

Record of Environmental Consideration

Date: 24 April 2020

Proponent: **United States Army**
US Army Engineering and Support Center Huntsville District

Purpose of the REC. To satisfy the requirements for environmental review as required by the National Environmental Policy Act, 42 U.S.C. 4321, et seq. (NEPA), Council on Environmental Quality Regulations 40 CFR 1500-1508, Department of the Interior (DOI) NEPA regulations at 43 CFR Part 46, and DOI Office of Environmental Policy Draft NEPA Guidance for the Office of Insular Affairs (516 DM 6) dated April 2013.

1. Official Project Title: Drum Removal, Lonfit Planning Project Formerly Used Defense Sites, Asan, Guam (Site number H09GM030000)

2. Date of Proposed Action: 2020

3. Authority: This remedial work will be completed in support of the US Army Corps of Engineers (USACE) Pacific Ocean Division, under the US Army Engineering and Support Center Huntsville's Pacific Ocean Division Area of Responsibility contract, and falls within the Military Munitions Response program under the United States Department of Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP/FUDS). The proposed action will be conducted under the authority of the DERP/FUDS Program in compliance with Guam EPA, Department of Defense, Army and the USACE Regulations and Guidance to include Interim Guidance and all applicable Data Item Descriptions. All activities involving work in areas potentially containing explosive hazards shall be conducted in full compliance with all applicable USACE, Department of the Army (DA), and Department of Defense (DOD) regulations, guidance, standards and manuals.

4. Project Background:

The Lonfit Ammunition Depot and Vicinity Installation covered approximately 2,520 square acres in Ordot in the Municipalities of Asan, Chalan Pao-Ordot, Yona and Agana Heights (Passan) in Central Guam. See attached maps. The area lies generally northeast of the Lonfit River, east of the Navy's Sasa Valley Fuel Farm, southeast of the Navy's former Nimitz Hill Annex, south of Sinajana, and west of Route 4. The project site was under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States and transferred prior to 17 October 1986 and is eligible of inclusion in the DERP/FUDS program established under 10 USC Section 2701, et seq. Records show that the project site was used for a Naval Ammunition Depot Ground Ammunition (USACE 2020c).

5. Description of Proposed Action:

The United States Army (Army) proposes to remove sixty-two (62) 55-gallon drums from Quonset Hut B at the Lonfit Planning Project FUDS. This site is located within an abandoned ammunition storage area previously known as Area 6A, Fifth Field Depot, Ammunition Storage. See Location Map (attachment 1). Fifty-nine (59) drums contain asphalt-like material and three (3) drums contain a basic liquid suspected to be sodium hydroxide solution.

1 A 2018 site visit showed that the drums to be removed are housed within a Quonset hut structure,
2 which is covered on the sides and top with soil. See photographs are provided in Attachment 2. Both the
3 soil and Quonset hut will be removed to allow for equipment access to the drums. A total of 62 drums
4 were identified and visually inspected. The drums and the Quonset hut containing them were
5 determined to be in poor condition. Although the drums were reported to be leaking, there was no
6 evidence that the contents leaked beyond the Quonset hut floor. Representative samples of the waste
7 were collected and analyzed during the inspection. Results of this analyses indicated there were 59
8 drums of asphalt-like material and 3 drums containing a basic liquid suspected to be sodium hydroxide
9 solution. All drums are to be shipped off-island for disposal. There was no evidence of additional drums
10 outside of the Quonset hut (USACE 2019b).

11
12 **Quonset hut Removal.** Once the soil is removed from the structure, the steel structure will be
13 dismantled using chop saws in conjunction with the backhoe and telehandler to allow for unrestricted
14 access to the drums. Metallic debris and any solid waste found within the Quonset hut or generated by
15 field activities will be removed from the site. Appropriate recycling and/or disposal requirements will be
16 considered to ensure that that materials are transported to the appropriate facilities, using green and
17 sustainable options where feasible. All uncontaminated excavated soils will remain onsite. As the soil is
18 removed, it will be stockpiled nearby (USACE 2019b).

