

**DRAFT FINAL**

**ENVIRONMENTAL ASSESSMENT**

**CONSOLIDATION OF THE 88 CIVIL ENGINEER**

**GROUP OPERATIONS PHASE II**

**WRIGHT-PATTERSON AIR FORCE BASE, OHIO**



**PREPARED BY:**

**88 CEG/CEIEA**  
**ENVIRONMENTAL BRANCH**  
**INSTALLATION MANAGEMENT DIVISION**  
**WRIGHT-PATTERSON AFB**

**JULY 2019**



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**ENVIRONMENTAL ASSESSMENT**

**CONSOLIDATION OF THE 88 CIVIL ENGINEER GROUP**

**OPERATIONS PHASE II**

**WRIGHT-PATTERSON AIR FORCE BASE, OHIO**

**Responsible Agency:** 88th Civil Engineer Group (88 CEG), Wright-Patterson Air Force Base (WPAFB/Base), Ohio

**Affected Location:** WPAFB, Ohio

**Proposed Action:** Consolidate 88 CEG operations and facilities to existing CEG Compounds.

**Report Designation:** Draft-Final Environmental Assessment (EA)

Written comments and inquiries regarding this document should be directed to 88th Air Base Wing (ABW)/Public Affairs, 5135 Pearson Road, Building 10, Room 252, WPAFB, Ohio, 45433, 88abw.pa@us.af.mil.

**Abstract:** The purpose and need of this environmental assessment is to consolidate the 88 CEG operations and facilities. The purpose for consolidating 88 CEG facilities is to address aging facilities, improve operational efficiency, improve management of personnel and vacate space needed for future expansion of the National Air and Space Intelligence Center (NASIC) complex.

The analysis in the EA considers alternatives and the No-Action Alternative, and will aid in determining whether a Finding of No Significant Impact (FONSI) can be prepared or whether an Environmental Impact Statement (EIS) is needed.

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**DRAFT FINAL**  
**FINDING OF NO SIGNIFICANT IMPACT**  
**FOR THE CONSOLIDATION OF**  
**88 CIVIL ENGINEER GROUP OPERATIONS PHASE II**  
**WRIGHT-PATTERSON AIR FORCE BASE, OHIO**  
**19 JULY 2019**

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Pursuant to the Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act (40 Code of Federal Regulations [CFR] 1500-1508), Department of Defense Directive 6050.1 and Air Force Regulation 32 CFR Part 989, the 88th Civil Engineer Group, Installation Management Division, Environmental Management Branch (88 CEG/CEIE) has prepared an Environmental Assessment (EA) for the consolidation of 88th Civil Engineer Group (88 CEG) operations and facilities at Wright-Patterson Air Force Base (WPAFB), Ohio. The EA is incorporated by reference into this finding per 40 CFR 1508.13.

**Purpose and Need:**

Wright-Patterson AFB proposes to consolidate the 88 CEG operations and facilities. The purpose for consolidating 88 CEG facilities is to address aging facilities, improve operational efficiency, improve management of personnel, and vacate space needed for future expansion of the National Air and Space Intelligence Center (NASIC) complex.

**Description of Proposed Action and Alternatives:**

The relocation of 88 CEG personnel and operations must meet the following criteria:

- Secure location
- Located near existing 88 CEG Compounds / Facilities.
- Compatible with WPAFB Installation Development Plan (IDP)
- Road salt storage locations must be located a minimum of 300 feet away from water wells, streams, rivers, ponds, lakes or wetlands and 100 feet from storm drains or ditches.

For this Proposed Action, WPAFB evaluated several options to consolidate and relocate 88 CEG personnel and operations. After evaluating each alternative against the selection criteria, WPAFB determined only the Proposed Action and the No-Action Alternative met the purpose and need, and were carried forward for further evaluation.

**Proposed Action:**

In Area A, the 88 CEG Open Storage Yard, Entomology personnel and operations, as well as the road salt storage will be relocated to the existing Area A, 88 CEG Compound.

In Area B, 88 CEG Pavement and Grounds material storage bins, road salt storage and a vehicle and equipment storage facility will be relocated to the Area B, 88 CEG Compound.

The Recycling Center operations and scrap metal yard will be relocated to Facility (F/20746 and F/20741. A 10,000 square foot (SF) addition will be added to F/20741 to accommodate Recycling Center operations and commodity storage. The existing F/20741 will house recycling administrative offices, breakroom, and restrooms. The Recycling Center scrap metal yard will be relocated to the area adjacent to F/20746 with a small fenced off area for the Defense Logistic Agency's scrap metal yard.

### **No-Action Alternative:**

Status quo will not provide the needed space for NASIC expansion in Area A, nor will it meet the need for 88 CEG personnel and operations to be centrally located to 88 CEG Compounds. Per the Council of Environmental Quality (CEQ), the No Action Alternative will be used as a baseline to determine impacts the Proposed Action and/or any other alternative will have on the environment, and will be carried forward for further analysis.

### **Alternatives Eliminated from Further Study:**

**Area A Pavement and Grounds.** An alternative to the Proposed Action to leave the Area A Pavement and Grounds at its existing location was considered. However, this alternative did not meet the selection criteria to locate operations near existing 88 CEG Compounds / Facilities. Furthermore, the future expansion of NASIC will require this area to be designated for parking.

**Entomology.** The alternative to leave the entomology facility at its current location was considered. The option to keep the operations at its current site was considered. However, this option did not meet the selection criteria to locate operations near existing compounds / facilities, nor would it allow for the expansion of the NASIC campus. Furthermore, relocating personnel and operations to an existing facility was considered. Due to the unique functional requirements of entomology equipment and operations, it was determined that renovation costs would exceed new facility construction costs and therefore eliminated from further analysis. Constructing a new facility between F/30072 and F/30123 was also considered. This option was eliminated because it does not meet the selection criteria to locate operations near existing 88 CEG Compounds / Facilities. Furthermore, locating a new facility between Skeel Avenue and F/30022 was considered and eliminated because the location was not conducive to the IDP.

