Supplemental Environmental Assessment for the 914th Air Refueling Wing KC-135 Aircraft Fuel Hydrant System

Prepared for

U.S. Army Corps of Engineers – Louisville District
600 Dr. Martin Luther King Jr. Place
Louisville, Kentucky 40202-2232

June 2021

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Executive Summary

This Supplemental Environmental Assessment (SEA) was prepared for the Air Force Reserve Command (AFRC) to evaluate the potential environmental consequences of the Proposed Action at Niagara Falls Air Reserve Station (NFARS) in Niagara County, Niagara Falls, New York. An Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) were previously prepared to analyze the environmental consequences of replacing eight C-130 aircraft assigned to NFARS with eight KC-135 aircraft (2017 USACE). These documents are herein incorporated by reference and will be referred to as the *2017 EA*. The *2017 EA* concluded that there would be no significant impact resulting from implementation of the Proposed Action or the No Action Alternative. Subsequent to approval of the *2017 EA*, many of the actions evaluated therein have been accomplished and the KC-135s are now operational at NFARS.

While not expressly considered in the *2017 EA*, it was understood that repairs to the existing hydrant fueling system at NFARS would be required to support the KC-135 mission. NFARS currently has two bulk storage petroleum, oil, and lubricant (POL) yards. The West POL Yard was previously used to support the former KC-135 mission; however, the current fuel storage capacity of the West POL Yard is not sufficient to support the current KC-135 mission. The East POL Yard currently provides fuel storage for the KC-135 mission. The East and West POL Yards are connected via a dual-walled fuel transfer pipeline, with 6-inch interior and 8-inch exterior casing, which was previously used to transfer fuel stored at the East POL Yard to the West POL Yard. From the West POL Yard, fuel was supplied via a 10-inch hydrant transfer pipeline (with above-ground and below-ground segments) to the airfield for aircraft refueling.

This SEA has been developed to supplement the *2017 EA* and evaluate environmental consequences of additional actions related to the KC-135 bed-down which were not evaluated in the *2017 EA*.

Purpose and Need

The purpose of the action is to provide a workable fueling solution for the KC-135 mission at NFARS. This includes providing for a hydrant fueling system with sufficient fuel storage, as well as the demolition and removal of existing fueling infrastructure that is no longer functional or needed.

The action is needed to support the KC-135 mission at NFARS. Currently, the lack of suitable fueling infrastructure requires the KC-135 aircraft to be re-fueled by individual refueling trucks which is both time and labor intensive. The current condition adversely impacts the efficiency and capability of the KC-135 mission at NFARS.

Description of the Proposed Action and Alternatives

The *2017 EA* included a description of the proposed action and alternatives for the initial KC-135 Aircraft Conversion which will not be reproduced in this SEA. For the purposes of this SEA, the AFRC proposes to construct and operate a fuel storage and hydrant fueling system to support the KC-135 mission at NFARS. The following sections provide a detailed description of the Proposed

Action and the alternatives considered to meet the Purpose and Need. Refer to **Section 1.1** for additional background information.

Proposed Action

The Proposed Action would consist of two distinct phases where Phase I includes construction and operation of a new 10,000-barrel (BBL) aboveground storage tank (AST), associated fueling infrastructure and appurtenances, demolition of above ground portions of the East POL Yard, and abandonment of the transfer line between the East POL Yard and the West POL Yard. Phase II includes demolition of remaining at-grade and underground infrastructure at the East POL Yard and a remedial investigation of potential contamination at the East POL Yard to include restoration efforts, if determined necessary. Specific details of Phase I and Phase II are described in **Section 2.1**.

No Action Alternative

Under the No Action Alternative, the new AST, hydrant fueling system, and associated infrastructure would not be implemented. The KC-135 aircraft would continue to be fueled by individual re-fueling trucks, and this would continue to limit the effectiveness and capability of the KC-135 mission at NFARS. As a result, the No Action Alternative does not fulfill the project purpose and need. It is included in this analysis to provide a baseline against which the beneficial and adverse impacts of the other alternatives can be compared.

Summary of Environmental Consequences and Mitigation Measures

This SEA contains a comprehensive evaluation of the existing conditions and environmental consequences of implementing the Proposed Action and the No Action Alternative, as required by the National Environmental Policy Act (NEPA). **Table 3-3** in **Section 3.3** summarizes the impacts of the Proposed Action and No Action Alternative. An explanation of the impact terminology used in **Table 3-3** is provided in **Section 3, Existing Environmental Conditions and Resources Considered in Detail**. Based on the evaluation of potential environmental impacts associated with the Proposed Action and No Action alternatives, neither alternative would result in significant impacts to any resource category. Therefore, a FONSI is appropriate and an environmental impact statement (EIS) would not be required.

No specific mitigation measures are necessary in order to reduce the effects of the Proposed Action to insignificant levels.

Public and Stakeholder Involvement

NEPA ensures that environmental information is made available to the public during the decision-making process and prior to actions being taken. The premise of NEPA is that the quality of federal decisions will be enhanced if proponents provide information on their actions to state and local governments, tribal governments, and the public, and involve these entities in the planning process.

The Intergovernmental Cooperation Act of 1968 and Executive Order (EO) 12372, Intergovernmental Review of Federal Programs, require federal agencies to cooperate with and consider state and local views in implementing a federal proposal. Air Force Instruction (AFI) 32-7060, Interagency and Intergovernmental Coordination for Environmental Planning (IICEP), requires the United States Air Force (USAF) to implement the IICEP process, which is used to facilitate agency coordination and implement scoping requirements under NEPA.

The AFRC and NFARS provided a Description of the Proposed Action and Alternatives to relevant federal, state, and local agencies, and Federally-Recognized Tribes. Agencies and tribes had an opportunity to provide comments or information concerning the Proposed Action during this initial scoping period. Responses received were incorporated into the SEA.

A notice of availability for the Draft Final SEA and Draft Final FONSI was published in the Niagara Gazette. Publication of the notice of availability initiated a 30-day public review period. Copies of the Draft Final SEA and the unsigned Draft Final FONSI were made available at the Niagara Falls Public Library, Earl W. Brydges Building, 1425 Main Street, Niagara Falls, New York, 14305. They were also made available online. The Draft Final SEA and Draft Final FONSI were also made available during the 30-day public review period for federal, state and local agencies, and tribes. Comments to the Draft Final SEA and Draft Final FONSI were accepted electronically and in writing.

Table of Contents

Acronyms and Abbreviations

AFFF	aqueous film forming foam
AFI	Air Force Instruction
AFMAN	Air Force Manual
AFRC	Air Force Reserve Command
AST	Aboveground Storage Tank
BBL	barrel
BOMARC	Boeing/Michigan Aeronautical Research Center
BTEX	benzene, toluene, ethylbenzene, and xylenes
CAA	Clean Air Act
CATEX	Categorical Exclusion
CEQ	Council on Environmental Quality
CEV	Environmental Management
CFR	Code of Federal Regulations
CO_2	carbon dioxide
EA	Environmental Assessment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EPCRA	Emergency Planning and Community-Right-To-Know Act
EO	Executive Order
FONSI	Finding of No Significant Impact
GHG	Greenhouse gases
HAZMART	Hazardous Materials Emergency Planning and Response
HW	Hazardous Waste
HWMP	Hazardous Waste Management Plan
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
IRP	Installation Restoration Program
km	kilometers
LHA	life-time health advisory
MCL	maximum contaminant levels
MSG	Mission Support Group

NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NFARS	Niagara Falls Air Reserve Station
NYSDEC	New York State Department of Environmental Conservation
OTR	Ozone Transport Region
PCB	polychlorinated biphenyls
PFAS	per- and polyfluorinated alkyl substances
PFBS	perfluorobutane sulfonate
PFOA	perfluorooctanoic acid
PFOS	perfluorooctane sulfonate
POL	petroleum, oil, and lubricant
ppb	parts per billion
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
SEA	Supplemental environmental assessment
SHPO	State Historic Preservation Office
SI	Site Investigation
SIP	State Implementation Plan
SMP	Site Management Plan
TPH	total petroleum hydrocarbons
tpy	tons per years
TSCA	Toxic Substances Control Act
USAF	United States Air Force
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
UST	Underground Storage Tank
UU/UE	unlimited use/unrestricted exposure
VOC	volatile organic compounds
µg/m3	micrograms per cubic meter

1

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1. Purpose and Need for Action

1.1. Introduction

This Supplemental Environmental Assessment (SEA) was prepared for the Air Force Reserve Command (AFRC) to evaluate the potential environmental consequences of the Proposed Action at Niagara Falls Air Reserve Station (NFARS) in Niagara County, Niagara Falls, New York (see **Figure 1-1**). An Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) were previously prepared to analyze the environmental consequences of replacing eight C-130 aircraft assigned to NFARS with eight KC-135 aircraft (2017 USACE). These documents are herein incorporated by reference and will be referred to as the *2017 EA*. The *2017 EA* concluded that there would be no significant impact resulting from implementation of the Proposed Action or the No Action Alternative. Subsequent to approval of the *2017 EA*, many of the actions evaluated therein have been accomplished and the KC-135s are now operational at NFARS.

While not expressly considered in the *2017 EA*, it was understood that repairs to the existing hydrant fueling system at NFARS would be required to support the KC-135 mission. NFARS currently has two bulk storage petroleum, oil, and lubricant (POL) yards (see **Figure 1-2**). The West POL Yard was previously used to support the former KC-135 mission; however, the current fuel storage capacity of the West POL Yard is not sufficient to support the current KC-135 mission. The East POL Yard currently provides fuel storage for the KC-135 mission. The East and West POL Yards are connected via a dual-walled fuel transfer pipeline, with 6-inch interior and 8-inch exterior casing, which was previously used to transfer fuel stored at the East POL Yard to the West POL Yard. From the West POL Yard, fuel was supplied via a 10-inch hydrant transfer pipeline (with above-ground and below-ground segments) to the airfield for aircraft refueling.

