7.12 HUMAN HEALTH AND SAFETY HAZARDS

7.12.1 Affected Environment

The following section describes the affected environment pertaining to human health and safety hazards as a result of current military actions on KTA.

Hazardous Materials and Waste Management

Hazardous materials and wastes that are used and generated at KTA are regulated by the same federal, state, and Army regulations as at SBMR. The regulations include implementing the current Army hazardous waste standard operating procedures and the Army spill contingency plan. Any hazardous waste that is produced during training exercises at KTA is managed at hazardous waste storage points until the DRMO picks up the waste and ships it directly off-island for proper disposal (Akasaki 2002b).

Specific Health and Safety Hazards

The following sections address specific hazardous materials and wastes that may be used, stored, or transported within KTA, as well as wildfire issues. Hazardous material and wastes consistently affect the environment and often have specific regulations that govern their use, storage, and disposal.

Ammunition

KTA is the second largest training area on O'ahu. This area can support larger scale maneuver exercises (Nakata Planning Group, LLC 2002b, 3). Although remnants of past live-fire training have been found on KTA, no live-fire activities currently take place there. KTA provides the space for infantry and associated support units to maneuver. No live bullets are fired during maneuvers, and blanks are used in rifles and machine guns, along with MILES equipment, provided to allow units to maneuver against the enemy, to engage the enemy, and to receive incoming fire (Garo 2002a).

Installation Restoration Program

There are no IRP sites under investigation on KTA.

Lead

The properties of and regulations for lead are described in detail in Chapter 3, Section 3.12 of this document. No lead surveys have been conducted at KTA, but any future lead survey information will be available on the DPW lead and asbestos database.

Asbestos

The properties of and regulations for asbestos are described in detail in Chapter 3, Section 3.12 of this document. Current asbestos survey information for KTA is maintained on the DPW lead and asbestos database.

To date, the DPW has surveyed for ACM at three structures on KTA, all of which contained nonfriable but no friable ACM, and one of which was set for demolition (USARHAW 2002d).

Polychlorinated Biphenyls

The KTA former transformer site, used in conjunction with the former missile launch facility, consists of two transformer pads at the abandoned generator building on a former Nike missile launch facility within the training area. The site is fairly remote and is accessible only over a rough road that is controlled by a guard shack and gate.

The missile launch facility generator structure consisted of a concrete block building that housed the emergency power generators and two fenced enclosures for the power distribution transformers. The transformers used at this site were of the type that typically contained PCBs in cooling oil.

The US Army, Engineering Services Division, sampled the site on September 12, 1994. Samples of the water and sludge in one of the transformers and the oil in the remaining three transformers were tested for PCB Aroclor congeners or constituents. PCBs were detected in the transformer oil samples and a water/sludge sample. Soil samples were also obtained near the concrete transformer pad, but PCBs were not detected in those samples. Under current site uses, the former transformer site does not appear to pose a significant threat to human health and the environment. However, if hazardous material or waste contamination is present in the surface soil, changes in use could create new and more immediate targets and associated risks.

There are ongoing efforts to assess and remediate possible PCB contamination sources throughout the Proposed Action project area, including KTA. Devices containing regulated levels of PCBs that are on-line are to be replaced with non-PCB devices or refilled and reclassified to non-PCB status, in accordance with requirements outlined in 40 CFR Part 761.30(a)(2)(v). Devices containing regulated levels of PCBs that are off-line are to be removed from the installation and disposed of (PRC 1995, 4).

Between February 4 and 28, 1991, Power Systems Analysis, Inc., conducted a survey to determine the concentration of PCBs in the electrical distribution equipment in Hawai'i military installations. The survey phase of this project included collecting dielectric fluid and recording pertinent data from approximately 1,500 pieces of electrical equipment (USAEHA 1993a, C-5-8). Of the seven samples collected from KTA during this study, none contained PCBs.

Based on historical and ongoing sampling and analysis, devices that are found to contain regulated levels of PCBs are either upgraded to non-PCB devices or are refilled or removed, drained, packaged, and disposed of in accordance with 40 CFR Part 761 (PRC 1995, 4).

Electromagnetic Fields

There is one RAWS on KTA. RAWS require personnel to be on-site only for maintenance and not for operations, and they are typically located in remote wildland areas. The general public typically is not allowed in areas that could contain EMF hazards from Army equipment, minimizing exposure to potential sources of EMF. The standard Army communications equipment at KTA is operated by qualified personnel in accordance with regulatory requirements.