**Recycling Center and Scrap Yard.** Several sites were considered for the relocation of Recycling Center operations. The option to keep the Recycling Center at its present location was considered but quickly eliminated because it is designated as future parking for the expansion of NASIC, nor did it meet the selection criteria to locate operations near existing 88 CEG Compounds / Facilities. Relocating the Recycling Center and Scrap Yard to an area east of Gate 15A was also considered. However, this option was eliminated due to the area's proximity to an existing landfill and that it does not meet the selection criteria to locate personnel and operations near 88 CEG Compounds / Facilities.

**Road Salt Storage.** Several areas were evaluated for the relocation of the Area A and Area B salt barns. Keeping the salt barns at their current locations was considered, however, eliminated from further analysis due to the facilities' small size, dilapidated conditions, and difficult logistics of maneuvering newer equipment.

Consolidating both salt barns into one operation at a centralized location adjacent to the 88 CEG operated Area B heat plant was also considered. This alternative was eliminated from further analysis due to off-base location security concerns, and increased mobilization time during inclement weather.

A third alternative was considered to move the Area A salt barn to the preferred alternative Area A Pavement and Grounds yard material bins. This location was removed from further consideration because it is located less than 300 feet from a tributary and 100 feet from a storm water drain or ditch.

### **Environmental Consequences:**

The Proposed Action would have minimal or no environmental impacts on the following issues: socioeconomics, and safety and health.

**Air Installation Compatible Use Zone (AICUZ)/Land Use (EA Section III.B.):** The Proposed Action would have no impact to this resource as re-classification of the existing land-use is not required and the action falls outside the AICUZ noise contours.

**Air (EA Section III.C.):** The Proposed Action would have minor impacts to air quality due to limited construction activities and the relocation of existing personnel and operations.

**Water Resources (EA Section III.D.):** The Proposed Action would have minimal to no impact on existing wetlands, floodplain or surface waters. An approved Storm Water Pollution Prevention Plan will be implemented during construction activities, and no additional material will be added to the retarding basin. The road salt storage will not be located within 300 feet of a water well, stream, river, pond, lake, or wetland nor within 100 feet of a storm drain or ditch.

**Hazardous Materials/Waste (EA Section III.E.):** The Proposed Action would have no adverse impact on hazardous materials or waste. A comprehensive environmental survey will be completed prior to any demolition activities. All waste will be managed in accordance with the WPAFB Hazardous Waste Management Plan. Furthermore, Entomology will be relocated into a state-of-the-art facility designed for the storage, mixing and dispensing of pesticides, insecticides, and rodenticides.

**Biological / Natural Resources (EA Section III.F.):** The Proposed Action would not have an impact on biological or natural resources. Some trees may need to be cut down during relocation and construction activities. Trees will not be removed from 01 April and 30 September. Any tree removed will be replaced with new trees to accommodate the Indiana bat roosting and foraging habitat.

**Cultural Resources (EA Section III.G.):** The Proposed Action will occur in areas which have no cultural or historical significance and are located in areas previously disturbed. Therefore there will be no cultural resource impact.

**Geology and Soils (EA Section III.H.):** The Proposed Action would have a minor impact on geology and soils due to construction activities.

**No Action Alternative (EA Section III.I.):** The No-Action Alternative would have no environmental impact on any natural or man-made resources.

**Cumulative Impacts (EA Section III.J.):** The cumulative effects of the Proposed Action when added to other past, present, and reasonably foreseeable future actions were evaluated and found to be insignificant since planned construction projects will not take place simultaneously. There are no unavoidable adverse impacts associated with the Proposed Action or the No-Action Alternative.

**Public Notice:**

A public notice was posted in the *Dayton Daily News* on 19 July 2019 for a 10-day public comment period. XX comments were received.

**Finding of No Significant Impact:**

The Proposed Action consists of consolidation and relocation of 88 CEG personnel, facilities and operations at WPAFB. Based upon my review of the facts and analyses contained in the EA, which is hereby incorporated by reference, I conclude that the Proposed Action will not have a significant impact on the natural or human environment. An environmental impact statement is not required for this action. This analysis fulfills the requirements of the NEPA, the President's Council on Environmental Quality, and 32 CFR 989.

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MICHAEL HOWE, NH-04, DAF  
Director, 88 CEG/CL

Date: \_\_\_\_\_



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## **I. PURPOSE AND NEED FOR ACTION**

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### ***A. Purpose and Need.***