The repairs were envisioned to include repair of bulk aboveground storage tanks (ASTs), distribution lines, the transfer line, hydrant pits, pump houses, controls, valves, fill stands, and other components of the existing hydrant fueling system in order to restore the system to operational capacity as described in **Table 4-2** of the *2017 EA*. The anticipated repairs to the hydrant fueling system were envisioned as a separate maintenance project to be covered under a Categorical Exclusion (CATEX). A federal action may be "categorically excluded" from a detailed environmental analysis (i.e., an EA or Environmental Impact Statement [EIS]) when the action is of a type which does not have the potential for significant effect on the environment. However, it has subsequently been determined that the necessary repairs to the hydrant fueling system cannot be achieved as envisioned, due to unforeseen circumstances including poor existing condition which would require a higher level of maintenance and repair than was originally envisioned as well as existing soil and groundwater contamination associated with the existing East POL Yard. In the interim, the lack of suitable fueling infrastructure requires the KC-135 aircraft to be re-fueled by individual refueling trucks which obtain fuel at the East POL Yard and deliver it to the KC-135 aircraft on the airfield. This process is both time and labor intensive and compromises the effectiveness and capability of the KC-135 mission. Therefore, it has been determined that a new hydrant fueling system would be required in order to

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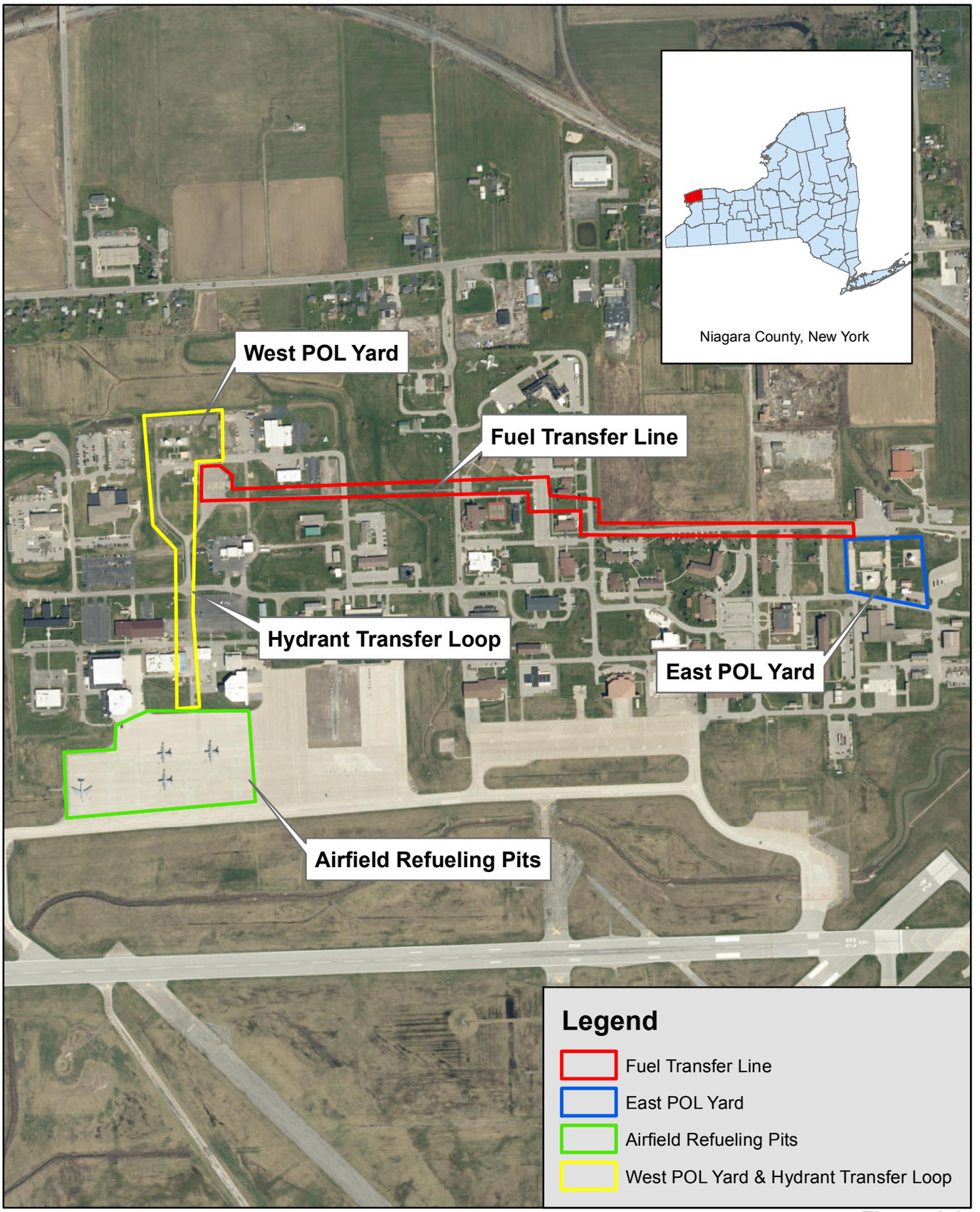
Figure 1-1
Project Vicinity Map

Niagara Falls Air Reserve Station
KC-135 Aircraft Fuel Hydrant System SEA
Niagara County, New York
June 2021



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Figure 1-2
Project Location Map

0 550 1,100 Feet
0 190 380 Meters

Niagara Falls Air Reserve Station
KC-135 Aircraft Fuel Hydrant System SEA
Niagara County, New York
June 2021

support the KC-135 mission at NFARS. This SEA has been developed to supplement the *2017 EA* and evaluate environmental consequences of additional actions related to the KC-135 bed-down which were not evaluated in the *2017 EA.*

1.2. Purpose and Need of the Action

The purpose of the action is to provide a workable fueling solution for the KC-135 mission at NFARS. This includes providing for a hydrant fueling system with sufficient fuel storage, as well as the demolition and removal of existing fueling infrastructure that is no longer functional or needed.

The action is needed to support the KC-135 mission at NFARS. Currently, the lack of suitable fueling infrastructure requires the KC-135 aircraft to be re-fueled by individual refueling trucks which is both time and labor intensive. The current condition adversely impacts the efficiency and capability of the KC-135 mission at NFARS.

1.3. Relevant Plans, Laws, and Regulations

Accomplishing the stated purpose and need requires consideration of numerous factors, including mission requirements, regulatory requirements, and environmental considerations. In addressing environmental considerations, the USACE and AFRC were guided by relevant statutes (and their implementing regulations) and executive orders (EOs) that establish standards and provide guidance on environmental and natural resources management and planning.

The proposed action would require compliance with the federal regulations and EOs, including, but not necessarily limited to, the following:

- National Environmental Policy Act (NEPA)
- 32 Code of Federal Regulations (CFR) 989 (Air Force NEPA implementing regulations)
- Noise Control Act
- Clean Air Act
- Occupational Safety and Health Act
- Energy Independence and Security Act, Section 438
- Resource Conservation and Recovery Act and its associated hazardous and solid waste amendments
- Comprehensive, Environmental Response, Compensation, Liability Act, as amended by Emergency Planning and Community Right-To-Know-Act; release or threatened release of a hazardous substance
- Federal Air Quality Conformity Applicability
- Clean Water Act
- Water Quality Act
- Endangered Species Act
- The Sikes Act

- Migratory Bird Treaty Act
- National Historic Preservation Act
- Intergovernmental Cooperation Act of 1968
- EO 11990, *Protection of Wetlands*
- EO 11988, as amended by EO 13690, *Floodplain Management*
- EO 11593, *Protection and Enhancement of the Cultural Environment*
- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- EO 12372, *Intergovernmental Review of Federal Programs*
- EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*
- Air Force Manual (AFMAN) 32-7003, *Environmental Conservation*
- Department of Defense Instruction 2000.16, Department of Defense (*DoD) Antiterrorism Standards.*

1.4. Summary of Key Environmental Compliance Requirements

1.4.1. National Environmental Policy Act

NEPA (42 United States Code Sections 4321–4347) is a federal statute requiring the identification and analysis of potential environmental impacts associated with proposed federal actions before those actions are taken. The intent of NEPA is to help decision makers make well-informed decisions based on understandings of the potential environmental consequences and take actions to protect, restore, or enhance the environment. NEPA established the Council on Environmental Quality (CEQ), which was charged with developing and implementing regulations and ensuring federal agency compliance with NEPA. The CEQ regulations mandate that all federal agencies use a prescribed structured approach to environmental impact analyses. This approach also requires federal agencies to use an interdisciplinary and systematic approach in their decision-making process. The process evaluates potential environmental consequences associated with a proposed action and considers alternative courses of action.

The process for implementing NEPA is codified in Title 40 CFR, Parts 1500–1508, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act. The CEQ was established to implement and oversee federal policy in this process. The CEQ regulations specify that an EA must be prepared to provide evidence and analysis for determining whether to prepare a FONSI, where appropriate, or whether the preparation of an EIS is necessary. The EA can aid in an agency's compliance with NEPA when an EIS is unnecessary or facilitate preparation of an EIS when one is required.

Air Force Policy Directive 32-70, Environmental Quality, states that the United States Air Force (USAF) will comply with applicable federal, state, and local environmental laws and regulations, including NEPA. USAF's implementing regulation for NEPA is its Environmental Impact Analysis Process, 32 CFR Part 989, as amended.

1.4.2. Integration of Other Environmental Statutes and Regulations

To comply with NEPA, the planning and decision-making process for actions proposed by federal agencies involves a study of other relevant environmental statutes and regulations. The NEPA process, however, does not replace procedural or substantive requirements of other environmental statutes and regulations. It addresses them collectively in the form of an EA or EIS, which enables the decision maker to have a comprehensive view of major environmental issues and requirements associated with a Proposed Action. According to CEQ regulations, the requirements of NEPA can be integrated "with other planning and environmental review procedures required by law or by agency practice so that all such procedures run concurrently rather than consecutively" (40 CFR part 1500.2 [c]).

1.4.3. Interagency Coordination and Public Involvement

NEPA ensures that environmental information is made available to the public during the decision-making process and prior to actions being taken. The premise of NEPA is that the quality of federal decisions will be enhanced if proponents provide information on their actions to state and local governments, tribal governments, and the public, and involve these entities in the planning process. The Intergovernmental Cooperation Act of 1968 and EO 12372, *Intergovernmental Review of Federal Programs*, require federal agencies to cooperate with and consider state and local views in implementing a federal proposal. AFI 32-7060, *Interagency and Intergovernmental Coordination for Environmental Planning* (IICEP), requires the USAF to implement the IICEP process, which is used to facilitate agency coordination and implement scoping requirements under NEPA.

The AFRC and NFARS provided a Description of the Proposed Action and Alternatives to relevant federal, state, and local agencies, and Federally-Recognized Tribes. Agencies and tribes had an opportunity to provide comments or information concerning the Proposed Action during this initial scoping period from May 4, 2021 to June 5, 2021. Responses received were incorporated into the SEA.

A notice of availability for the draft SEA and draft FONSI was published in the *Niagara Gazette*. Publication of the notice of availability initiated a 30-day public review period. Copies of the draft SEA and the unsigned draft FONSI were made available at the Niagara Falls Public Library, Earl W. Brydges Building, 1425 Main Street, Niagara Falls, New York, 14305. They were also made available online. The draft SEA and draft FONSI were also made available during the 30-day public review period for federal, state and local agencies, and tribes. Comments to the draft SEA and draft FONSI were accepted electronically and in writing.

2. Description of the Proposed Action and Alternatives

The *2017 EA* included a description of the proposed action and alternatives for the initial KC-135 Aircraft Conversion which will not be reproduced in this SEA. For the purposes of this SEA, the AFRC proposes to construct and operate a fuel storage and hydrant fueling system to support the KC-135 mission at NFARS. The following sections provide a detailed description of the Proposed Action and the alternatives considered to meet the Purpose and Need. Refer to **Section 1.1** for additional background information.

2.1 Proposed Action

The Proposed Action would consist of two distinct phases where Phase I includes construction and operation of the new fueling infrastructure, and demolition of the East POL Yard with abandonment of the transfer line. Phase I would occur first, and a proposed site plan has already been developed (see **Figure 2-1)**. Phase II includes demolition and abandonment of the existing fueling infrastructure and restoration of associated contamination. Phase II would occur following Phase I, and project-specific plans would be developed in the future. Specific details of Phase I and Phase II are described below.

Phase I

- Construction of one (1) new 10,000-BBL/ 420,000-gallon AST at the West POL Yard
  - Site layout with a dike area, foundations, and a ring wall would be constructed for the tank.
  - Grading would be performed, and new impervious area would be required.
  - Cathodic protection systems would be implemented for the tank.
  - A fire access drive would be designated with additional construction for fire hydrants.
  - Stormwater collected in the secondary containment would be discharged to existing on-base stormwater system.
- Demolition of East POL Yard and abandonment of transfer line
  - Demolition of above ground infrastructure at the East POL Yard, including piping, equipment, and bulk ASTs.
  - Slurry fill existing transfer line between the East POL Yard and the West POL Yard.
- Construction of new Commercial Offloading Positions for the new tank at the West POL Yard
  - Two commercial offload locations with containment area.
  - Pump skids and controls for commercial offload.
  - All jet fuel would be filtered into storage upon receipt.
- New Power Distribution and Controls at the West POL Yard
  - A new motor control center would be installed for Building 919.

