



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

May 15, 2017

MAJ John Bagaglio, Environmental Program Manager
Massachusetts Army National Guard
Joint Force Headquarters
2 Randolph Road
Hanscom AFB, MA 01731-3001

RE: Joint Base Cape Cod (Massachusetts Military Reservation)
Massachusetts National Guard Request to Modify Prohibition on Live Firing and Use of
Pyrotechnics
EPA Final Response

Dear MAJ Bagaglio:

By letter dated 31 August 2016, the Massachusetts National Guard ("MANG"), on behalf of itself and the National Guard Bureau ("NGB"), requested that the United States Environmental Protection Agency ("EPA") 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 Joint Base Cape Cod ("JBCC"). First, the MANG requested that the prohibition of "All firing of lead ammunition or other 'live' ammunition at small arms ranges at or near the Training Range and Impact Area" be modified. Second, the MANG requested that the prohibition of "All use of pyrotechnics at or near the Training Range and Impact Area" be modified. Third, the MANG requested that the pilot project at Juliet, Kilo and Tango ranges be terminated. MANG also requested that EPA accept and approve the Pilot Period Final Report for Juliet, Kilo and Tango ranges, and recognize the Commonwealth of Massachusetts Environmental Management Commission ("EMC") as the oversight body for small arms range development and pyrotechnic use at Camp Edwards. In response to the MANG's request, on 5 October 2016, EPA submitted for public comment a proposal to modify AO2. EPA then conducted a 30-day public comment period which concluded on 5 November 2016. This letter summarizes the comments submitted and EPA's final findings, and constitutes EPA's final response to the MANG's 31 August 2016 request.

I. Public Participation

From 6 October through 5 November 2016, EPA conducted a 30-day comment period on proposed modifications to AO2. EPA received two sets of written comments from the public during this period. A summary of the comments submitted and EPA's responses are attached to this letter. EPA carefully considered each of these comments in developing its findings and in specifying the conditions of the modification to AO2.

II. Information Submitted by MANG

Information was submitted by MANG regarding the Juliet, Kilo and Tango ranges pilot project and on investigatory and remedial activities at the Small Arms Ranges, and on the limited use of certain pyrotechnic training devices at and near the Training Range and Impact Area. The studies and data submitted by the MANG indicate that:

- a. Lead has been detected in a limited number of wells downgradient of the small arms ranges, but no plumes have been identified.
- b. The lack of significant groundwater contamination is attributable to two main reasons: (1) the geochemistry of the soil serves to retard the migration of lead, and (2) the depth to groundwater is significant, and substantial intervening soil acts as an absorbent.
- c. The information does not support the conclusion that lead is immobile in soil. Rather, the data suggests that lead in soil will take a long time to significantly impact the groundwater.
- d. Removal actions have been conducted at the B, C, G, KD, N, Former B, Former C, Former D, Former N and Former M-2 ranges to address elevated levels of Small Arms-related metals (including antimony, lead, and tungsten) in surface soils. The mass of these contaminants has been greatly reduced at the Small Arms Ranges as a result of these and other soil removal actions and range maintenance activities. Therefore, the risk of future impacts to groundwater has been reduced.
- e. A long-term groundwater monitoring program with land use controls to protect monitoring wells and other environmental sampling equipment has been implemented at the B, C, G, GA/GB, I, J, K, SE/SW, and T ranges to verify that these ranges are not currently a source of groundwater contamination above action levels.
- f. Operations, Maintenance, and Monitoring plans are created for all ranges and devices approved for use. These plans have been developed by MANG in partnership with EPA, MassDEP, and the EMC. The goal of these plans is to avoid any releases or damage to the environment that may cause harm to the Camp Edwards Training Area/Upper Cape Water Supply Reserve's groundwater resources. These plans provide for the monitoring of environmental media that includes soil, porewater and groundwater.
- g. Soil samples at Juliet, Kilo and Tango ranges are currently analyzed for antimony, lead, and copper. During the nine-year pilot period, no Action Levels for soil have been exceeded at Juliet, Kilo or Tango ranges.
- h. Based on currently available data, the resumption of lead ammunition training at Juliet, Kilo and Tango ranges has not led to lead contamination in pore water or groundwater.
- i. The operational history of the STAPP™ systems at Juliet, Kilo and Tango ranges demonstrates that although the systems have experienced unanticipated problems, the MANG has acted to investigate, research, and implement solutions to problems as they are discovered.
- j. EPA has approved a Pilot Period Final Report for Juliet, Kilo and Tango ranges which summarizes the use of the ranges, any operational issues encountered and how they were resolved, all environmental monitoring data, changes made to the systems, the Operations, Maintenance and Monitoring Plan (OMMP), and lessons learned for the pilot period which ran from 2007 to 2016. Section 7 of this report provides a description of the EMC and the Environmental Performance Standards, which govern the use and operation of the ranges under Chapter 47 of the Acts of 2002 for the Commonwealth of Massachusetts.
- k. Three pyrotechnic devices used in training have been approved for use by EPA on a limited basis and subject to certain conditions. The first was the M116A1 hand grenade simulator

