

November 8, 2001

Garrison Commander
U.S. Army Garrison, Fort Belvoir
Attn: ANFB-ELZ (Lt. Col. David L. Farace)
9340 Jackson Loops, Suite 107
Fort Belvoir, Virginia 22060

RE: Environmental Assessment and Finding of No Significant Impact for the Permanent Relocation
of the Defense Threat Reduction Agency to
Fort Belvoir, Virginia DEQ-01-185F

Dear Colonel Farace:

The Commonwealth of Virginia has completed its review of the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) described above. The Department of Environmental Quality is responsible for coordinating Virginia's review of federal environmental documents and responding to appropriate federal officials on behalf of the Commonwealth. The following agencies and planning district commission participated in this review:

Department of Environmental Quality
Department of Agriculture and Consumer Services
Department of Conservation and Recreation
Department of Transportation
Marine Resources Commission Department of Historic Resources
Department of Mines, Minerals, and Energy Chesapeake Bay Local Assistance Department Northern
Virginia Regional Commission.
In addition, the Department of Health and Fairfax County were invited to comment.

An Agency of the National Resources Secretariat

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Project Description

The Army proposes to relocate approximately 840 employees of the Defense Threat Reduction Agency from offices in Alexandria and Franconia (part of Fairfax County) to new buildings at Fort Belvoir. Construction associated with the move would include an addition to the existing Andrew T. McNamara Building (formerly the Defense Logistics Agency headquarters building) at Fort Belvoir; a three-level parking garage for approximately 1,100 cars in the southeastern portion of the existing parking lot, and a temporary gravel parking lot for approximately 800 cars along McCutchen Road, about 500 feet south of the McNamara headquarters complex (HQC). (EA, page 1-1.)

The McNamara HQC covers 72 acres of developed land bordering the Fairfax County Parkway (Route 7100), John J. Kingman Road, and Beulah Street (Route 613).

Environmental Impacts and Mitigation

The Commonwealth has no objection to this project, provided that construction and operation activities are carried out in accordance with applicable federal, state, and local laws. We concur with the Finding of No Significant Impact which appears after the signature page in the EA, and agree that it is not necessary to prepare an Environmental Impact Statement.

1. Air Quality Impacts. Fort Belvoir is in an ozone non-attainment area, according to the DEQ's Division of Air Program Coordination. Accordingly, the Army should take all reasonable precautions to limit emissions of oxides of nitrogen (NOx) and volatile organic compounds (VOC), principally by controlling or limiting the burning of fossil fuels. An additional precaution, stemming from 9 VAC 5-40-5490 in the Regulations for the Control and Abatement of Air Pollution, is that there are some limitations on the use of "cut-back" asphalt (liquefied asphalt cement, blended with petroleum solvents) that may apply in the construction of roads, driveways, or parking lots associated with the project. The asphalt must be "emulsified" (predominantly cement and water with a small amount of emulsifying agent) except when specified circumstances apply. Moreover, there are time-of-year restrictions on its use during the months of April through October in VOC emission control areas.

The EA mentions the control of fugitive dust from construction activity and mentions the use of water and street sweeping to control dust (page 4-23, section 4.5.2.3.). In addition to the techniques mentioned, we would add the following:

- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets, and of dried sediments resulting from soil erosion.

(See the Regulations for the Control and Abatement of Air Pollution, 9 VAC 5-50-60, specifically, 9 VAC 5-60-90.)

The EA also mentions several facilities associated with the project that will or may require air permits. These include the natural gas-fired boilers to heat the new building addition (page 4-24, section 4.5.2.4.) and a diesel-fueled 800-kilowatt emergency generator which may be added, as a temporary measure or permanent fixture, to four existing generators (page 2A, section 2.2.2.). DEQ's Northern Virginia Regional Office provided permitting guidance on these actual or potential emission sources; see "Regulatory and Coordination Needs," item 1, below.

According to DEQ's Northern Virginia Regional Office, this project meets the general conformity rule in EPA's guidance, *Determining Conformity of General Federal Actions to State and Federal Implementation Plans.* Although emission estimates from construction activities in addition to stationary sources were calculated (EA, section 4.5.2.4., pages 4-23 through 4-26), DEQ regulations exempt consideration of such "secondary emissions" for determining potential emissions. Also, emissions estimated for commuter vehicle traffic do not need to be considered for purposes of Virginia's stationary source air regulations.

2. Water Quality and Wetland Impacts. The EA states that the project will disturb approximately 16 acres of land area altogether, including areas on which construction has taken place in the past (EA, page ES-3 and pages 4-4, and 4-5 (section 4.1.3.)). According to DEQ's Virginia Water Protection Permit Program, the project will not directly affect wetlands or waterways; this confirms the statements in the EA (page 4-34, section 4.9.5., and page 4-35, section 4.9.7.). No Virginia Water Protection Permit will be required. However, the disturbance of more than five acres will require a Virginia Pollutant Discharge Elimination System (VPDES) Stormwater General Permit; see "Regulatory and Coordination Needs," item 2, below. In addition, the proximity of the proposed temporary parking lot to Mason Run (Figure 3-6, following page 3-42), which may be a tidal tributary, may require Marine Resources Commission permit review; see "Regulatory and Coordination Needs," item 5, below.

The Virginia Water Protection Permit Program encourages the use of appropriate

erosion and sediment control measures as part of this project. See "Regulatory and Coordination Needs," item 3, below.

