U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT

Martin State Airport
Middle River, Maryland

Lockheed Martin Corporation Groundwater Plume Treatment Facility

1. **Introduction.** This document is a Finding of No Significant Impact (FONSI) on the environment as a result of the proposed Lockheed Martin Corporation (LMC) Groundwater Plume Treatment Facility located in the Dump Road Area (DRA) at Martin State Airport (MTN). The LMC is a tenant of the Maryland Aviation Administration (MAA), owner and operator of Martin State Airport (MTN). The proposed project area is approximately 25 acres located between Taxiway T and Frog Mortar Creek on the east side of the airport property, and a narrow utility corridor extending south from Eastern Boulevard along Lynbrook Road to the DRA.

   The Federal Aviation Administration (FAA) must comply with the National Environmental Policy Act of 1969 (NEPA) before being able to take the federal action of further processing of an application for Federal assistance in funding various airport development and/or for approval of the Airport Layout Plan (ALP) that depicts the proposed airport development projects. Approval of the ALP is authorized by the Airport and Airway Improvement Act of 1982, as amended (Public Laws 97-248 and 100-223). The issuing of this FONSI does not constitute a commitment by the FAA to provide federal financial assistance for these actions.

2. **Project Purpose and Need.** The proposed project is to control migration of contaminated groundwater from the DRA at concentrations that can lead to exceedances of water quality standards in Frog Mortar Creek. This action will also comply with the regulatory requirements of the Maryland Hazardous Substance Response Plan (MDHSRP) as required under Title 7, Subtitle 2 of the Environmental Article of the Maryland Annotated Code and under the authority of Maryland Department of the Environment (MDE) per the Superfund Memorandum of Agreement (MOA).

   Remediation of the site is necessary to address the volatile organic compounds (VOC) levels in Frog Mortar Creek, and to comply with COMAR Title 26, Subtitle 14, and to limit the lateral migration of contaminated groundwater to Frog Mortar Creek by constructing a groundwater extraction and treatment system that will gain hydraulic control of contaminated water migrating towards Frog Mortar Creek; preventing human exposure (through showering, drinking, or irrigation) to groundwater containing VOC concentrations greater than preliminary remediation goals (PRGs); and preventing worker exposures to VOCs through vapor intrusion into buildings. Implementation of the project constitutes an

effective remedy to alleviate the potential for off-site migration and potential human exposure, and complies with MDHSRP requirements.

3. **Proposed Project.** The following is a listing of the various components of the proposed project:

- Approximately 14,400 SF treatment facility
- Installation of groundwater extraction wells
- Construct an outfall discharge in Frog Mortar Creek
- Widening of access roads to facility
- Utility (water, electric, communication) installation
- Stormwater Management System

4. **Reasonable Alternatives Considered.** As described in Section 3 of the attached Environmental Assessment (EA), alternatives, to include the no action alternative, were evaluated for the proposed project.

5. **Assessment.** The attached EA addresses the effect of the proposed project on the quality of the human and natural environmental, and is made a part of this finding. The following impact analysis highlights the more thorough analysis presented in the EA prepared in September 2014.

Air Quality. Martin State Airport is located within Baltimore County, which is designated as being in non-attainment status for the ozone one-hour standard, in "moderate" non-attainment for the ozone 8-hour standard, and in non-attainment for the PM2.5 24-hour standard. The applicability of the federal Clean Air Act (CAA) General Conformity Rule (40 CFR 90 Sec 153) has been evaluated because of these designations. An applicability analysis was conducted to evaluate de minimis thresholds, and the estimated construction-related emissions using AP-42 were found to be within the General Conformity Rule de minimis levels for PM2.5, for NOx and SO2 precursors, and for ozone (O3) precursors of NOx and VOCs. Therefore, the proposed project automatically conforms to the State Implementation Plans (SIP) for PM2.5 and O3 and no further assessment is necessary (EA-Table 5-1).

Coastal Resources. The project area falls within the Maryland Coastal Zone Management area and therefore must comply with Federal and State Coastal Zone regulations. A Federal Consistency review was submitted as part of the draft EA. Maryland Department of the Environment concurred that the proposed action is consistent with the Maryland Coastal Zone Management Program, contingent upon authorization of the proposed wetlands and waterways impacts by the Wetlands and Waterways Program, and compliance with the Chesapeake Bay Critical Area requirements (EA-Appendix C).

Fish, Wildlife, and Plants. For this analysis impacts to biotic resources, including fish, wildlife, and plants were considered by evaluating the expected impact to habitats and forested areas within the DRA. To quantify these impacts

the limits of both Habitat Protection Areas (HPAs) and forest boundaries were compared with the proposed limits of disturbance for the project. Although there will be some permanent impacts, given the relatively small nature of the impacted area, previous disturbance in the DRA, and lack of unique wildlife habitat, no significant ecological impact to the habitat in the general vicinity is expected to occur as a result of this activity.

The project area is within an area classified as an intensely developed area (IDA), and DRA forest stands are less than 50 acres in size, none of the forested areas in the DRA qualify as forest interior dwelling species (FIDS) habitat. The location of the treatment facility was chosen to be in the largest non-forested area available on-site, thus minimizing forest-related impacts to the maximum extent practicable. There will be some permanent impacts, however given that only a narrow portion of the forest edge along the existing road will be affected, it is not expected that any significant wildlife impacts, particularly to species preferring interior forest, will occur.