1 2 3 4 5

D C B A

A1 OVERALL SITE PLAN

SCALE: 1" = 250'

0 125' 250' 500' 750'

PLAN NORTH

TRUE N

Figure 2-1. Phase I Site Plan

Legend	
C/L	Construction Limits

US Army Corps of Engineers ® Louisville Distrct

MARK	DESCRIPTION	DATE
1	AMENDMENT 001	6/10/2021

DESIGNED BY: H. SAAM
DRAWN BY: B.SCOGGIN
CHECKED BY: V. EASTERBROOK
SUBMITTED BY: C.MAIOCCO
SIZE: ANSI D
FILE NAME: C-101-exhibit.dwg
ISSUE DATE: 10 JUNE 2021
SOLICITATION NO.:
CONTRACT NO.:
PROJECT NUMBER:

U.S. ARMY CORPS OF ENGINEERS
LOUISVILLE DISTRICT
LOUISVILLE, KENTUCKY 40210-0059

POND

3500 PARKWAY LANE, SUITE 500
PEACHTREE CORNERS, GA 30092
PHONE (678) 336-7740
FAX (678) 336-7744
POND JOB # 1210132

REPLACEMENT FUEL BULK STORAGE FACILITY
HYDRANT REPAIR
NIAGARA FALLS ARS
P2 NO. 488039, 488040, 488041 AND 495422

OVERALL SITE PLAN

SHEET ID

C-101

FILE PATH: \\ACP3SERVER.PONDCO.COM\RESOURCES\PROJECTS\FY21\1210132\04.CAD BIM\04.02.CAD\EXHIBITS\C-101-EXHIBIT PLOTTED BY: SAAM, HUBERT DATE: 6/11/21

CERTIFIED FINAL DESIGN SUBMITTAL

- The hydrant fuels area input/output and tank appurtenances would be integrated into the new pump control unit located in Building 919.

- New Fuels Lab Facility at the West POL Yard
  - Construct new addition to Building 918 to accommodate new fuels lab and classroom.
- Repair Hydrant Transfer Loop
  - Replacement of underground segment of existing 10-inch hydrant transfer loop from the West POL Yard to the airfield apron.
  - Existing airfield refueling pits would be demolished and new refueling pits would be installed.
  - Existing concrete pavement would be demolished and replaced in kind for replacement of the hydrant transfer loop.

Phase II

- Demolition of portions of at-grade and underground infrastructure associated with the former fuel system at the East POL Yard
  - Demolition of three (3) concrete secondary containment areas, including access stairs and pipe supports.
  - Demolition of concrete and asphalt access drives within the tank farm area.
  - Demolition of the existing oil water separator and associated concrete pad.
- Remedial investigation to determine the nature and extent of contamination in both the soil and groundwater due to the historical activities at the East POL Yard.
  - Restoration efforts, if needed, would be designed and implemented at East POL Yard.
  - NFARS would coordinate with the New York State Department of Environmental Conservation (NYSDEC), Division of Environmental Remediation (DER) throughout the process to confirm any remediation action is in compliance with current regulations and cleanup standards.
- At this time, Phase II is planned to be programmed as a Facility Sustainment, Restoration, and Maintenance (FSRM) project.

2.2 No Action Alternative

Under the No Action Alternative, the new AST, hydrant fueling system, and associated infrastructure would not be implemented. The KC-135 aircraft would continue to be fueled by individual re-fueling trucks, and this would continue to limit the effectiveness and capability of the KC-135 mission at NFARS. As a result, the No Action Alternative does not fulfill the project purpose and need. It is included in this analysis to provide a baseline against which the beneficial and adverse impacts of the other alternatives can be compared.

2.3 Alternatives Considered and Eliminated from Further Evaluation

Multiple configurations of repair and/or replacement of the existing fueling infrastructure (e.g., bulk ASTs at the East POL Yard, fuel transfer pipeline, and hydrant fueling system, etc.) have been considered. Specifically, an alternative of replacing transfer and hydrant lines, replacing refueling pits on the apron, and repairing two existing bulk ASTs was originally considered. Initially, it was thought that much of the existing infrastructure would be usable or could be repaired to usable condition. However, previous investigations have determined that significant repairs and full replacement of major components would be required to satisfy the requirements. Furthermore, during previous evaluation of the repair/replace alternative, the transfer line did not meet current NYSDEC environmental requirements for pressure monitoring and leak detection. It was determined that full replacement of the transfer line would be required in order to meet the NYSDEC requirements. Therefore, additional design iterations considered full replacement of the 5,725 linear foot fuel transfer line as well as appurtenant structures such as drains, valves, pumphouse, and connections to bulk ASTs, pumps, and off load headers which would not efficiently support the purpose and need to the project as originally envisioned. An additional specific alternative considered adding a new bulk AST at the East POL Yard. However, during excavation at the East POL Yard in 2020 (associated with a separate project), soil and groundwater contamination was discovered. A long-term restoration plan for the larger area has not yet been completed. The identification of soil and groundwater contamination at the East POL Yard represents a challenge to implementing project alternatives involving major improvements at the East POL Yard. The contamination would require additional investigation, design, and remediation efforts which would delay achieving the purpose and need of the Proposed Action. Therefore, the repair/replace alternative, including related design iterations, is not carried forward for detailed evaluation within this SEA and, therefore, after thorough consideration, are removed from further NEPA study; however, investigation of contamination and remediation, if necessary, would be carried forward under Phase II of the Proposed Action.

3. Existing Environmental Conditions and Resources Considered in Detail

Information gathered from site visits, interviews, and existing documentation was used to characterize the existing environment. Analyses of environmental impacts in an EA typically address numerous resource areas that may be affected by implementing a proposed action. **Section 3.1** discusses the resources that were determined to have no potential for significant impacts, while **Section 3.2** discusses resources where the potential for impacts could influence the decision to be made.

Two categories of potential environmental consequences (impacts or effects) were evaluated: direct and indirect. A direct impact is the result of the Proposed Action and occurs at the same time and place. An indirect impact is caused by the Proposed Action and "[is] later in time or farther removed in distance, but…still reasonably foreseeable" (40 CFR Part 1508).

In the following sections, the duration of each impact is described either as short-term, such as limited to the construction period or immediately thereafter, or long-term, which includes impacts that recur through time, related to operations, or continue well beyond the period of construction. Impacts can be beneficial or adverse. Beneficial impacts improve the resource or issue analyzed. Adverse impacts negatively affect the resource or issue analyzed. The degree of a potential impact refers to its severity and takes into account the level of controversy associated with impacts on human health; whether the action establishes a precedent for further actions with significant effects; the level of uncertainty about projected impacts; and the extent to which the action threatens to violate federal, state, or local environmental protection laws or constrain future activities. Potential beneficial impacts are discussed separately from potential adverse impacts. The thresholds of change for the degree of impacts are defined as follows:

- Negligible: When the impact is localized and not measurable at the lowest level of detection
- Minor: When the impact is localized and slight, but detectable
- Moderate: When the impact is readily apparent and appreciable
- Major: When the impact is severely or significantly disruptive to current conditions

Degrees of impacts that are classified as negligible, minor, or moderate are considered to be insignificant impacts in this analysis. Significant impacts are those categorized as "major." Measures that would be implemented to avoid or minimize potential impacts to the environment, including those that would otherwise be significant, are also presented.

3.1 Resources Eliminated from Further Consideration

This section describes the resources which do not require detailed analysis and consideration to determine that impacts associated with evaluated alternatives would be less than significant. It also provides a brief rationale for these determinations.

3.1.1 Land Use

Zoning maps from the Town of Niagara and Town of Wheatfield note that the land use comprising the entirety of the Proposed Action area is industrial in nature. The Proposed Action would include conversion of maintained grass to developed area; however, this change would remain consistent with current zoning and land use categorization. Therefore, land use is not considered further in this SEA. There would be no impact to land use under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.2 Geology

Construction and operation of the Proposed Action would not substantially alter or damage a unique or recognized geologic feature, adversely affect geologic conditions or processes, or expose people or property to geologic hazards that could result in injury or loss of use. There would be no impact to geology under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.3 Soils

Construction and operation of the Proposed Action would not result in a substantial loss of soil. There would be no impact on farmland soils on the NFARS because urban or built-up land (including that used for airports) cannot be considered prime farmland. Therefore, soils are not given further consideration for protection under the Farmland Protection Policy Act, and a Farmland Conversion Impact Rating Form (AD-1006 Form) is not required. There would be negligible, direct, short-term, adverse impacts to soils under the Proposed Action due to soil disturbance and no impact under the No Action alternative, and further consideration is not warranted.

Contaminated soils are located within the vicinity of the Proposed Action on NFARS and are specifically discussed in **Section 3.2.2**.

3.1.4 Topography

The land in the vicinity of the Proposed Action is generally level; only minimal excavation and grading would be required. There would be negligible, direct, long-term, adverse impacts to topography under the Proposed Action due to excavation and grading and no impact under the No Action alternative, and further consideration is not warranted.

3.1.5 Surface Water and Wetlands

Cayuga Creek and its tributaries flow through the center of the airfield from east to west. There are surface waters and wetlands in the vicinity of the taxiways and a perennial stream which crosses the transfer pipeline. These surface waters and wetlands would not be impacted during the implementation of the Proposed Action and work would not be conducted within any waters of the U.S. Protection measures, such as silt fencing, would be used around surface waters and wetlands adjacent to areas that would be disturbed to prevent loose soils from entering the wetlands during construction activities. NFARS would comply with federal, state, and USAF regulations with respect to stormwater management. This includes, but is not limited to, obtaining required permits, developing stormwater pollution prevention plans, and constructing post-construction management practices, as required. NFARS would address water quality and quantity discharge at construction projects to ensure the impact to site hydrology is minimized from pre-construction to post-construction. There would be negligible, direct, long-term, adverse impacts to surface waters and wetlands under the Proposed Action due to stormwater discharge and no impact under the No Action alternative, and further consideration is not warranted.

3.1.6 Groundwater

The seasonally high water table north of the airfield is approximately 6 to 12 inches below ground surface, and south of the airfield is at or just below the ground surface (HDR, 2012). Shallow groundwater depths can fluctuate throughout the year, especially during spring when snow is melting and rains are heavy.

Shallow excavation could intercept groundwater. If groundwater were to be encountered during excavation, excavation would stop or, as needed, the water would be pumped out of the excavation area and be managed in accordance with base requirements. NFARS would comply with federal, state, and USAF regulations with respect to spill prevention management.

An increase in impervious surfaces would result in a smaller amount of recharge of shallow groundwater resources than currently exists. This impact would not be significant because depletion of an aquifer would not occur. Proper compliance with federal, state and Air Force regulations for stormwater management would be followed involving this increase in impervious area. There would negligible, indirect, short-term, adverse impacts to groundwater under the Proposed Action if encountered during excavations, and there would be and no impact under the No Action alternative, and further consideration is not warranted.

The potential to encounter contaminated groundwater is analyzed in **Section 3.2.3.1** of this SEA.