3. Natural Heritage and Wildlife Resources. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formation, according to the Department of Conservation and Recreation (DCR). DCR's Division of Natural Heritage indicates, as it did in an earlier (August 15) letter to the Army's consultant (EA, Appendix D), that the wood turtle (*Clemmys insculpta*), a state-listed species, has been documented in the vicinity of the project and may appear within the project boundaries if appropriate habitat is present. The wood turtle inhabits forested floodplains and nearby fields, wet meadows, and farmland, as the EA states (page 4-37, section 4.9.9.2.). This species overwinters on the bottoms of creeks and streams, so a primary habitat requirement is the presence of water. The wood turtle is classified as threatened by the Department of Game and Inland Fisheries.

The EA indicates that there have been three sightings of the wood turtle on Fort Belvoir in recent years. It commits the Army to a survey for the species in the area between McCutchen Road and Mason Run, in order to evaluate whether appropriate habitat exists. A final report is to be issued December with recommendations for wildlife habitat protection. (EA, page 4-37, section 4.9.9.2.). The Department of Conservation and Recreation recommends that the Army coordinate this effort with the Department of Game and Inland Fisheries as well as the Department of Conservation and Recreation.

We recommend that copies of the resulting report be provided to both agencies.

The Department of Conservation and Recreation also recommends that the Army minimize project impacts on wood turtle habitat by implementing strict erosion and sediment controls (see "Regulatory and Coordination Needs," item 3, below).

The Department of Agriculture and Consumer Services indicates that the project is not likely to give rise to adverse effects upon state-listed endangered or threatened plant or insect species, or to important farmland.

4. Wildlife Resources. Under Title 29.1 of the Code of Virginia, the Department of Game and Inland Fisheries (DGIF) is the primary wildlife and freshwater fish management agency in the Commonwealth. The DGIF has full law enforcement and regulatory jurisdiction over all wildlife resources, inclusive of state and federally endangered or threatened species, but excluding listed insects. The agency maintains a comprehensive system of databases of wildlife resources that is available through the Agency's site at www.dgif.state.va.us, in the "Wildlife" section from the link to "Wildlife Information Online". The DGIF determines likely impacts on fish and wildlife resources

and habitats, and recommends appropriate measures to avoid, reduce or compensate for those impacts. For more information on the Wildlife Information Online Service, the Anny may contact the DGIF (Kathy Quindlen, telephone (804) 367-9717).

5. Solid and Hazardous Waste. The EA addressed the storage of hazardous waste (pages 3-45 and 3-46, section 3.10.) and solid waste management (page 3-34, section 3.7.5.). However, the DEQ's Office of Remedial Programs recommends that the Army conduct an environmental investigation before construction begins to ensure that there are no unaddressed questions. The adjacent National Guard Motor Pool should be included in the investigation. *Any* soil suspected of contamination must be tested. If it is contaminated, the Anny should notify the DEQ's Northern Regional Office (telephone (703) 583-3800); it should then dispose of the soil in accordance with the Virginia Hazardous Waste Management Regulations (9 VAC 20-60 et seq.) and the Virginia Regulations for the Transportation of Hazardous Materials (9 VAC 20-110 et seq.)

A cursory review of DEQ's Division of Waste Programs Coordination files did not reveal any contaminated sites which might affect the land area in question. The Anny may wish to contact DEQ's Northern Virginia Regional Office (telephone (703) 583-3800) to determine whether that Office has additional information on nearby contamination.

In regard to solid waste, we recommend reducing waste materials at the source, re-using them, and recycling them to the greatest extent practicable. It appears, from the EA, that the Army is well along in this regard at Fort Belvoir because it has reached a 50% rate of recycling (page 3-34, section 3.7.5.).

6. Chesapeake Bay Preservation Areas. The EA acknowledges the requirements of Fairfax County's local Chesapeake Bay Preservation ordinance (pages 3-42 and 3-43, section 3.9.7.2. and pages 4-35 and 4-36, section 4.9.7.2.). The proposed action appears to be generally consistent with the requirements of the Chesapeake Bay Preservation Act, according to the Chesapeake Bay Local Assistance Department. Figure 3-6 (following page 3-42) indicates that no Resource Protection Areas would be affected by the proposed construction. However, Fairfax County has classified all County lands that are not Resource Protection Areas as Resource Management Areas, which means that they are subject to the general performance standards of the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.).

The proposed project is considered to be "redevelopment" under the Regulations, and a detention basin currently serves the site, so the Regulations require that post-development runoff may not exceed the existing load of non-point source water pollution. The Anny should ensure that the existing Best Management Practice (BMP) has been

designed and is maintained to perform at the target pollutant removal efficiency. Treatment of runoff from the proposed temporary parking lot (EA, page 4-31, section 4.7.6.2.) was not specifically addressed in the EA. It appears that this would also meet the requirements for "redevelopment." If this area is not currently served by a BMP, the standards require a 10% reduction in pollutant loadings from the site.

7. Erosion and Sediment Control; Stormwater Management. In Chesapeake Bay Preservation Areas, projects involving land disturbance of 2,500 square feet or more may require Erosion and Sediment Control Plans. In addition, Stormwater Management Plans are required for projects disturbing more than one acre of land area. These requirements are likely to apply to the project, subject to any implementation agreement that the Army has with the Department of Conservation and Recreation. See "Regulatory and Coordination Needs," item 3, below.