(25 June 2012), the next was the M69 practice grenade with the M228 fuse (2 May 2013), and the third was the PAN (1 June 2016). Where appropriate, these devices have been tested to determine if there are constituents of concern and/or the ingredient list has been presented to EPA and EMC for review. Pyrotechnic items currently in use have limitations placed on the number of devices to be used annually. All items approved and in use have a Standard Operating Procedure (SOP) in place. These SOPs provide all users directions for use, management, and reporting for these devices on Camp Edwards.

- l. The EMC was created in 2000. The EMC is comprised of the Department of Fish and Game, the Department of Environmental Protection, and the Department of Conservation and Recreation. Its authority is derived from Massachusetts Chapter 47 of the Acts of 2002.
- m. The EMC oversees compliance with, and enforcement of, the Environmental Performance Standards. Environmental Performance Standards are a set of standards specifically created through the Massachusetts Environmental Policy Act process to protect all environmental resources at Camp Edwards.
- n. Along with EPA and MassDEP, the EMC has successfully overseen small arms, pyrotechnic use, and training at Camp Edwards for 16 years. The EMC conducts training area inspections (including small arms ranges) and regular public meetings, and receives input and advice from its Science and Community Advisory Councils. On a day-to-day basis, the EMC's Environmental Officer has direct oversight of training and information access.
- o. Monitoring data show that current small arms range training activities at the STAPP™ ranges, when properly operated and maintained, can be conducted without causing unacceptable contamination levels in the groundwater. Management, operational controls, environmental monitoring, and inspections are provided through an Operations, Maintenance and Monitoring Plan with emphasis on timely projectile removal and environmental monitoring along with internal inspections being conducted by Camp Edwards Range Control, and environmental staff, and external inspections conducted by the EMC's Environmental Officer.
- p. The MANG has committed to EPA that it will continue to request sufficient funds to sustain proper operation and maintenance of the STAPP™ systems at Juliet, Kilo and Tango ranges.

III. EPA Findings

EPA's findings are based on review of the above information, and were not substantially altered as a result of the comments received during the comment period. EPA has concluded that there are sufficient grounds under Paragraph 125 of AO2 to:

1. Modify AO2 to terminate the pilot program at Juliet, Kilo, and Tango small arms ranges at JBCC, and exclude from the prohibition on "live firing", the following: All firing of lead ammunition or other 'live' ammunition at Juliet, Kilo, and Tango ranges, to the extent it receives continued approval and oversight from EMC in accordance with the Environmental Performance Standards.
2. Modify AO2 to exclude from the prohibition on "live firing", the following: Use of the pyrotechnic device M116A1 Hand Grenade, the M228 fuse used with the M69 Hand Grenade, and the Percussion Activated Neutralizer, to the extent it receives continued approval and oversight from EMC in accordance with the Environmental Performance Standards.

3. Modify AO2 to exclude from the prohibition on "live firing", the following: All firing of lead ammunition or other 'live' ammunition at small arms ranges at or near the Training Range and Impact Area, to the extent it receives approval and oversight from EMC in accordance with the Environmental Performance Standards.
4. Modify AO2 to exclude from the prohibition on "live firing", the following: All use of pyrotechnics at or near the Training Range and Impact Area, to the extent it receives approval and oversight from EMC in accordance with the Environmental Performance Standards.

