

Tab B – DEPARTMENT OF DEFENSE

DEPARTMENT OF THE NAVY

DRAFT FINDING OF NO SIGNIFICANT IMPACT FOR CONSTRUCTION AND OPERATION OF A CONTAINED BURN FACILITY AT NAVAL SUPPORT FACILITY INDIAN HEAD, MARYLAND

Introduction

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 United States Code (U.S.C.) Sections 4321 to 4347, and Department of the Navy (Navy) procedures for implementing NEPA (32 CFR Part 775), the Navy prepared an Environmental Assessment (EA) and has determined that an Environmental Impact Statement is not required for the construction and operation of a Contained Burn Facility (CBF) at Naval Support Facility (NSF) Indian Head in Indian Head, Maryland.

For purposes of this EA, the Department of the Navy (DON) has voluntarily elected to generally follow those Council of Environmental Quality regulations at 40 C.F.R. Parts 1500– 1508 that were in place at the outset of this EA, in addition to DON's procedures/regulations implementing NEPA at 32 C.F.R. Part 775, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

Proposed Action

Naval Support Facility Indian Head, Commander, Navy Installations Command (CNIC) is proposing to construct and operate a CBF for Naval Surface Warfare Center Indian Head Division (NSWC IHD). CNIC and Naval Sea Systems Command (NAVSEA) are Joint Action Proponents for this action. The CBF would treat energetic hazardous waste, military munitions, and other waste materials contaminated with energetics that are currently processed in an open air facility at Strauss Avenue Thermal Treatment Point (SATTP). The CBF would include one Equipment Pad to support the Contained Burn System, one supporting facility (Staging Building), one Control Building and associated surface parking, and a Storage Lot for material potentially presenting an explosive hazard (MPPEH)/material documented as safe (MDAS). The new CBF would treat approximately 85 percent of the future projected energetic hazardous waste workload, resulting in a reduction in open burning at SATTP.

Purpose of and Need for Proposed Action

The purpose of the Proposed Action is to provide a facility with more effective pollution controls as an alternative to the current open burning operations that are used to treat or destroy energetic hazardous waste and military munitions generated from installation mission operations. The Proposed Action is needed to address the installation's Interim Resource Conservation and Recovery Act (RCRA) Subpart X requirement to evaluate alternative technologies to treat energetic hazardous waste and military munitions instead of open burning, to improve safety, and to reduce environmental effects on human health and the environment.

Alternatives

Alternatives were developed for analysis based on the following screening factors:

- The facility should be in an area with compatible land use and mission operations and outside of conflicting explosive safety arcs.

- The facility should be in an area large enough to allow for all parts of the proposed facility to be collocated as close as allowable based on explosive safety siting requirements.
- The selected location should minimize effects on natural and cultural resources.
- The selected location should maximize the extent of explosive safety arcs on Navy property with minimal impediment of adjacent waterways.
- The selected location should be in an unused or underused area of the installation that has existing infrastructure and explosive safety transportation routes.

Based on the screening factors, the Navy identified two action alternatives that meet the project purpose and need along with the No Action Alternative.

No Action Alternative: Under the No Action Alternative, the Proposed Action would not be implemented. Open burning of energetic hazardous waste, military munitions, and other energetics-contaminated waste would continue to occur at SATTP, in accordance with the current practices and requirements of the interim RCRA Subpart X application. Open burning operations at SATTP would follow existing safety and environmental issues and operational inefficiencies. Operations would continue with a high safety risk to operators and the public, fewer pollution controls, and greater risk of weather-related delays. In addition, if energetic hazardous waste storage time exceeds certain limits, fines can be assessed upwards of \$90,702 per day per violation. The No Action Alternative poses a threat to the installation's mission and would not meet the purpose of and need for the Proposed Action. However, the No Action Alternative is carried forward for analysis in this EA to establish a comparative baseline.

Alternative 1 (Preferred Alternative): Under Alternative 1, a new CBF would be constructed in the general area of Building 859, which would be demolished. The Proposed Action would include the demolition of seven vacant buildings, Building 3005, a small concrete pad, and railroad tracks. Construction would include a natural gas line extension; and approximately 31,150 square feet of new construction for the Equipment Pad, Staging Building, Control Building, associated surface parking, and an MPPEH/MDAS Storage Lot. The total limit of disturbance is estimated to be 307,000 square feet (7.05 acres), with approximately 41,000 square feet (0.94 acres) of new impervious surface. Approximately 94,000 square feet (2.16 acres) of tree clearing would be required. While the explosive safety arcs would encumber portions of Mattawoman Creek, the CBF would be sited to reduce new arcs over the creek, which would minimize potential interruptions to operations and reduce public safety concerns. Visual monitoring would occur on portions of the creek where the explosive safety arcs exist. The arcs would be within the expanded Danger Zone currently being sought by the Navy for multiple missions on NSF Indian Head. The new CBF would treat approximately 85 percent of the future projected energetic hazardous waste workload, and open burning at SATTP would be greatly reduced.