3.1.7 Floodplains

Review of the Federal Emergency Management Agency Flood Insurance Rate Map numbers 36063C0326E, 36063C0327E, and 36063C0331E indicated that areas adjacent to Cayuga Creek and its tributaries are within both the 100-year and 500-year floodplain (Federal Emergency Management Agency, 2010). No portion of the Proposed Action would be within the floodplain. There would be no impacts to floodplains under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.8 Coastal Zone Resources

NFARS is not within the New York Coastal Management Zone (New York State Department of Environmental Conservation, 2015). There would be no impact to coastal zone resources under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.9 Vegetation and Wildlife

Construction of the new AST at the West POL Yard and new commercial offloading positions would displace turf grasses. Turf grasses on NFARS include Kentucky bluegrass (*Poa pratensis*), tall fescue (*Festuca arundinace*a), orchard grass (*Dactylis glomerata*), and Italian ryegrass (*Lolium multiflorum*) (HDR, 2012). Wildlife in these areas would likely consist of invertebrates and possibly foraging birds. Conversion of the maintained grassy area to impervious area in these locations would have negligible impacts on vegetation and wildlife. Migratory birds would not likely nest in areas surrounding the West or East POL Yards because of disturbance from routine mowing. There would negligible, direct, long-term, adverse impacts to vegetation and wildlife under the Proposed Action and no impact under the No Action alternative, and further consideration is not warranted.

3.1.10 Federally Listed Threatened or Endangered Species and Critical Habitat

The U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation System website (USFWS, 2021) indicates that no federally listed species are known to occur within NFARS. One federally listed threatened species, the northern long-eared batt (*Myotis septentrionalis*), is known to occur in Niagara County. The northern long-eared bat hibernates in caves during the winter. Northern long-eared bats typically prefer mature forest with dead or decaying snags for summer roost habitat. Males prefer stands of coniferous trees, while females typically prefer deciduous trees for summer roosts (USFWS, 2011). NFARS does not contain caves; therefore, there is no winter habitat for hibernating northern long-eared bats on NFARS. There are no trees within the vicinity of the Proposed Action. The USFWS Information, Planning, and Conservation System website indicates that no critical habitat is present on NFARS (USFWS, 2021). Therefore, no critical habitat would be affected by the Proposed Action. There would be no impact to federally listed

threatened or endangered species and critical habitat under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.11 State-listed Threatened or Endangered Species

Several state-listed threatened or endangered bird species have been identified at NFARS (HDR, 2012). Seven New York State-listed bird species have been observed on the installation, including the upland sandpiper (*Bartramia longicauda*, threatened), short-eared owl (*Asio flammeus*, threatened), northern harrier (*Circus cyaneus*, threatened), grasshopper sparrow (*Ammodramus savannarum*, species of concern), American bittern (*Botaurus lentiginosus*, species of concern), least bittern (*Ixobrychus exilis*, threatened), and horned lark (*Eremophila alpestris*, species of concern). Seven other state-listed bird species are known to migrate through the area. No other state-listed species are known to occur on NFARS. The vicinity of the Proposed Action does not provide habitat for state-listed bird species due to frequent mowing. There would be no impact to state-listed threatened or endangered species under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.12 Cultural Resources

There are no identified archaeological, historical, traditional resources, or architectural resources at NFARS according to the latest Integrated Cultural Resources Management Plan (ICRMP), reviewed in 2020 (USAF, 2020). Correspondence with the New York State Historic Preservation Office concurred with these findings on May 6, 2021, which noted that "no historic properties, including archaeological and/or historic resources, will be affected by this undertaking." There would be no impact to cultural resources under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.13 Visual Resources

Visual changes would include a new AST, demolition of the East POL Yard and abandonment of the transfer line, and new commercial offloading positions and fuels lab facility at the West POL Yard. These impacts would not be significant because the visual change would be consistent with the character of the surrounding area. There would negligible, direct, long-term, adverse impacts to visual resources under the Proposed Action and no impact under the No Action alternative, and further consideration is not warranted.

3.1.14 Airspace

The Proposed Action would not result in a change in airspace configuration or usage. There would be no impact to airspace under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.15 Socioeconomics

The Proposed Action would benefit the local economy during construction, resulting from incidental spending in the local area by construction workers. Any additional jobs generated as a result of the Proposed Action would be temporary, construction-based positions. This would result in a negligible change in the local economy, as compared to existing conditions. There would negligible, direct, short-term, beneficial impacts to socioeconomics under the Proposed Action and no impact under the No Action alternative, and further consideration is not warranted.

3.1.16 Ground Transportation

NFARS is bordered to the north by Lockport Road, to the east by Walmore Road, to the south by the Niagara Falls International Airport, and to the west Packard Road and Porter Road. The entrance to NFARS is from Lockport Road. The 2017 EA noted that Lockport Road is a 2-lane paved road that has an estimated average annual daily traffic volume of approximately 6,000 vehicles in the vicinity of the base entrance.

Impacts to ground transportation would result from increased construction-related traffic on the installation. Installation roadways would be used to access the facilities being renovated. Access to the taxiways for construction vehicles would be coordinated through NFARS Security Office to minimize impacts to the airfield activities.

The previously estimated traffic count is unlikely to substantially change, as the project would generate a marginal increase in traffic due to short-term construction-related commuters. The public roadway network adjacent to the installation has sufficient capacity to accommodate the additional employee traffic demand. There is sufficient parking at NFARS to accommodate the additional personnel. There would negligible, direct, short-term, adverse impacts to ground transportation under the Proposed Action and no impact under the No Action alternative, and further consideration is not warranted.

3.1.17 Safety and Occupational Health

NFARS has one fire station that serves both the airfield and installation. The nearest hospital is Niagara Falls Memorial Medical Center, approximately 6 miles to the west. All contractors performing construction activities at NFARS are responsible for complying with applicable safety requirements, including Occupational Safety and Health Administration regulations and applicable Department of Defense and USAF regulations, to establish and maintain safety procedures. The Proposed Action would not increase the need for greater levels of protection for installation personnel or the public. Airfield access would be maintained in accordance with local regulations. The nearest occupied residence is approximately 850’ from the new AST and 1000’ from a special needs school. Per UFC 3-460-01 8-3.6.2 b), the minimum offset distance of 100’ is required for occupied buildings (Department of Defense, 2019). There would negligible, direct, short-term,

adverse impacts to safety and occupational health under the Proposed Action and no impact under the No Action alternative, and further consideration is not warranted.

3.1.18 Environmental Justice

EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, requires federal agencies to consider disproportionately high adverse effects on the human or environmental health to minority and low-income populations that would result from implementation of a proposed action. The Proposed Action would take place entirely within NFARS and there are no minority and low-income populations on NFARS. The vicinity of the Proposed Action is divided between Census tracts 226.02 and 227.11. These tracts both have lower percentages of population below the poverty threshold compared to New York State (11.7 and 5.6%, respectively, compared to 13.0%). Additionally, the tracts have lower percentages of minority populations compared to New York State (10.8 and 3.3%, respectively, compared to 36.3%) (US Census Bureau, 2021). There would be no disproportionate impact to low-income or minority populations under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.19 Protection of Children

EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, states that each federal agency "(a) shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and (b) shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks." Children do not frequently or routinely have access to NFARS and the vicinity of the Proposed Action. No environmental health or safety risks to children would be created. There would be no impact to children under either the Proposed Action or No Action alternative, and further consideration is not warranted.

3.1.20 Utilities

Utilities currently service NFARS and the vicinity of the Proposed Action. Utility work would be required to demolish the East POL Yard and implement construction at the West POL Yard. Utility work would be planned and conducted in order to minimize interruption of services. There would negligible, direct, short-term, adverse impacts to utilities under the Proposed Action due to these service disruptions and no impact under the No Action alternative, and further consideration is not warranted.

3.1.21 Noise

Assessing impacts of noise involves several factors, including frequency, content, time of day during which noise occurs, duration, and loudness of the noise. A proposed action could have a

significant effect on noise if noise-sensitive areas experience a long-term increase in noise exposures at or above a long-term equivalent A-weighted sound levels of 70 dBA over a 24-hour period, which is the noise level known to cause hearing loss with prolonged exposure (EPA, 1974). However, short-term exposures to elevated noise levels would not cause significant effects. Noise generation would last only for the duration of construction activities. Noise from the airfield would mask some of the noise from construction activities on the airfield and taxiways. There would be negligible, direct, short-term, adverse impacts to noise receptors under the Proposed Action due to construction and demolition and no impact under the No Action alternative, and further consideration is not warranted.

3.2 Resources Considered in Detail

This section identifies the potential environmental consequences of the Proposed Action and No Action alternative for the air quality and hazardous materials and solid waste at NFARS.

3.2.1 Air Quality

3.2.1.1 Definition of Resource

Air pollution is the presence in the outdoor atmosphere of one or more contaminants (e.g., dust, fumes, gas, mist, odor, smoke, or vapor) in quantities and of characteristics and duration such as to be injurious to human, plant, or animal life or to property, or to interfere unreasonably with the comfortable enjoyment of life and property. Air quality as a resource incorporates several components that describe the levels of overall air pollution within a region, sources of air emissions, and regulations governing air emissions. The following paragraphs discuss the National Ambient Air Quality Standards (NAAQS), local ambient air quality, General Conformity, Greenhouse Gas emissions, and Federal and State of New York regulatory requirements.

3.2.1.2 Regulatory Overview

The United States Environmental Protection Agency (USEPA) and the New York State Department of Environmental Conservation (NYSDEC) regulate air quality in the State of New York. The Clean Air Act (CAA) (42 U.S.C. §§ 7401–7671q), as amended, gives USEPA the responsibility to establish the primary and secondary National Ambient Air Quality Standards (40 CFR § 50) that set acceptable concentration levels for seven criteria pollutants. These standards represent the maximum allowable ambient concentrations for ground level ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), respirable particulate matter (including particulate matter equal to or less than 10 microns in aerodynamic diameter [PM10] and particulate matter equal to or less than 2.5 microns in aerodynamic diameter [PM2.5]), and lead (Pb). Ground level O3 is created through the reactions of volatile organic compounds (VOCs) and nitrogen oxides (NOX) in the presence of sunlight. Short-term standards (i.e., periods

generally less than 24 hours) have been established for pollutants contributing to acute health effects, while long-term standards (i.e., quarterly or annual averages) have been established for pollutants contributing to chronic health effects. Each state has the authority to adopt standards stricter than those established under the federal program; however, the State of New York follows the federal standards for all pollutants that would be emitted under this Proposed Action. Table 3-1 presents the USEPA NAAQS for federally listed criteria pollutants and the additional state-only standards.

Table 3-1. National and State Ambient Air Quality Standards

Pollutant	Averaging Time	Primary Standard		Secondary Standard
		Federal	New York	
CO	8-hour	9 ppm	Same	None
	1-hour	35 ppm	Same	None
Pb	Rolling 3-Month Average	0.15 µg/m^3	Same	Same as Primary
NO_2	Annual	53 ppb	Same	Same as Primary
	1-hour	100 ppb	Same	None
PM_{10}	24-hour	150 µg/m^3	Same	Same as Primary
$PM_{2.5}$	Annual	12.0 µg/m^3	Same	15.0 µg/m^3
	24-hour	35 µg/m^3	Same	Same as Primary
O_3	8-hour	0.070 ppm	Same	Same as Primary
SO_2	Annual	0.030 ppm	Same	None
	1-hour	75 ppb	Same	None
	3-hour	--	0.5 ppm	0.5 ppm
	24-Hour	0.14 ppm	Same	None

Sources: USEPA 2021a, NYSDEC 2021

Key: ppm = parts per million; ppb = parts per billion; mg/m^3 = milligrams per cubic meter; µg/m^3 = micrograms per cubic meter

Attainment Versus Nonattainment.