8. Historic and Archaeological Resources. The Department of Historic Resources indicates that this project will not affect resources listed on or eligible for the Virginia Landmarks Register or the National Register of Historic Places.

9. Transportation Impacts. The Department of Transportation does not anticipate any significant adverse transportation impacts from this project.

10. Pollution Prevention. The DEQ advocates that principles of pollution prevention be used in all construction projects as well as in facility operations. Effective siting, planning, and on-site Best Management Practices (BMPs) will help to ensure that environmental impacts are minimized. However, pollution prevention techniques also include decisions related to construction materials, design, and operational procedures that will facilitate the reduction of wastes at the source. We have several pollution prevention recommendations that may be helpful in constructing or operating this project:

- Consider development of an effective Environmental Management System (EMS). An effective EMS will ensure that the proposed facility is committed to minimizing its environmental impacts, setting environmental goals, and achieving improvements in its environmental performance. DEQ offers EMS development assistance and recognizes facilities with effective Environmental Management Systems through its Virginia Environmental Excellence Program.
- Consider designs, techniques, and technologies that will facilitate the re-circulation and re-use of waters used for cooling and steam generation. These techniques can save money by minimizing intake and treatment needs.

- Consider environmental attributes when purchasing materials. For example, the extent of recycled material content, toxicity level, and amount of packaging should be considered and can be specified in purchasing contracts.
- Consider contractors' commitments to the environment (such as an EMS) when choosing contractors. Specifications regarding raw materials and construction practices can be included in contract documents and requests for proposals.
- Choose sustainable materials and practices for infrastructure and building construction and design. These could include asphalt and concrete containing recycled materials, and integrated pest management in landscaping, among other things.
- Integrate pollution prevention techniques into the facility maintenance and operation, to include the following: inventory control (record-keeping and centralized storage for hazardous materials), product substitution (use of non-toxic cleaners), and source reduction (fixing leaks, energy-efficient HVAC and equipment). Maintenance facilities should be designed with sufficient and suitable space to allow for effective inventory control and preventive maintenance.

DEQ's Office of Pollution Prevention provides free information and technical assistance relating to pollution prevention techniques and EMS. If interested, the Army may contact that Office (Tom Griffin, telephone (804) 698-4545).

11. Energy Conservation. The addition to the McNamara Building should be planned and designed to comply with state and federal guidelines and industry standards for energy conservation and efficiency. For example, energy efficiency of the facility can be maximized by optimizing the use of the following:

- thermally-efficient building shell components (roof, wall, floor, and insulation);
- high efficiency heating, ventilation, air conditioning systems;
- high efficiency lighting systems;
- energy-efficient office and data processing equipment.

The Department of Mines, Minerals and Energy (Eugene Rader, telephone (804) 951-6358) should be contacted for assistance in meeting this challenge.

Regulatory and Coordination Needs

1. Air Quality Permitting. Any open burning of construction or land-clearing debris may require an open burning permit from DEQ's Northern Virginia Regional

Office pursuant to the Regulations for the Control and Abatement of Air Pollution, 9 VAC 5-40-5600 et seq.

As indicated above ("Environmental Impacts and Mitigation," item 1), air permitting requirements may apply to heating boilers and the emergency generator involved in this project. If each of the two boilers contemplated have heat input capacities less than 10 million Btu per hour, they would be below the permit exemption level (see 9 VAC 5-80-11 in the Regulations). The same is true for the emergency generator. However, both of these items would need to be added to Fort Belvoir's existing Title V Operating Permit as ..insignificant emission units" (see the Regulations at 9 VAC 5-80-720. C.). The EA does not mention other types of emission units that may be needed at the HQC later; these might include a fuel storage tank, which is subject to Subpart Kb of EPA's New Source Performance Standards if its storage capacity exceeds 10,000 gallons.

The Army should contact DEQ's Northern Virginia Regional Office (Terry Darton, Air Permit Manager, telephone (703)583-3845) to determine the applicability of permitting requirements to this project. The air pollution control program is one of the Enforceable Programs of the Virginia Coastal Resources Management Program (see item 7, below).

2. Water Quality Permitting. As indicated above, the project will require a VPDES Stormwater General Permit because it will disturb a land area greater than five acres. The DEQ's Northern Virginia Regional Office administers this permit program and can answer questions about it (telephone (703) 583-3800). As with the air pollution control program, this permit program is one of the Enforceable Programs of the Virginia Coastal Resources Management Program (see item 7, below).

3. Erosion and Sediment Control. To ensure compliance with Erosion and Sediment Control Plan requirements (another one of the Enforceable Programs; see item 6, below), the Army should contact the Department of Conservation and Recreation's Potomac Watershed Office (Mary Apostolico, telephone (540) 347-6420) for technical guidance in preparing or implementing the Erosion and Sediment Control Plan. To discuss the implementation agreement, or absence thereof, the Army should contact the Department of Conservation and Recreation's central office (Derral Jones telephone (804) 786-9042).

The Potomac Watershed Office should also be contacted for technical guidance in regard to a Stormwater Management Plan for the project. Plan review for Stormwater Management Plans lies with Fairfax County in this case. We recommend that the Army

Contact the County's Soil and Water Conservation District (Diane Hoffman, District Administrator, telephone (703) 324-3200) in this regard.

4. Natural Heritage and Wildlife Resources. To ensure compliance with endangered species legislation, the Army should coordinate its wood turtle habitat survey efforts with the Department of Game and Inland Fisheries (Tom Wilcox, telephone (804) 367-8998), the Department of Conservation and Recreation's Division of Natural Heritage (Rene Hypes, telephone (804) 37-2708), and the U.S. Fish and Wildlife service (Eric Davis, telephone (804) 693 6994, extension 104).

