPA Administrative Order issued to the MAARNG in 1997.

The proposed adjustment to General Performance Standard and the new EPS, 19 Small Arms Range (SAR) Performance Standard are included in the EPSs for the Reserve. The areas that will be changed and or added to are highlighted by the use of bold and italic font.

The MAARNG requests that this correspondence be included as part of the package that will be posted in the Executive Office of Environmental Affairs' *Environmental Monitor* for a period of at least 30 days to provide for continued public involvement. And further requests that all correspondence generated on the proposed changes to the EPSs with respect to lead ammunition by the posting be submitted to the EMC Environmental Officer for coordination with the MAARNG.

Respectfully,

A handwritten signature in cursive script, appearing to read "William F. FitzPatrick".

William F. FitzPatrick
COL, FA
Deputy Director

Enclosure

ENVIRONMENTAL PERFORMANCE STANDARD – ADJUSTMENT FOR SMALL ARMS RANGE

(Reviewer's Note: Proposed changes to the EPSs with the section in the General Performance Standard, page 2 and 3, and the new EPS 19 Small Arms Range (SAR) Performance Standard, starting on page 14. Both changes will be highlighted in bold and italic font.)

ENVIRONMENTAL PERFORMANCE STANDARDS

For Massachusetts National Guard Properties at the Massachusetts Military Reservation

CAMP EDWARDS TRAINING AREA GENERAL PERFORMANCE STANDARDS

None of the banned military training activities will be allowed in the Camp Edwards Training Areas. The restrictions fall into two categories:

Live weapon fire limitations:

- It is not allowed outside of the established ranges.
- Blank ammunition for small arms may be used in areas outside of the ranges, as appropriate.
- Lead-bullet ammunition is prohibited from all training areas ***except in accordance with Environmental Performance Standard 19, other applicable Performance Standards, and a range specific Operations and Maintenance (O&M) plan approved by the Environmental Management Commission (EMC).***

Banned military training activities:

- Artillery live fire
- Mortar live fire
- Demolition live fire training
- Artillery bag burning
- Non-approved digging, deforestation or vegetation clearing
- Use of 'CS', riot control, or tear gas for training outside the NBC bunkers
- Use of field latrines with open bottoms
- Vehicle refueling outside designated Combat Service Area and Fuel Pad locations
- Field maintenance of vehicles above operator level

Each user will be responsible for proper collection, management, and disposal of the wastes they generate, as well for reporting on those actions.

Use and application of hazardous materials or disposal of hazardous waste shall be prohibited except as described in the Groundwater Protection Policy.

Vehicles are only authorized to use the existing network of improved and unimproved roads, road shoulders, ranges and bivouac areas., except where necessary for land rehabilitation and management, water supply development, and remediation, or where roads are closed for land rehabilitation and management.

Pollution prevention and management of the small arms ranges will focus on and include the following:

The Camp Edwards Training Area Small Arms Ranges (SAR) will be managed as part of a unique water supply area under an adaptive SAR management program that integrates pollution prevention, best management practices (BMP), to include recovery of projectiles. This will be done through individual SAR specific Operation and Maintenance (O&M) plans that are written by the MANG and approved by the EMC, or their staff, for implementation. Adaptive, in this context, means making decisions as part of a continual process of monitoring, reviewing collected data, evaluating advances in range monitoring, design and technology, and responding with management actions as dictated by the resulting information and needs of protecting the environment while providing compatible military training within the Upper Cape Water Supply Reserve. A SAR Pollution Prevention Plan shall be in place to reduce the potential for an unintended release to the environment outside of the established containment area(s) identified in the SAR O&M plans for the operation of the SARs. All users must be aware of, and comply with, the Environmental Performance Standards that are applicable to all SAR activities, and follow any range specific approval(s) from the Environmental Management Commission. Camp Edwards SAR Pollution Prevention Plan shall be followed to prevent or minimize releases of metals or other compounds related to the normal and approved operation of each SAR to the environment. The adaptive SAR management program components required in each SAR O&M plan will include:

- *Consultation with applicable agencies with oversight of the training area before any actions that may affect state and/or federal requirements.*
- *Specific recovery plans for the removal and proper disposition of spent projectiles, residues and solid waste associated with the weapons, ammunition, target systems, and/or their operation and maintenance.*
- *Reduction of adverse impacts to the maximum extent feasible, including consideration for the redesign and/or relocation of the activity or encouraging only those activities that result in meeting the goal of overall projectile and / or projectile constituent containment.*
- *Coordinated documentation for the Camp Edwards range management programs and other related Camp Edwards management programs including: the Integrated Training Area Management Program, Range Regulations, Camp Edwards Environmental Management System, Civilian Use Manual, and Standard Operating Procedures.*
- *Long-term range maintenance, monitoring and reporting of applicable parameters and analysis.*

Protection and management of the groundwater resources in the Camp Edwards Training Area will focus on the following:

- Development of public and Massachusetts Military Reservation water supplies.
- Preservation and improvement of water quality and quantity (recharge).
- Activities compatible with the need to preserve and develop the groundwater resources.

All users of the Camp Edwards Training Area must comply with the provisions of the Groundwater Protection Policy and any future amendments or revisions to the restrictions and requirements. These will apply to all uses and activities within the overlays relative to Wellhead Protection, Zone II's within the Cantonment Area, and the Camp Edwards Training Areas.

Development of water supplies will be permitted within the Camp Edwards Training Area after review and approval by the managing agencies, principally the Department of the Army and its divisions, together with the Massachusetts Department of Environmental Protection, and the Massachusetts Division of Fish and Wildlife.

All phases of remediation activities will be permitted within the Camp Edwards Training Area after review and approval by the managing agencies, principally the Department of the Army and its divisions, together with the federal and state agencies who will have jurisdiction for remediation.

Protection and management of the vegetation of the Camp Edwards Training Area for focus on the following:

- Preservation of the habitat for federal and state-listed rare species and other wildlife.
- Preservation of the wetland resource areas.
- Activities compatible with the need to manage and preserve the vegetative resources.
- Realistic field training needs.
- Identification and restoration of areas impacted by training activities.

Goals for the Adaptive Ecosystem Management approach to management of the Camp Edwards properties will be as follows:

- Management of the groundwater for drinking water resources
- Conservation of endangered species.
- Management of endangered species habitat for continuation of the species.
- Ensuring compatible military training activities.
- Allowing for compatible civilian use.
- Identification and restoration of areas impacted by training activities.

The Environmental Performance Standards will be incorporated into the programs and regulations of the Massachusetts National Guard as follows. Those standards relating to natural resources management shall be incorporated as standards into each of the state and federal environmental management programs and attached as an appendix or written into the documentation accompanying the plan or program. All the Environmental Performance Standards will be attached to the Integrated Training Area Management Plan 'Trainer's Guide' and to the Camp Edwards Range Regulations. Modification of the Standards Operating Procedures will include review and conformance with the Environmental Performance Standards for trainers and soldiers at Camp Edwards.

SPECIFIC RESOURCE PERFORMANCE STANDARDS IN THE CAMP EDWARDS TRAINING AREA

1. Groundwater Resources Performance Standards

1.1. All actions, at any location within the Camp Edwards Training Areas, must preserve and maintain groundwater quality and quantity, and protect the recharge areas to existing and

potential water supply wells. All areas within Camp Edwards Training Areas will be managed as State Zone II, and, where designated, Zone I, water supply areas.

1.2 The following standards shall apply to designated Wellhead Protection Areas:

- The 400-foot radius around approved public water supply wells will be protected from all access with signage. That protection will be maintained by the owner and/or operator of the well, or the leaseholder of the property.
- No new stormwater discharges may be directed into Zone I areas.
- No in ground septic system will be permitted within a Zone I area.
- No solid wastes may be generated or held within Zone I areas except as incidental to the construction, operation, and management of a well.
- Travel in Zone I areas will be limited to foot travel or to vehicles required for construction, operation, and maintenance of wells.
- No new or existing bivonac activity or area shall be located within a Zone I area.
- All other areas will be considered as Zone II designated areas and will be subject to the standards of the Groundwater Protection Policy.