The USEPA classifies the air quality in an air quality control region (AQCR), or in subareas of an AQCR (e.g. counties), according to whether the concentrations of criteria pollutants in ambient air exceed the NAAQS. Areas within each AQCR are therefore designated as either "attainment," "nonattainment," "maintenance," or "unclassified" for each of the seven criteria pollutants. Attainment means that the air quality within an area is better than the NAAQS; nonattainment indicates that criteria pollutant levels exceed NAAQS; maintenance indicates that an area was previously designated nonattainment but is now attainment; and an unclassified air quality designation by USEPA means that there is not enough information to appropriately classify an area, so the area is considered attainment. In accordance with the CAA, each state or commonwealth must develop a State Implementation Plan, which is a compilation of regulations, strategies, schedules, and enforcement actions designed to move the state or commonwealth into compliance with all NAAQS.

General Conformity.

The federal General Conformity Rule (40 CFR Part 93) applies to federal actions in nonattainment or maintenance areas. Actions that are subject to the Transportation Conformity Rule or that are below de minimis thresholds are exempt from the rule. The General Conformity rule requires that a subject federal action must meet the requirements of a State Implementation Plan (SIP) or Federal Implementation Plan. More specifically, CAA conformity is ensured when a federal action does not cause a new violation of the NAAQS; contribute to an increase in the frequency or severity of violations of NAAQS; or delay the timely attainment of any NAAQS, interim progress milestones, or other milestones toward achieving compliance with the NAAQS.

Greenhouse Gas Emissions and Climate Change.

Greenhouse gases (GHGs) are gaseous compounds that trap heat in the atmosphere. These compounds are emitted from natural processes as well as human activities. The most common GHGs emitted from human activities include carbon dioxide (CO_2), methane, and nitrous oxide. GHGs are produced by the burning of fossil fuels and through industrial and biological processes. Scientific evidence indicates a trend of increasing global temperature over the past century due to an increase of GHGs in the atmosphere. Human activity has contributed to the increase in GHG concentrations. The climate change associated with this global warming is predicted to produce negative environmental, economic and social consequences across the globe.

As of date of this SEA, guidance for analysis of GHGs with respect to NEPA documents is in flux. Draft guidance from the President's Council on Environmental Quality (CEQ) issued in 2019 was rescinded on February 19, 2021. The final guidance from 2016 is currently under review and update. As such, there is no specific guidance on whether to include a specific emissions amount or threshold that should be used in determining significance, instead leaving that determination up to the document preparers. Previous draft CEQ guidance recommended that agencies consider 27,563 tons (25,000 metric tons) of carbon dioxide equivalent (CO_2e) emissions on an annual basis as a reference point below which a quantitative analysis of GHG is not recommended unless it is easily accomplished based on available tools and data (CEQ 2014). That previous guidance will be used for this analysis.

3.2.1.3 Existing Conditions

New York has areas that are currently classified as nonattainment areas, including the New York City metropolitan area, Jamestown area and St. Lawrence County (USEPA 2021b). Niagara County, where NFARS is located, was previously classified as nonattainment for first the 1979 1-hour ozone standard and then the 1997 8-hour ozone standard, but both of these standards have since been revoked. Because the standards were revoked, the county never transitioned to

maintenance status. However, the General Conformity maintenance area de minimis thresholds will serve as the primary significance indicators for this analysis, per Air Force guidelines (Air Force Air Quality Environmental Impact Analysis Process, 2019).

New York state is a member of the 13-state Ozone Transport Region (OTR) which encompasses many states in the northeast and mid-Atlantic. The CAA sets out specific SIP requirements for member states. Maintenance areas within the OTR have lower VOC de minimis thresholds than they otherwise would outside of the OTR.

NFARS does not have a New York Air Facility Registration or Title V air permit. Air emissions from stationary sources located at NFARS are not subject to limits other than those generally applicable via state and federal regulations.

New York contains none of the 156 listed national parks Class-I wilderness areas identified and protected in the 1999 Regional Haze rule (40 CFR Part 51 Subpart P). There are none within 100 kilometers (km) of the project area (USEPA 2021c). Therefore, impact on regional haze will not be considered in this analysis.

3.2.1.4 Affected Environment

This analysis looks at the temporary emissions generated by short-term activities such as the construction, demolition, and other work to be performed as part of the KC-135 Aircraft Fuel Hydrant System project. The nature of the proposed plans would not be expected to result in any long-term continuous emissions. Per February 4, 2021 CEQ regulations, the affected environment includes reasonably foreseeable planned actions and environmental trends in the affected areas; however, none were identified.

3.2.1.5 Environmental Consequences

The environmental impacts on local and regional air quality conditions near a Proposed Action are determined based on increases in regulated pollutant emissions compared to existing conditions and ambient air quality. Although a conformity analysis is not mandatory for attainment areas, impacts on air quality would be considered significant if the Proposed Action would have emissions that exceed the de minimis threshold levels established under the General Conformity Rule, or would lead to a violation of any federal, state, or local air regulation

For this analysis, increases above baseline emissions were estimated for temporary emissions sources, primarily due to the construction and demolition activities associated with Phases I and II of the proposed repairs to the NFARS hydrant fueling system. The activities are described earlier in this document and include the construction of a new AST, demolition of the existing tanks and equipment at the East POL Yard, repair and refurbishment of the Hydrant Transfer Loop and other miscellaneous construction and demolition. Note that any potential restoration

efforts for contaminated soils were not considered in this analysis, as projects of a similar type and magnitude would not be anticipated to trigger non-conformity. The Air Conformity Applicability Model (ACAM), version 5.0.16, developed by the Air Force Civil Engineering Center (AFCEC), was used to estimate air emissions for the Proposed Action.

Construction and demolition emissions were conservatively assumed to occur over the same single calendar year, in 2022. An ACAM output report can be found in **Appendix A**.

Implementation of the Proposed Action at the NFARS would result in minor, direct, short-term, adverse impacts on overall air quality from demolition and construction activities. The operation of various construction equipment during demolition and construction activities would create exhaust emissions and generate dust and other particles in the air during the execution of the described activities.

General Conformity.

Annual emissions would be below the General Conformity Rule de minimis thresholds (**Table 3-2**) and would not contribute to a violation of any federal, state, or local air regulations.

Table 3-2. Total Construction Emissions for NFARS Hydrant System Repair, Compared to General Conformity *De Minimis* Thresholds

Activity	Emissions (tons per year)							Exceeded *De Minimis* Levels?
	NO_X	VOC[b]	CO	SO_2	PM_{10}	$PM_{2.5}$	CO_2e	
Construction[a] *(CY2020)*	2.8	0.5	3.6	0.007	2.9	0.1	709	No
***De Minimis* Threshold**	100	50	100	100	100	100	-	

Notes:

a) Assumes all construction and demolition actions are completed within a single year time frame. Actual construction time could vary.

b) New York is within the Northeast Ozone Transport Region. The maintenance area general conformity threshold for VOC within the region is 50 tpy.

Due to the nature of the emissions totals and short duration, implementation of the Proposed Action at NFARS would not cause significant air quality impacts. The emissions would end with the completion of construction and demolition activities and there would be no long-term effects on air quality.

Greenhouse Gas Emissions and Climate Change.

The Proposed Action would generate GHG emissions from construction-related activities. Implementation of the Proposed Action would result in a minor, direct, short-term, adverse increase in GHG emissions. Total emissions in carbon dioxide equivalents (CO_2e) from construction and construction-related activities are estimated to be a maximum of 709 tons per year (tpy) or 643 metric tpy. These estimated short term GHG emissions are well below the

Best Management Practices.

Best management practices (BMPs) would be required and implemented for construction emissions. The construction would be accomplished in full compliance with current and pending New York regulatory requirements through the use of compliant practices or products. Measures would include water or other dust suppressant application as well as operational controls during high wind or other adverse atmospheric events. Any dust suppressants used other than water will be regulatory approved as safe for use.

No Action Alternative

Under the no action alternative, the Proposed Action would not be implemented, air emissions would remain at their current baseline levels, and there would be no impact on air quality.

3.2.2 Hazardous Materials and Solid Waste

3.2.2.1 Definition of Resource

This section describes the affected environment associated with hazardous materials used or stored at the project site. As defined in 49 CFR 171.8, "hazardous material" is a "substance or material that the Secretary of Transportation has determined is capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and has been designated as hazardous under U.S.C. Title Section 5103." For the purposes of this EA, the term "hazardous materials" refers to any item or agent (biological, chemical, or physical) that has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. By contrast, "hazardous waste", as defined by Resource Conservation and Recovery Act in 42 U.S.C. Section 6903(5) is "a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (a) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (b) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed."

Issues associated with hazardous materials typically center around waste streams, underground storage tanks (USTs), ASTs, and the storage, transport, use, and disposal of pesticides, and other industrial substances. When such materials are improperly used, they can threaten the health and well-being of wildlife species, habitats, soil and water systems, and humans.

Petroleum products include crude oil or any derivative thereof, such as jet fuel, gasoline, diesel, or propane. These products are considered hazardous materials because they present health hazards to users in the event of incidental releases, spills, or extended exposure to the product vapors.

perfluorooctanoic acid (PFOA), perfluorooctane sulfonate (PFOS), and perfluorobutane sulfonate (PFBS) are included in a class of synthetic fluorinated chemicals used in industrial and consumer products, including defense-related applications. This class of compounds is also referred to as per- and polyfluorinated alkyl substances (PFAS). In 1970, the USAF began using aqueous film forming foam (AFFF) as firefighting agents containing PFOS and PFOA to extinguish petroleum fires. Releases of AFFF to the environment routinely occurred during fire training, equipment maintenance, storage, and use. Manufacturers have reformulated AFFF to eliminate PFOS and the USAF has implemented an enterprise-wide program to remove PFOS-based AFFF from their inventory and replaced it with formulations based on shorter carbon chains, which may be less persistent and bioaccumulative in the environment. PFAS are not regulated as hazardous materials/waste; however, the USEPA has issued life-time health advisory (LHA) levels for PFOS and PFOA in drinking water and the State of New York has issued maximum contaminant levels (MCLs) for PFOS and PFOA.

The USAF established its Installation Restoration Program (IRP) as a comprehensive program to address hazardous materials/waste contamination released from past activities and to restore USAF lands to useable conditions. Under the IRP, the USAF identifies, investigates, and cleans up hazardous substances, pollutants, and contaminants that pose environmental health and safety risks at active military installations and formerly used defense sites. NFARS has an IRP that manages open sites on NFARS that require restoration and remediation because of contamination and tracks closed sites in case additional contamination is identified during future construction operations.

3.2.2.2 Affected Environment

Activities at NFARS involving the use of hazardous materials and petroleum products include aircraft and vehicle operation and maintenance, infrastructure and equipment maintenance, demolition, and construction. Examples of hazardous materials and petroleum products include oils, lubricants, coolants, batteries, cleaners, hydraulic fluids, adhesives, pesticides, and gasoline and diesel fuels. Hydraulic fluids and petroleum products, such as gasoline and diesel used for construction and demolition activities are stored in temporary ASTs or transported to the construction site in fueler trucks, as necessary. As noted above, PFAS are not regulated as hazardous materials/waste; however, they are present in AFFF, which is stored and used on station for petroleum-fire suppression.