5. Subaqueous Bed Encroachment. Any activity which encroaches in, on, or over state-owned subaqueous lands requires the submission of a Joint Permit Application to the Marine Resources Commission or to the local Wetlands Board. It appears that a permit may be required from the Wetlands Board for this project. Questions on this matter may be addressed to the Marine Resources Commission (Mark Eversole, telephone (757) 247-2200). Subaqueous lands management is one of the Enforceable Programs of the Virginia Coast Resources Management Program (item 7, below).

6. Chesapeake Bay Preservation Areas Management. The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan requires the signatories, including the Department of the Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of storm water. The agencies also committed themselves to encourage construction design that minimizes natural area loss and adopts low-impact development and best management technologies for stormwater. This design must also minimize erosion and reduce impervious surfaces. Questions on the implementation of the Plan, or on application of the Chesapeake Bay Preservation Area Designation and Management Regulations to title proposed project, may be addressed to the Chesapeake Bay Local Assistance Department (Catherine Harold or Shawn Smith, telephone (800) CHESBAY (i.e. (800) (243-7229)). As with several of the foregoing requirements, the requirements under these Regulations, entitled "Coastal Lands Management" in the first enclosure, are part of the Enforceable Programs of the Virginia Coastal Resources Management Program (next item)

7. Federal Consistency under the Coastal Zone Management Act of 1972 The Virginia Coastal Resources Management Program is comprised of a network of programs administered by several agencies. In order to be consistent with the VCP, the Army must obtain all the applicable permits and approvals listed under the Enforceable Programs of the VCP prior to commencing the project. Based on the commitments provided in the consistency determination (EA, section 4.1.3.2., pages 4-4 and 4-5) that the Army will

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obtain and comply with all approvals from agencies administering the applicable enforceable policies, we concur with the finding that this proposal is consistent with the VCP. Questions on federal consistency may be directed to DEQ's Office of Environmental Impact Review (Charles Ellis, telephone (804) 698-4488).

Thank you for the opportunity to review this EA.

Sincerely,



Michael P. Murphy, Director
Division of Environmental Enhancement

Enclosures

cc: Keith R. Tignor, DACS
Derral Jones, OCR,
Thomas D. Modena DEQ-DWPC-ORP
K. S. Narasimhan, DEQ-DAPC-OADA
Wendy Kedzierski, DEQ-DWPC-VWPP
Charles D. Forbes, DEQ-NVRO
Angel N. Deem, VDOT-EQD
Mark Eversole, MRC
Marc Holma; DHR
Eugene K. Rader, DMME
Catherine M. Harold, CBLAD
David Bulova, NVRC
Diane Hoffman, Fairfax County

James S. Gilmore, III Governor
John Paul Woodley, Jr.
Secretary of Natural Resources



David G.
Brickley
Director

COMMONWEALTH *of* VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

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20J Governor Street, Suite 326

TDD (804) 786-2121 Richmond, Virginia 23219-2010 (804) 786-2556 FAX (804) 371-7399

NOV 05, 2001

Memorandum DEQ-Official of Environmental Impact Review

DATE: 31 October 2001
TO: Charles H Ellis, III Department of Environmental Quality
FROM: Derral Jones, Planting Bureau Manager
SUBJECT: DEQ#01-185F: Permanent Relocation of the Defense Threat Reduction Agency to Fort Belvoir

The Department of Conservation and Recreation (OCR) has **reviewed the** Environmental Assessment for the relocation of the Defense Threat Reduction Agency to Fort Belvoir. On 15 August 2001, DCR's Division of Natural Heritage submitted comments on the project to TAMS Consultants Inc. At present DCR would like to reiterate those comments" According to the information currently in our files, the wood turtle (*Clemmys insculpta*, G4/S2/NF/LT) has been documented in the project vicinity and may occur within the project limits if appropriate habitat is present. The wood turtle inhabits forested floodplains and nearby fields, wet meadows, and farmlands (Mitchell, 1994). As this species overwaters on the bottoms of creeks and streams a primary habitat requirement is the presence of water (Mitchell 1994). Please note that the wood turtle is classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

As stated on page 4-37 of the environmental assessment potential exists for the wood turtle within the project vicinity and DCR supports your plans for conducting a survey in late September to early October. We recommend coordination with the VDGIF and would appreciate receiving a copy of this survey once completed.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to erosion and sediment control measures during all land disturbing activities."

New and Updated information is continually added to BCD. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

For your records the proposed project is not anticipated to have any adverse impacts on existing or planned recreational facilities. Nor will it impact any streams on the National Park Service Nationwide Inventory, Final List of Rivers, potential Scenic Rivers or existing or potential State *Scenic* Byways. Please contact DCR for an update on this information if a significant amount of time passes before it is utilized.

Thank you for the opportunity to comment on this permit application.

Definition of Abbreviations Used on Natural Heritage Resource Lists of the Virginia Department of Conservation and Recreation

The following ranks are used by the Virginia Department of Conservation and Recreation to set protection priorities for natural heritage resources. Natural Heritage Resources, or "NHR's," are rare plant and animal species, rare and exemplary natural communities, and significant geologic features. The primary criterion for ranking NHR's is the number of populations or occurrences, i.e. the number of known distinct localities. Also of great importance is the number of individuals in existence at each locality or, if a highly mobile organism (e.g., sea turtles, many birds, and butterflies), the total number of individuals. Other considerations may include the quality of the occurrences, the number of protected occurrences, and threats. However, the emphasis remains on the number of populations or occurrences such that ranks will be an index of known biological rarity.