Petroleum, Oils, and Lubricants

Underground Storage Tanks

Only one UST remains in use on KTA, identified as tank KTA-4. Two other USTs, both containing diesel fuel, were removed in 1994 and 1998, in compliance with USEPA regulations.

Appendix K-4 lists all current and permanently decommissioned USTs and LUSTs on KTA. Additionally, Appendix K-4 provides location, responsible party, construction, and content information of all USTs and inspection and remediation status information for all LUSTs. There was one LUST site on KTA; it was remediated and was issued a clean closure status in 1999.

All industrial fueling is conducted from the "super station" at SBMR. Fuels, oils, or other hazardous materials needed for training exercises are brought with the unit to KTA and staged in a temporary storage point. Unused materials are either brought back to SMBR with the unit or are properly stored for pickup and disposal by DRMO-HI.

Aboveground Storage Tanks

There is one 288-gallon AST on KTA, in Building 67, and it is used to store liquid petroleum gas, also known as propane, for hot water heaters. Information on this tank is included in Appendix K-4.

Oil/Water Separators, Wash Racks, and Grease Traps

There are reportedly no oil/water separators, wash racks, or grease traps on KTA, and all maintenance is conducted at SBMR.

Pesticides/Herbicides

The Natural Resources Department is the only pesticide/herbicide user on KTA, where there are no pesticides/herbicides stored. Pest management is covered under the USAG-HI installation pest management plan (Yamamoto 2002).

Wildfires

There is a high risk of wildfires at KTA because rugged terrain in this area limits accessibility for suppression and increases the risk of fires spreading to sensitive native habitat (USARHAW and 25th ID[L] 2001a, 176 and 223-224). Highly flammable fuels adjacent to native plants further increase the risk of fire damage. Fires may start in adjacent areas, such as ridge top subdivisions or at sites within KTA that are accessible to the public. However, fires are typically started by unauthorized use of pyrotechnics, such as hand flares and smoke grenades. KTA is not a live-fire training area, and smoke grenades and other pyrotechnics are permitted in only designated areas. Blank ammunition, SRTA, and pyrotechnics are the only types of ammunition used. KTA depends on the closest responding forces, such as the City and County of Honolulu Fire Department, for first response and immediate Federal Fire Department/Range Control response. There is one RAWS on KTA to aid in determining weather conditions and the threat of wildfires.

Records indicate that there have been 16 fires at KTA since 1996 (USARHAW and 25th ID[L] 2003, 7-22). These fires burned less than 300 acres (121 hectares) total. A single fire of 250 acres (101 hectares) in the late 1990s in training area C-2 accounted for 85 percent of the recorded acreage burned. About half of the fires were started in August, but there is no clear pattern to the time of ignition. A number of different pyrotechnic devices, including smoke grenades, simulators, and star clusters, as well as blanks, started the fires.

Two wildfire areas have been designated based on the location of the most commonly used training areas and roads (USARHAW and 25th ID[L] 2003, 7-23 and 7-25). Each area was assigned an ignition potential, fuels hazard, and habitat value based on the best available information. The western half of KTA has high and very high wildfire prevention priorities. Most of the eastern half of KTA has a low-to-moderate wildfire prevention priority, and it also has an area of moderate wildfire prevention priority.

Figure 7-29 shows the location of fire management facilities. Fire protection in the fire management area includes firebreaks and fuels modification (USARHAW and 25th ID[L] 2003, 7-24). According to the IWFMP, there are no firebreaks at KTA, though there are a number of roads that will serve as fire control lines during fire suppression. These roads will not be kept at firebreak standards and will be maintained only to the extent necessary for vehicle traffic. There are no plans for fuels modifications at KTA.

Schofield Barracks Range Control is responsible for retrieving weather data from the KLOA RAWS (USARHAW and 25th ID[L] 2003, KTA-6). The burn index, as determined by the National Fire Danger Rating System, will be used to rank fire danger based on known ignition sources. Based on this system, green and red characterize fire conditions at KTA.

KLOA is not a live-fire training area. It depends on the closest responding forces, such as the City and County of Honolulu Fire Department, for first response and immediate Federal Fire Department/Range Control response (USARHAW and 25th ID[L] 2001a, 339). There are no RAWS on KLOA to aid in determining weather conditions and the threat of wildfires.