19
20 **Remedial Work.** Soil will be visibly inspected for visual or olfactory evidence of contamination as well as
21 screened using a photoionization detector. Soil with any evidence of asphalt staining will be added to
22 the drums for disposal offsite. A handheld Global Positioning System unit will be used in the field to
23 locate site features for incorporation into the site-specific geodatabase. Upon completion of the drum
24 removal, the soil will be redistributed onsite ensuring all excavated areas are backfilled. Since the drums
25 are in poor condition, all will be re-packaged for compliant Department of Transportation transport. As
26 the drums are being re-packed, any soil and asphalt-like or non-metallic material on the concrete floor
27 will be placed in the repacked drums. The leaking drums were reported to be contained within the
28 Quonset hut; no additional drums were observed around the exterior areas. The drum contents were
29 previously sampled in 2018 and the analytical results will be used to characterize the waste for disposal.
30 All the drums will then be transported for ultimate disposal at a United States mainland disposal facility.

31
32 Activities associated with removal of the drums from the Lonfit Quonset hut will be completed in
33 accordance with the Quality Assurance Project Plan (QAPP). A full description of the removal action and
34 Quonset Hut B project area is provided in the QAPP (USACE 2019b).

35 36 **6. Purpose and Need:**

37 The purpose of this proposed action is to minimize risk to human and ecological health through the
38 removal of petroleum-contaminated soil, and any remnant tank steel, associated with the abandoned
39 fuel farm. This site that was formerly used defense site (FUDS), owned by, leased to or otherwise
40 possess by the United States under the jurisdiction of the Secretary of Defense prior to October 1986.

41
42 The need for the removal of the drums and Quonset hut is to ensure public safety and prevent potential
43 impacts to the surrounding environment.

7. Environmental Resource Agency Coordination:

This action has been/will be coordinated with the following offices/agencies:

	<i>Coordination for CatEx determination</i>	
✓	Guam Coastal Management Program, Bureau of Statistics and Plans	To be determined during planning and permit application process.
✓	Guam Historic Preservation Office	March 11, 2020 letter - The GHPO concurred that the Lonfit Drum Removal Action Undertaking will not adversely impact a component feature of the Lonfit Ammunition Depot, based on its age of over fifty years old. USACE determination that the Lonfit Drum Removal Action will have an adverse effect to the potentially NHRP –eligible historic property being that the building is structurally unsound and need to be demolished and removed. See the attached letter for additional information. (Attachment 3)
✓	Guam Environmental Protection Agency, GEPA	15 Jan 2020 - Letter requests USACE reconsideration of the proposed “No Further Action” at the site and rescinds the 20 Sep 2014 concurrence. (Attachment 4)
✓	Guam Dept. of Agriculture, Division of Aquatic and Wildlife Resources (DAWR)	To be determined during planning and permit application process.
✓	Guam Dept. of Land Management (DLM)	To be determined during planning and permit application process.
	NOAA Fisheries (ESA, MMPA)	NA
✓	U.S Fish and Wildlife Service (ESA, FWCA)	In-progress
	Guam International Airport Authority (GIAA) & Federal Aviation Administration (FAA)	NA
	<i>Coordination for pre-construction activities</i>	
	U.S. Army Corps of Engineers Permit (RHA, CWA)	NA
✓	USEPA Region 9 Notice of Intent (NPDES)	NA

Additional concerns have been identified through the consultation process. Contractors for this work must be made aware of these additional requirements. Consultations under Section 7 of the Federal Endangered Species Act (ESA) (16 United States Code [U.S.C.] 1531 et seq.) has generated a list of best management practices that requires compliance from the project proponent.

8. Environmental Resources:

8.1. Air Quality

The proposed action will require ground disturbance and demolition of the deteriorating Quonset hut. Remediation work will require sixty-three 55-gallon drums to be repacked and transported off-site for disposal. Heavy equipment and vehicles used to do earthwork and transport of materials to be exposed will result in generation of dust and emissions, however, Guam is dominated by constant trade winds designated as an attainment by the EPA. The limited amount of emissions will not require a Clean Air Act permit. Additionally, ground disturbance will result in the exposure of soils and could result in the generation of dust. Appropriate best management practices as identified in the UFP-QAPP will be implemented to prevent affecting air quality. Impact to air quality will be negligent and temporary. Impacts are less than significant.