IV. EPA's Final Modification

By this letter, EPA modifies AO2, Scope of Work, Section II.A.1.a and Section II.A.1.f, to read as follows:

- a.i. Firing of lead ammunition or other "live" ammunition at Juliet, Kilo, and Tango ranges will not be prohibited, to the extent it receives continued approval and oversight from EMC in accordance with the Environmental Performance Standards.
 - (A) The authorization is conditioned upon continued compliance with all conditions established by the EMC.
 - (B) The authorization is conditioned upon MANG requesting and receiving the funds necessary to ensure compliance with the approved Operations, Maintenance, and Monitoring Plan.
 - (C) The authorization does not extend to any other ammunition or training device.
 - (D) The proposed use of this ammunition or training device is authorized only to the extent it does not interfere with the completion of investigation and cleanup activities.
 - (E) This decision will be reviewed as appropriate, but in no event less often than every five years. The purpose of the review is to revisit the appropriateness of the decision in providing adequate protection of human health. The scope of the review will include, but is not limited to the following questions: are the ranges operating as designed (i.e., monitoring or maintenance); have any of the cleanup standards changed since this decision; and is there any new information that would warrant modifying or withdrawing this decision. If appropriate, additional actions (including, if necessary, reopening this decision) may be required as a result of these reviews. EPA retains all its enforcement authorities pursuant to its four Administrative Orders.
- a.ii. Firing of lead ammunition or other "live" ammunition at small arms ranges at or near the Training Range and Impact Area will not be prohibited, to the extent it receives approval and oversight from EMC in accordance with the Environmental Performance Standards,
 - (A) The authorization is conditioned upon continued compliance with all conditions established by the EMC.
 - (B) The authorization is conditioned upon MANG requesting and receiving the funds necessary to ensure compliance with the approved Operations, Maintenance, and Monitoring Plan.

- (C) The authorization does not extend to any other ammunition or training device.
- (D) The proposed use of this ammunition or training device is authorized only to the extent it does not interfere with the completion of investigation and cleanup activities.
- (E) This decision will be reviewed as appropriate, but in no event less often than every five years. The purpose of the review is to revisit the appropriateness of the decision in providing adequate protection of human health. The scope of the review will include, but is not limited to the following questions: are the ranges operating as designed (i.e., monitoring or maintenance); have any of the cleanup standards changed since this decision; and is there any new information that would warrant modifying or withdrawing this decision. If appropriate, additional actions (including, if necessary, reopening this decision) may be required as a result of these reviews. EPA retains all its enforcement authorities pursuant to its four Administrative Orders.

f.i. Use of pyrotechnics M116A1 Hand Grenade, the M228 fuse used with the M69 Hand Grenade, and the PAN at or near the Training Range and Impact Area will not be prohibited, to the extent it receives continued approval and oversight from EMC in accordance with the Environmental Performance Standards.

- (A) The authorization is conditioned upon continued compliance with all conditions established by the EMC.
- (B) The authorization is conditioned upon MANG requesting and receiving the funds necessary to ensure compliance with the approved Operations, Maintenance, and Monitoring Plan.
- (C) The authorization does not extend to any other ammunition or training device.
- (D) The proposed use of this ammunition or training device is authorized only to the extent it does not interfere with the completion of investigation and cleanup activities.
- (E) This decision will be reviewed as appropriate, but in no event less often than every five years. The purpose of the review is to revisit the appropriateness of the decision in providing adequate protection of human health. The scope of the review will include, but is not limited to the following questions: are the ranges operating as designed (i.e., monitoring or maintenance); have any of the cleanup standards changed since this decision; and is there any new information that would warrant modifying or withdrawing this decision. If appropriate, additional actions (including, if necessary, reopening this decision) may be required as a result of these reviews. EPA retains all its enforcement authorities pursuant to its four Administrative Orders.

f.ii. Use of pyrotechnics at or near the Training Range and Impact Area will not be prohibited, to the extent it receives approval and oversight from EMC in accordance with the Environmental Performance Standards.

- (A) The authorization is conditioned upon compliance with all conditions to be established by the EMC.
- (B) The authorization is conditioned upon MANG requesting and receiving the funds necessary to ensure compliance with the Standard Operating Procedures, and Operations, Maintenance, and Monitoring Plans.
- (C) The authorization does not extend to any other ammunition or training device.