S1 — Extremely rare; usually 5 or fewer populations or occurrences in the state; or may be a few remaining individuals; often especially vulnerable to extirpation.

S2 — Very rare; usually between 5 and 20 populations or occurrences; or with many individuals in fewer occurrences; often susceptible to becoming extirpated.

S3 — Rare to uncommon; usually between 20 and 100 populations or occurrences; may have fewer occurrences, but with a large number of individuals in some populations; may be susceptible to large-scale disturbances.

S4 — Common; usually >100 populations or occurrences, but may be fewer with many large populations; may be restricted to only a portion of the state; usually not susceptible to immediate threats.

S5 — Very common; demonstrably secure under present conditions.

SA — Accidental in the state.

S#B — Breeding status of an organism within the state.

SH — Historically known from the state, but not verified for an extended period, usually > 15 years; this rank is used primarily when inventory has been attempted recently.

S#N — Non-breeding status within the state. Usually applied to winter resident species.

SU — Status uncertain, often because of low search effort or cryptic nature of the element.

SX — Apparently extirpated from the state.

SZ — Long distance migrant whose occurrences during migration are too irregular, transitory and/or dispersed to be reliably identified, mapped and protected.

Global ranks are similar, but refer to a species' rarity throughout its total range. Global ranks are denoted with a "G" followed by a character. Note that GA and GN are not used and GX means apparently extinct. A "Q" in a rank indicates that a taxonomic question concerning that species exists. Ranks for subspecies are denoted with a "T". The global and state ranks combined (e.g. G2/S1) give an instant grasp of a species' known rarity.

These ranks should not be interpreted as legal designations.

Federal Legal Status

The Division of Natural Heritage uses the standard abbreviations for Federal endangerment developed by the U.S. Fish and Wildlife Service, Division of Endangered Species and Habitat Conservation.

LE — Listed Endangered – threatened with extinction throughout all or a significant portion of its range

LT — Listed Threatened – likely to become endangered in the foreseeable future

PE — Proposed Endangered —

E(S/A) Treat as endangered because of similarity of appearance

PT — Proposed Threatened —

T(S/A) Treat as threatened because of similarity of appearance

C — Candidate – enough information is available to propose for listing, but listing is precluded by other pending proposals of higher priority

SOC — Species of Concern — species that merit special concern (not a regulatory category)

NF — No federal legal status

State Legal Status

The Division of Natural Heritage uses similar abbreviations for State endangerment.

LE — Listed Endangered —

PE — Proposed Endangered

LT — Listed Threatened —

PT — Proposed Threatened

C — Candidate

SC — Special Concern – animals that merit special concern according to VDGIF (not a regulatory category)

NS — No state legal status

*For information on the laws pertaining to threatened or endangered species, contact: U.S. Fish and Wildlife Service for all **FEDERALLY** listed species Department of Agriculture and Consumer Services Plant Protection Bureau for **STATE** listed plants and insects Department of Game and Inland Fisheries for all other **STATE** listed animals 3/99*

If you cannot meet the deadline, please notify CHARLIE ELLIS at **804/698-4488** prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

Review Instructions:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

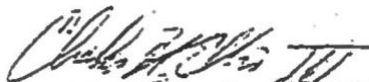
B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

MR. CHARLES B. ELLIS III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, V 23219
Fax #804/698-4319

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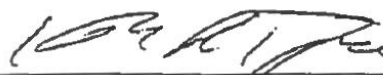
DEQ-Office of Environmental
Impact Review


Charles H. Ellis III
Environmental Program

COMMENTS

Based on information in our database, we do not anticipate this project will have any adverse impacts as it relates to VDACS' responsibilities for the preservation of agricultural lands and the protection of listed endangered or threatened plant and insect species.

Thank you for the opportunity to comment on this project. If you have any questions or need additional information, please contact us at (804) 786-3515.

(signed)  (Keith R. Tignor) (date) October 30, 2001
(title) Endangered Species Coordinator
(agency) VDACS, Office of Plant and Pest Services

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OCT 31 2001



DEQ-Office of Environmental
Impact Review

James S. Gilmore, III
Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Dennis H. Treacy
Director

(804) 698-4000
1-800-592-5482

MEMORANDUM

TO: Charles Ellis
FROM: Thomas Modena
DATE: October 31, 2001
COPIES: Kevin Greene
SUBJECT: Environmental Assessment
Relocation of the Defense Threat Agency to Fort Belvoir

The Office of Remedial Programs has reviewed the Environmental Assessment for the Relocation of the Relocation of the Defense Threat Agency to Fort Belvoir, Fairfax County. We have the following comments concerning the waste issues associated with this project.

Some waste issues were addressed in the report, such as the storage of hazardous waste and solid waste management units, but an environmental investigation should be conducted before construction to assure that there are not other unaddressed issues. The adjacent National Guard Motor Pool should be included in this investigation. The central office of the Waste Division did a cursory review of its data files and did not find any additional sites that might impact this project. It is recommended that the Northern Virginia Regional Office of the Virginia Department of Environmental Quality (VDEQ) should be contacted at 703-583-3800 to see if there are any regional office-related waste sites.