Hazardous materials used by installation personnel were managed in compliance with Air Force Instruction (AFI) 32-7086 until February 2020 when these instructions were superseded by incorporation into AFMAN 32-7002 Environmental Compliance and Pollution Prevention. Government-owned hazardous materials are issued and reissued through the Hazardous Materials Emergency Planning and Response (HAZMART) central supply facility. This facility tracks all

government-owned hazardous material from purchase to disposal. Contractors working at the installation must also comply with all federal, state, and local regulations concerning the use, storage, and reporting of hazardous materials. Contractor compliance with regulations for the use of hazardous materials during construction projects at NFARS is dictated through contract specifications imposed during the procurement process (Powell 2021).

Hazardous wastes generated at NFARS by installation personnel were managed and disposed in compliance with AFI 32-7089 until February 2020 when these instructions were also superseded by incorporation into AFMAN 32-7002. Hazardous wastes and used petroleum products generated from NFARS activities include used oil, fuels, cleaning compounds, paints, demolition debris, and insecticide/pesticides. NFARS is permitted under the Resource Conservation and Recovery Act (RCRA) as a large quantity hazardous waste generator. Hazardous wastes generated by NFARS are stored in various satellite accumulation points (SAP) on the installation. Waste from the SAPs is then transferred to the RCRA permitted Central Accumulation Area until it can be disposed.

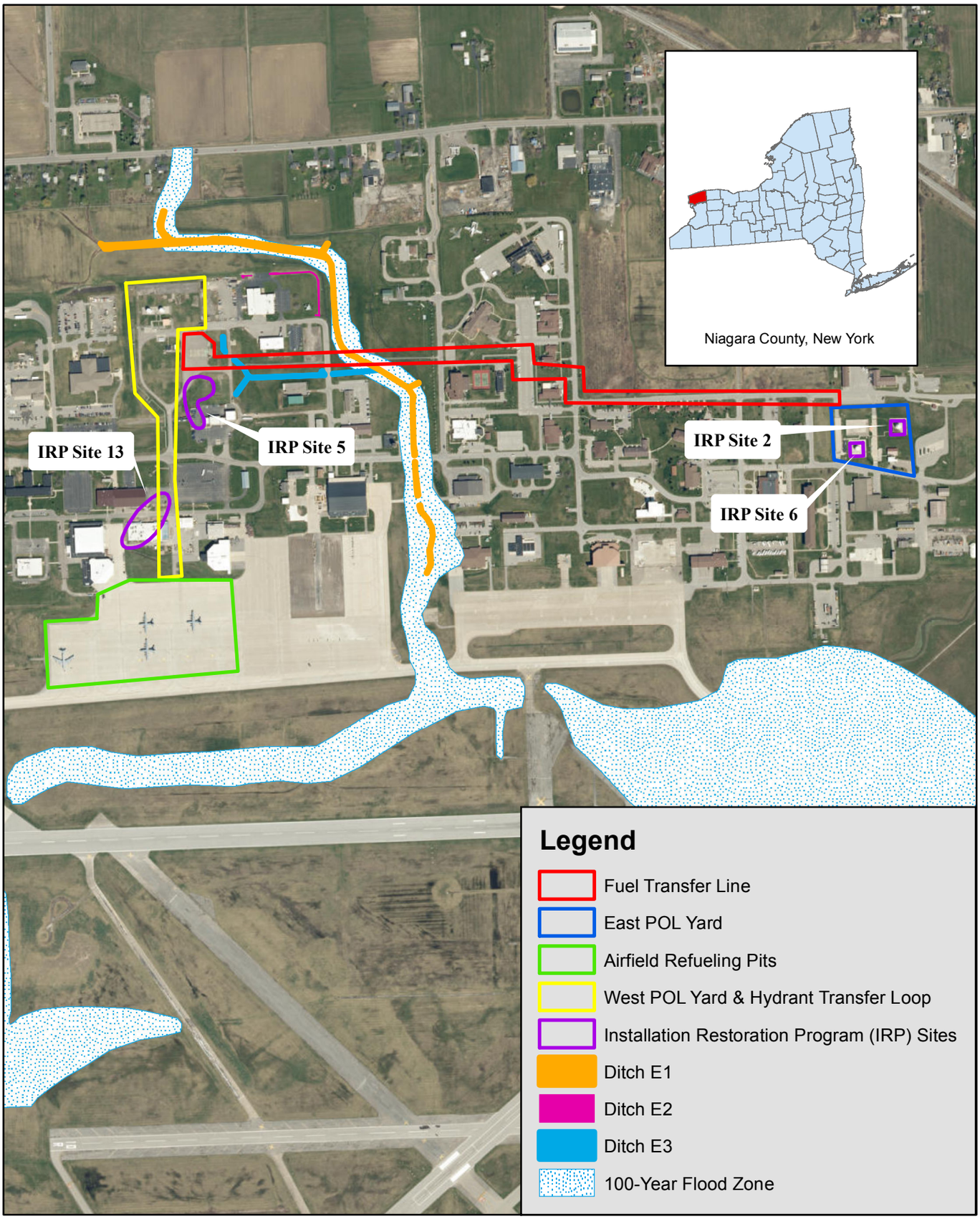
NFARS manages use and storage activities and management programs for hazardous materials and hazardous wastes in accordance with federal, NYSDEC, and local rules and regulations. NFARS accomplishes this through implementation of an Environmental Management System (EMS) defined in AFMAN 32-7002, Chapter 3. While AFMAN 32-7002 is not the governing publication for all aspects of USAF hazardous materials, it provides cross-functional, coordinating procedures that connect functional management policies, standards, and procedures. NFARS hazardous materials programs are implemented per Chapter 3—Hazardous Materials Management. Hazardous wastes are handled in accordance with Chapter 5—Hazardous Waste (HW) Management. In addition, AFMAN 32-7002 Chapter 7—Toxics Management defines how NFARS manages hazardous materials subject to regulation under the Toxic Substances Control Act (TSCA) and Emergency Planning and Community-Right-To-Know Act (EPCRA) regulations and directs implementation of TSCA and EPCRA programs. Per AFMAN 32-7002, NFARS has developed and maintains a Hazardous Waste Management Plan (HWMP) that outlines roles and responsibilities for program managers and operations personnel and establishes record keeping, and reporting procedures for hazardous materials labeling, handling, transportation, and turn-in for disposal (NFARS 2016). Hazardous waste management activities are coordinated through and approved by the Hazardous Waste section of NFARS Environmental Management Flight. In addition, NFARS's HAZMAT Plan identifies specific procedures and responsibilities for responding to hazardous material and petroleum product spills (NFARS 2020).

As of September 2016, NFARS is under a consent order with the NYSDEC to manage the 13 listed IRP sites addressed by the program (EA Engineering 2017). The IRP sites listed in the consent order have not achieved unlimited use/unrestricted exposure (UU/UE) levels for site contaminants of concern in impacted media. Some of the sites are in long-term monitoring or have corrective measures being implemented. As sites achieve UU/UE cleanup levels, NFARS will coordinate with the NYSDEC to have these sites removed from the consent order.

IRP Site 5 and Site 13 affect the West POL Yard and Hydrant Transfer Loop, respectively. IRP Site 5 is a combined former hazardous waste storage area and former Boeing/Michigan Aeronautical Research Center (BOMARC) antiaircraft missile complex. The contaminants at IRP Site 5 include chlorinated solvents and benzene, toluene, ethylbenzene, and xylenes (BTEX) volatile organic compounds (VOCs) in soil and groundwater and polychlorinated biphenyls (PCBs) confined to soil in concrete-lined exhaust pits where the BOMARC launch equipment and shelters were disposed (Ecology and Environment, 2000). PCB contamination has been detected in at least one missile launcher pit associated with Site 5. These pits are buried in place and soil disturbance is not proposed within the boundary of IRP Site 5. IRP Site 13 is a response area for a leaking 4,000-gallon UST that was first used for fuel storage and subsequently used for waste storage of spent solvent mixtures. The contaminants at IRP Site 13 are chlorinated VOCs in groundwater (Black & Veatch 2013). Remedial actions for chlorinated VOCs are underway for groundwater at both IRP Site 5 and Site 13 (Versar 2019). The remedial action at IRP Site 5 does not specifically address BTEX, which are present at lower concentrations than chlorinated VOCs. Remaining soil contamination in the West POL Yard is managed using Land Use Controls that dictate how any construction excavation work is performed per the Site Management Plan (SMP) for NFARS (EA Engineering 2017).

In the East POL Yard there are two closed IRP sites, Site 2 and Site 6. Both closed IRP Sites in the East POL Yard were created to respond to releases of JP-4 from bulk ASTs, Tank A and Tank C (SAIC 1991). Leaking pipelines were reported at Tank A in 1979 and at Tank C in 1982. Each leak was reported to have contaminated soil and groundwater with more than 4,000 gallons of JP-4. Limited removal of contaminated soil was completed during pipeline repairs. Although the IRP Sites in the East POL Yard were administratively closed with regulatory agency approval, petroleum hydrocarbons have been recently detected in soil and groundwater during construction work at the East POL Yard (Nue-Velle 2020). These IRP sites, in addition to other environmental constraints (100-year flood zone, wetland ditches) are shown in **Figure 3-1**.

Site Investigations (SIs) were completed at NFARS in 2017 at eight inspection areas where suspected or known releases of AFFF had occurred to determine if PFOS, PFOA, and/or PFBS are present in soil, sediment, groundwater or surface water at concentrations exceeding the



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Figure 3-1
Environmental Constraints Map

0 550 1,100 Feet
0 190 380 Meters

Niagara Falls Air Reserve Station
KC-135 Aircraft Fuel Hydrant System SEA
Niagara County, New York
June 2021

applicable USEPA and NYSDEC levels (Aerostar 2018). The findings of the Final SIs Report indicate that PFOS, PFOA, and PFBs are present in soil and groundwater at all the investigation areas.

After petroleum sheen was observed in groundwater infiltrating a POL pipeline repair trench in the East POL Yard in 2020, Neu-Velle LLC completed soil and groundwater sampling that indicated that PFOS and PFOA contamination is present in groundwater of the East POL Yard at concentrations greater than applicable USEPA advisory levels and the State MCLs for drinking water (Neu-Velle 2020). Petroleum hydrocarbon contamination was also identified in the soil and groundwater samples at concentrations greater than NYSDEC Part 375 Environmental Remediation Guidance Values, and Ambient Water Quality Standards, respectively.

Known contamination in the vicinity of the Proposed Action subject to remedial actions including Institutional Controls and Engineering Controls include:

- West POL Yard—Chlorinated VOCs and BTEX at IRP Site 5 and chlorinated VOCs at IRP Site 8; groundwater remedial action ongoing (EA Engineering 2017).
- Hydrant Transfer Loop—Chlorinated VOCs at IRP Site 13; groundwater remedial action ongoing (EA Engineering 2017).
- Airfield Refueling Pits – No IRP Site contamination identified, risk of total petroleum hydrocarbons (TPH) released from the out-of-service hydrant fueling system.
- East POL Yard—TPH from historical JP-4 pipeline leaks at IRP Site 2 and IRP Site 6; IRP Sites closed with ICs (EA Engineering 2017). TPH, PFOS, and PFOA detected in soil and groundwater during a pipeline repair project in 2020 (Neu-Velle 2020).
- BOMARC Shelters – There is known PCB contamination associated with IRP Site 5.

Per February 4, 2021 CEQ regulations, the affected environment includes reasonably foreseeable planned actions and environmental trends in the affected areas; however, none were identified.

3.2.2.3 Environmental Consequences

The threshold level of significance for impacts resulting from the use of hazardous materials or generation of hazardous waste would include a release of hazardous materials or a violation of local, state, or federal hazardous materials regulations.