- (D) The proposed use of these training devices is authorized only to the extent it does not interfere with the completion of investigation and cleanup activities.
- (E) This decision will be reviewed as appropriate, but in no event less often than every five years. The purpose of the review is to revisit the appropriateness of the decision in providing adequate protection of human health. The scope of the review will include, but is not limited to the following questions: are the ranges operating as designed (i.e., monitoring or maintenance); have any of the cleanup standards changed since this decision; and is there any new information that would warrant modifying or withdrawing this decision. If appropriate, additional actions (including, if necessary, reopening this decision) may be required as a result of these reviews. EPA retains all its enforcement authorities pursuant to its four Administrative Orders.

If you have any questions about the terms of this modification, please contact me at (617) 918-1210.

Sincerely,



Anni Loughlin, Chief
Federal Facilities Superfund Section
Office of Site Remediation and Restoration

Attachment

cc: L. Pinaud/EMC
M. Ciaranca/E&RC
S. Cody/IAGWSP
J. Dolan
T. Conway

Response to Comments

Proposal to Modify EPA's AO for Juliet, Kilo and Tango ranges to allow the firing of lead ammunition, and use of pyrotechnics at JBCC

May 15, 2017

Introduction

In a letter dated 31 August 2016, the Massachusetts National Guard ("MANG"), on behalf of itself and the National Guard Bureau ("NGB"), requested that the United States Environmental Protection Agency ("EPA") 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 Joint Base Cape Cod ("JBCC"). First, the MANG requested that the prohibition of "All firing of lead ammunition or other 'live' ammunition at small arms ranges at or near the Training Range and Impact Area" be modified. Second, the MANG requested that the prohibition of "All use of pyrotechnics at or near the Training Range and Impact Area" be modified. Third, the MANG requested that the pilot project at Juliet, Kilo and Tango ranges be terminated. MANG also requested that EPA accept and approve the Pilot Period Final Report for Juliet, Kilo and Tango ranges, and recognize the Commonwealth of Massachusetts Environmental Management Commission ("EMC") as the oversight body for small arms range development and pyrotechnic use at Camp Edwards. On 5 October 2016, EPA responded to this request and proposed modifications to AO2 subject to a 30-day public comment period. The comment period expired on 5 November 2016. EPA received two sets of comments from the public during this period. This document contains a summary of the comments received and EPA's responses.

Response to Comments

1. *Comment:* The commenter is in favor of the proposal to allow firing of lead ammunition or other 'live' ammunition at small arms ranges, and use of pyrotechnics at the Training Ranges and Impact Area at Joint Base Cape Cod.

Response: After review of the information submitted and comments received, EPA has decided to approve the request with conditions as indicated in its approval letter 26 April 2017.

2. *Comment:* The Association to Preserve Cape Cod commented that the proposed amendments fail to insure that the military training is consistent with both the Act [Chapter 47 of the Acts of 2002] and the Clean Water Act. The conditions established by the EPA are both inadequate, and more importantly, not currently met by the State.

Response: Based on this comment, EPA has consulted with the EMC. The EMC, in a March 29, 2017 letter (attached), stated that "[t]he EMC is committed to ensuring that the Environmental Officer has the necessary time and resources to successfully ensure that activities at the Upper Cape Water Supply Reserve at Camp Edwards are compatible with the natural resource purposed of water supply and wildlife habitat protection." Based on that assurance by EMC, EPA believes the water supply can be protected from potential impacts from training activities because a robust environmental monitoring and inspection program is in place for those training activities that have been approved of by the EMC. EMC reviews the results of the environmental monitoring, and inspects ranges and training areas prior to, during, and after training occurs. A robust vetting by EMC will continue to

occur for future training activities that may be proposed by MANG. EPA notes that the Environmental Performance Standards were specifically created through the Massachusetts Environmental Policy Act process to protect all environmental resources at Camp Edwards. The Community Advisory Council (CAC) and Science Advisory Council (SAC) were also created to provide guidance to the EMC as part of the environmental review process.

