



REGION 1

BOSTON, MA 02109

January 8, 2024

Cheryl Quaine
Federal Aviation Administration
New England Division
12 New England Executive Park
Burlington, MA 01803

Rebecca L. Tepper, Secretary
Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: EPA comments on the Draft Environmental Assessment and Draft Environmental Impact Report (EEA File Number: 16692) for the Plymouth Municipal Airport Extensions to Runway 6-24, Taxiway A, Taxiway E and 5-year Capital Improvement Plan, Plymouth, Massachusetts

Dear Secretary Tepper and Ms. Quaine:

We are writing in response to the Draft Environmental Assessment (EA) and Draft Environmental Impact Report (DEIR) for the Plymouth Municipal Airport project located in the Town of Plymouth, Massachusetts. We submit the following comments on the EA/DEIR in accordance with our responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Safe Drinking Water Act. The EA/DEIR describes several capital improvement projects at the Plymouth Municipal Airport including the Runway 6-24 extension, extensions to taxiways A and E; relocation of runway lighting; development of two (2) new hangars; and other possible on-and-off airport property construction. As outlined in the 2022 Technical Master Plan Update (TMPU), the 5-year improvement plan also describes water/sewer main upgrades, reconstruction of Runway 6-24 and Gate 3 taxiway, and emergency generator airside infrastructure. According to the EA/DEIR the purpose of the proposed airport work is to bring the airport in compliance with Federal Aviation Administration (FAA) safety standards. The safety improvements are focused on runway and taxiway lengths and other upgrades to address operations during airport peak hours. Other proposed work is focused on enhanced climate resilience and economic objectives for the airport.

EPA reviewed the EA/DEIR and offers the following **comments and recommendations** related to the analysis of groundwater/aquifer protection, public and private drinking water, chemical storage and use, spill prevention control, and stormwater management. We request that these issues be more fully addressed in the final EA/EIR for the project.

Plymouth/Carver Sole Source Aquifer

The Plymouth Municipal Airport project is located over the Plymouth/Carver Sole Source Aquifer. EPA's review of the EA/DEIR focused primarily on the project's potential to impact the underlying aquifer pursuant to our responsibilities under Section 1424 (e) of **The Safe Drinking Water Act (SDWA)**. **The SDWA provides EPA discretionary authority to review federally funded projects within Sole Source Aquifers. In this case, a portion of the funding for the project is being supplied by the Federal Aviation Administration. The Plymouth/Carver Sole Source Aquifer was designated on August 7, 1990. (Federal Register Notice Vol. 55, No.152).**¹

Based on our review we found that the **EA/DEIR does not provide sufficient information to assess the potential for groundwater impacts associated with the project.** For example, Section 4.2.8 Water Resources – Groundwater (EA page 32) does not provide any descriptive information about the locations of public or private water supply wells or other drinking water sources **(relative to potential groundwater impact areas)**, depth to groundwater, or groundwater flow directions. **Based on the lack of information, we do not agree with the preliminary conclusion in the EA that groundwater "...is considered a resource not affected and is dismissed from further consideration."**

The comments and recommendations in the balance of this letter are framed to help the FAA provide information to support the conclusions regarding potential impacts to groundwater as part of the joint NEPA and MEPA process. EPA will review the responses to our comments provided in the final EA/EIR to determine if additional information is required to understand potential impacts to groundwater or if any follow-up groundwater assessment is warranted. We encourage the FAA to coordinate with us directly during the preparation of the final EA for any necessary clarification regarding our recommendations.

Aquifer Protection

We recommend that the EA/DEIR be expanded to fully support any conclusions reached regarding direct or cumulative groundwater impacts to include the following:

- A map showing groundwater depth, contours, and flow directions to better describe the context, existing location and subsurface environment for areas potentially affected by the proposed project. Please show the location of existing and proposed monitoring wells and include a narrative to explain how groundwater contours were developed. We recommend that the locations of public and private water supply wells and surface water supply sources within 5 miles of the proposed project be included in the maps.
- A list describing the expected annual loading of potential contaminants of groundwater (as compared to baseline conditions at the airport—see below) from construction and project-related operations including information on fuel-related contaminants and loadings such as volatile organic compounds, metals, and polyaromatic hydrocarbons.
- A description of any past contamination events at the airport along with baseline groundwater contaminant conditions.

¹ EPA's review and comments on the EA/DEIR does not constitute a Sole Source Aquifer project review. Should EPA choose to exercise its authority and discretion under the SDWA the scope of the analysis for any future review will be determined at that time.

- An expanded description of measures and best management practices to reduce the release of contaminants and provide aquifer protection during construction and airport operations. We specifically recommend additional detail regarding how the airport will protect groundwater from contaminated runoff, spills, or accidents at the airport.