Since *this* is a construction project, any soil that is suspected of contamination or wastes that are generated must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal

Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous Materials, 49 CFR Parts 107, 171.1 – 172.558.

Finally, VDEQ encourages that all construction projects implement pollution prevention principles, including the reduction , reuse, and recycling of all solid waste generated.

If you have any questions or need further information, please let me know.

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DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION

OCT
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2001

ENVIRONMENTAL REVIEW REPORT APPLICABLE TO AIR QUALITY,

TO: Charles H. Ellis III DEQ-OEIA PROJECT NUMBER: 01 - 185 F

PROJECT TYPE: ☐ STATE EA/EIR ☒ FEDERAL EA/FONSI ☐ FEDERAL EIS

☐ scc ☐ CONSISTENCY DETERMINATION/CERTIFICATION

PROJECT TITLE: PERMANENT RELOCATION OF THE DEFENSE THREAT REDUCTION AGENCY TO FORT BELVOIR, VIRGINIA

PROJECT. SPONSOR: DOD/DEPARTMENT OF THE ARMY /FORT BELVOIR

PROJECT LOCATION: ☒ OZONE NON-ATTANMENT AREA

☐ OZONE MAINTENANCE AREA

☒ STATE VOLATILE ORGANIC COMPOUNDS & NITROGEN OXIDES EMISSION CONTROL AREA

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO:

☒ CONSTRUCTION

☒ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT **MAY APPLY:**

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3. ☒ 9 VAC 5-40-5490 et seq. -Asphalt Paving Operations
4. ☒ 9 VAC 5-40-5600 et seq. -Open Burning
5. ☒ 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to
7. ☐ 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8. ☒ 9 VAC 5-50-400 Subpart Db, Standards of Performance for New Stationary Sources, designates standards of performance for the criteria pollutants
9. ☒ 9 VAC 5-80-10 et seq. of the regulations - Permits for Stationary Sources
10. ☒ 9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the fossil fuel fired boilers
11. ☒ 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to

COMMENTS SPECIFIC TO THE PROJECT:

Being an ozone non-attainment area, all precautions are to be taken to restrict emissions of nitrogen oxides (NOx) and volatile organic compounds, besides regulating fugitive dust, open burning and asphalt paving operations. Further, operation is subject to other regulations cited above as committed vide 4.5.2.2 of the report.

For any technical or permit assistance, the Northern Virginia Office may please be contacted.

(Kotur S. Narasimhan)
Office of Air Data Analysis

10/25/01
Date



James S. Gilmore, III Governor

John Paul Woodley, Jr.
Secretary of Natural Resources

Dennis H. Treacy
Director

Gregory L. Clayton
Regional Director

October 28, 2001
MEMORANDUM

COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193-1453
(703) 583-3800 /FAX (703) 583-3801
<http://www.deq.state.va.us>

TO: Charlie Ellis
FROM: Charlie Forbes
SUBJECT: NVRO Review Comments: Fort Belvoir EIR Request No. 01-185F

The purpose of this memorandum is to provide the subject comments. There may have been some confusion in providing earlier comments on this project by less formal means – the comments contained herein supercede any other comments you may have received from NVRO previously.

The only comments of note relate to air quality. Specifically, the environmental assessment report included the impact of air emission units and activities from the construction and operation of the new facility in accordance with the Clean Air Act. The project also meets the general conformity rule provided by U.S. EPA in their guidance "Determining Conformity of General Federal Actions to State and Federal Implementation Plans". Although emission estimates from construction activities were calculated in addition to stationary sources, DEQ regulations exempt consideration of such "secondary emissions" for determining potential emissions. Also emissions estimated for the commuter vehicle traffic do not need to be considered for Virginia's stationary source air regulations.

The only significant emissions relevant to DEQ air pollution regulations concern the construction of the building boilers and the emergency generator. The report states that the new building will likely have a couple of gas-fired boilers with a total heat input capacity of 11.8 million Btu per hour. They estimated the potential oxides of nitrogen emissions using EPA AP-42 factors, at 4.8 tons per year. Although EPA New Source Performance Standards (NSPS) are applicable to a boiler with heat input capacity greater than 10 million Btu per hour, if two boilers are installed, each would likely be below the permit exemption level. The boilers would be considered as insignificant emission units. However, they should still be included in the Title V permit as an "insignificant" emission unit. They also anticipate the construction of another (diesel) emergency generator, rated at 800 kilowatts, for the new building addition. Although the estimated emissions, using AP-42, would be less than our state permit exemption level, it is not exempt as an "Insignificant Activity" as stated in 9 VAC 5-80-720C for our Title V sources, and may need to be added to their permit then. The boiler(s) and generator are the only emission units that have been identified as likely to need review under our air regulations. However, there may be other emission units needed later, such as a fuel storage tank with capacity greater than 10,000 gallons, which is subject to NSPS Subpart Kb. U.S. Army Fort Belvoir should notify NVRO about the building emission units when the design is finalized.

The only outstanding air pollution concern regards the temporary modular building constructed in 2000, and whether there are any emission units that may be subject to DEQ regulations (likely insignificant).

If you cannot meet the deadline, please notify CHARLIE ELLIS at **804/698-4488** prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

Review Instructions:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.