The Proposed Action would result in minor, direct, short-term, adverse impacts on the environment, from the use of hazardous materials and the generation of hazardous wastes and solid wastes during construction. Small amounts of hazardous materials may be used, and

hazardous wastes may be generated, during construction activities; however, these would be managed and disposed of in accordance with existing management plans for NFARS operations.

Contractor compliance with existing management plans would be dictated through contract specifications to ensure construction operations comply with federal, state, and local regulations and requirements.

The Proposed Action would also result in minor, short-term, indirect, adverse impacts from hazardous wastes where contaminated groundwater or soils were encountered at IRP Sites during construction activities. The SMP for NFARS dictates procedures for all construction excavations at areas where Institutional Controls and Engineering Controls have been implemented for the IRP (NFARS 2017). If contaminated groundwater or soils are encountered during construction activities on or near IRP sites (including BOMARC shelters), the handling, storage, transportation, and disposal activities would be conducted in accordance with applicable federal, state, and local regulations; AFIs; and established NFARS management procedures.

Due to the possibility of leaks, spills, or other accidental releases, the Proposed Action may result in minor, long-term, adverse impacts from hazardous materials/wastes accumulation, handling, storage, transportation, and disposal activities during subsequent normal aircraft fueling operations. These operations would be conducted in accordance with the same applicable federal, state, and local regulations, AFIs, and NFARS management procedures as are applied to current aircraft fueling operations. Conversely, the Proposed Action would reduce the risk of hazardous materials spills from vehicles because fueling truck trips between the East POL Yard and the flightline would be significantly reduced or eliminated by implementation of the Proposed Action. The Proposed Action would also reduce the risk of fuel spills during fuel truck loading operations in the West POL Yard because the number of tank truck fueling operations would be significantly reduced.

No Action Alternative

No new construction or development activities are proposed under the No Action alternative. Therefore, the no action alternative would pose the same long term, adverse impacts to human health and the environment as current aircraft fueling operations.

3.3 Comparison of Effects

Table 3-3 provides a comparison of the anticipated environmental, social, and human resource effects of the Proposed Action and No Action alternative.

Table 3-3. Summary of Environmental Impacts for the Proposed Action and the No Action Alternative

Impact Category	Proposed Action Degree of Impact			No Action Alternative Degree of			EA Section Where Details Are Discussed
	Significant	Insignificant	No Impact	Significant	Insignificant	No Impact	
Land Use			X			X	Section 3.1.1
Geology			X			X	Section 3.1.2
Soils		X				X	Section 3.1.3
Topography		X				X	Section 3.1.4
Surface Water and Wetlands		X				X	Section 3.1.5
Groundwater		X				X	Section 3.1.6
Floodplains			X			X	Section 3.1.7
Coastal Zone Resources			X			X	Section 3.1.8
Vegetation and Wildlife		X				X	Section 3.1.9
Federally Listed Threatened or Endangered Species			X			X	Section 3.1.10
State-listed Threatened or Endangered Species			X			X	Section 3.1.11
Cultural Resources			X			X	Section 3.1.12
Visual Resources		X				X	Section 3.1.13
Airspace			X			X	Section 3.1.14
Socioeconomics		X				X	Section 3.1.15
Ground Transportation		X				X	Section 3.1.16
Safety and Occupational Health		X				X	Section 3.1.17
Environmental Justice			X			X	Section 3.1.18
Protection of Children			X			X	Section 3.1.19
Utilities		X				X	Section 3.1.20
Noise		X				X	Section 3.1.21
Air Quality		X				X	Section 3.2.1
Hazardous Materials and Solid Waste		X				X	Section 3.2.2

3.4 Mitigation Measures and Conclusions

All resource categories evaluated in this SEA resulted in a finding of insignificant or no impact; therefore, mitigation measures are not necessary. Compliance with applicable federal, state, and local regulations and requirements would occur, as necessary. Measures such as avoidance, limitation of action, restoration, protection and maintenance, replacement/ compensation, and adaptive management strategies may be utilized, as appropriate, during the implementation of the Proposed Action to further protect resources. However, no specific mitigation measures are necessary in order to reduce the effects of the Proposed Action to insignificant levels.

Based on the information and analysis presented in this SEA, both the Proposed Action and No Action alternative would result in insignificant effects; therefore, the preparation of an EIS is not necessary and the issuance of a FONSI would be appropriate.

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4. List of Preparers, Agencies Contacted, and Distribution

4.1 Preparers

Table 4-1 lists the preparers of this SEA.

Table 4-1. List of Preparers
KC-135 Aircraft Fuel Hydrant System, Niagara Falls, New York

Name	Education and Experience	Primary Responsibilities
Glenn Martin/Pond	B.S., Forest Resources, University of Georgia, 2004; M.S., Forest Resources, University of Georgia, 2010 17 years of experience in environmental investigation, due diligence, natural resource studies, impact analysis, and permitting for federal and state agencies and private clients	Senior NEPA Reviewer
Taylor Jordan/Pond	M.S., Environmental Management, Indiana University, 2014; B.S. Environmental Management, University of Georgia, 2012 5 years of experience in NEPA projects for the Department of Defense, federal and state agencies, and private clients	Project Scientist, responsible for preparation of SEA text
Michelle Bates/Tetra Tech	MESM, Environmental Science and Management, University of California, Santa Barbara, 2000; B.S., Biology, Pepperdine University, 1993 22 years of experience in NEPA and natural resources	Project Manager and senior technical reviewer
James Elliot/Tetra Tech	MA, Geological Sciences, University of California, Santa Barbara, 1993; BS Geology, Ohio State University, 1988; Professional Geologist, CA and UT. 27 years of experience environmental restoration, site assessment.	Senior technical review and quality assurance of hazardous materials and solid waste analysis
Stephen Dodson/Tetra Tech	B.A., Geological Sciences, Humboldt State University, Arcata California, 1994; Professional Geologist, CA 26 years of experience in hazardous materials and hazardous waste site due diligence analysis, site assessment, and restoration	Author of hazardous materials and solid waste analysis

Amy Noddings/Tetra Tech	MESM, Environmental Science and Management, University of California, Santa Barbara, 2008; Environmental Science, University of Notre Dame, 2006 12 years of experience in NEPA and natural resources	Peer review of air quality analysis
Sandy Lare/Tetra Tech	B.S. Environmental Studies/Environmental Planning, State University of New York at Binghamton, 1990 Over 25 years experience in environmental impact assessment and permitting	Prepared List of Required Permits
Jonas Berge/Tetra Tech	B.S. Chemistry, University of Wisconsin – Madison, 2006 B.S. Biological Aspects of Conservation, University of Wisconsin – Madison, 2006 12 years of air quality experience	Author of air quality analysis

4.2 IICEP Agency Distribution List

The following entities received copies of the SEA/FONSI and the DOPAA:

Table 4-2. IICEP/NAC Agency Distribution List

Agency/Organization Contacted	Date Letter Mailed (DOPAA)	Date Response Received (DOPAA)	Date Document Mailed (Draft Final SEA)	Date Response Received (Draft Final SEA)
FEMA Region II	May 3, 2021	N/A	TBD	TBD
U.S. Army Corps of Engineers – Buffalo District	May 3, 2021	N/A	TBD	TBD
U.S. Environmental Protection Agency Region 2	May 3, 2021	N/A	TBD	TBD
U.S. Fish and Wildlife Service	May 3, 2021	N/A	TBD	TBD
U.S. Department of Agriculture Service Center	May 3, 2021	N/A	TBD	TBD
New York State Department of Environmental Conservation	May 3, 2021	N/A	TBD	TBD
New York State Office of Parks and Recreation & Historic Preservation	May 3, 2021	May 6, 2021	TBD	TBD
Niagara Frontier Transportation Authority	May 3, 2021	N/A	TBD	TBD
Town of Niagara	May 3, 2021	N/A	TBD	TBD
Town of Wheatfield	May 3, 2021	N/A	TBD	TBD
City of Niagara Falls – Office of Environmental Services	May 3, 2021	N/A	TBD	TBD
Niagara County Department of Public Works	May 3, 2021	N/A	TBD	TBD
107 MSG/CEV	May 3, 2021	N/A	TBD	TBD
99th DIV (R), U.S. Army Reserves	May 3, 2021	N/A	TBD	TBD
Defense Logistics Agency	May 3, 2021	N/A	TBD	TBD
Tuscarora Nation	May 3, 2021	N/A	TBD	TBD
Seneca Nation of Indians	May 3, 2021	May 26, 2021	TBD	TBD
Cayuga Nation	May 3, 2021	N/A	TBD	TBD
Seneca-Cayuga Nation	May 3, 2021	N/A	TBD	TBD
Tonawanda Band of Seneca	May 3, 2021	N/A	TBD	TBD

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5. References

Black & Veatch Special Projects Corp. (Black & Veatch)
2013 *Final Five-Year Review Reports for Site 1: Building 600 JP-4 Pipeline Leak, ST011; Site 3: Former Landfill, LF008; Site 5: Former BOMARC Missile Site, DS004; Site 13 Former UST Pit, ST010; Site 7: JP-4 Tank Truck Spill, SS014; Site 8: Former Building 202 Drum Storage Yard, DS002; Site 10 Former Fire Training Area No. 1, FT005; Site 13 Former UST Pit, ST010; at Niagara Falls Air Reserve Station, New York,.* April.

Council on Environmental Quality (CEQ)
2014 "White House Council on Environmental Quality." Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change in NEPA Reviews, Dec. 2014.

Department of Defense
2019 United Facilities Criteria (UFC). Design: Petroleum Fuel Facilities. July 16, 2019.

EA Engineering, P.C and Its Affiliate EA Science and Technology (EA Engineering)
2017 *Site Management Plan, NYSDEC Registry Site#: 932106, USEPA RCRA ID#: NY0570024273, Niagara Falls Air Reserve Station, Niagara County Niagara Falls, New York.* May.

Ecology and Environment
2000. Focused RCRA Facility Investigation and Interim Corrective Measures Study Niagara Falls Air Reserve Statuib Niagara Falls, New York.

Federal Emergency Management Agency (FEMA)
2021. Flood Insurance Rate Map 36063C0331F. Effective May 4, 2021.

Federal Emergency Management Agency (FEMA)
2010 Flood Insurance Rate Maps 36063C0326E and 36063C0327E. Effective September 17, 2010.

HDR EOC, Inc. (HDR)
2012 Draft Integrated Natural Resources Management Plan (INRMP) and Environmental Assessment of the Implementation of the INRMP. Niagara Falls Air Reserve Station, New York. May.

Neu-Velle LLC (Neu-Velle)
2020 *POL Trench Soil and Groundwater Sampling Report, Niagara Falls Air Reserve Station.* June.

New York State Department of Environmental Conservation (NYSDEC)
2020 New York State Department of Environmental Conservation. Regulations for the control and Abatement of Air Pollution. Title 6, Chapter III, Part 257: Air Quality Standards. https://www.dec.ny.gov/regs/2492.html. Accessed 05/07/2021.

New York State Department of Environmental Conservation (NYSDEC) 2021
NYS Coastal Boundary Map. https://appext20.dos.ny.gov/coastal_map_public/map.aspx. Accessed on May 15, 2021.

Niagara Falls Air Reserve Station (NFARS)
2016 *U.S. Air Force Hazardous Waste Management Plan, Niagara Falls Air Reserve Station.* Prepared by Ecology and Environment Engineering, P.C. April.

2020a *Hazardous Materials Emergency Planning and Response (HAZMAT) Plan for Niagara Falls Air Reserve Station*, Revised. April.

