

# Record of Environmental Consideration: 20160004

## Project Information

Organizational Unit:	Public Works		
Tracking Number:	20160004	Date of Request:	3/16/2016 7:42 PM
Need Date:	1/28/2016		
Title of Proposed Action:	Record of Environmental Consideration (REC) for Demolition of 70 Facilities (FA) (112 Army Family Housing Dwelling Units (DU)	Request Type:	2) Garrison - NEPA Request
Submitted By:	Andersen, John W Mr CIV USA IMCOM john.w.andersen.civ@mail.mil	Phone:	435-831-3556
Proponent:	Doryl M. Lish doryl.m.lish.civ@mail.mil	Phone:	4358312161

### Purpose and Need of Action:

Dugway is remote and isolated; it is 40 highway miles over a mountain pass from the nearest city with services. For this reason, Department of Army civilians and contractors are allowed to live in housing units not occupied by military personnel. Despite this fact, housing units have been underutilized. Because housing units are being underutilized, IMCOM and Dugway managers agreed that 112 excess dwelling units should be demolished to comply with the Army guidance to, "Reduce the Footprint". Future maintenance of these units will be minimal in anticipation of demolition of these units. Residents in occupied units will be moved to available vacant units in other Army Housing areas on Dugway, e.g., Mountain View and East Wherry housing areas.

### Description:

Demolish 70 Facilities (FA) made up of 112 Army Family Housing Dwelling Units (DU) with a total square footage of 161,671 SF at Dugway Proving Ground, UTAH. Work includes asbestos-containing material (ACM) remediation, building demolition, segregation of recyclable, scrap, salvage, and debris, removal and re-purposing, recycling, or disposal of the same, utility line removal to include but not limited to water, sewer, propane, cable TV, and power, backfill & compaction of depression left after demolition/debris removal, grading, and seeding of disturbed area after completion of work.

Any equipment that contain Ozone Depleting Substance (ODS) will have the ODS removed to the maximum extent practical and disposed / recycled in accordance with all local, state, and federal laws, rules, and regulations.

ACM remediation will be performed by a contractor certified and licensed by the State of Utah for the work required. ACM remediation will be accomplished in accordance with all local, state, and federal laws, rules, and regulations. ACM will be disposed of at the DPG landfill which is licensed for this purpose.

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The facilities have 31 each, non-regulated, underground storage tanks containing fuel oil (FS-2). Each tank has a 500 gallon nominal capacity. Usable product will be removed from the tank to the maximum extent practical. The tanks will then be excavated and be removed in accordance with all local, state, and federal laws, rules, and regulations.

Lead-based-paint (LBP) has not been found in previous sample taken throughout the Dugway Army Family Housing areas. However, if LBP is discovered, it will be sampled for verification, and handled in accordance with all local, state, and federal laws, rules, and regulation. No children will be allowed in the areas of demolition so potential for any exposure is minimized.

## Support Links:

None

## Support Files:

None

## File Attachments (See Appendix for images):

FY16 AFH Demo Plan 19Jan2016.pdf

## Program Review

[Environmental](#) > [Compliance and Restoration](#) > [Air Quality](#)

//SIGNED// Elkins, Jeffrey E CIV USA IMCOM 4/27/2016 1:52 PM

Does the proposed action fit within the limits of the Title V permit?

*UNK*

Will additional fuel burning equipment be used/required during proposed action? If so, list equipment by size/type.

*Unknown*

Will proposed action release PM<sub>10</sub>/PM<sub>2.5</sub>, VOC's, NO<sub>x</sub>, or SO<sub>x</sub>?

*UNK*

Will Hazardous Air Pollutants (HAPs) be released?

*No*

Does the proposed action require an outdoor emission report to be filed?

*No, action has no reporting requirements.*

Meets requirements? Undetermined

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## Comments:

In the event that an asbestos abatement inspection report determines that ACM meets the following definition "Regulated Asbestos-Containing Material (RACM)" means friable ACM, Category I non-friable ACM that has become friable, Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation project operations", then work will stop and the Environmental Air Quality Manager will be immediately notified.

Class I and Class II ODS are found in DPG's Title V Permit Condition's II.B.1.c and II.B.1.d. In the event the ODS being removed during demolition activities meet the definition of a class I and/or class II refrigerant(s), they will need to managed IAW permit conditions.