3. *Comment:* The commenter stated that the acting environmental officer is reportedly working from Lakeville, MA and has a myriad of other environmental responsibilities, contrary to the Act which requires that the officer have an office located within the environmental readiness center or such other location on JBCC as may be appropriate to carry out the duties.

Response: As stated in its March 29, 2017 letter, the EMC has indicated to EPA that the Acting Environmental Officer is performing the duties and responsibilities required to monitor and evaluate compliance with the Act, including performing environmental inspections necessary to oversee training and other activities. In addition, the Acting Environmental Officer holds weekly office hours at Camp Edwards, has a designated office on base, and is available for meetings and other events.

4. *Comment:* The commenter suggested that the environmental officer does not appear to be on the ranges when the military is training, contrary to Section 8 of the Act which requires a presence during training evolutions to monitor, oversee, evaluate and report on environmental compliance.

Response: The Acting Environmental Officer was not present for every training event, but conducted 59 inspection-days from July 2015 through 3 April 2017. These inspections consisted of a compliance review of the ranges and training areas prior to, during, and after training events. Seven inspections were conducted of live-fire training events at multiple ranges, 4 of prescribed burn events either active or post-burn, 15 of pre- or post-military training events on the Reserve, 27 of multiple training areas within the Reserve, and 6 of non-military Reserve use. Range inspection forms documenting the condition of the STAPP systems and ranges, and specific firing activities are required to be filled out prior to and after each firing event. These are maintained at Camp Edwards Range Control and are available at any time for review by the Acting Environmental Officer.

5. *Comment:* The commenter suggested that the failure of the State to adequately staff the oversight and monitoring with an environmental officer means that one of the conditions established by the EPA is not satisfied from the start.

Response: EPA agrees that sufficient staffing by the EMC is important to ensuring the success of this modification of AO2. The EMC has assured EPA that the Baker-Polito Administration and Commissioners serving on the EMC fully recognize the importance of the EMC and the Environmental Officer and are committed to ensuring that the Environmental Officer has the necessary time and resources to successfully complete this important mission.

6. *Comment:* The commenter suggested that the vacancies and infrequent meetings (EMC and CAC) are not part of a successful formula for oversight and monitoring of the most important resource on the base – drinking water.

Response: EPA recognizes the concern of the commenter and has consulted with the EMC in this regard. The EMC has stated to EPA in its March 29, 2017 letter, that the EMC recognizes the importance of these meetings, and one of the initial tasks performed by the Acting Environmental Officer after he assumed the EMC duties was to schedule CAC and SAC meetings. Both the CAC and SAC met in the fall of 2015. Unfortunately, an EMC meeting could not be scheduled in the fall or winter of 2015 due to conflicts among the Commissioners' schedules. Subsequently, the SAC met in April and October of 2016, the CAC met in May and October of 2016, and the EMC met in June and November of 2016. Meetings are tentatively scheduled for the SAC and CAC in May 2017 and for the EMC in June. Although there are vacancies on the advisory councils, the EMC and the Acting Environmental Officer have been diligently working with appropriate agency staff to finalize new appointments to replace advisory council members who departed.

7. Comment: The commenter recommended that the commanding officer of Camp Edwards be specifically tasked with the mission of protecting the water supply and part of his or her office evaluation should include protection of the water supply. Failure to carry out the terms and conditions of the AO should provide a basis for being relieved of command.

Response: Because of the unique qualities of JBCC and the importance of the environmental concerns addressed in AO2, the Adjutant General established the position of Executive Director, JBCC (MANG) to ensure inter-agency communication and coordination amongst numerous non-MANG tenants, and to ensure that government and community stakeholders are informed and engaged. The Executive Director, JBCC recognizes that training activities should be supportive of national security objectives, beneficial to the Cape Cod economy and, above all, respectful of the fragile environment of the Upper Cape. The environmental protection commitments are also codified in other documents, including the JBCC Groundwater Protection Policy Memorandum of Understanding between the Massachusetts Air National Guard, Massachusetts Army National Guard, United States Coast Guard, and United States Air Force, and the *Best Management Practices and Operations, Maintenance, and Monitoring Plan for Juliet, Kilo, and Tango Ranges at Camp Edwards, Massachusetts*.