Chemical Storage and Use

We recommend that the final EA/EIR provide a list of chemicals and de-icing products used at the airport, and a description of where and how they will be stored and managed on airport property. A full discussion of aircraft or vehicle maintenance practices/activities that can pollute runoff along with measures that will be implemented to reduce and control pollutants is recommended. We also recommend that the final EA/EIR include a list of past and current firefighting foam products (which might contain per- and polyfluoroalkyl substances PFAS/PFOA/PFOS) which will be used in association with the proposed project.

Monitoring Plan

We recommend that the final EA/EIR consider the development of multi-media monitoring as a means of determining the effectiveness of pollution prevention measures aimed at preventing or minimizing the potential for the proposed project to contaminate the aquifer. We request that the final EA/EIR include a monitoring plan that describes how and when soil and groundwater will be monitored for potential contaminants of concern and how baseline soil and groundwater contaminant conditions will be established. We recommend that the monitoring plan detail the frequency of sampling and how the sampling results, along with needed and executed response actions, will be shared with appropriate water department officials in the project area. We recommend annual reporting.

Public and Private Drinking Water Sources and Coordination with Water Systems

The EA/DEIR states that "...there are no Interim Wellhead Protection Areas nor Zone II Protection Areas as mapped by MADEP on Airport property." (EA Page 32). Figure 4-11 provides the related map. We recommend that the final EA/EIR provide additional hydrogeologic information as it relates to the flow of potential contaminants from the proposed project, including construction, and the potential impact, including groundwater flow continuing off-site, to existing or proposed public or private water supplies. We recommend that distances and time of travel (if times are readily available) to nearest water supplies be provided. We also recommend that the EA describe past and proposed future coordination with public water supply systems regarding drinking water resources.

Spill Prevention Control and Countermeasure Plan

Given the location of the proposed project above a Sole Source Aquifer EPA recommends that the airport's Spill Prevention, Control and Countermeasure (SPCC) Plan be updated prior to construction to account for all aspects of the proposed project's construction and operations. For more specific information about requirements with the SPCC rule, refer to www.epa.gov/oil-spills-prevention-and-preparedness-regulations/spill-prevention-control-and-countermeasure-19. Please direct questions regarding the SPCC rule to EPA's Joe Canzano at canzano.joseph@epa.gov or 617-918-1763.

Stormwater Management

Given the location of the proposed project above a Sole Source Aquifer, EPA recommends that the airport's erosion and sediment control plan, and associated stormwater runoff controls and Best Management Practices (BMPs), consider ground water resources at the site. We encourage the use of monitoring wells and advanced stormwater BMPs (including pretreatment capabilities as required by Massachusetts stormwater requirements).

Underground Injection Control

EPA's Underground Injection Control (UIC) program is administered by MassDEP and, as such, UIC systems are regulated by MassDEP. Infiltration best management practices used to drain stormwater runoff or other wastewater are regulated as "Class V" underground injection wells under Massachusetts UIC regulations (310 CMR 27.02) if they include any of the following:

- a bored, drilled, or driven shaft, a dug hole, or seepage pit whose depth is greater than its largest surface dimension; or,
- an improved sinkhole; or,
- any subsurface structure that has a soil absorption system (SAS) with a subsurface fluid distribution line and aggregate. Note: This refers to subsurface infiltration enhancement systems but does not include underdrains designed to collect and convey stormwater to a surface outfall or a storm drain network.

If any of these are proposed as part of the project we recommend that the final EA/EIR describe how they are designed to meet appropriate standards. Please direct questions about UIC regulations to Joe Cerutti, the MassDEP UIC Program Coordinator, at joseph.cerutti@state.ma.us or 617-292-5859.

Please feel free to contact us during the development of the final EA/EIR for clarification of any of the comments and recommendations provided above. EPA requests the opportunity to be kept informed about any activities that might affect the Sole Source Aquifer during project design, construction, or operation. Please communicate directly with the EPA Region 1 Sole Source Aquifer Coordinator, Kira Jacobs. She can be reached at jacobs.kira@epa.gov or 617-918-1817.

