



GUAM ENVIRONMENTAL PROTECTION AGENCY

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Office of the Governor of Guam
Attn: Military Buildup Office (Mark Calvo)
Ricardo J. Bordallo Governor's Complex
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Subject: Guam Environmental Protection Agency Input / Comment on the Draft
Supplemental Environmental Impact Statement (SEIS)

The following general comments are provided for your review and consideration:

The anticipated relocation of U.S. Marines, their dependents and other people who will relocate to Guam before, during and the post-buildup of Guam will have an impact on Guam EPA's resources. Guam EPA reasserts most of its comments that were previously submitted several years ago, and add or reiterates those in the below.

Since its initial comments were submitted, Guam EPA has filled some key vacancies within the agency, and it continues to aggressively fill other vacancies that will enable it to efficiently perform its duties in all areas relative to the buildup. However, there is a decent probability that Guam EPA will need to create new full-time employee (FTE) slots to best handle the expected workload over the next five to 10 years. The reason for this is twofold: an increase in breadth and number of project applications; a decrease in personnel due to attrition.

A major, if not the single largest, impact on the agency will come by way of the water and wastewater infrastructure. Currently, the island's water utility infrastructure is going through some upgrades, but it is not nearly enough to accommodate the eventual surge in capacity that thousands of additional people will create.

Another key impact on the agency will be seen through the rise in solid waste. At present, Guam has only one permitted landfill and a handful of transfer stations. The impact could mean a shortened lifespan of the landfill, or an increase in illegal dumping.

In addition, it is safe to presume that a very appreciable amount of earthen material will need to be imported to meet construction demands. The inherent dangers with this type of activity include possible contamination of the earthen material, i.e. aggregate and sand. Guam EPA will need to be able to send pertinent staff off-island and to various points-of-origin to pre-sample earthen material identified or destined for Guam. This is important to eliminate the potential for contaminated material to enter - and overwhelm - our civilian seaport.

Guam EPA will continue to review the DSEIS and internal discussion at all staff levels. If necessary, Guam EPA will provide additional information.

Finally, we submit our full support of the military buildup in Guam.

- All imported aggregates and other construction materials must follow all established local rules and regulations for the importation of these materials. Guidelines can be obtained from Guam EPA and the Department of Agriculture
- Proposed mitigation Measures for proposal to designate an ERA on NAVMAG or to expand the Orote ERA is not acceptable for the loss of any limestone forest for any alternative. Mitigation should be the vicinity and of similar type. As loss impacts special status species and having mitigation areas on the other side of the island and in different habitats will not enhance their rehabilitation.
- Should the Navy decide to import standby emergency generators from foreign sources (Okinawa), the generators must at minimum meet a USEPA Tier III Emission Standard and have a Certificate of Conformity for each of the standby emergency generators.

The following specific comments with cited pages are provided for your review and consideration:

Executive Summary Page ES-19. Table ES-5

Summary of Impact Determination for Cantonment/Family Housing Alternatives & LFTR Alternatives: *Comment: Does this assessment take into account the

amount of green waste from clearing and grading activities and secondary/indirect impact green waste may have in the area. The clearing of 1,452 acres would produce a large quantity of decaying/dry vegetative waste that may attract the invasive Rhino Beetle. Decaying trees especially coconut palm trees may provide a haven for the Rhino Beetle to congregate and reproduce. What mitigation measures are planned to minimize adverse impacts from land preparation activities? What are the contingency plans if weather conditions and surroundings do not allow for the burning of green-waste. Is there a Green Waste reduction plan such as a tree and plant conservation plan for existing flora in the areas of concern for native trees and limestone vegetation. The SEIS should elaborate on these concerns and provide mitigation measures and clearly identify individuals who would be responsible to manage and carry out mitigation measures.

Ch. 2 Page 11. "Solid Waste"

The DSEIS states there will be a reduction in the amount of solid waste generated from 165,600 lbs./day to 54,241 lbs./day. *What methodology was used to arrive at this figure?*

Ch. 2 "Solid Waste"

All of the alternatives for the Cantonment and Family Housing are the same. The DoN intends to construct a recycling center and transfer station for the Cantonment and Family Housing. What methodology will be used to determine the size and design specifications for the transfer station and recycling center?

Ch. 2 "Solid Waste"

The DoN states that C & D debris will be taken to the Navy Landfill and the two other permitted hardfills in Yigo. The Navy Landfill does not currently have a permit for the landfill or a hardfill to accept C & D debris. Additionally, there are three additional hardfills that have been permitted since 2012, Smithbridge, UMS, and Hemlani.