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March 29, 2017

Mr. Bryan Olson, Director
Office of Site Remediation and Restoration
Mail code OSRR07-2
U.S. Environmental Protection Agency- Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Subject: Association to Preserve Cape Cod (APCC) letter to the USEPA Region 1 dated October 27, 2016 regarding Joint Base Cape Cod Modification to Administrative Orders

Dear Mr. Olson:

The Environmental Management Commission (EMC) has received the subject letter from the APCC to the USEPA Region 1 regarding APCC comments on the proposed amendments to the Administrative Orders (AO) impacting range operations at Joint Base Cape Cod. The Upper Cape Water Supply Reserve (Reserve) was created by Chapter 47 of the Acts of 2002 (the Act) and was designated as public conservation land dedicated to the natural resource purposes of water supply and wildlife habitat protection and for the use and training of the military forces of the Commonwealth; provided that such military use and training is compatible with the natural resource purposes of water supply and wildlife habitat protection. The EMC was established within the Executive Office of Energy and Environmental Affairs by the Act for the purpose of providing oversight and monitoring of military and other activities on the Reserve.

The APCC raised concerns regarding the current status of the EMC Environmental Officer position. The Act states that the EMC shall appoint an Environmental Officer for the Massachusetts Military Reservation (now Joint Base Cape Cod) who shall report to the EMC and whose duties and responsibilities shall be to monitor and evaluate the environmental impact of the activities being conducted on, and the uses of, the Reserve on the water supply and wildlife habitat. To this end, the EMC has appointed an Environmental Officer to fulfill these duties and responsibilities since the Act was promulgated. The Environmental Officer who had served in the position for the past 13 years retired from state service on June 30, 2015. An Acting Environmental Officer was appointed by the Environmental Management Commission on July 1, 2015. Although not at Camp Edwards on a full time basis, the Acting Environmental Officer is performing the duties and responsibilities required to monitor and evaluate compliance with the Act, including performing inspections necessary to oversee training and other

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activities. In addition, the Acting Environmental Officer holds weekly office hours at Camp Edwards, has a designated office on base, and is available for meetings and other events.

The APCC also raised concerns regarding meetings of the Environmental Management Commission and the EMC Community and Science Advisory Councils (CAC/SAC). The EMC recognizes the importance of these meetings, and one of the initial tasks performed by the Acting Environmental Officer after he assumed the EMC duties was to schedule CAC and SAC meetings. Both the CAC and SAC met in the fall of 2015. Unfortunately, an EMC meeting could not be scheduled in the fall or winter of 2015 due to due conflicts among the Commissioners' schedules. Subsequently, the SAC met in April and October of 2016, the CAC met in May and October of 2016, and the EMC met in June and November of 2016. Meetings are tentatively scheduled for the SAC and CAC in May 2017 and for the EMC in June. Although there are vacancies on the advisory councils, the EMC and the Acting Environmental Officer have been diligently working with appropriate agency staff to finalize new appointments to replace advisory council members who departed.

The Baker-Polito Administration and Commissioners serving on the EMC fully recognize the importance of the EMC and the Environmental Officer in ensuring that activities at the Upper Cape Water Supply Reserve at Camp Edwards are compatible with the natural resource purposes of water supply and wildlife habitat protection. The Acting Environmental Officer has successfully provided the necessary oversight to evaluate the environmental impact of the activities being conducted on the Reserve and to ensure compliance with applicable standards. We are committed to ensuring that the Environmental Officer has the necessary time and resources to successfully complete this important mission.

Sincerely,



George N. Peterson, Jr.
Commissioner /Chair

Environmental Management Commission

Ec: Massachusetts National Guard:
COL Patrick Keefe, Commander, Camp Edwards
LTC Shawn Cody, Deputy Commander, Camp Edwards
LTC John Bagaglio, Environmental Program Manager
Michael Ciaranca, Environmental & Readiness Center, Camp Edwards

USEPA R1:
Anni Loughlin, Chief, Federal Facilities Superfund Section
Tim Conway, Esq.

Environmental Management Commission:
Martin Suuberg, Commissioner
Leo Roy, Commissioner
Leonard Pinaud, Acting Environmental Officer
Science Advisory Council
Community Advisory Council