Sincerely,

Timothy Timmermann, Director
Office of Environmental Review



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

January 8, 2024

Rebecca L. Tepper,
Secretary of Energy and Environment
Executive Office of Energy &
Environmental Affairs
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: DEIR Review EOEEA #16692
PLYMOUTH. Plymouth Municipal Airport
Runway 6 Extension Improvement Plan
at 71 Airport Road

Dear Secretary Tepper,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Draft Environmental Impact Report (DEIR) for the Plymouth Municipal Airport Runway 6 Extension and Technical Master Plan Update, LLC at South Meadow Road, Plymouth and Carver, Massachusetts ((EOEEA #16692). The Project Proponent provides the following information for the Project:

This FEIR Supplement has been prepared to address the Secretary's directive to SouthCoast Wind to provide additional information on wetlands, water quality, air emissions, ocean/ benthic impacts, marine and rare species, and environmental justice. SouthCoast Wind was also directed to provide more definitive mitigation measures and commitments for the Project. SouthCoast Wind has developed comprehensive responses to the comment letters received on the FEIR. We have addressed the items outlined in the Scope of the FEIR Certificate, including updated reports such as an updated Fisheries Monitoring Plan, which has been revised to reflect recent consultations with the Massachusetts Division of Marine Fisheries (DMF). As requested in the Secretary's Scope, SouthCoast Wind has consulted with the Massachusetts Coastal Zone Management (CZM) Office, Massachusetts Department of Environmental Protection Southeast Regional Office (MassDEP), Massachusetts Natural Heritage and Endangered Species Program (NHESP), and MA DMF to review SouthCoast Wind's analysis and response to agency comments. In addition, SouthCoast Wind is actively working with the Town of Somerset to develop a host community agreement designed, in part, to address coordination with the Town on construction of the Project.

Bureau of Water Resources (BWR) Comments

Wetlands. The Project as proposed will not alter any wetlands resource areas. However, according to the DEIR, some of the work may fall within the buffer zone to bordering vegetated wetlands

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.

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(310 CMR 10.55) and would require a final Order of Conditions prior to commencement. It should also be noted that there is an open wetlands variance for work at the project site and this proposal must not conflict with conditions of the variance.

Underground Injection Control. The Project Proponent reports its proposed use of its infiltration systems requiring registration under the MassDEP Underground Injection Control (UIC) program. These structures must be registered with MassDEP UIC program through the submittal of a BRP WS-06 UIC Registration application through MassDEP's electronic filing system, eDEP. All information regarding on-line (eDEP) UIC registration applications may be obtained at the following web page: <https://www.mass.gov/info-details/underground-injection-control-uic-application-forms>. The statewide UIC program contact is Joe Cerutti who can be contacted at joseph.cerutti@mass.gov.

Bureau of Waste Site Cleanup (BWSC) Comments

BWSC finds the project proponent's responses to BWSC's comments accurate and acceptable. BWSC has no further comments or questions.

Bureau of Air and Waste (BAW) Comments

Air Quality. Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor or noise. To determine the appropriate requirements please refer to:

- 310 CMR 7.09 Dust, Odor, Construction, and Demolition
- 310 CMR 7.10 Noise

The Proponent is advised that the Department's Air Quality regulations (310 CMR 7.11(3) Aircraft) specifies that "No person owning or operating an airport shall cause, suffer, allow, or permit routine warmups, testing, or other operation of aircraft while on the ground, in such a manner as to cause or contribute to a condition of air pollution, outside of the property lines of the airport, that in the opinion of the Department are unreasonable and feasibly preventable." To further clarify, this means that all aircraft, once on the ground, should cease to operate its engines until such time when departure is warranted. Alternatively, to running these engines on idle, when warranted to maintain comfort within these aircraft during the warm summer months, plug in stations should be provided by the airport as an alternative to the greenhouse gas emissions, air pollutant emissions and noise that are emitted while these engines continue to operate while on the ground to keep onboard systems (refrigeration, air conditioning, etc.) running.

In fulfillment of the requirements of 301 CMR 11.07(6) and the Greenhouse Gas (GHG) Emissions Policy and Protocols (<https://www.mass.gov/doc/greehouse-gas-emissions-policy-and-protocol/download>), the Proponent is required to provide the Department with an analysis of alternatives to idling (plug in stations) to address GHG, air quality in general and noise, and the proposed mitigation measures to reduce those emissions.

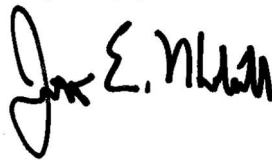
Solid Waste Management. The Proponent's DEIR has addressed the Solid Waste Management program's comments.

Industrial Wastewater. Plymouth Municipal Airport is required to demonstrate the ability to apply extinguishing agent as part of its FAA Part 139 safety certification. The capital improvements to the airport should include provisions to collect the wastewater containing the extinguishing agents generated during these demonstrations and/or training events so that proper storage, treatment and/or disposal can occur in conformance with Massachusetts requirements.

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this ENF. If you have any questions regarding these comments, please contact George Zoto at George.Zoto@mass.gov or Jonathan Hobill at Jonathan.Hobill@mass.gov.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

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