8.2. Hazardous Materials, Hazardous Waste, Toxic Substances

The propose project will not result in the use, treatment, storage, and/or disposal of hazardous materials or wastes. However, if hazardous materials, hazardous wastes or toxic substances are found on site, actions taken for disposal will comply with the project Uniform Federal Policy-Quality Assurance Project Plan (UFP-QAPP) and all applicable Department of Defense (DoD), Department of Transportation (DOT), Department of the Army (DA), United States Army Corps of Engineers (USACE) regulations and guidance, and Federal and State laws, regulation and guidance. No impacts are expected.

8.3. Solid Waste

The proposed action will result in the disposal of hazardous materials and wasted and the disposal of an existing facility. The Army proposes to demolish Quonset Hut B and remove sixty-two (62) 55-gallon drums from within the hut. Fifty-nine (59) drums contain asphalt-like material and three (3) drums contain a basic liquid suspected to be sodium hydroxide solution. Due to the deteriorated conditions of the drums, they will be re-packaged in DOT approved containers for disposal. Soils under deteriorated drums will be tested for contamination after drums are removed. The drums will be packed with the contaminated soil and hazardous waste (HW) recovered or generated as a result of field activities.

During field work for removal, the drums will be collected and secured and properly stored in preparation for disposal. Drums will be transported to the United States mainland for disposal in a government approved facility. Detailed waste manifests will be signed by a government official certified and designated by the generator. Appropriate recycling and/or disposal requirements will be considered to ensure that that materials are transported to the appropriate facilities, using green and sustainable options where feasible. To minimize risk to human health and the environment during disposal actions, work will comply with the project the UFP-QAPP and all applicable DoD, DOT, DA, USACE regulations and guidance, and Federal and State laws, regulation and guidance.

DOD's potential petroleum contamination in territorial soils, critical groundwater supply, surface water and coastal habitat place an unacceptable risk to human health and the environment and impose undue financial burden on the Territory of Guam. The removal of the drums and Quonset hut will ensure public safety and prevent the content the drums from leaking into the environment. Impacts are beneficial.

All activities involving work in areas potentially containing explosive hazards shall be conducted in full compliance with applicable USACE, Department of the Army (DA), and Department of Defense (DOD) regulations, guidance, standards and manuals.

1 **8.4. Water Quality**

2 Under the proposed action there is potential for accidental spills of hazardous substances, however, to
3 minimize risk to human health and the environment during disposal actions, work will comply with the
4 project Uniform Federal Policy-Quality Assurance Project Plan (UFP-QAPP) and all applicable DoD, DOT,
5 DA, USACE regulations and guidance and Federal and State laws, regulation and guidance.
6

7 All drums and contaminated soil will be removed from the site. Although the drums were reported to be
8 leaking, previous studies showed that there was no evidence that the contents leaked beyond the
9 Quonset hut floor. However, soils under deteriorated drums will be tested for contamination after
10 drums are removed. If contamination is found, soils will be removed and disposed of. Removal of drums
11 and contaminated soil will avoid potential contamination in territorial soils, critical groundwater supply,
12 surface water and coastal habitat place which can pose an unacceptable risk to human health and the
13 environment and impose undue financial burden on the Territory of Guam. Impacts are beneficial.
14

15 **8.5. Topography and Soils**

16 The proposed action will require ground disturbance and demolition of the deteriorating Quonset hut.
17 Soils may become exposed during demolition and field work and will increase the potential for soil
18 erosion. Approximately 0.5 acre of vegetation clearing will be required prior to the removal of the metal
19 structure. Additionally, contaminated soils will be removed. To minimize impacts to soil and topography,
20 vehicular traffic for transportation of disposed drums will be limited to existing roadways as much as
21 possible and heavy equipment will not exceed the width of the existing roads. All uncontaminated
22 excavated soils will be stockpiled and remain onsite. Upon completion of the drum removal, the soil will
23 be redistributed onsite ensuring all excavated areas are backfilled. Appropriate best management
24 practices as identified in the UFP-QAPP will be implemented to prevent loss of soil. Impact to
25 topography and soils will be temporary and will only last for the duration of field work. Impacts are
26 expected to be less than significant.
27