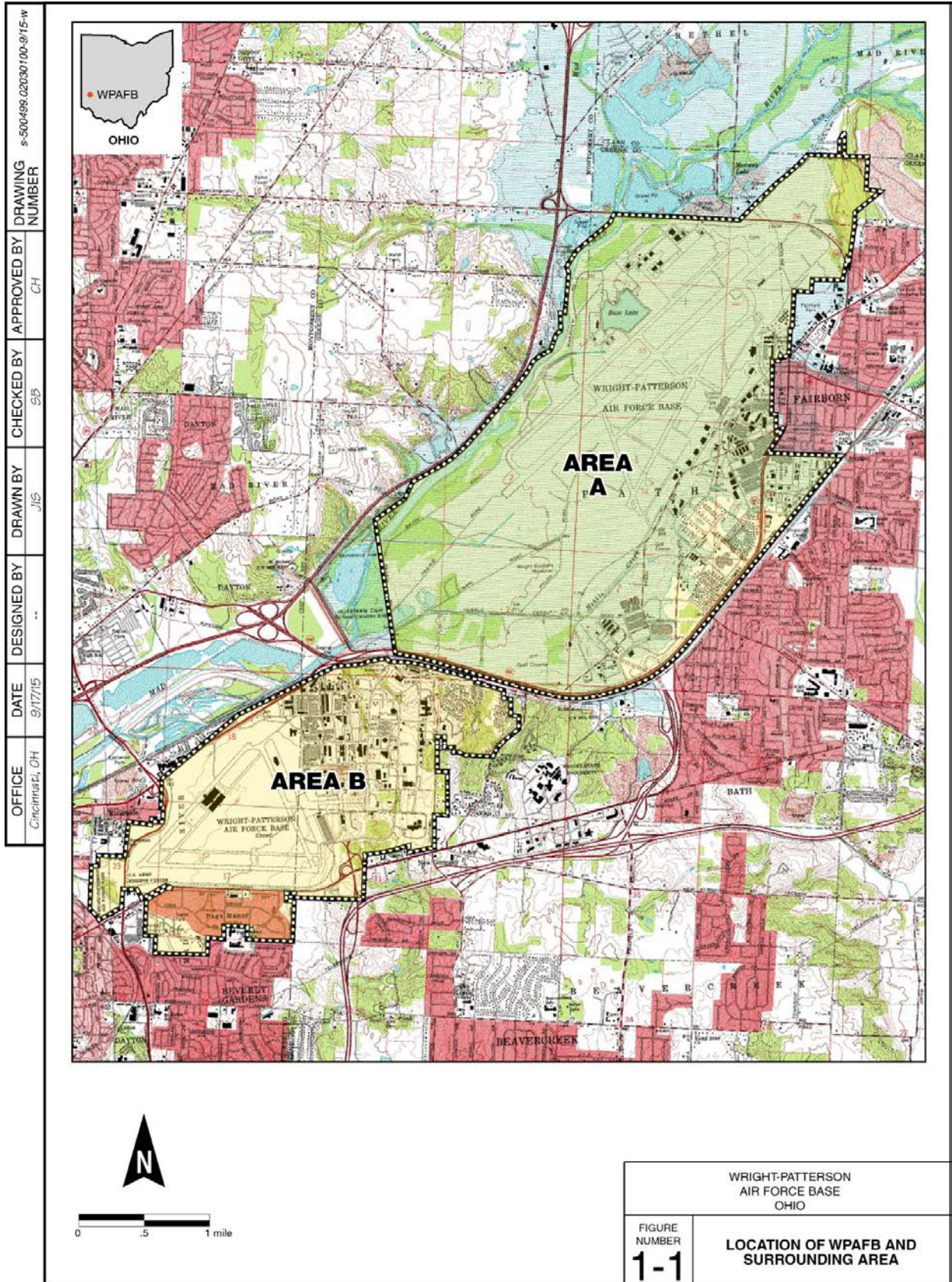
The purpose of the Proposed Action is to consolidate the 88th Civil Engineer Group (88 CEG) operations and facilities. The purpose of the consolidation is to address aging facilities, improve operational efficiency, improve management of personnel and vacate space needed for future expansion of the National Air and Space Intelligence Center (NASIC) complex.

### ***B. Project Description.***

Consolidate 88 CEG personnel and functions to existing locations where 88 CEG currently has operations. In 2012, the 88 CEG conducted an Environmental Assessment (EA) for the Consolidation of 88th Air Base Wing Civil Engineer Operations which resulted in the relocation of 88 CEG personnel and functions to two locations. This effort will further consolidate 88 CEG operations to either the Area A, 88 CEG Compound or the Area B Compound as well as relocating the Recycling Center to the area adjacent to the Area, B 88 CEG operated central heat plant facility 20770 (F/20770).

### ***C. Location.***

WPAFB is located in the southwest portion of the state of Ohio in Greene and Montgomery counties, approximately 10 miles east of the city of Dayton. WPAFB encompasses 8,145 acres and is classified as non-industrial with mixed development. The WPAFB is subdivided into two areas: Areas A and B. Area A consists primarily of administrative offices and contains an active airfield. Area B is located across State Route 444 to the southwest of Area A and consists primarily of research and development as well as educational functions. Figure 1-1 shows WPAFB and the surrounding area.



#### ***D. Scope of Environmental Analysis.***

The scope of analyses presented in the EA is based on the environmental resources and issues potentially affected by the implementation of the Proposed Action and Alternatives. If the Proposed Action and Alternatives would not result in significant environmental impacts, a Finding of No Significant Impact (FONSI) would be prepared. A FONSI briefly presents reasons why a Proposed Action would not have a significant effect on the human environment and why an environmental impact statement (EIS) is unnecessary. If significant environmental issues would result that cannot be mitigated to insignificance, an EIS would be required, or the Proposed Action would be abandoned and no action would be taken.

The USAF has prepared this EA in accordance with the National Environmental Policy Act (NEPA) of 1969; 40 Code of Federal Regulations (CFR), Parts 1500-1508, the Council on Environmental Quality (CEQ) regulations implementing NEPA; the USAF Environmental Impact Analysis Process (EIAP) [32 CFR Part 989]. The Proposed Action and alternative(s) are evaluated for potential environmental impacts to these elements of the natural and human environment:

- Air Installation Compatible Use Zone/Land Use/Noise;
- Air Quality;
- Water Resources;
- Safety and Occupational Health;
- Hazardous Materials and Hazardous Waste
- Biological / Natural Resources;
- Cultural Resources;
- Geology and Soils;
- Socioeconomics;
- Other (Infrastructure, Communications, Environmental Restoration Program).

The USAF considered a broad range of potential environmental impacts associated with the implementation of the Proposed Action and Alternatives. The scope of the environmental analysis is based on the environmental resources and issues potentially affected by the Proposed Action and Alternatives. The CEQ regulations and guidance and Air Force Environmental Impact Analysis Program (EIAP) regulations emphasize that an EA should be a concise document; thus, this EA focuses on those resources or issues that are appropriate for evaluation in context with the Proposed Action and Alternatives.

Because of the nature of activities being proposed, the potential for environmental impacts on some of the environmental resource areas normally evaluated in an EA are not warranted for this project. In accordance with CEQ guidance, all environmental resources were initially considered, but some were subsequently eliminated from further consideration if a determination was made there would be no potential and/or minimal impact with implementation of the Proposed Action.



***D.1. Issues and Concerns eliminated from Detailed Study.***

The following issues and concerns were determined to have limited potential for environmental impacts and therefore are not being evaluated in this EA: Safety and Occupational Health, and Socioeconomics.

**Safety and Occupational Health.** Because the Proposed Action is limited to relocating existing personnel and operations, there will be no impact to the safety and health of personnel. Construction site safety and health is the responsibility of the employer to meet applicable Occupational Safety and Health Administrations requirements.

**Socioeconomics.** Because the Proposed Action is limited to relocating existing personnel and operations there will be minimal limited socioeconomic impact.

**D.2. Notice of Availability.**

A Notice of Availability (NOA) for the Draft Final EA was published in the Dayton Daily News 19 July 2019. A hard copy of the Draft Final EA was made available in the Greene County Public Library, Fairborn Branch. An electronic copy of the EA was also provided on the WPAFB Environmental Management website at <http://www.wpafb.af.mil/units/cev>. During the public review period, XXXXX were received. The NOA is included in Appendix A of the Final Document.