Alternative 2: Under Alternative 2, the CBF would be constructed at the site of existing Building 497, which would be demolished. Buildings 497, 498, seven other vacant buildings and trailers within the construction and staging area, and railroad tracks would be demolished or moved. Alternative 2 would also include approximately 31,150 square feet of new construction. The total limit of disturbance is estimated to be 250,000 square feet (5.70 acres), with approximately 31,000 square feet (.70 acres) of new impervious surface and 25,000 square feet (0.60 acres) of tree clearing. The layout and configuration of the facility would be similar to that of Alternative 1, with minor differences due to existing structures and existing road infrastructure. The explosive safety arcs would encumber portions of Mattawoman Creek within the currently established Danger Zone. The new CBF would treat approximately 85 percent of the future projected energetic hazardous waste workload, and open burning at SATTP would be greatly reduced.

Environmental Effects of the Preferred Alternative

The EA examined in detail the potential effects of Alternative 1, Alternative 2, and the No Action Alternative on the following resource categories: air quality, water resources, geological resources, cultural resources, biological resources, land use, infrastructure, public health and safety, and hazardous materials and waste. The following is a summary of the environmental consequences of Alternative 1, as it is the Navy's Preferred Alternative.

Air Quality: Short-term, minor effects on air quality would result from the operation of equipment during site preparation, demolition, and construction activities. Long-term, minor, beneficial effects on air quality would result from the operation of the CBF as compared to existing conditions and open burning. Greenhouse gas emissions would be negligible and insignificant in relation to global yearly emissions from the installation. Alternative 1 would not result in significant adverse effects on air quality and would have long-term beneficial effects due to the operation of the CBF.

Water Resources: No new groundwater demand or use is anticipated. Alternative 1 would result in approximately 41,000 square feet (0.94 acres) of impervious surfaces, which would decrease the area available for water infiltration back into the ground. There would be no direct effects on surface waters or wetlands. Consultation with and verification of wetland/stream boundaries from the U.S. Army Corps of Engineers (USACE) and Maryland Department of the Environment (MDE) would occur prior to construction to ensure compliance with Section 401/404 of the Clean Water Act. If required, Section 401/404 permitting would be obtained and any subsequent mitigation would be implemented. With implementation of best management practices (BMPs) during and after construction to manage stormwater runoff and pollutants, short- and long-term indirect effects on surface waters from runoff would be negligible. There would be no effects to the 100-year floodplain and long-term, negligible effects to the 500-year floodplain.

Geological Resources: There would be minor effects on geological resources from construction activities and an increase in impervious surface. However, by constructing on existing developed areas and following BMPs, short- and long-term effects on geological resources of Alternative 1 would be minimized.

Cultural Resources: There would be no effects on archaeological resources. Adverse effects on built resources are expected from demolition of National Register of Historic Places (NRHP)-eligible resources, but effects would not be significant. New construction would be located in a historically industrial area adjacent to other non-historic resources, and a combination of existing Memorandums of Agreement and a new Programmatic Agreement (PA) with the State Historic Preservation Officer (SHPO), being negotiated separately from this action, would resolve or mitigate adverse effects associated with this action. The Maryland SHPO provided concurrence on the Preferred Alternative conditioned up execution of the PA prior to implementation of the Preferred Alternative. The Navy anticipates this PA being executed soon. While unlikely, activities under Alternative 1 could cause a blast at the proposed CBF and potentially cause damage to historic buildings due to their locations within explosive safety arcs, which would be an adverse effect. If such an event occurred, the Navy would consult with the SHPO to mitigate the adverse effect. In addition, in the event of an unanticipated archaeological discovery, Standard Operating Procedure 6 from the Integrated Cultural Resources Management Plan would be followed.

Biological Resources: There would be short- and long-term, minor effects on biological resources from construction activities and changes to habitat. These include effects related to the construction of new facilities, roads, and additional paving. Temporary effects include increased noise and sedimentation caused by construction activities. Since the Alternative 1 site would be within an area with similar land

use, the long-term operation of the CBF would not result in changes to the ambient noise level. Additionally, by reducing the current open air burning currently performed at NSF Indian Head, an overall decrease in long-term effects would be expected on biological resources. Adherence to U.S. Fish and Wildlife Service (USFWS) time of year restrictions for habitat alteration and tree removal would also minimize effects on rare, threatened, and endangered species. Consultation with the USFWS would occur as required for any listed species potentially affected by the Proposed Action.