28 **8.6. Natural Resources**

29 The project area comprises of a savannah habitat with limited forested habitat occurring in association
30 with ravines and drainages. The project site provides habitat requirements for a number of threatened
31 and endangered species (T&E), therefore, there is potential for these species to be present at the
32 project site. The proposed action has a potential to affect T&E species. However, no federally protected
33 species were observed during a biological survey that was conducted on 30 October 2019. Under
34 Section 7 of the ESA, USACE has made the determination that the proposed action may affect, but is not
35 likely to adversely affect species for which the project site provides suitable habitat (USACE 2020a).
36 Consultation with USFWS is currently in progress.
37

38 To minimize impacts to natural resources, best management practices have been identified by the US
39 Fish and Wildlife Service and will be implemented during project implementation. Less than significant
40 impacts are expected.
41

42 **8.7. Archaeological & Historic Resources**

43 Lonfit Planning Project is in Asan, Guam within an area previously known as Area 6A, Fifth Field Depot,
44 Ammunition Storage. Remnants of the former ammunition depot include numerous Quonset huts
45 comprised of corrugated steel on concrete floor slabs. The depot is a World War II (WWII) ammunition
46 storage facility and falls under the Advisory Council on the Historic Preservation (ACHP) Program
47 Comment for WWII and Cold War Era (1939-1974) Ammunition Storage Facility. Under Section 106 of
48 the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations

(36 CFR 800), USACE has determined that the Lonfit Drum Removal Action will have an adverse affect to the potentially National Register of Historic Places (NRHP) –eligible historic property. However, The Guam Historic Preservation Officer (GHPO) concurred that the Lonfit Drum Removal Action Undertaking will not adversely impact a component feature of the Lonfit Ammunition Depot, based on its age of over fifty years old being that the Quonset hut B building is structurally unsound and need to be demolished and removed.

Since the soil removal requires excavation and there is the potential to encounter cultural items, an archaeological monitor as well as UXO construction support team will be monitoring during the overburden and ground disturbance. A draft Archaeological Monitoring and Discovery Plan has been developed and will be submitted to the GHPO for their records.

Impacts on cultural resources are expected to be less than significant.

8.8. Land Use

The proposed project will take place Site number H09GM030000 and is located on FUDS land. The proposed action will not alter the present land use. The project is consistent with the existing land use and is not expected to affect any changes in zoning. No impacts are expected under Land Use.

8.9. Noise

While there will be an increase in noise levels during ground work, demolition and clean-up of the 55-gallon drums, the increase will be temporary and within acceptable range for the existing land use. There are no sensitive noise receptors surrounding the project site. Once clean-up work is complete and the site restored, there will be no operations in place which would result in sustained noise. Impacts for noise are expected to be less than significant.

8.10. Utilities

Will the proposal require disposal or alternations to existing utility systems or drainage systems (e.g., power, drinking water, waste water, storm water)? The proposed action will not require disposal or alterations to existing utility systems or drainage systems. After demolition and removal of Quonset Hut B and the 55-gallon drums within, the site will be restored. No impacts are expected for utilities.

9. Determination of Categorical Excluded Actions:

As defined in 40 CFR 1508.4 (CEQ Regulations), “Categorical exclusion” means a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations (Sec. 1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement is required. An agency may decide in its procedures or otherwise, to prepare environmental assessments for the reasons stated in Sec. 1508.9 even though it is not required to do so. Any procedures under this section shall provide for extraordinary circumstances in which a normally excluded action may have a significant environmental effect.

A review of the proposed action, the results of resource agency coordination, and the analysis of environmental impacts (Section 8), indicate that the action as identified and described in this document does not individually or cumulatively have a significant effect on the human environment and qualifies as a categorical exclusion as provided for under Appendix B, Section II, paragraph (h)(4) of 32 CFR Part 651, Environmental Analysis of Army Actions. The proponent has determined that this action is

1 categorically excluded from the requirement to prepare an environmental assessment or an
2 environmental impact statement.