C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

MR. CHARLES B. ELLIS III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, V 23219
Fax #804/698-4319

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Oct 26, 2001
DEQ- Office of Environmental Impact Review

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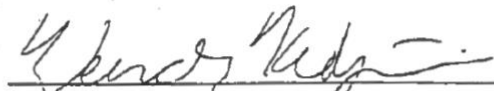
OCT 26 2001

DEQ-Office of Environmental
Impact Review


Charles H. Ellis III
Environmental Program Planner

COMMENTS

There are no anticipated impacts to State waters, including wetlands, as a result of this project. A Virginia Water Protection Permit will not be required. This program encourages the use of appropriate erosion and sediment control measures and careful construction practices to minimize temporary impacts to State waters during construction activities.

(signed)  (date) 10-25-01
(title) Environmental Specialist
(agency) DEQ-Water

PROJECT # 01-185F

8/98

If you cannot meet the deadline, please notify CHARLIE ELLIS at **804/698-4488** prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

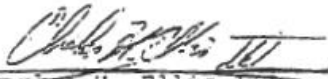
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MR. CHARLES B. ELLIS III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, V 23219
Fax #804/698-4319


Charles H. Ellis III
Environmental Program Planner

COMMENTS

No significant adverse transportation impacts are anticipated as a result of the proposed action.

(signed) Ange Deem (date) 10-28-01
(title) Env. Commitment Coordinator
(agency) VDOT

PROJECT # 01-185F

8/98

If you cannot meet the deadline, please notify CHARLIE ELLIS at **804/698-4488** prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

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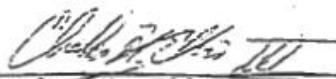
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MR. CHARLES B. ELLIS III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, V 23219
Fax #804/698-4319

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OCT 19 2001


Charles H. Ellis III
Environmental Program Planner

COMMENTS

DEQ-Office of Environmental
Impact Review

Any activities which impact tidal wetlands or encroach on, over or under State-owned subaqueous bottom, require the submission of a Joint Permit Application. From the plans submitted, it appears that a permit may be required from the local Wetlands Board. A permit may be required from the Marine Resources Commission.

(signed) 

(title) 10-17-01

(agency) MRC

PROJECT # 01-185F



Office: 757-247-8063
Fax: 757-247-8062
Email: meversole@mrc.state.va.us

MARK EVERSOLE
ENVIRONMENTAL ENGINEER

MARINE RESOURCES COMMISSION
COMMONWEALTH OF VIRGINIA

2600 WASHINGTON AVE.
NEWPORT NEWS, VA 23607



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OCT 25 2001

DEQ-Office of Environmental Impact Review

COMMONWEALTH of VIRGINIA

Department of Historic Resources 2801 Kensington Avenue, Richmond, Virginia 23221

James S. Gilmore, III *Governor*

John Paul Woodley, Jr. *Secretary of Natural Resources*

Kathleen S. Kilpatrick *Director*

Tel: (804) 367-2323 Fax: (804) 367-2391 TDD: (804) 367-2386 www.dhr.state.va.us

October 23, 2001

Mr. Charles H. Ellis, III Virginia Department of Environmental Quality Office of Environmental Impact Review 629 East Main Street, Sixth Floor Richmond, Virginia 23219

Re: Environmental Assessment Permanent Relocation of the Defense Threat Reduction Agency to Fort Belvoir, Virginia DHR File No. 2001-1526

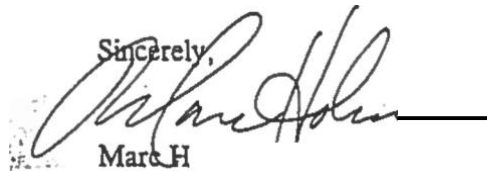
Dear Mr. Ellis:

We have reviewed the Environmental Assessment (EA) for the permanent relocation of the Defense Threat Reduction Agency to Fort Belvoir, Virginia. It is our understanding that in association with this undertaking the Department of Defense will build a three level parking garage for 1,000 to 1,100 vehicles in the southeastern portion of the McNamara HQC parking lot, near the Defense Threat Reduction Center.

We determine that this undertaking will have no effect to resources listed in or eligible for the Virginia Landmarks Register or the National Register of Historic Places. No further consultation with our office is necessary regarding this project.

If you have any questions about the Section 106 review process or our comments, please call me at (804) 367-2323, Ext. 114.

Sincerely,

Sincerely,

Marc H

Marc Holma, Architectural Historian Division of Resource Services and Review

cc: LTC David J. Farace, Ft. Belvoir

<i>Program</i>	<i>Petersburg Office</i>	<i>Portsmouth</i>	<i>Roanoke Office</i>	<i>Winchester</i>
Services Div. 10	19-B	Office 612 Court	1030 Penmar	Office 107 N.
Courthouse	Bollingbrook	St., 3rd Fl.	Ave., SE	Kent St., #203
Ave. Petersburg,	Street Petersburg,	Portsmouth, VA	Roanoke, VA	Winchester, VA
VA 23803 Tel:	VA 23803 Tel:	23704 Tel: (757)	24013 Tel: (540)	22601 Tel: (540)
(804) 863-1655	(804) 863-1610	396-6707 Fax:	857-7585 Fax:	722-3427 Fax:
Fax: (804) 862-	Fax: (804) 863-	(757) 396-6712	(540) 857-7588	(540) 722-7535
6196	1627			

If you cannot meet the deadline, please notify CHARLIE ELLIS at

804/698-4488 prior to the date given. Arrangements will be made

to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

Review Instructions:

A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.