Land Use: Under the Alternative 1 layout, NSWC IHD personnel would still be able to operate within the existing buildings when necessary because they are associated with the mission. Therefore, no adverse effects on the adjacent land uses are expected. The explosive safety arcs at the Alternative 1 site would extend into a portion of Mattawoman Creek, which would cause intermittent, minor effects on the public access of the creek. A small portion of the safety arcs would fall within the existing Danger Zone and a larger portion would extend past the boundaries of the current Danger Zone. The Navy is coordinating with the USACE to expand the Danger Zone to support multiple operations at NSF Indian Head. A Federal Consistency Determination was submitted to the MDE. The MDE responded with a conditional concurrence with the findings of the Federal Consistency Determination. The MDE requested that the Navy continues to consult with Maryland Historical Trust, that earth disturbance adhere to the erosion and sediment control plan requirements approved by the appropriate authority, and that stormwater management is compliant with applicable criteria.

Infrastructure: New utility infrastructure connections would include potable water, non-potable river water, stormwater, sanitary sewer, electrical, natural gas, and communications. Short-term disruptions in utilities could occur during connection of new utility infrastructure, but these would be minor and coordinated to minimize operational effects. Operation of the facilities would not result in an increase in personnel. New potable water, natural gas, and sanitary waste connections are being coordinated with civil engineering to ensure the utilities and capacities meet requirements. Utility capacity at the installation is currently adequate, and the proposed size and use of the new CBF would not be expected to result in major increases in utility needs and communications in the context of existing demands and uses at NSF Indian Head.

Public Health and Safety: Alternative 1 would result in long-term, beneficial effects on public health and safety from the use of safety protocols appropriate for specific demolition, construction, and operational tasks; and from less human exposure to air pollution emissions due to a large reduction in open burning.

Hazardous Materials and Wastes: Alternative 1 would result in short-term, minor, adverse effects from the removal of special hazards and construction within and adjacent to Installation Restoration (IR) sites. Before construction would begin, an Explosives Safety Site Approval Request covering new construction and demolition would be prepared and approved by Naval Ordnance Safety and Security Activity. The proposed CBF would replace much of the existing open burning practices resulting in long-term, beneficial effects from the reduced potential for human exposure to hazardous materials and wastes.

Environmental Justice: Although a discussion of environmental justice factors is included in the EA, the environmental justice analysis is not considered in the decision to sign this FONSI.

Cumulative Effects: The Navy analyzed potential cumulative effects of all of the alternatives in combination with other past, present, or reasonable foreseeable future actions and determined there would be no significant cumulative impacts.

Public and Agency Involvement

The Navy published a Notice of Availability for the Draft EA in the *Maryland Independent* on December 6 and December 13, 2024. The Navy held a public meeting to describe the environmental effects of the Proposed Action and alternatives and to receive comments on the Draft EA on Wednesday December 18, 2024, from 6:00 to 8:30 p.m. at the Velocity Center in Indian Head, Maryland. The Navy coordinated or consulted with Federal and local agencies regarding the Proposed Action. Agency responses were received from the Maryland Department of Natural Resources, Maryland Department of the Environment (MDE), Maryland Clearinghouse, Maryland Historical Trust (MHT), and the U.S. Environmental Protection Agency (EPA). The Navy did not receive any public comments.

MDE found this project to be generally consistent with their plans, programs, and objectives, with qualifying comments and requests for additional information and analysis. The comments received were generally related to air permitting requirements, projected future workloads of the CBF, the current practice of OB/OD at the SATTP and future use of the facility, and potential per- and polyfluoroalkyl substances (PFAS) contamination.

The EPA's comments overlapped with those provided by MDE. Additional questions and comments from the EPA included inquiries into the potential expansion of the CBF to accommodate future increased workloads, siting and layout design of the facility to minimize environmental effects, expansion of the existing Potomac River/Mattawoman Creek Danger Zone, noise and vibrations effects, best management practices (BMPs) for soil and water contamination, and cumulative effects.

Many of the comments received during the public and agency engagement process were addressed through revisions of the EA to include incorporating additional, clarifying information as requested. Other comments and concerns expressed will be addressed through ongoing coordination and consultation associated with the federal and state permitting processes.

Finding of No Significant Impact

Based on the analysis presented in the EA, which is herewith incorporated by reference into this Finding of No Significant Impact, the Navy finds that implementation of the Proposed Action (including Alternative 1 as the Navy's Preferred Alternative), would not significantly affect the quality of the human or natural environment or generate significant controversy. Preparation of an Environmental Impact Statement is not required.

The EA prepared by the Navy addressing this action is on file. Interested parties may obtain a copy by sending an email to Naval Facilities Engineering Systems Command Washington at NAVFACWashNEPA1@navy.mil.