The Maryland Department of Natural Resources (MDNR) Wildlife and Heritage and the United States Fish and Wildlife Service (USFWS) stated that no state or federally proposed or listed endangered or threatened species are known to exist in the project area. Therefore, no further consultation with these agencies is required, and it is expected that the proposed remediation project would have no effect or impact on listed species under MDNR and USFWS jurisdiction. No significant or adverse effects are expected to threatened and endangered species, bald eagles, or essential fish habitat (EA-Figure 1 & 2, Table 5-2 & 3, Appendix C).

Historical, Architectural, Archeological and Cultural Resources. The Maryland Historical Trust (MHT) was consulted in order to document historic resources within the project's area of potential effect (APE). Coordination with the MHT indicated that no listed historic properties (or properties eligible for listing) on the National Register of Historic Places (NRHP) occur within the DRA APE. The MHT concurred that the proposed project will have no adverse effect on historic properties (EA-Appendix C).

Water Resources. A segment of the unnamed tributary stream located within the DRA, as well as a small area below the mean high water line (tidal boundary) of Frog Mortar Creek will be impacted by the proposed project. Temporary impacts to water quality during construction may occur due to stream diversion, erosion, or vegetation removal.

A wetland delineation was conducted in the project area in accordance with the United States Army Corps of Engineers (USACE) Wetlands Delineation Manual, Technical Report Y-87-1 (USACE, 1987), and Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (USACE, 2008). Several unavoidable impacts to wetland areas,

wetland buffers, and intermittent stream channel will result from implementation of the proposed project.

Pursuant to Section 404 of the Clean Water Act (CWA) and the Maryland Nontidal Wetlands Protection Act, a Joint Federal/State Permit for the Alteration of any Floodplain, Waterway, Tidal or Nontidal Wetland in Maryland has been obtained from USACE and MDE before any surface water resources are disturbed. The permitting process ensures that water quality concerns are addressed, and that mitigation plans, if required, are incorporated into the final design of the proposed project. Because all of the proposed impacts to wetlands, their associated buffers, and total stream impacts are considered to be minimal and qualify for coverage under the Maryland State Programmatic General Permit (MDSPGP-4) the impacts are not considered significant therefore no mitigation is required (EA-Appendix C, G).

6. **Public Participation.** The Draft Supplemental EA was made available for public review from October 2, 2014 to November 21, 2014 (EA-Appendix C).

7. **Mitigation Measures.** The FAA requires that the MAA implement the following conservation measures, if the Tenant decides to pursue the proposed project:

   a. Develop and implement erosion and sediment control measures in accordance with the latest version of the Maryland Standards and Specifications for Erosion and Sediment Control Handbook and Maryland Stormwater Management Laws and Regulations.
   b. Pursuant to Section 404 of the Clean Water Act (CWA) and the Maryland Nontidal Wetlands Protection Act, a Joint Federal/State Permit for the Alteration of any Floodplain, Waterway, Tidal or Nontidal Wetland in Maryland must be obtained from the United States Army Corps of Engineers (USACE) and MDE prior to construction.
   c. Installation of a 70-foot, six-inch diameter outfall discharge pipe with end diffusers and bottom anchoring system below the mean high water (tidal) line of Frog Mortar Creek. Impacts below the tidal boundary line will be avoided and minimized to the maximum extent practicable to minimize overall impact to the creek. The preferred alternative's impact on bottom habitat will be approximately 1,400 sf. A marker, buoy, or other aid to navigation may be placed near the discharge pipe to alert boaters to the location of this structure; a final determination of the need for this feature will be made in coordination with the United States Coast Guard (USCG). If a navigation aid is required, this feature will be employed in full compliance with USCG regulations under 33 CFR Part 66.
   d. A National Pollutant Discharge Elimination System (NPDES) permit for the point source discharge from the outfall discharge must be acquired from MDE/USEPA.
   e. A permit to construct (PTC) and (potentially) a permit to operate (PTO) must be acquired before construction and operation of the facility for the air stripper. The PTC/PTO will include any necessary mitigation in the

form of emission minimization measures to be employed to ensure that emissions are within permissible levels.

f. As a condition of the Chesapeake Bay Critical Area Commission (CAC) approval forest impacts within the expanded tidal buffer (37,957 sq. ft.) will be mitigated at a 2:1 ratio, while impacts outside of the buffer (120,567 sq. ft.) are to be mitigated at a 1:1 ratio. The total forest mitigation is provided in order to offset the proposed impacts to forest resources of 196,481 sf (4.5 acres). Requirement of two years to identify a mitigation site for forest impacts with progress reports submitted every three months and one year to complete planting after CAC approves the planting plan for the mitigation site.
g. Best management practices (BMPs) will be followed to avoid and minimize any potential impacts to the environment.
h. All required permits and approved plans for the proposed project must be obtained prior to construction.
i. Construction contract provisions must contain the provisions of FAA AC 150/5370-10E, *Standards for Specifying Construction of Airports* item P-156, temporary air, water pollution, soil erosion and siltation control and FAA AC 150/5320-5C, *Airport Drainage*.

8. Finding of No Significant Impact

I have carefully and thoroughly considered the facts contained in the attached EA. Based on that information I find that the proposed Federal action is consistent with existing national environmental policies and objectives as set forth in section 101(a) of the National Environmental Policy Act of 1969 (NEPA). I also find the proposed Federal Action, with the required mitigation referenced above will not significantly affect the quality of the human environment or otherwise include any condition requiring consultation pursuant to section 102 (2)(C) of NEPA. As a result, FAA will not prepare an EIS for this action.

APPROVED:

_____ 9/15/15

Matthew J. Thys, Manager
Washington Airports District Office

Date

DISAPPROVED:

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Matthew J. Thys, Manager
Washington Airports District Office

Date