Only one fire has been recorded at KLOA. It burned 310 acres (125 hectares) in September 2000 (USARHAW and 25th ID[L] 2003, 7-13). The reported ignition source was hot brass/muzzle flash and must have been caused by blank fire because no other munitions are allowed at KLOA. Despite the size of this fire, blanks represent a very low fire ignition threat, based on the number of fires they have caused throughout the USARHAW fire history. No analysis for fire trends is possible at KLOA with such limited data.

A wildfire prevention analysis requires that a parcel of land be divided by significant barriers to fire, either human-made or natural, in order to create units that are then given a prevention priority (USARHAW and 25th ID[L] 2003, 7-15). Because there are no readily definable barriers within KLOA, it is not possible to carry out a wildfire prevention analysis. However, generally speaking, areas at low elevation are dominated by flammable alien species, while higher elevations are less fire prone. Conversely, low elevations harbor few

Figure 7-29
Fire Management Facilities at Kahuku and Kawailoa Training Areas

federally listed species, while high elevations contain many. For these reasons, fire prevention dollars would be better spent in low elevation areas concentrated around heavily used training locations.

Figure 7-29 shows the location of fire management facilities. Fire protection in the fire management area includes firebreaks and fuels modification (USARHAW and 25th ID[L] 2003, 7-16). A new RAWS will be purchased and placed at Pu'u Kapu in fiscal year 2004 to facilitate fire danger rating at KLOA. There are no firebreaks at KLOA, though Drum Road can serve as a control line during fire suppression. It will not be kept at firebreak standards and will be maintained only for vehicle access. There are no plans for any firebreaks to be built in KLOA. Several other roads throughout the installation will provide access for fire fighting vehicles. There are no plans for any fuels management at KLOA at this time, except for Drum Road. Should this road be built, unmanaged fuels will be cut and herbicide will be applied. Fine fuels will be kept to less than a foot high or less than 20 percent crown cover, which the Army will monitor once annually. It is unlikely that much if any fuels management will be required along this route, most of which passes through heavily managed agricultural fields.

Schofield Barracks Range Control is responsible for retrieving weather data from the KLOA RAWS (USARHAW and 25th ID[L] 2003, KLOA-6 and KLOA-20). The burn index, as determined by the National Fire Danger Rating System, will be used to rank fire danger based on known ignition sources. Based on this system, green and red characterize fire conditions at KLOA.

Drum Road is expected to have wildfire characteristics similar to the KTA and KLOA because of its proximity to these areas. Thus the rugged topography of Drum Road constrains fire suppression efforts (USARHAW and 25th ID[L] 2001a, 339). Highly flammable plants adjacent to native plants increase the risk of fire damage. Fires may start in adjacent areas, such as ridge top subdivisions or at sites within KLOA that are accessible to the public.

7.12.2 Environmental Consequences

Summary of Impacts

This section is a discussion of potential impacts of implementing the Proposed Action and alternatives at KTA and at KLOA, located just south of KTA. Three significant impacts were discovered under the Proposed Action or the RLA Alternative, and all could be mitigated to be less than significant, as follows:

- Construction and demolition at KTA could expose workers to lead-based paint or lead-containing construction materials, creating a significant health and safety risk.

- Construction and demolition at KTA could expose workers to asbestos-containing materials, which could be a significant health and safety risk.

- The proposed CACTF is on a location that formerly contained PCB-contaminated soils. Moving these soils could create a significant impact by releasing the PCBs into the air and exposing construction workers, Army personnel, and the environment.

Each of these impacts could be reduced to less than significant through mitigation. All other human health and safety issues were identified as being either less than significant or as having no impact. There are no human health and safety hazard impacts associated with KLOA under the Proposed Action or the RLA Alternative.

Impacts and methodology and significance thresholds are discussed in Chapter 4, Section 4.12.1. Table 7-28 summarizes the potential human health and safety hazards for KTA that have been identified in this analysis.