Powell, K., Environmental Flight Chief (914 MSG/CEV)
2021 RE: NFARS Replacement Fuel Bulk Storage Facility Hydrant Repair - Phase 2 Information Request. 23 April.

Science Applications International Corporation (SAIC)
1991 *Remedial Investigation/Feasibility Study (RI/FS) Report 1987-1990, Niagara Falls International Airport, Niagara Falls, New York.* May.

United States Air Force (USAF)
2020 Integrated Cultural Resources Management Plan. Niagara Falls Air Reserve Station. June 16, 2020.

United States Air Force
2019 Air Force Air Quality Environmental Impact Analysis Process Guide – Fundamentals.

United States Census Bureau
2021 From: https://data.census.gov/cedsci/. Accessed May 15, 2021.

United States Environmental Protection Agency (USEPA)
2021a National Ambient Air Quality Standards Table. United States Environmental Protection Agency. From: https://www.epa.gov/criteria-air-pollutants/naaqs-table Accessed May 7, 2021.

United States Environmental Protection Agency (USEPA)
2021b The Green Book of Nonattainment Areas for Criteria Pollutants, April 30, 2021. United States Environmental Protection Agency. 2021. Downloaded from https://www.epa.gov/green-book/green-book-data-download. Accessed May 7, 2021.

United States Environmental Protection Agency (USEPA)
2021c List of Areas Protected by the Regional Haze Program. United States Environmental Protection Agency. 2021. From: https://www.epa.gov/visibility/list-areas-protected-regional-haze-program. Accessed December 12, 2019.

United States Environmental Protection Agency (USEPA)
1974 Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. March.

United States Fish and Wildlife Service (USFWS)
2011 Endangered and Threatened Wildlife and Plants; 90-Day Finding on a Petition To List the Eastern Small-Footed Bat and the Northern Long-Eared Bat as Threatened or Endangered. June 29.

United States Fish and Wildlife Service (USFWS)
2021 IPaC Resource List. Accessed May 15, 2021.

Versar and EA Engineering (Versar)
2019 *Data Summary Report June 2019 Basewide Sampling, Niagara Falls Air Reserve Station, New York.* June.

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Appendix A
Air Quality Emission Estimates and Record of Non-Applicability

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

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 Manual 32-7002, Environmental Compliance and Pollution Prevention; 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: NIAGARA FALLS ARS
State: New York
County(s): Niagara
Regulatory Area(s): Buffalo-Niagara Falls, NY

b. Action Title: 914th Air Refueling Wing KC-135 Aircraft Hydrant System - Supplemental Environmental Assessment

c. Project Number/s (if applicable):

d. Projected Action Start Date: 1 / 2022

e. Action Description:

The Proposed Action would consist of two distinct phases where Phase I includes construction and operation of the new fueling infrastructure, and demolition of the East POL Yard with abandonment of the transfer line. Phase I would occur first, and a proposed site plan has already been developed (see Figure 2-1). Phase II includes demolition and abandonment of the existing fueling infrastructure and restoration of associated contamination. Phase II would occur following Phase I, and projectspecific plans would be developed in the future. Specific details of Phase I and Phase II are described below.

Phase I

• Construction of one (1) new 10,000-BBL/ 420,000-gallon above ground storage tank at the West POL Yard
▪ Site layout with a dike area, foundations, and a ring wall would be constructed for the tank.
▪ Grading would be performed, and new impervious area would be required.
▪ Cathodic protection systems would be implemented for the tank.
▪ A fire access drive would be designated with additional construction for fire hydrants.
▪ Stormwater collected in the secondary containment would be discharged to existing on-base stormwater system.
• Demolition of East POL Yard and abandonment of transfer line
▪ Demolition of above ground infrastructure at the East POL Yard, including piping, equipment, and bulk storage tanks.
▪ Slurry fill existing transfer line between the East POL Yard and the West POL Yard.
• Construction of new Commercial Offloading Positions for the new tank at the West POL Yard
▪ Two commercial offload locations with containment area.
▪ Pump skids and controls for commercial offload.
▪ All jet fuel would be filtered into storage upon receipt.
• New Power Distribution and Controls at the West POL Yard
▪ A new motor control center would be installed for Building 919.
▪ The hydrant fuels area input/output and tank appurtenances would be integrated into the new pump control unit located in Building 919.
• New Fuels Lab Facility at the West POL Yard
▪ Construct new addition to Building 918 to accommodate new fuels lab and classroom.
• Repair Hydrant Transfer Loop
▪ Replacement of underground segment of existing 10-inch hydrant transfer loop from the West POL Yard to the airfield apron.
▪ Existing airfield refueling pits would be demolished and new refueling pits would be

installed.
▪ Existing concrete pavement would be demolished and replaced in kind for replacement of the hydrant transfer loop.
Phase II
• Demolition of portions of at-grade and underground infrastructure associated with the former fuel system at the East POL Yard
▪ Demolition of three (3) concrete secondary containment areas, including access stairs and pipe supports.
▪ Demolition of concrete and asphalt access drives within the tank farm area.
▪ Demolition of the existing oil water separator and associated concrete pad.
• Remedial investigation to determine the nature and extent of contamination in both the soil and groundwater due to the historical activities at the East POL Yard.
▪ Restoration efforts, if needed, would be designed and implemented at East POL Yard.
▪ NFARS would coordinate with the New York State Department of Environmental Conservation (NYSDEC), Division of Environmental Remediation (DER) throughout the process to confirm any remediation action is in compliance with current regulations and cleanup standards.
• At this time, Phase II is planned to be programmed as a Facility Sustainment, Restoration, and Maintenance (FSRM) project.

f. Point of Contact:

Name: Jonas Berge
Title: Air Quality Specialist
Organization: Tetra Tech, Inc.
Email: jonas.berge@tetratech.com
Phone Number: 414.640.3487

2. Analysis: 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. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

Based on the analysis, the requirements of this rule are: _____ applicable
__X__ not applicable

Conformity Analysis Summary:

2022

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
Buffalo-Niagara Falls, NY			
VOC	0.509	50	No
NOx	2.800	100	No
CO	3.555		
SOx	0.007		
PM 10	2.945		
PM 2.5	0.129		
Pb	0.000		
NH3	0.002		
CO2e	709.3		

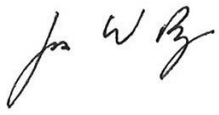
2023 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

		Threshold (ton/yr)	Exceedance (Yes or No)
Buffalo-Niagara Falls, NY			
VOC	0.000	50	No
NOx	0.000	100	No
CO	0.000		
SOx	0.000		
PM 10	0.000		
PM 2.5	0.000		
Pb	0.000		
NH3	0.000		
CO2e	0.0		

None of estimated emissions associated with this action are above the conformity threshold values established at 40 CFR 93.153 (b); Therefore, the requirements of the General Conformity Rule are not applicable.



Jonas Berge, Air Quality Specialist

19 May 2021
DATE

APPENDIX A

Record of Non-Applicability

Record of Non-Applicability (RONA) Concerning the General Conformity Rule (40 *Code of Federal Regulations* Part 51)

Name of Project: KC-135 Aircraft Fuel Hydrant System Repair

Location: Niagara Falls Air Reserve Station (NFARS), Niagara County, New York

The Proposed Action is to install a new fuel storage tank and associated equipment at the West POL yard, demolish the East POL yard and repair the fuel hydrant system.

Conformity under the Clean Air Act, Section 176, has been evaluated for the proposed action, in accordance with 40 *Code of Federal Regulations* (CFR) Part 51. The requirements of the General Conformity rule are not applicable to this project because air emissions associated with the Proposed Action are below the *de minimis* thresholds for criteria pollutants, for each year of construction and/or operation of the Proposed Action.

Peak total direct and indirect emissions (year 2022) from this project/action have been estimated at (only include information for the applicable pollutants):

2.8	tons/year of nitrogen oxide
0.5	tons/year of volatile organic compounds
2.9	tons/year of particulate matter less than or equal to 10 micrometers in diameter
3.6	tons/year of carbon monoxide
0.007	tons/year of sulfur dioxide

These levels are below the conformity threshold values established in 40 CFR 93.153 (b). This project/action is not considered regionally significant under 40 CFR 93.153 (i).

_____

Base Civil Engineer
914 MSG/CE
Niagara Falls Air Reserve Station

_____

Date

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Appendix B

Agency/Organization Responses

NEW YORK STATE OF OPPORTUNITY. Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

May 06, 2021

Taylor Jordan
Pond & Company
3500 Parkway Ln #500
Peachtree Corners, GA 30092

Re: AIR FORCE
914th Air Refueling Wing KC-135 Aircraft Fuel Hydrant System at Niagara Falls Air Reserve Station
2405 Franklin Dr, Niagara Falls & Wheatfield, Niagara County, NY
21PR02952

Dear Taylor Jordan:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the project in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources. They do not include potential environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

Based upon this review, it is the opinion of the New York SHPO that no historic properties, including archaeological and/or historic resources, will be affected by this undertaking.

If further correspondence is required regarding this project, please be sure to refer to the OPRHP Project Review (PR) number noted above.

Sincerely,

R. Daniel Mackay

Deputy State Historic Preservation Officer
Division for Historic Preservation

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New York Ecological Services Field Office
3817 Luker Road
Cortland, NY 13045-9385
Phone: (607) 753-9334 Fax: (607) 753-9699
http://www.fws.gov/northeast/nyfo/es/section7.htm

In Reply Refer To: June 15, 2021
Consultation Code: 05E1NY00-2021-SLI-3039
Event Code: 05E1NY00-2021-E-09449
Project Name: Niagara Falls Air Reserve Station

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*). This list can also be used to determine whether listed species may be present for projects without federal agency involvement. New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list.

Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the ESA, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC site at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list. If listed, proposed, or candidate species were identified as potentially occurring in the project area, coordination with our office is encouraged. Information on the steps involved with assessing potential impacts from projects can be found at: http://www.fws.gov/northeast/nyfo/es/section7.htm

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the Services wind

energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the ESA. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New York Ecological Services Field Office
3817 Luker Road
Cortland, NY 13045-9385
(607) 753-9334

Project Summary

Consultation Code: 05E1NY00-2021-SLI-3039
Event Code: 05E1NY00-2021-E-09449
Project Name: Niagara Falls Air Reserve Station
Project Type: MILITARY OPERATIONS / MANEUVERS
Project Description: Fuel hydrant relocation and fuel storage project for NFARS
Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@43.113639649999996,-78.94168813750349,14z

Counties: Niagara County, New York

Endangered Species Act Species

There is a total of 0 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

From:	Joe Stahlman
To:	MAGNUSSON, CARL J Col USAF AFRC 914 ARW/CC; MATHEWS, JAMES G GS-12 USAF AFRC 914 MSG/CEV; President Matthew Pagels; John Waterman
Subject:	[Non-DoD Source] Re: Proposed Action and Alternatives for the 914th Air Refueling System
Date:	Wednesday, May 26, 2021 3:42:41 PM
Attachments:	image001.png

Col. Magnusson,
Thank you for your letter. Seneca Nation THPO has reviewed your letter and our records. At this time, we have determined a "No Effect" for your project. However, if anything changes during the project or anything is uncovered, please contact me.

Thank you,

Joe

Dr. Joe Stahlman
Director
Seneca-Iroquois National Museum
Tribal Historic Preservation Office
Onöhsagwë:De' Cultural Center
82 W. Hetzel Street
Salamanca, NY 14779
Phone (716) 945-1760
Cell (716) 277-5580
Joe.Stahlman@sni.org

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