1.3. Land-use activities that do not comply with either the state Wellhead Protection regulations (310 CMR 22.00 et seq.) or the Groundwater protection Policy are prohibited.

1.4. All activities will support and not interfere with either the Impact Area Groundwater Study and/or the Installation Restoration Program. All activities shall conform to the requirements of Comprehensive Environmental Response, Compensation and Liability Act, the Massachusetts Contingency Plan, and the Safe Drinking Water Act.

1.5. Extraction, use, and transfer of the groundwater resources must not degrade [e.g. draw down surface waters] in freshwater ponds, vernal pools, wetlands, and marine waters, unless properly reviewed, mitigated, and approved by the managing and regulating agencies.

1.6. Land uses and activities in the Camp Edwards Training Areas will meet the following standards:

- Will conform to all existing and applicable federal, state and local regulations.
- Must be able to be implemented without interference with ongoing remediation projects.
- Allow regional access to the water supplies on the Massachusetts Military Reservation.

1.7. The following programs and standards will be used as the basis for protecting groundwater resources in the Camp Edwards Training Areas:

- Groundwater Protection Policy.
- Federal and Department of Defense environmental programs: Integrated Natural Resources Management Plan, Integrated Training Area Management Program, Range Regulations, Spill Prevention Control and Countermeasures Plan (or equivalent), Installation Restoration Plan, Impact Area Groundwater Study, or other remediation programs.
- State and federal laws and regulations pertaining to water supply.

2. Wetlands and Surface Water Performance Standards

2.1 Since there are relatively few wetland resources found at the Massachusetts Military Reservation, and since they are important to the support of habitat and water quality on the properties, the minimum standard will be no net loss of any of the wetland resources or their 100-foot buffers.

2.2 Land uses and activities will be managed to prevent and mitigate new adverse impacts and eliminate or reduce existing conditions adverse to wetlands and surface water resource areas. Impacts from remediation activities may be acceptable with implementation of reasonable alternatives.

2.3 Wetland area management priorities:

- Protection of existing wetland resource areas for their contributions to existing and potential drinking water supplies.
- Protection of wetlands for rare species and their habitats.
- Protection of human health and safety.

2.4 Activities will be managed to preserve and protect wetlands and vernal pools as defined by applicable, federal, state, and local regulations. These activities will include replacement or replication of all wetland resource buffer areas, which are lost after completion of an activity or use.

2.5 All land altering activities within 100 feet of a certified vernal pool must be reviewed before commencement by the Massachusetts Department of Environmental Protection/Wetlands Unit and the Natural Heritage and Endangered Species Program within the Division of Fish and Wildlife for impacts to wildlife and habitat. The certification of vernal pools will be supported by the on site personnel and will proceed with the assistance of the appropriate state agencies.

2.6 All new uses or activities will be prohibited within the wetlands and their 100-foot buffers, except those associated with an approved habitat enhancement or restoration program; those on existing improved and un-improved roads where appropriate sediment and erosion controls are put in place prior to the activity; or those where no practicable alternative to the proposed action is available. No new roads should be located within the 100-foot buffers. Existing roads within such buffers should be relocated provided that:

- The relocation does not cause greater environmental impact to other resources.
- There are funds and resources allocated for resource management and that those resources are approved and available for the relocation.

2.7 During the period of 1 March to 15 June, roads within 500 feet of all wetlands will be closed to vehicle access to protect the migration and breeding of reptiles, with the following exceptions:

- The primary roads -Frank Perkins, Burgoyne, Gibbs and Greenway Roads will not normally be closed during this period.
- Emergency response and environmental management activities will not be restricted.

2.8 No new bivouac area shall be located within 500 feet of any wetland. Any existing bivouac within a wetland buffer shall be relocated provided there are funds and resources allocated for the relocation.