Table 7-28
Summary of Potential Human Health and Safety Hazard Impacts at KTA/KLOA

	Proposed Action		Reduced Land Acquisition		No Action	
Impact Issues	**KTA**	**KLOA**	**KTA**	**KLOA**	**KTA**	**KLOA**
Hazardous materials management	⊙	○	⊙	○	⊙	⊙
Hazardous waste management	⊙	○	⊙	○	⊙	⊙
Ammunition	⊙	○	⊙	○	○	○
Unexploded ordnance	○	○	○	○	○	○
General training	⊙	○	⊙	○	○	○
Installation restoration program sites	○	○	○	○	○	○
Lead	⊘	○	⊘	○	○	○
Asbestos	⊘	○	⊘	○	○	○
Polychlorinated biphenyls	⊙	○	⊙	○	○	○
Electromagnetic fields	⊙	○	⊙	○	⊙	⊙
Petroleum, oils, and lubricants	⊙	○	⊙	○	⊙	⊙
Pesticides/herbicides	○	○	○	○	○	○
Biomedical waste	○	○	○	○	○	○
Radon	○	○	○	○	○	○
Wildfires	⊘	⊘	⊘	⊘	⊙	⊙

In cases when there would be both beneficial and adverse impacts, both are shown on this table. Mitigation measures would only apply to adverse impacts.

LEGEND:

⊗ = Significant
⊘ = Significant but mitigable to less than significant
⊙ = Less than significant
○ = No impact
+ = Beneficial impact
N/A = Not applicable

Proposed Action (Preferred Alternative)

Significant Impacts Mitigable to Less than Significant

Impact 1: Ammunition. Blank ammunition, SRTA, and pyrotechnics are the only types of ammunition planned for training at KTA. Because SRTA is technically considered live-fire ammunition and would be conducted at the training area in conjunction with the Proposed Action, this impact is considered significant but mitigable. There would be no live-fire training conducted on KLOA under the Proposed Action.

SRTA is considered to be live-fire, and does produce some of the safety risks related to true live-fire training. However, SRTA would not likely produce a significant wildland fire threat because the ammunition has a plastic tip and does not include the use of tracer rounds. Additionally, the ammunition does not contain lead and would not contaminate the soil. As discussed in Section 7.2, the Army will restrict access at KTA when training with SRTA ammunition occurs. The mitigation measures below will reduce the impact to less than significant.

Regulatory and Administrative Mitigation 1. All government personnel or government contractors accessing impact areas will continue to follow OSHA and Army standards and guidelines to minimize health and safety impacts from exposure to any contaminants or ordnance. The general public will be allowed in or near impact areas only at times and in group sizes approved by USARHAW Command. Army trained and certified personnel would escort the general public at all times. Access is limited to only those areas deemed safe by USARHAW Range Control.

The Army will undertake additional risk-based investigations as appropriate in the event any active range is closed and transferred out of DoD control. Based on the results of this health risk-based analysis, all remediation necessary to mitigate an imminent threat to human health and the environment would be undertaken at such time.

When the CACTF is active, the Army will establish all prudent measures to prevent unauthorized access within the SDZs for SRTA, which are up to 2,300 feet (700 meters) during training operations. This would help ensure public safety during training.

Additional Mitigation 1. No additional mitigations have been proposed.

Impact 1: Lead. Construction and demolition activities associated with the Proposed Action could expose workers to airborne lead particulates at the proposed project sites within KTA. The workers could be exposed to LBP and pipes during demolition or soil excavation and grading at specific project sites. Buildings S150 and S151 are proposed for demolition in conjunction with the CACTF, and neither building has been surveyed for the presence of lead. The mitigation measures below will reduce the impact to less than significant.

Regulatory and Administrative Mitigation 1. The Army will expand existing programs for LBP to any SBCT-related activities that would affect older structures where LBP could have bee used. Lead is managed in place for existing structures. In the event of demolition or

renovation projects affecting such structures, a survey is required prior to demolition/renovation and appropriate actions must be taken to prevent the release of LBP into the environment. Construction workers must be properly trained/certified to handle these materials, and any debris must be tested by TCLP and disposed of according to the results.

Additional Mitigation 1. No additional mitigations have been proposed.

Impact 2: Asbestos. Construction and demolition activities associated with the Proposed Action could expose workers to asbestos during demolition or grading at specific project sites. Buildings S150 and S151, proposed for demolition as part of the CACTF construction, have not been surveyed for the presence of ACM. The mitigation measures below will reduce the impact to less than significant.

Regulatory and Administrative Mitigation 2. . The Army will expand existing programs for asbestos to any SBCT-related activities that would affect older structures where asbestos could have been used. Asbestos is managed in place for existing structures. In the event of demolition or renovation projects affecting such structures, a survey is required prior to demolition/renovation and appropriate actions must be taken to prevent the release of asbestos into the environment. Construction workers must be properly trained/certified to handle asbestos-containing materials, and any debris must be tested by TCLP and disposed of according to the results.