## [Environmental > Compliance and Restoration > Asbestos Abatement](#)

//SIGNED// Sheffey, Steven S Mr CIV USA IMCOM 4/27/2016 2:01 PM

Does this project meet the asbestos abatement requirements?

*Undetermined*

Meets requirements? Undetermined

## Comments:

This office will need to review the Asbestos Abatement Inspection Report before any work can begin to determine if any asbestos containing material(s) are present in the 70/112 buildings to be demolished so a disposal plan can be established with the solid waste/landfill POC.

## [Environmental > Compliance and Restoration > IRP](#)

//SIGNED// Roberts, Boyd CIV US USA 4/11/2016 1:01 PM

SWMU/HWMU - Are there SWMU's / HWMU's in the proximity of the proposed action?

*NO*

If yes, are there surface restrictions?

If yes, are there Intrusive Restrictions?

Monitoring Wells - Are there any Monitoring Wells located in the area of the proposed action?

*NO*

If yes, will the Monitoring well be affected by the proposed action?

Meets requirements? Yes

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## [Environmental > Compliance and Restoration > Pollution Prevention](#)

//SIGNED// Elkins, Jeffrey E CIV USA IMCOM 4/27/2016 12:36 PM

EPCRA 1: Are EPCRA chemicals on-hand and being used?

*NO*

EPCRA 2: Are EPCRA chemicals being released into the environment (i.e. field testing)?

*NO*

Spill Response 1: Is spill response verbiage in the NEPA document?

*No*

Spill Response 2: Is spill response verbiage in the operating document such as a work plan, contract, permit, standard operating procedure (SOP), etc.?

*Unknown*

Meets requirements? Yes

## [Environmental > Compliance and Restoration > RCRA](#)

//SIGNED// Raff, Jason N Mr CIV USA IMCOM 4/26/2016 9:09 AM

Will the proposed action include use of or generation of waste/material that could be considered hazardous, meaning the waste/material is considered listed or characteristic as defined in 40 CFR Part 261 Subparts C and D?

*YES*

Could the proposed action result in hazardous waste/material that may require storage, treatment, and/or disposal?

*YES*

Will munitions or components be used for the proposed action?

*NO*

Could proposed actions result in any abandoned munitions, munitions requiring disposal, or damaged/deteriorated munitions that can not be used in the future?

*NO*

Could proposed actions result in any release of hazardous waste or

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materials to the environment (soil, water, and/or air)?

YES

Meets requirements? Yes

Comments:

All hazardous waste materials generated should be managed in accordance with test procedures and RCRA regulatory requirements.

[Environmental > Compliance and Restoration > Recycling](#)

//SIGNED// Mason, Gerald L CIV USA IMCOM 3/22/2016 3:04 PM

Will there be recyclable material which can be handled in accordance with DPG policy?

YES

If yes, please list types of materials and respective volumes/amounts.

When recyclable materials are generated, does the proponent understand that he/she will be responsible to manage the materials properly? (Any recyclable material management must be coordinated with the Environmental Programs Office.)

YES

Meets requirements? Yes

[Environmental > Compliance and Restoration > UST](#)

//SIGNED// Sheffey, Steven S Mr CIV USA IMCOM 3/17/2016 10:12 AM

Will an UST be affected by this project?

*YES: Heating oil tanks at certain units*

Are there any UST requirements for this project?

*YES: Heating oil tanks are exempt from regulated removal rules but need to ensure the soils in and around the tanks is clean after removal of the tanks.*

Meets requirements? Yes

[Environmental > Compliance and Restoration > Water Quality](#)

//SIGNED// Sheffey, Steven S Mr CIV USA IMCOM 3/17/2016 10:14 AM

Will dewatering be required? (If yes, indicate amount in gal/min)

*YES: Ensure water piping has no running water to the units before*

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*demolition.*

Will contaminated water be encountered?

*UNK*

Will potable water be necessary for the action? (If *yes*, how will it be supplied)

*NA*

Is action by a DPG culinary water system? (If *yes*, which one)

*No*

If applicable, how much water will be used in gallons per day (GPD)?

Will non-potable water be used? (If *yes*, how will it be supplied)

*No*

If new well is being provided have water rights been established and at what depth will the well excavation be (ft)?

*NA*

Will there be an increase in runoff, erosion, or siltation?

*NO*

Will domestic and/or industrial wastewater be generated? (If *yes*, how will it be discharged)

*Yes, in sanitary sewer system (includes lagoons)*

Are water or wastewater permits required?