3. Rare Species Performance Standards

3.1 As the Natural Heritage and Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife has identified the entire Massachusetts Military Reservation as State Priority Habitat for state-listed species (version dated 2000-2001), all activities and uses must comply with the Massachusetts Endangered Species Act and its regulations.

3.2 Where activities and uses are not specifically regulated under the Camp Edwards Training Area Range and Environmental Regulations, including these Environmental Performance Standards, the MMR Environmental and Readiness Center must review the activities for conformance with the Integrated Natural Resource Management Plan, and shall- consult with the Natural Heritage and Endangered Species Program regarding potential impacts to state-listed species.

3.3 All activities impacting rare species habitat must be designed to preserve or enhance that habitat as determined by the MMR Environmental and Readiness Center in consultation with the Natural Heritage and Endangered Species Program.

3.4 Users are prohibited from interfering with state and federal listed species.

3.5 Users will report all sightings of recognized listed species, e.g. box turtles, within any area of the Massachusetts Military Reservation.

4. Soil Conservation Performance Standards

4.1 Activities and uses must be compatible with the limitations of the underlying soils. Limitations on uses and activities may be made where the soils or soil conditions would not support the activity.

4.2 Agricultural soil types will be preserved for future use.

4.3 Any perennial or intermittent stream identified by the Environmental & Readiness Center Office will be protected from siltation by retaining undisturbed vegetative buffers to the extent feasible.

4.4 Cultural resource evaluations must be completed before any earth-moving operation may take place in undisturbed areas with high potential for cultural resources, and earth moving may be limited to specific areas (See Cultural Resource Performance Standards).

4.5 An erosion control analysis will be made part of the land management programs (Integrated Natural Resource Management Plan, the Integrated Training Area Management Program, Range Regulations, Civilian Use, and Standard Operating Procedures) for the Camp Edwards Training Area, including appropriate mitigation measures where existing or potential erosion problems are identified.

4.6 For all improved and unimproved roads, ditches and drainage ways:

- All unimproved roads, ditches, roads and drainage ways identified for maintenance will be cleaned of logs, slash and debris.
- Unimproved roads and roads may not otherwise be improved unless approved for modification.

- Any trail, ditch, road, or drainage way damaged by activities will be repaired in accordance with the hazard and impact it creates.

4.7 Erosion-prone sites will be inspected periodically to identify damage and mitigation measures.

5. Vegetation Management Performance Standards

5.1 All planning and management activities impacting vegetation

- Will ensure the maintenance of native plant communities, and
- Shall be performed to maintain the biological diversity.

5.2 Revegetation of disturbed sites will be achieved by natural and artificial recolonization by native species.

5.3 Timber harvesting or clear-cutting of forested areas should not occur on steep slopes with unstable soils or within the buffers to wetland resources.

5.4 Vegetation management will be subject to a forest management and fire protection program prepared by the users in accordance with federal standards, and carried out in a manner acceptable to the Massachusetts Military Reservation Committee and other state agencies or commissions, as may be designated by the Commonwealth of Massachusetts.

6. Habitat Management Performance Standards

6.1 The Camp Edwards Training Area will be managed as a unique rare species and wildlife habitat area under an adaptive ecosystem management program that integrates ecological, socio-economic, and institutional perspectives, and which operates under the following definitions:

- Adaptive means making decisions as part of a continual process of monitoring, reviewing collected data, and responding with management actions as dictated by the resulting information and needs of the system.
- Ecosystem means a system-wide understanding of the arrangements of living and non-living things, and the forces that act upon and within the system.
- Management entails a multi-disciplinary approach where potentially competing interests are resolved with expert analysis, user and local interest considerations, and a commitment to compromise interests when the broader goal is achieved to manage the Camp Edwards Training Area as a unique wildlife habitat area.

6.2 The adaptive ecosystem management program will include:

- Coordinated documentation for the management programs, Integrated Natural Resource Management Plan, the Integrated Training Area Management Program, Range Regulations, Civilian Use, and Standard Operating Procedures.
- The Massachusetts National Guard Environmental and Readiness Center staff and necessary funding to support its ecosystem management plans, as related to the amount of training occurring.
- Cooperative agreements to create a management team of scientific and regulatory experts.
- Long-term land maintenance, monitoring of resources and trends, study and analysis.

