

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

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Boston, MA 02109-3912

11 March 2013

Colonel Richard V. Crivello, Commander Camp Edwards
Department of the Army
Headquarters Camp Edwards
Beaman Street Building 3468
Camp Edwards, MA 02542

RE: Training Range and Impact Area, Massachusetts Military Reservation, EPA Docket No. SDWA I-97-1030, Proposed Authorization for M69 Hand Grenade Simulator Training

Dear Col. Crivello:

In a letter dated 25 January 2013, the Massachusetts Army National Guard (MAARNG), requested the United States Environmental Protection Agency (EPA) to modify the Scope of Work (SOW) to Administrative Order SDWA I-97-1030 (AO2) issued pursuant to Section 1431(a) of the Safe Drinking Water Act with respect to the Massachusetts Military Reservation (MMR). Specifically, the MAARNG requested approval to use the M69 Hand Grenade Simulator training device at Training Area BA-1 on Camp Edwards.

This letter constitutes EPA's proposed agreement to modify AO2 to allow the use of the M69 Hand Grenade Simulator at Camp Edwards, based on the conditions of the proposed use. This letter also announces that EPA's proposed response is subject to a thirty day public comment period starting on 11 March 2013 and ending on 9 April 2013.

Background:

In its efforts to protect the sole source Cape Cod Aquifer, EPA has issued four administrative orders at MMR, three pursuant to the Safe Drinking Water Act. The second Administrative Order, known as AO2, was issued in May 1997. Among other provisions, AO2 includes the suspension of particular military training activities at the Training Range and Impact Area of MMR (AO2, Scope of Work, Section II.A.). Among the activities suspended were "[a]ll firing of lead ammunition or other 'live' ammunition at small arms ranges at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.a), "[a]ll use of artillery and mortar propellants in non-live firing of munitions at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.e), and "[a]ll use of pyrotechnics at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.f).

AO2 also includes provision for modifying Scope of Work Requirements based on specified demonstrations (Paragraph 125). If a Respondent to AO2 believes that a modification to the Work

specified pursuant to AO2 is necessary and appropriate, the Respondent may petition EPA for a determination on the potential modification. Included among the bases for such a modification is "documentation demonstrating that the use of a propellant ... that is suspended pursuant to this Order does not present a threat of harm to the public or the environment that would warrant its continued suspension under this Order" and "documentation demonstrating that the use of a pyrotechnic ... that is suspended pursuant to this Order does not present a threat of harm to the public or the environment that would warrant its continued suspension under this Order."

25 January 2013 MAARNG Petition for Modification:

As described above, the MARRNG petition requested a modification to allow use of the M69 Hand Grenade Simulator for training purposes. According to the petition, this M69 Hand Grenade Simulator would constitute use of a pyrotechnic training tool.

EPA Findings:

Per the information submitted with the 25 January 2013 petition, Use of the M69 Hand Grenade (and M228 fuse) Simulator on Camp Edwards, dated 6 August 2012; the M69 Hand Grenade Simulator contains the following constituents:

0.146 grams Primer Mix
43% Barium Nitrate
38% Lead Styphnate
9% Antimony Sulfide
8% Calcium Silicide
2% Tetrazene

37.58 grams Propellant M10
98% Nitrocellulose
1% Potassium Sulfate
1% Diphenylamine

0.97 grams Black Powder
74% Potassium Nitrate
15.6% Charcoal
10.4% Sulfur

3.24 grams Black Powder
74% Potassium Nitrate
15.6% Charcoal
10.4% Sulfur

In an email dated 26 February 2013, the Mass Guard has indicated that MAARNG units are authorized to use no more than 4,300 practice grenades per year and has forecasted to use 1,680 practice grenades for the upcoming training year. EPA finds that given the amount of contaminants contained in the M69 Hand Grenade Simulator, the number of practice grenades to be used by the Mass Guard in a given year, and the size of the area where the practice grenades will be used, EPA does not expect that the use of these items in the manner proposed will present a threat to the sole source aquifer. Please note that in making this proposed finding, EPA has not evaluated the BA-1

Training Area for safety hazards. MAARNG should be performing its own review of this site for safety-related hazards.

Proposed Modification:

Based on the above discussion and findings, EPA submits for public comment a proposal to modify AO2 as specified below: EPA hereby proposes to modify AO2, Section II.A.1.e and Section II.A.1.f, Response Activities, to allow the M69 Hand Grenade Simulator in the BA-1 Training Area. The specific modification proposed at this time by EPA is to modify AO2, Scope of Work, Section II.A.1.e and Section II.A.1.f, to read as follows:

e. All use of artillery and mortar propellants in non-live firing of munitions at or near the Training Range and Impact Area, and all use of pyrotechnics at or near the Training Range and Impact Area; provided however, that the use of the M69 Hand Grenade Simulator, in quantities no greater than 4,300 practice grenades per year shall not be prohibited on Training Area BA-1.

i. The authorization is conditioned upon compliance with all conditions established by the Environmental Management Commission.

ii. The authorization does not extend to any other ammunition.

iii. The proposed use of this ammunition does not interfere with the completion of investigation activities on Training Area BA-1.

If this proposed modification is made effective, it would not modify any other provision of the AOs.

Procedure:

EPA is accepting public comments on this proposal until 9 April 2013. All public comments must be submitted in writing, and may be sent to:

Lynne Jennings
EPA
5 Post Office Square – Suite 100
Mail Code OSRR07-03
Boston, MA 02109-3912

At the close of this public comment period, EPA will review public comments, make any appropriate changes and issue its final decision.

If you have any questions about the terms of this proposed modification, please contact me at (617) 918-1210 or Jennings.lynne@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Lynne A. Jennings". The signature is fluid and cursive, with the first name "Lynne" being more prominent.

Lynne A. Jennings
MMR Team Leader

cc: Len Pinaud, MADEP
Mark Begley, EMC
Mike Ciaranca, E&RC
Ben Gregson, IAGWSP
Desiree Moyer, EPA
Tim Conway, EPA
Bob Lim, EPA
Jane Dolan, EPA