3
4 The Categorical Exclusion is:

5 *h (4) Routine management, to include transportation, distribution, use, storage, treatment, and disposal*
6 *of solid waste, medical waste, radiological and special hazards (for example, asbestos, PCBs, lead-based*
7 *paint, or unexploded ordnance), and/or hazardous waste that complies with EPA, Army, or other*
8 *regulatory agency requirements. This CX is not applicable to new construction of facilities for such*
9 *management purposes.*

10
11 The extraordinary circumstances governing the use of Army CATEX's discussed in 32 CFR Part 651,
12 Appendix B, have been considered and it has been determined that these conditions are not applicable
13 to the proposed action. All the requirements and conditions set forth in the UFP-QAPP and all applicable
14 DoD, DOT, DA, USACE regulations and guidance, and Federal and State laws, regulation and guidance
15 and resulting consultations will be complied with.

16
17 **10. Requirements from Agency Coordination:** This REC does not relieve the proponent from
18 compliance with other applicable Federal, State, and Local environmental requirements and other
19 general or specific requirements, restrictions, and practices set forth as a result of resource agency
20 coordination.

1 **Prepared by:**

2
3
4
5
6 _____
7 Dawn A. Lleces
8 Environmental Protection Specialist
9 US Army Corps of Engineers

_____ Date

10
11 **Reviewed by:**

12
13
14
15
16 _____
17 Uyen Tran
18 Supervisory Environmental Engineer
19 US Army Corps of Engineers

_____ Date

20
21 **Approved by:**

22
23
24
25
26 _____
27 David Griffin
28 Environmental Programs Branch Chief
29 US Army Corps of Engineers

_____ Date

References

- U.S. Army Corps of Engineers (USACE). 2008. Final *Site Inspection Report, Lonfit Planning Project, Asan Guam. (FUDS Project Number – H09GM030002)*. Prepared for USACE, Honolulu District and USACE, Huntsville District. Contract no. W912DY-04-D-0005, Task Order No. 0008. Prepared by Parsons. March 2008
- _____. 2011. *Site Inspection Report, Lonfit Planning Project, Asan Guam. (Project Number – H09GM030002)*. Environmental Programs Branch, Honolulu District. March.
- _____. 2019a. Draft Project Management Plan. Drum Removal, Lonfit Planning Project, Formerly Used Defense Site (FUDS), Asan. Guam. Prepared for USACE, Huntsville District and USACE, Honolulu District. Contract No. W912DY-16-D-0012, Task Order No. W912DY19F0459. Prepared by EA Engineering, Science, and Technology, Inc. August 2019.
- _____. 2019b. Draft Uniform Federal Policy-Quality Assurance Project Plan. Drum Removal, Lonfit Planning Project, Formerly Used Defense Site (FUDS), Asan. Guam. Prepared for USACE, Huntsville District. Contract No. W912DY-16-D-0012, Task Order No. W912DY19F0459. Prepared by EA Engineering, Science, and Technology, Inc. October 2019.
- _____. 2020a. Draft Biological Assessment for Drum Removal, Lonfit Planning Project, Formerly Used Defense Site (FUDS), Asan. Guam. Prepared for USACE, Huntsville District. Task Order No. GU-NH-IESS (001)-EA-05. Prepared by EA Engineering, Science, and Technology, Inc. January 2020.
- _____. 2020b. Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP-FUDS) Property Eligibility Assessment for Lonfit Ammunition Depot and Vicinity, FUDS Property No. H09GM0300, Guam. Prepared by USACE, Honolulu District. January 2, 2020.
- _____. 2020c. Draft Ecological Resources Plan. Drum Removal, Lonfit Planning Project, Formerly Used Defense Site (FUDS), Asan. Guam. Prepared for USACE, Huntsville District. Contract No. W912DY-16-D-0012, Task Order No. W912DY19F0459. Prepared by EA Engineering, Science, and Technology, Inc. February 2020.
- U.S. Army Engineer District. 1996. DERP-FUDS Inventory Project Report, Lonfit Planning Project, Asan, Guam, Site No. H09GM030000. July 26, 1996.