- Recovery plans for species and habitats identified for improvement.
- Consultation with Federal and State agencies charged with oversight of the Endangered Species Program before any actions that may affect state and federal-listed species habitat.
- Reduction of adverse impacts to the maximum extent possible, including consideration for the relocation of the activity or encouraging only those activities that result in meeting a habitat management goal.
- Habitat management activities designed to promote protection and restoration of native habitat types.

7. Wildlife Management Performance Standards

7.1 Native wildlife habitats and ecosystems management will focus on the following:

- Protecting rare and endangered species, and,
- Maintaining biodiversity.

7.2 Hunting, recreation and educational trips must be approved, scheduled, planned, and supervised through Range Control.

7.3 Any activity or use will prioritize protection of life, property, and natural resource values at the boundaries of the Camp Edwards Training Area where wildlife interfaces with the surrounding built environment.

7.4 Wildlife management will include the following actions, specific to the species targeted for management:

- Development and implementation of a plan to monitor hunting of game species.
- Planning for multi-use objectives for recreation and hunting that incorporate public input and recommendations.
- Development of suitable monitoring programs for federal and state-listed species, and regular exchange of information with the Natural Heritage and Endangered Species Program.

8. Air Quality Performance Standards

8.1 All uses and activities will be responsible for compliance with both the State Implementation Plan for Air Quality and the Federal Clean Air Act.

8.2 Air quality management activities will include air sampling if required by regulation of the activity.

9. Noise Management Performance Standards

9.1 Noise management activities shall conform to the Army's Environmental Noise Management Program policies for evaluation, assessment, monitoring, and response procedures.

10. Pest Management Performance Standards

10.1 Each user will develop and implement an Integrated Pest Management Program to control pest infestations that may include outside contracting of services. Non-native biological controls should not be considered unless approved by federal and state agencies.

10.2 Each user will be held responsible for management of pests that threaten rare and endangered species, or are exotic and invasive species, Invasive plant species that may be considered pest species are those defined by the United States Fish and Wildlife Service and the Massachusetts Natural Heritage and Endangered Species Program of the Division of Fisheries and Wildlife office. Site-specific analysis will be performed before implementation of any proposed pest management plans.

10.3 Pest vegetation control must be balanced against environmental impact and any proposed pest management activities, including the use of herbicides and mechanical methods, within rare species habitat areas must be approved by the Natural Heritage and Endangered Species Program, or in the case of federally-listed species, by the United States Fish and Wildlife Service.

10.4 Only herbicide formulations approved by the United States Environmental Protection Agency, the Department of Agriculture, the agency managing the user, and the Commonwealth of Massachusetts may be applied.

10.5 Herbicides and pesticides will not be applied by aerial spraying unless required by emergency conditions and approved under applicable state and federal regulations.

11. Fire Management Performance Standards

11.1 All activities and uses shall manage, prevent, detect, and suppress fires on the Camp Edwards Training Area in coordination with the local and state fire services and natural resource managers in the Environmental & Readiness Center.

11.2 Prescribed burns will be used as a habitat management and fire prevention tool. Prescribed burns will be used to reduce natural fire potential and create or maintain diverse and rare species habitat.

11.3 Pre-suppression activities will include strategic firebreaks and other management of vegetation in high-risk and high-incidence areas. The Integrated Natural Resource Management Plan and Fire Management Plan will be consulted for proposed actions.

11.4 Other than the above, no open fires are allowed.

12. Stormwater Management Performance Standards

12.1 All stormwater facilities shall comply with the State Department of Environmental Protection Guidelines for Stormwater Management, including Best Management Practices and all other applicable standards for control and mitigation of increased stormwater flow rates and improvement of water quality.

12.2 All increases in stormwater runoff will be controlled within the user's property.

12.3 No new stormwater discharges will be made directly into wetlands or wetland resource areas.

13. Wastewater Performance Standards

13.1 All wastewater and sewage disposal will be in conformance with the applicable Federal and Massachusetts Department of Environmental protection agency regulations.