## II. DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

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### A. *Selection Criteria.*

Relocation of 88 CEG personnel and operations must meet the following criteria:

- Secure location
- Compatible with WPAFB Installation Development Plan (IDP)
- Located near existing 88 CEG Compounds / Facilities.
- Road salt storage locations must be located a minimum of 300 feet away from water wells, streams, rivers, ponds, lakes, wetlands and 100 feet from storm drains and ditches.

Initially 88 CEG looked at several options to consolidate and relocate 88 CEG personnel and operations. However, based upon the selection criteria established above, it was determined several of the alternatives were not feasible and were eliminated from further evaluation in this EA. The only alternative that meets the purpose and need is to consolidate operations to existing 88 CEG Compounds in Areas A and B and relocate the Recycling Center to F/20741 and F/20746 near the 88 CEG operated heat plant.

### B. *Alternatives Eliminated from Further Study.*

**Area A Pavement and Grounds.** There were several areas evaluated for siting the Area A Pavement and Grounds. The option to keep Pavement and Grounds operations at its present location was considered. However, the facilities are deteriorating and have exceeded their useful life. Additionally, this did not meet the selection criteria to locate operations near existing 88 CEG Compounds / Facilities. Furthermore, the future expansion of NASIC will require this area to become parking.

**Entomology.** There were several options considered for the location of the entomology facility. The option to keep the operations at its current site was considered. However, this option did not meet the selection criteria to locate operations near existing compounds / facilities. The current location of entomology facility is located within the pathway of the NASIC campus mission expansion. Relocating to an existing facility was considered however, the entomology facility functions are for a specific use and the design layout of the facility is critical to its function and mission. Facility functions are not easily adaptable to existing facilities and renovation of an existing facility may exceed the cost of constructing a new facility. The option to construct a facility in between F/30072 and F/30123 was also considered. This option was eliminated because it does not meet the selection criteria to locate operations near existing 88 CEG Compounds / Facilities. Furthermore, locating a new facility between Skeel Ave and F/30022 was also considered. This option was eliminated because it is not conducive to the IDP.

**Recycling Center and Scrap Yard.** There were several locations evaluated for Recycling Center operations. The option to keep the Recycling Center at its present location was considered but quickly eliminated because it is designated as future parking for the expansion of

NASIC and it did not meet the selection criteria to locate operations near existing 88 CEG Compounds / Facilities. Relocating the Recycling Center and Scrap Yard to the area east of Gate 15A was also considered. This option is located in the same general location of Area A, however, the site is currently a landfill and it does not meet the selection criteria to be located near 88 CEG Compounds / Facilities.

**Road Salt Storage.** Several areas were evaluated for the relocation of the Area A and Area B salt barns. Keeping the salt barns at their current location was considered however, the present salt barns are small, dilapidated and not conducive to maneuvering the newer equipment therefore impeding the salt operation processes.

Consolidating both salt barns into one operation at a centralized location adjacent to the 88 CEG operated Area B heat plant was also considered. This alternative is an off-base location which creates security concerns. Furthermore, the travel distances during inclement weather would require additional time to travel back and forth to Area A & B resulting in delays for clearing the roads. Because this alternative does not meet the selection criteria, it was eliminated from further consideration.

A third alternative was to move the Area A salt barn to the preferred alternative Area A Pavement and Grounds yard material bins. This location was removed from further consideration because it is located less than 300 feet from a stream and storm drain.

### ***C. Proposed Action.***

In Area A, the CEG Open Storage Yard and Entomology (F/10278) personnel and operations will be relocated to the existing Area A, CEG Compound. The Area A, 88 CEG Compound is located in the area of Littrell Avenue, Skeel Avenue and the east perimeter fence of the installation. Vacated facilities will be demolished and the area used for parking and green space for expansion of the NASIC complex.

The Area A Pavement and Grounds F/10879, salt barn F/10300 and material storage bins (gravel, soil, mulch, etc.) F/10869 will be relocated to the proposed Open Storage Yard adjacent to F/30016 and F/30015. Material storage bins will be constructed to the south and east of F/30015 and F/30016. Furthermore, F/30014 will be demolished to allow a storage structure to be constructed to the north of F/30016 to accommodate 1,000 tons of road salt. Two new equipment storage facilities will be erected within the Open Storage Yard to accommodate equipment and supplies from the demolition of F/10879 and the partial demolition of F/ 30029. Entomology will be relocated to a new facility, built on the footprint of a portion of the demolished F/30029. Figure 2-1 shows the proposed Area A 88 CEG Compound layout.

In Area B, Pavement and Grounds material storage bins currently located at F/20740 and on the Accelerated Runway as well as the Area B salt barn F/10742 will be relocated to the Area B, 88 CEG Compound. The Area B, CEG Compound is located at the corner of Skyline Drive and 13<sup>th</sup> Street.



# 88 CEG Compound - Area A



LEGEND	
	DEMOLITION
	NEW BUILDING
	CEG COMPOUND OPEN STORAGE
	BASE BOUNDARY

Figure 2-1

Material storage bins will be constructed on the west side of the Area B 88 CEG Compound across from F/20611 and F/20614 along Skyline Dr. The Area B salt storage will be relocated to a newly constructed structure capable of storing 1,000 tons of road salt. A 4,500 SF addition will be added to F/20611 or a new 4,500 SF standalone facility will be constructed to accommodate vehicles and equipment. F/20740 and F/20742 will be demolished and the area will be leveled and graded for the expansion of the RV parking lot. The expansion of the RV parking lot was evaluated in the 2012 Environmental Assessment for the Consolidation of 88<sup>th</sup> Air Base Wing Civil Engineer Operations. Figure 2-2 shows the proposed Area B 88 CEG Compound layout.

The Recycling Center F/20093 operations and scrap metal yard will be relocated to F/20746 and F/20741. A 10,000 SF addition will be added to F/20741 to accommodate loading dock(s), overhead doors, large paper shredder, commodity sorting, horizontal baler, worm farm, commodity storage, etc. The existing F/20741 will house recycling administrative offices, breakroom, restrooms, etc. The Recycling Center scrap metal yard will be relocated to the area adjacent to F/20746 with a small fenced off area for the Defense Logistic Agency's scrap metal yard. Figure 2-3 shows the proposed 88 CEG Recycling Center / RV Lot layout.