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C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

MR. CHARLES B. ELLIS III
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, V 23219
Fax #804/698-4319

RECEIVED OCT 17 2001 DEQ-Office of Environmental Impact Review		FAX #804/698-4319
		<i>Charles H. Ellis III</i> Charles H. Ellis III Environmental Program Planner
<u>COMMENTS</u> <i>I agree with a finding of no significant impact.</i>		
(signed)	<i>Eugene D. Raden</i>	(date) <i>10/15/01</i>
(title)	<i>Geologist Manager</i>	
(agency)	<i>DMRE/DMR</i>	
PROJECT # <u>01-185F</u> 8/98		



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DEQ-Office of Environmental Impact Review

COMMONWEALTH of VIRGINIA

CHESAPEAKE BAY LOCAL ASSISTANCE DEPARTMENT

James S. Gilmore, III *Governor*

John Paul Woodley, Jr. *Secretary of Natural Resources*

James Monroe Building 101 North 14th Street, 17th Floor Richmond, Virginia 23219 FAX: (804) 225-3447

Michael D. Clower *Executive Director*

(804) 225-3440 1-800-243-7229 Voice/TDD

October 30, 2001

Mr. Charles H. Ellis, III Department of Environmental Quality Office of Environmental Impact Review 629 East Main Street, Sixth Floor Richmond, VA 23219

RE: Permanent Relocation of DTRA to Fort Belvoir CBLAD Project Review No. FSPR-ARMY-18-01

Dear Mr. Ellis:

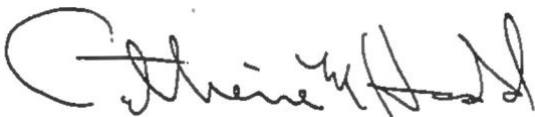
As you requested, we have reviewed the Finding of No Significant Impact and Environmental Assessment (EA) for the permanent relocation of the Defense Threat Reduction Agency to Fort Belvoir.

The EA acknowledges the requirements of the local Chesapeake Bay Preservation ordinance in Fairfax County and the proposed action appears to be generally consistent with the requirements of the Chesapeake Bay Preservation Act. According to Figure 3-6 in the EA document, no Resource Protection Areas (RPAs) will be affected by the proposed construction. However, Fairfax County has classified all lands within the County that are not RPAs as Resource Management Areas, which are subject to the general performance standards of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations). As the proposed activity is considered to be "redevelopment" and a detention basin currently serves the site, the Regulations require that post-development runoff cannot exceed the existing load of nonpoint source pollution. The installation should ensure that the existing BMP has been designed and maintained to perform at the target pollutant removal efficiency. Treatment of runoff from the proposed temporary parking lot was not specifically addressed in the EA document. It appears that this would also meet the requirements for "redevelopment". If this area is not currently served by a BMP, the standards require that a 10% reduction in pollutant loadings from the site.

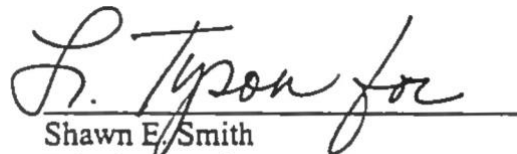
Mr. Ellis
October 30, 2001
1 Page 2 of 2

The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan requires the signatories, including the Department of the Army, to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of storm water. The agencies also committed to encouraging construction design that minimizes natural area loss, adopts low impact development and best management technologies for storm water, sediment and erosion control and reduces impervious surfaces. We appreciate the opportunity to provide our comments on this proposal. Please do not hesitate to contact us at 1-800-CHESBAY, should you have any questions or comments.

Sincerely,



Catherine M. Harold Environmental Engineer



Shawn E. Smith
Principal Environmental Planner

Cc: Scott Crafton, CBLAD
Martha H. Little, CBLAD

5 Little River Turnpike, Suite 100 Andale, Virginia 22003-2937 www.novaregion.org

OCT 18 2001

DEQ-Office of Environmental Impact Review

Voice: 703-642-0700 Fax: 703-642-5077 TDD: 703-642-8061

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OCT 2001

DEQ-Office of Environmental Impact Review



Northern Virginia Regional Commission

Chairman Hon. Katherine K. Hanley

Vice-Chairman Hon. Scott K. York

Treasurer Hon. Kristen C. Umstattd

Executive Director G. Mark Gibb

County of Arlington

Albert C. Eisenberg

Hon. Barbara A. Favola

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County of Fairfax

Hon. Sharon Bulova

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Hon. Harry J. Parrish, II

City of Manassas Park

Jesse Ludvigsen
Hon. William R. Wren

Town of Dumfries

Christopher K. Brown

Town of Herndon

Hon. Thomas Davis Rust

Town of Leesburg

Hon. Kristen C. Umstattd

Town of Vienna

Hon. Albert J. Boudreau

of February 14, 2001)

October 9, 2001

Garrison Commander U.S. Army Garrison Fort Belvoir ATTN: ANFB-ELZ 9430 Jackson Loop Fort Belvoir,
VA 22060-5130

Re: FNSI, Defense Threat Reduction Agency Relocation

Dear Sir or Madam:

The Northern Virginia Regional Commission staff has reviewed the application described below and has no comment on the proposal.

A copy of this letter should be included with your submission to indicate that review by this agency has been completed.

Your cooperation in this intergovernmental review process is appreciated.

Sincerely yours,

David Bulova Director, Environmental Services

Project: Relocation of the Defense Threat Reduction Agency to Fort Belvoir, Virginia Sponsor: Dept. of the Army