14. Solid Waste Performance Standards

14.1. All solid waste streams (i.e., wastes not meeting the criteria for hazardous wastes) will be monitored and managed to substitute, reduce, recycle, modify processes, implement best management practices, and/or reuse waste, thereby reducing the total tonnage of wastes,

14.2. All users will be held responsible for collection, removal and disposal outside of the Camp Edwards Training Areas of solid wastes generated by their activities.

14.3 All users must handle solid wastes using best management practices to minimize nuisance odors, wind-blown litter, and attraction of vectors.

14.4 No permanent disposal of solid waste within the Groundwater protection Policy area/Camp Edwards field training areas will be permitted.

15. Hazardous Materials Performance Standards

15.1 Where they are permitted, use and application of hazardous materials shall be otherwise minimized in accordance with pollution prevention and waste minimization practices, including material substitution.

15.2 No permanent disposal of hazardous wastes within the Groundwater protection Policy area/Camp Edwards field training areas will be permitted.

15.3 Fuel Management

15.3.1 Spill Prevention, Control, and Countermeasure Plan, is in place to reduce potential for a release. Camp Edwards Spill Response Plan is in place to respond to a release if an event should occur. All users will comply with these plans at the Camp Edwards Training Area.

15.3.2 If found, non-complying underground fuel storage tanks will be removed in accordance with state and federal laws and regulations to include remediation of contaminated soil.

15.3.3 No storage or movement of fuels for supporting field activities, other than in vehicle fuel tanks, will be permitted except in approved containers no greater than five gallons in capacity.

15.3.4 New storage tanks are prohibited unless they meet the following requirements:

- Are approved for maintenance heating, or, permanent emergency generators and limited to propane or natural gas fuels.
- Conform to the Groundwater Protection Policy and applicable codes.

15.4 Non-fuel Hazardous Material Storage

15.4.1 No storage above those quantities necessary to support field training activities will be allowed within the Camp Edwards Training Area except where necessary to meet regulatory requirements, and where provided with secondary containment.

15.4.2 When required by applicable regulation, the user shall implement a Spill Prevention, Control and Containment/Emergency Response or other applicable response plan.

16. Hazardous Waste Performance Standards

16.1 All uses shall comply with applicable local, state, and federal regulations governing hazardous waste generation, management, and disposal (including overlays relative to Wellhead Protection, Zone II's within the Cantonment Area).

16.2 Accumulations of hazardous waste shall be handled in accordance with regulations governing accumulation and storage.

16.3 Existing facilities must implement pollution prevention and waste minimization procedures (process modifications, material substitution, recycling, and best management practices) to minimize waste generation and hazardous materials use.

16.4 Occupants and users will be held responsible for removing all solid or hazardous wastes generated during the period of use/tenancy/visitation upon their departure or in accordance with other applicable or relevant regulations.

16.5 Remedial activities undertaken under the Installation Restoration Program, the Impact Area Groundwater Study Program, the Massachusetts Contingency Plan, or other governing remediation programs are exempt from additional regulation (e.g., waste generation volume limits). Removal, storage, and disposal of contaminated material are required to comply with all state, and federal regulations.

16.6 Post-remedial uses and activities at previously impacted sites will be allowed in accordance with terms and conditions of the applicable regulations.

16.7 All hazardous wastes will be transported in accordance with federal Department of Transportation regulations governing shipment of these materials.

16.8 Transport shall reduce the number of trips for transfer and pick-up of hazardous wastes for disposal to extent feasible. This may include planning appropriate routes that minimize proximity to sensitive natural resource areas, and reducing internal transfers of material, including transfers from bulk storage tanks to drums, tankers, carboys, or other portable containers or quantities.

16.9 No permanent disposal of hazardous wastes within the Groundwater Protection Policy area/Camp Edwards field training areas will be permitted.