#### ***D. No-Action Alternative.***

Status quo will not provide the needed space for parking for the NASIC expansion in Area A nor will it meet the need for 88 CEG personnel and operations to be centrally located to 88 CEG Compounds. Per the Council of Environmental Quality (CEQ), the No Action Alternative will be used as a baseline to determine impacts the Proposed Action and/or any other alternative will have on the environment and will be carried forward for further analysis.

# CEG Compound - Area B

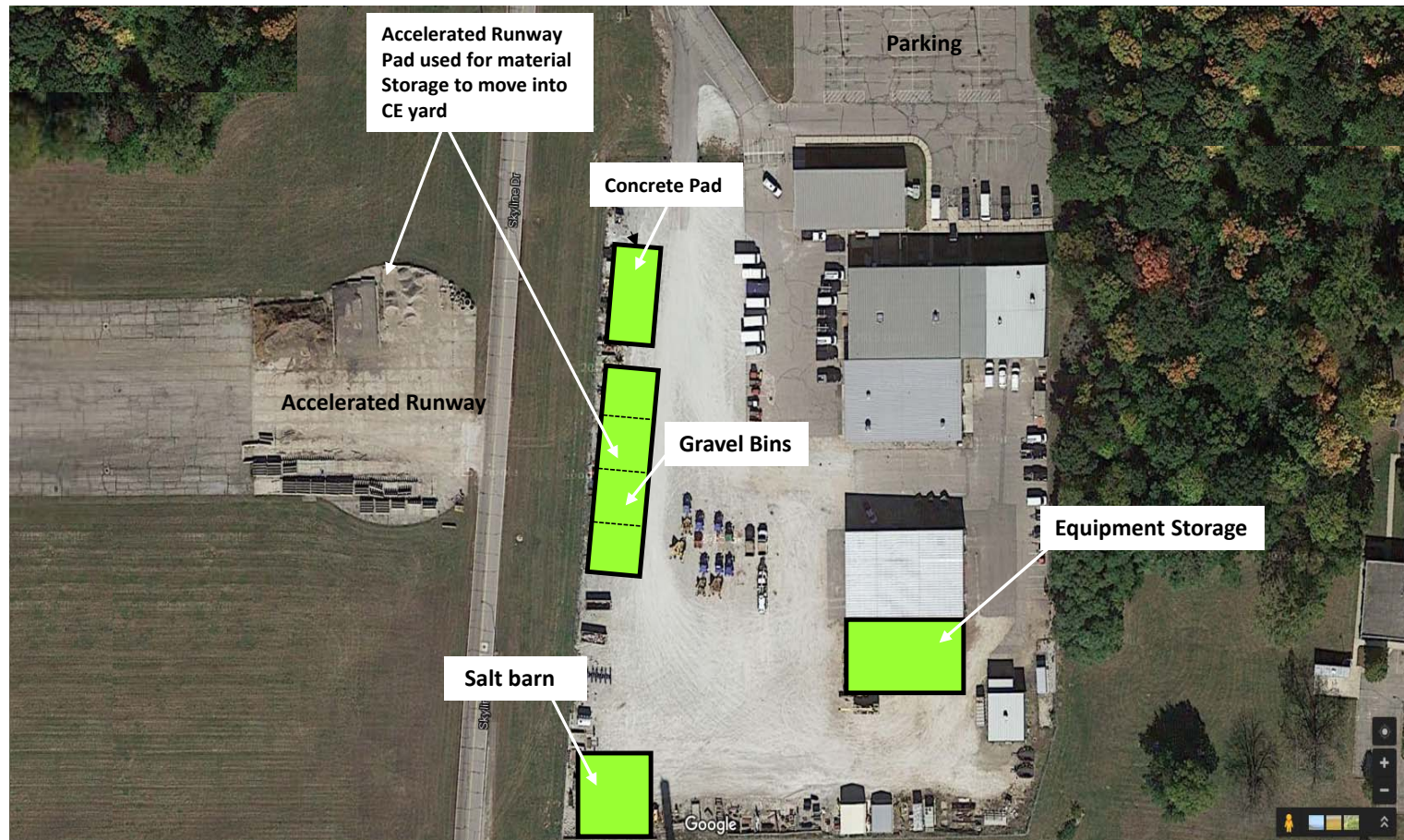


Figure 2-2



# 88 CEG Recycling Center / RV Lot



Figure 2-3

### III. AFFECTED ENVIRONMENT /POTENTIAL ENVIRONMENTAL IMPACT

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#### A. *Introduction.*

The Greater Dayton Area, located in the southwest portion of Ohio, encompasses Montgomery, Greene, Miami and Clark Counties. Wright-Patterson AFB is located in Greene and Montgomery counties. WPAFB is subdivided into two areas: A and B. Area B is separated from Areas A by State Route (SR) 444 and is more highly developed than other areas of the WPAFB. WPAFB is about 10 miles east of Dayton, Ohio, 60 miles northeast of Cincinnati, and 70 miles southwest of Columbus. WPAFB encompasses 8,145 acres with a variety of land uses ranging from administrative and residential to research and industrial.

#### B. *Air Installation Compatible Use Zone (AICUZ)/Land Use.*

The relocation and consolidation of CE functions will be located in a compatible land use zone. The 88 CEG Compounds / Facilities are not located within a Clear Zone / Accident Potential Zone and are located outside the 65 dB noise contour. In accordance with the IDP, the 88 CEG Compounds are in conformance for industrial use. Based on this analysis the Proposed Action will have no impact to this resource, as re-classification of the existing land-use is not required and the action falls outside the AICUZ noise contours.

#### C. *Air Quality.*

The U.S. Environmental Protection Agency (USEPA) has classified the National Ambient Air Quality Standards under the Clean Air Act (CAA) for the metropolitan Dayton region in which WPAFB falls under as attainment for all criteria pollutants.