Ch. 3 Page 94. "Solid Waste"

In order for the Navy Landfill to accept waste banned from the Layon Landfill such as asbestos, C & D and Green Waste, the DoN must apply for and appropriately design the site to meet the permit criteria.

Ch. 3 Page 98. "Solid Waste"

The Final SEIS should include the additional recommendations of USEPA which are: 1. Developing and performing a waste characterization study using the existing DoD waste stream, and prepare a report on waste stream composition by percent on a weight basis. 2. A plan for special waste not accepted by the Layon landfill. The Navy Landfill is not permitted to accept any waste. The Layon landfill permit can be amended to accept asbestos. 3. A mandatory recycling plan 4. Address CVN Carrier waste.

Ch. 4 Page 122.

Update number of GEPA permitting staff across all divisions and programs.

Ch. 4 Page 157. "Cantonment"

This section states that Finegayan contains two (2) 90-day hazardous waste storage areas that would be maintained under this alternative. The existing hazardous waste accumulation sites at Finegayan do not have adequate capacity to support the proposed cantonment area. *How many additional 90-day hazardous waste accumulation sites does the Navy intend to create at Finegayan? Will the sites be located in the contiguous area in Finegayan? What are estimated wastes that will be generated and stored at each of these sites?*

Ch. 4 Page 158. "Toxic Substances Construction"

Because the proposed construction areas are located in a USEPA Radon Zone 1, it is possible that new building, facilities and structures could encounter radon intrusion. *Is the Navy planning on testing the efficiency of the installation of radon resistant construction techniques and mitigation system at each of these buildings after they have been installed?*

Ch. 4 Page 165. "Unexploded Ordnance"

Unexploded ordnances (UXOs) that are found during the construction of the facilities that requires open detonation in-place would require an emergency permit from Guam EPA. UXO's that are found safe to transport shall be taken to Andersen Air Force Base (AAFB) Hazardous Waste Management Facility - AAFB EOD Permitted Facility to be safely detonated.

Ch. 6 Page 2. Table 6.1.1

Road ways and routes leading to LFTRC site must have properly sized culverts to ensure that surface waters and drainage channels replenishing wetlands are

not blocked or redirected in a direction that negatively impacts the wetlands (NAVMAG area).

Ch. 7 Page 23. Table 7.5.1

There are no composting construction or operations at the Layon Landfill

Ch. 7 Page 90. Table 1

Solid waste quantities are estimated using population, commercial/industrial operations, and construction activity for C&D debris and green waste. Please show the calculations and figures used for this purpose.

Appendix F.2 Water Resources Page 22. Table 3.2.1

General Comment Wetlands and military construction over-sight: The proposed LFTRC at the NAVMAG locations will required wetlands over-sight to ensure construction activities adhere to BMP's are followed to protect, minimize, or mitigate impacts to wetlands. On-island wetlands personnel have dwindle down to less than a handful of subject matter experts due to personnel in these fields retiring or leaving the resource management/regulatory agency. Funding and wetlands training are needed to fill the wetlands personnel vacancies especially in anticipation of military construction activities. The GEPA in the past have worked with the USACE Guam Office routinely and has coordinated joint wetlands inspections and delineation island-wide. Due to wetlands staff shortages in both local and federal regulatory departments and agencies, little time have been afforded to joint wetlands inspections as before. Resources in both funding and personnel are needed to protect the resource.

Appendix F-2 Page 76. Table 1

The wetlands information in the table was done 2009. If any development such as earth-moving/site preparation activities have taken place that may have changed the hydrology up-gradient of the wetlands, then a wetlands re-delineation may be appropriate to assess if the wetlands boundaries have changed.

Appendix F-2 Page 76. Table 1

The table states that (Range Type:) KD Riffle row, wetlands column: Buffer wetlands associated with the Sarasa River to the south are in "close proximity" to the range foot print. This statement must be clarified. Close proximity needs to be defined (unit measurement is needed); how many feet? Also what is meant by

"Buffer Wetlands"? Will this area be compromised "buffered" to minimize what kind of impact (construction activity, firing range operational activity)?

Appendix F.7 Page 1-7.

All of the site statuses need to be updated.

If you have any questions regarding these comments, please contact the undersigned at eric.palacios@epa.guam.gov or phone 671-300-4751/52.



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