17. Vehicle Performance Standards

17.1 Vehicles within the Camp Edwards Training Area will be limited to the existing improved and unimproved road system except where required for natural resource management or property

maintenance or where off-road activity areas are located and approved by the Environmental and Readiness Center in consultation with the Massachusetts Division of Fisheries and Wildlife.

17.2 Unimproved, established access ways will be limited to use by vehicles in accordance with soil conditions as described in the Soil Conservation Performance Standards.

17.3 The number of military and civilian vehicles within the Camp Edwards Training Area will be controlled using appropriate scheduling and signage.

18. General Use and Access Performance Standards

18.1 General User Requirements. Requirements that will apply to all users, both public and private, in the Camp Edwards Training Area include the following:

- All acts that pollute the groundwater supply are prohibited.
- No litter or refuse of any sort may be thrown or left in or on any property.
- All users will be held responsible for providing, maintaining, and removing closed-system, sanitary facilities necessary for their use and activity.
- No person shall wade or swim in any water body except for activities approved by the Massachusetts National Guard including remediation, scientific study, or research.
- Vehicles may only be driven on roads authorized and designated for such use and parked in designated areas, and may not cross any designated wetland.
- Public users may not impede the military training activities.

18.2. Civilian Use Manual. To guide public conduct on the Massachusetts Military Reservation, a Civilian Use Manual will be prepared and periodically updated. All civilian users will obtain and follow this Manual.

18.3. Siting and Design Performance Standards

18.3.1 New or expanded buildings should not be proposed within the Camp Edwards Training Areas, with the following exceptions:

- Buildings to support allowed training, operations and activities, including upgrading of those facilities currently in place,
- Buildings used for the purposes of remediation activities,
- Buildings used for the purposes of development, operation and maintenance of water supplies,
- Buildings used for the purpose of natural resource and land management.

19. Small Arms Ranges (SARs) Performance Standards

19.1 All operational SARs will be managed to minimize negative impacts to the environment within the Upper Cape Water Supply Reserve. SAR management at each range will include to the maximum extent practicable metal bullet recovery and recycling, prevention of bullet fragmentation and ricochets, and prevention of sub-surface metals percolation.

19.2. Small arms ranges will only be used in accordance with approved SAR Specific Operation and Maintenance plans.

19.3. All operational SARs will be monitored to assess compliance of the SAR O&M plan as well as the implementation and effectiveness of the range specific best management practices.

19.4. All activities on a SAR will be done in accordance with that specific SARs approved Operations and Maintenance Plan. These plans are written to minimize to the maximum extent practicable the release of metals to the environment outside of specifically approved containment areas/systems. Occasional ricochets that result in rounds landing outside of these containment areas is expected and every effort to minimize and correct these occurrences shall be taken. Failure to follow the SAR O&M plans shall be considered a violation of this EPS.

19.5. Camp Edwards / Massachusetts National Guard Environmental and Readiness Center will staff and request appropriate funding to support its SAR management plans.

19.6. Camp Edwards is responsible for following range operation procedures and maintaining range pollution prevention systems.

19.7. Camp Edwards will be held responsible for BMPs implementation and enforcement of BMPs by authorized SAR users, including collection and removal of spent ammo and associated debris.

19.8. All users must use and follow Camp Edwards' Range Control checklists and procedures to:

- *Minimize debris on the range (e.g. shell casings, used targets)*
- *Minimize or control residues on the ranges resulting from training (e.g., unburned propellant, metal shavings from the muzzle blast)*
- *Ensure the range is being used for the designed purpose in accordance with all applicable approvals*

19.9. Range best management practices will be reviewed annually for effectiveness and potential improvements in their design, monitoring, and operational procedures in an effort to continually improve them. Each year the annual report shall detail the range specific activities regarding number of rounds fired, number of firers, and number of days the range was in use. The annual report will also detail active SAR groundwater well and lysimeter results, as well as any range maintenance/management activities that took place that training year and the result of such activities i.e. lbs of lead recovered and recycled etc. The Mass Guard will provide regular and unrestricted access for the EMC to all its data, information, and provide immediate access to environmental samples from the range management and monitoring systems and activities operating the ranges.