- Ozone – Attainment
- Nitrogen Dioxide – Attainment
- Sulfur Dioxide – Attainment
- Lead – Attainment
- Carbon Monoxide – Attainment
- Particulate Matter – Attainment

Air quality is typically good in the vicinity of WPAFB, and is generally affected only locally by military and civilian vehicle emissions, particulate pollution from vehicle traffic, emissions from wastewater treatment plants, industrial sources, and construction activities. Mobile sources, such as vehicle and aircraft emissions, are generally not regulated and are not covered under existing air permits. Stationary emission sources at WPAFB include natural gas boilers; research and development sources, such as laboratory fume hoods and test cells; paint spray booths; refueling operations; and emergency power generators. WPAFB has been issued a Title V operating permit covering approximately 1,050 air sources, many of which are insignificant.

Construction activities will generate minor air pollution which would have no substantial impact to the greater Dayton area air quality due to the short duration of the project(s) and dust control measures implemented during construction and demolition activities. Relocating 88 CEG personnel and operations to three centralized areas will have no impact on air pollution since the operations and personnel are already in the area. In order to analyze the impact of consolidating personnel and operations, the Air Force's Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action. This is done in accordance with the Air Force Instruction 32-7040, Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis which indicates no impact to the air quality (Appendix B).

#### ***D. Water Resources.***

**Surface Water.** WPAFB and the Greater Dayton Area lies within the Mad River Valley. The Mad River, which borders Area A of WPAFB, originates approximately 40 miles north of Springfield, Ohio, flowing south and southwest past WPAFB to its confluence with the Great Miami River in Dayton, Ohio, and ultimately flows into the Ohio River near Cincinnati, Ohio. Ohio EPA has identified the lower segment of the Mad River, which flows through WPAFB, as an impaired water under the Clean Water Act (CWA) for not meeting aquatic life and recreational use standards.

WPAFB has prepared a Storm Water Management Plan (SWMP) and Storm Water Pollution Prevention Plan (SWPPP), which describe the storm drainage areas along with management approaches to reduce potential storm water contamination. The installation has been issued an Ohio EPA industrial permit and a municipal National Pollutant Discharge Elimination System (NPDES) general permit covering their storm water program. The SWPPP and SWMP provide specific best management practices to prevent surface water contamination from activities such as major construction and/or building demolition projects are required to be followed for all construction sites greater than one acre. Furthermore, the road salt storage facilities will be located in areas away from water wells, streams, rivers, ponds, lakes, wetlands, storm drains and ditches in accordance with the Ohio Water Resources Council Recommendations for Salt Water Storage.

**Wetlands.** Proposed areas for facility construction will not be in a wetlands area. Forty wetlands covering approximately 19.8 acres are within the limits of WPAFB; 23 are found within Area A. Of these 23 wetlands, 13 have been identified as jurisdictional waters of the United States; however, none of these wetlands fall within the immediate vicinity of the 88 CEG Compounds or the Area B heat plant.

**Floodplains.** Proposed areas for facility construction will not be in a floodplain location. Approximately 80 percent of WPAFB lies within the 100-year floodplain (813.4 feet) above mean sea level) with most of Area A falling within this area. The Miami Conservancy District (MCD) reserves the right to flood much of Area A, if necessary, which is located behind Huffman Dam within its retarding basin. The retarding basin is defined as the area of land that

would be submerged if floodwater backed up to the top of the Huffman Dam spillway, at an elevation of 834.10 feet above sea level. The Area A floodplain boundary runs to just north of the current NASIC complex within the Prairie Trace Golf Course. None of the proposed locations are located in the floodplain. However, the Proposed Action to consolidate operations and personnel at the 88 CEG Area A Compound is within the retarding basin. The MCD will be consulted during the design process and any additions to the retarding basin will be offset by removing an equal amount of material from the retarding basin resulting in a zero net gain.

***E. Hazardous Materials/Waste.***

A comprehensive Environmental Survey will be conducted prior to any demolition or construction activities. The majority of the facilities at WPAFB have Asbestos Containing Material (ACM), Lead-Based Paint (LBP), Mercury, Polychlorinated Biphenyls (PCBs), and associated with them due to their age. If the survey identifies the presence of ACM, LBP, PCB, or any other potentially hazardous materials, the materials will be abated prior to demolition. Any wastes generated during demolition / construction activities will be handled and disposed of according to the WPAFB Hazardous Waste Management Plan.

Entomology will be relocated into a new facility designed for the storage, mixing and dispensing of pesticides, insecticides, rodenticides, etc. The operations and facility will be inspected by Environmental, Safety and Occupational Health personnel on a regular basis.

***F. Biological / Natural Resources.***

Newly constructed facilities will not be intentionally located near threatened or endangered species. The proposed sites where 88 CEG personnel and operations will be relocated is on land designated for industrial use. Vegetation consists of mowed turf and ornamental trees/shrubs. Wildlife seen within the area are common mammals such as eastern gray squirrel, eastern chipmunk, groundhog, etc. and common avian species such as Canada goose, European starling, American robin, mourning dove, etc. While four federally threatened and endangered species have been known to occur at WPAFB, their habitat locations are well outside the boundaries of the proposed actions and alternatives.

***G. Cultural Resources.***

The Proposed Action to relocate 88 CEG functions will not have any impact on cultural resources such as Native American burial sites, archaeological sites or historical significance. Sites have been previously disturbed and further disturbance for construction will not have any impact on Cultural Resources.

## ***H. Geology and Soils.***

There will be minor grading and compacting of the sites for construction of the Proposed Action or alternative. Sites have been previously disturbed and further disturbance for construction will not have any impact to soils.

## ***I. No Action Alternative.***

The no action alternative would have no environmental impacts on any natural or man-made resources.

## ***J. Cumulative Impacts.***

A cumulative effect is defined as an effect on the environment that results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place locally or regionally over a period of time. The purpose of analyzing the cumulative effects of a Proposed Action is to ensure that federal decisions consider the “big picture” of the consequences of the Proposed Action.

Cumulative effects are identified by defining the direct and indirect effects of the Proposed Action, determining which environmental resources are affected, and deciding which effects on these resources are important from a cumulative effects perspective. Also, when analyzing cumulative effects, the spatial (geographical area) and temporal (time frame) components must be expanded beyond the scope of the Proposed Action. **Table 1** presents potential future projects that have been identified in the project areas:

Demolition and constructions activities associated with the Proposed Action would have minor short term impacts on Air Quality, Water Resources, Hazardous Materials/Waste, Geology and Soil. The Proposed Action would have no impact on Natural/Biological Resources, Cultural Resources or AICUZ /Land Use. Therefore, the evaluation of direct and indirect effects of the Proposed Action with past, present, and reasonably foreseeable future actions there will be no long-term impacts to environmental resources.