*YES*

Additional comments.

Meets requirements? Yes

[Environmental > Conservation and Preservation > Cultural Resources](#)

//SIGNED// Quist, Rachel CIV USA IMCOM 3/21/2016 9:05 AM

Does the project have the potential to affect "Historic Properties" as defined by 36 CFR 800 or cultural resource as defined by Army

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Regulation 200-4?

*NO*

Will a cultural resource survey need to be performed to determine if cultural resources are present? If 'yes' please provide anticipated completion date.

*NO*

Will "Historic Properties" be affected by the project as defined by 36 CFR 800?

*No*

Define adverse effects (if applicable)

Is SHPO concurrence required prior to implementation of the project? If required please provide date of anticipated concurrence.

*NO*

Is Tribal consultation required prior to implementing the project? If 'yes' please provide anticipated completion date.

*NO*

What is the minimum required NEPA document based upon cultural resource issues?

*Categorical Exclusion (REC)*

Meets requirements? Yes

Comments:

Housing to be demolished is part of the Capehart Wherry Program Comment from the Army. (St. John housing is Capehart). No further consideration is necessary under Section 106.

[Environmental > Conservation and Preservation > GIS](#)

//SIGNED// Raff, Jason N Mr CIV USA IMCOM 3/17/2016 4:20 PM

Is there a map attached?

*Yes*

Are coordinates or a known location provided?

*YES*

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What coordinate system and datum are the map and coordinates in?

*UTM, WGS 1984*

Meets requirements? Yes

[Environmental > Conservation and Preservation > Natural Resources](#)

//SIGNED// Marvel, Keeli S CIV US USA 4/11/2016 3:17 PM

Will action occur in a floodplain, wetland, playa (dry lake), or prime/unique community?

*No*

Are Threatened/Endangered (T&E) species surveys needed?

*No*

Will Threatened/Endangered species or State of Utah Sensitive species be affected? If yes, what will be affected.

*NO*

Is a Clean Water Act Section 404 permit (dredge or fill material discharge in Waters of the US), or ESA T&E Consultation required? If yes, attach appropriate permit(s) or consultation documents.

*NO*

Is consultation with regulatory agency required? If no, explain why it is not necessary.

*NO*

If consultation is required, please indicate which agency(ies).

*None*

Meets requirements? Yes

Comments:

There is an active Red-tailed Hawk nest in the St. John's housing area. Demolition in that area should wait until the end of the nesting season. All units must be inspected to make sure no active bird nests are present under eaves, in chimneys, or along roof line. If nests are present, the natural resources office (x2657) must be contacted prior to demolition. It is against the law (Migratory Bird Treaty Act) to destroy eggs or baby birds in an active nest.

[Other > INTEL](#)

//SIGNED// Smith, Jedediah W 3/30/2016 4:32 PM



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Is there sufficient information for a decision?

*YES*

Are there any OPSEC issues?

*NO*

Meets requirements? Yes

[Other > Legal](#)

//SIGNED// Skeen, Jack CIV USA IMCOM 3/22/2016 11:25 AM

Does this project meet all legal requirements?

*YES*

Meets requirements? Yes

Comments:

This is purely a NEPA legal review, which is all that is requested herein. This is not a review of notification requirements, if any, under non-NEPA regulations. This qualifies under CATEX c2 demolition in Appendix B, 32 CFR 651.

[Other > Safety](#)

//SIGNED// Wendt, Scott A Mr CIV USA ATEC 4/4/2016 8:18 AM

Does this meet all the safety guidelines required for activities at DPG?

*YES*

Meets requirements? Yes

Comments:

No Additional Comments

Determination

Proposed Action Qualifies for Categorical Exclusion

Categorical Exclusion(s)

32 CFR 651 App B Sec II(c)(002) C-2: Demolition of non-historic buildings, structures, or other improvements and disposal of debris therefrom, or removal of a part thereof for disposal, in accordance with applicable regulations, including those regulations applying to removal of asbestos, polychlorinated biphenyls (PCBs), lead-based paint, and other special hazard items (REC required).

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Signed on 4/28/2016 by:  
\\ signed \\ 1231410348@mil  
Doryl M. Lish  
Director of Public Works  
Organization: Public Works

Signed on 5/2/2016 by:  
\\ signed \\ 1258370666@mil  
Jason Raff  
Environmental Programs  
Organization: Dugway Proving Ground