**Table 1. DoD Past, Present, and Reasonably Foreseeable Actions**

Project Name	Description	Planned Year of Implementation	Resources Potentially Affected	Magnitude of Impact
Entry Control Point (ECP / gate) 15A Renovation	Add/alter ECP 15A in Area A.	FY 2021	Noise, Air Quality, Earth Resources, Occupational Health and Safety, Traffic/Transportation	Potential impact to traffic/transportation at ECP 15A, which is in the vicinity of the of the 88 CEG Consolidation Phase II project sites requiring demolition. However, access to the project sites does not rely on entry through ECP 15A; access to the project sites would still be accessible while ECP 15A is temporarily re-routed for renovation.
ECP 1A Renovation	Add/alter ECP 1A in Area A.	FY 2021	Noise, Air Quality, Earth Resource, Occupational Health and Safety, Traffic/Transportation	Potential impact to traffic/transportation in the vicinity of ECP 1A. However, ECP 1A is not located near the 88 CEG Consolidation Phase II project sites.
NASIC Complex Renovation	Add/alter the existing NASIC Complex.	FY 2021	Noise, Occupational Health and Safety	Not Significant
Primary Runway Pavement Replacement, EA	Provide long-term replacement of pavement for the existing primary runway and taxiways, enabling aircraft to continue to operate in a safe manner.	FY 2020 – 2023	Noise, Air Quality, Water Resources, Occupational Health and Safety, Hazardous Materials/Waste	Potential impact to overall air quality emissions.
Headquarters (HQ) AFMC	Repair/renovate HQ AFMC facility 10262 (F/10262).	FY 2020 – 2023	Noise, Occupational Health and Safety	Not Significant
HQ AFMC	Repair/renovate HQ AFMC Phase I, F/10262	FY 2020 – 2023	Noise, Occupational Health and Safety	Not Significant
Repair Roads	Repair roads basewide	FY 2020 – 2023	Noise, Air Quality, Earth Resources, Occupational Safety and Health	Potential impacts to overall air quality emissions and temporary impacts to traffic/transportation.
NASIC Complex Renovation	Add/alter the existing NASIC Complex	FY 2020 – 2023	Noise, Occupational Health and Safety	Not Significant

***K. Unavoidable Adverse Impacts.***

There are no unavoidable adverse impacts associated with the Proposed Action or the no action alternative.

***L. Relationships of Short-Term Uses and Long-Term Productivity.***

Neither the Proposed Action nor the no-action alternative would affect the long-term productivity of the environment; no significant impacts to the environment or socioeconomic factors have been identified through this EA process.

***M. Irreversible and Irretrievable Commitments of Resources.***

CEQ regulations in 40 CFR §1502.16 require that an agency identify any irreversible or irretrievable commitments of resources that would be involved in the Proposed Action, should it be implemented. Capital, energy, materials, and labor would be required for the Proposed Action. These resources are not retrievable.

#### IV. Conclusion

The results of this EA indicate that the Proposed Action, to consolidate 88 CEG operations at the 88 CEG Compounds located in Area A and B as well as the relocation of the Recycling Center and Scrap Yard to facilities and paved areas adjacent to the 88 CEG Area B heat plant would have no significant environmental impacts. Based on this study, the preparation of an EIS is not warranted. It is recommended that a FONSI be issued. The evaluation of the potential environmental impacts from the Proposed Action and no-action alternative is summarized in Table 2.

**Table 2. Summary of Potential Environmental Impacts**

<b>Resource</b>	<b>Environmental Impacts Proposed Action</b>	<b>Environmental Impacts No-Action</b>
Land Use	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Air	<u>Short-term</u> : Potential minor impacts from construction and demolition activities.  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Water Resources	<u>Short-term</u> : Potential minor impacts from construction and demolition activities.  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Safety & Occupational Health	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Hazardous Materials/Waste	<u>Short-term</u> : Potential minor impacts from construction and demolition activities.  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Biological/Natural Resources	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Cultural Resources	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Geology Resources	<u>Short-term</u> : Potential minor impacts from construction and demolition activities.  <u>Long-term</u> : No impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts
Socioeconomics	<u>Short-term</u> : No Impacts  <u>Long-term</u> : No Impacts	<u>Short-term</u> : No impacts  <u>Long-term</u> : No impacts

**V. *Persons Contacted:***

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Gardenier Ware - 88 CEG Project Manager  
Paul Woodruff – 88 CEG Cultural Resource Program Manager 88 CEG/CEIE  
Darryn Warner – 88 CEG Natural Resource Program Manager 88 CEG/CEIE  
Chris Tumbusch – 88 CEG Air Program Manager 88 CEG/CEIE  
Karen Beason – 88 CEG Tank/Water Program Manager 88 CEG/CEIE

**VI. *References:***

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WPAFB 2019 Environmental Assessment Administrative Office Space March 2019  
WPAFB 2012 Environmental Assessment for the Consolidation of 88<sup>th</sup> Air Base Wing  
Civil Engineer Operations September 2012  
OEPA 2013 Ohio Water Resources Council Recommendations for Salt Storage  
February 2013  
WPAFB 2019 Hazardous Waste Management Plan January 2019

**VII. *Preparer:***

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John Banford  
MS, Environmental Sciences  
EIAP/Environmental Program Manager  
88 CEG/CEIEA  
Environmental Management Branch  
Asset Management Section  
Wright-Patterson Air Force Base

# **APPENDIX A**

## **Notice of Availability**

## **PUBLIC NOTICE**

### **Notice of Availability Draft Final Environmental Assessment For The Consolidation of the 88 Civil Engineer Group Operations Phase II Wright-Patterson Air Force Base (WPAFB)**

Beginning 19 to 29 July 2019, the United States Air Force will accept comments on the Environmental Assessment (EA) to evaluate alternatives to provide administrative space for growing organizations and during renovation of existing facilities at WPAFB, Ohio. The results, as found in the EA, show that the Proposed Action of consolidating 88 Civil Engineer Group Operations would not have an adverse impact on the environment—indicating that a Finding of No Significant Impact would be appropriate. The public is invited to review the document at the Greene County Public Library, Fairborn Branch, located at 1 East Main Street, Fairborn, Oh 45324, (937) 878-9383 or access the document on the WPAFB public website at <http://www.wpafb.af.mil/units/cev/>.

Written comments and inquiries on the Public Notice should be directed to:

88 ABW/Public Affairs  
5135 Pearson Rd. Bldg 10, Rm 252  
Wright-Patterson AFB, OH 45433  
or  
E-mail to: [88abw.pa@us.af.mil](mailto:88abw.pa@us.af.mil)

# **APPENDIX B**

## **ACAM Report**

**1. General Information:** The Air Force's Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action in accordance with the Air Force Instruction 32-7040, Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis.

**a. Action Location:**

**Base:** WRIGHT-PATTERSON AFB  
**State:** Ohio  
**County(s):** Greene; Montgomery  
**Regulatory Area(s):** NOT IN A REGULATORY AREA

**b. Action Title:** CE Consolidation II

**c. Project Number/s (if applicable):** N/A

**d. Projected Action Start Date:** 7 / 2019

**e. Action Description:**

Consolidate 88 CEG functions to existing 88 CEG Compounds. In the 2012 88 CEG conducted an Environmental Assessment for the Consolidation of 88th Air Base Wing Civil Engineer Operations. Subsequently many of the CE functions have been consolidated to two locations. . This effort will further consolidate 88 CEG operations to either Area A CE Compound or Area B Compound.

**Proposed Action:**

In Area A, the Roads and Grounds (F/10300, F/10869, F/10879) and Entomology (F/10278) functions will be relocated to the existing Area A, CE Compound. The Area A, CE Compound is located in the area of Littrell Avenue, Skeel Avenue and the east perimeter fence of the installation. All vacated facilities will be demolished and converted to green space which will be used for parking for the expansion NASIC complex.

The Area A Roads and Grounds will be relocated from F/10300, F/10869 and 10879 to F/30016. F/30014 will be demolished to allow for the construction of outdoor material (gravel, soil, mulch, etc.) storage bins to the south and east of F/30015 and F/30016. Furthermore, a storage structure will be constructed to the east of F/30016 to accommodate 1,000 tons of road salt.

A new facility will be constructed for the relocation of Entomology between F/30022 and Skeel Ave.

In Area B, Roads and Grounds material (gravel, soil, mulch, etc.) storage bins (F/20740) and salt barn (F/10742) will be relocated to the Area B, CE Compound. The Area B, CE Compound is located at the corner of Skyline Drive and 13th Street.

Material storage bins will be constructed on the west side of the Area B CE Compound across from F/20611 and F/20614 along Skyline Dr. The Area B salt storage will be relocated to a newly constructed structure capable of storing 1,000 of road salt. A 4,500 SF addition will be added to F/20611 or a new 4,500 SF standalone facility will be constructed to accommodate vehicles and equipment. F/20740 and F/20742 will be demolished and the area will be leveled for the expansion of the RV parking.

The Recycling Center (F/20093) operations and scrap metal yard will be relocated to F/20746 and F/20741. A 10,000 SF addition will be added to F/20741 to accommodate recycling administration activities, commodity sorting and storage. The Recycling Center scrap metal yard will be relocated to the area adjacent to F/20746 with a small fenced off area for the Defense Logistic Agencies scrap metal yard.



**f. Point of Contact:**

**Name:** Chris Tumbusch  
**Title:** NH-03  
**Organization:** 88 CEG/CEIEA  
**Email:** christopher.tumbusch@us.af.mil  
**Phone Number:** 937-257-2455

**2. Air Impact Analysis:** Based on the attainment status at the action location, the requirements of the General Conformity Rule are:

\_\_\_\_\_ applicable  
\_\_X\_\_ not applicable

Total combined direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the “worst-case” and “steady state” (net gain/loss upon action fully implemented) emissions.

“Air Quality Indicators” were used to provide an indication of the significance of potential impacts to air quality. These air quality indicators are EPA General Conformity Rule (GCR) thresholds (de minimis levels) that are applied out of context to their intended use. Therefore, these indicators do not trigger a regulatory requirement; however, they provide a warning that the action is potentially significant. It is important to note that these indicators only provide a clue to the potential impacts to air quality.

Given the GCR de minimis threshold values are the maximum net change an action can acceptably emit in non-attainment and maintenance areas, these threshold values would also conservatively indicate an actions emissions within an attainment would also be acceptable. An air quality indicator value of 100 tons/yr is used based on the GCR de minimis threshold for the least severe non-attainment classification for all criteria pollutants (see 40 CFR 93.153). Therefore, the worst-case year emissions were compared against the GCR Indicator and are summarized below.

**Analysis Summary:**

**2019**

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.562	100	No
NOx	3.724	100	No
CO	3.331	100	No
SOx	0.008	100	No
PM 10	21.132	100	No
PM 2.5	0.169	100	No
Pb	0.000	25	No
NH3	0.002	100	No
CO2e	786.1		

**2020**

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	1.327	100	No
NOx	8.613	100	No
CO	7.808	100	No
SOx	0.018	100	No
PM 10	42.331	100	No
PM 2.5	0.405	100	No
Pb	0.000	25	No
NH3	0.005	100	No
CO2e	1787.4		

**2021**

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.057	100	No
NOx	0.337	100	No
CO	0.335	100	No
SOx	0.001	100	No
PM 10	0.018	100	No
PM 2.5	0.018	100	No
Pb	0.000	25	No
NH3	0.000	100	No
CO2e	67.6		

**2022 - (Steady State)**

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.000	100	No
NOx	0.000	100	No
CO	0.000	100	No
SOx	0.000	100	No
PM 10	0.000	100	No
PM 2.5	0.000	100	No
Pb	0.000	25	No
NH3	0.000	100	No
CO2e	0.0		

None of estimated emissions associated with this action are above the GCR indicators, indicating no significant impact to air quality; therefore, no further air assessment is needed.

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Chris Tumbusch, NH-03

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