Additional Mitigation 2. No additional mitigations have been proposed.

Impact 4: Wildfires. There is a high risk of wildfires at KTA. The one training area that would be constructed at KTA under the Proposed Action, the CACTF, would support nonlive-fire training using blank ammunition and live-fire training using only SRTA and no ball or tracer ammunition. Nonlive-fire and live-fire training using SRTA, which still has the potential to ignite wildfires, would increase but would not likely produce a significant wildfire risk because the ammunition has a plastic tip.

Following the construction/upgrade of Drum Road, units would transport materials and equipment via military vehicles. Transportation of personnel and flammable or combustible materials, such as fuel or weaponry, could increase the potential for starting a wildfire, especially in areas not previously used frequently, such as Drum Road, which is at both KTA and KLOA. The Army's use of the road would increase potential sources of wildfire ignition from training in areas that do not have established fire management actions. Unlike training activities conducted on installations, the road would not always be near an installation where access to Army fire suppression resources would be readily available. A wildfire could damage animal and plant communities, could damage cultural resources, and could contribute to soil erosion by removing vegetation. The mitigation measures below will reduce the impact to less than significant.

Regulatory and Administrative Mitigation 4. The IWFMP for Pōhakuloa and O'ahu Training Areas was updated on October 2003. The Army will fully implement this plan for all existing

and new training areas to reduce the impacts associated with wildland fires. Public and firefighter safety is the first priority in every fire management activity. The plan considers the potential need for firebreaks and/or fuel breaks at each installation, along with other safety concerns. The plan is available upon request.

Less than Significant Impacts

Hazardous materials management. The Proposed Action would not significantly increase hazardous materials usage at KTA. Short-term impacts would be associated with construction activities at the proposed project sites. Construction-related activities would require the use of hazardous materials in excess of existing quantities. Construction activities of the 3-acre (1.2-hectare) CACTF would consist of demolishing approximately 280 square feet (164 square meters) of facilities, including tactical movement trails, simulated firing points, obstacles, targets, and other infrastructure. Project construction would involve earth movement, grading, and other typical construction activities. Construction of a tactical vehicle wash would involve similar construction activities to provide six wash stations, each to support a 60-foot (18-meter) long by 12-foot (4-meter) wide vehicle. Contract specifications control the use of hazardous materials and require compliance with federal, state, and local requirements and with installation policy on hazardous materials. The US Army follows strict SOPs for storing and using hazardous materials, so no new procedures would need to be implemented to store or use the construction-related hazardous materials. Excess quantities of unused hazardous materials would be removed after construction. Construction issues would not likely result in any significant impacts.

Hazardous materials would be handled in accordance with existing regulations and base-wide hazardous materials management and standard operating procedures. The new facilities would continue to use the existing HMCC facility on SBER. The USAG-HI also conducts routine compliance inspections of all facilities containing hazardous materials to ensure their proper handling, use, and storage. The proposed activities would not introduce a significant impact, and no mitigation would be necessary.

Hazardous waste management. Activities related to the Proposed Action would not significantly affect hazardous waste management. Construction could generate small amounts of hazardous waste. Operational activities associated with the Proposed Action would not significantly affect hazardous waste management. As mentioned in Chapter 5, Section 5.12, the US Army follows strict regulations and SOPs for the temporary storage and disposal of hazardous waste. The SBCT would be required to manage and dispose of hazardous waste generated by operations through DRMO-HI, in accordance with existing regulations and base-wide protocol regarding storage, use, and disposal. Hazardous waste associated with construction activities would cease to be generated at the completion of construction.

The additional hazardous waste generated by the Proposed Action would not result in a significant increase to the total amount of hazardous waste managed and disposed of from the base; therefore, there would be no significant construction-related or operational impacts, and no mitigation would be required.

Ammunition. Blank ammunition, SRTA, and pyrotechnics are the only types of ammunition planned for training at KTA. SRTA is technically considered live-fire ammunition and would be used at the training area in conjunction with the Proposed Action. For this reason, through existing Army protocols and regulatory requirements, the Army would continue to manage SRTA to prevent hazards, to ensure security precautions, and otherwise to maintain environmental stewardship. The Army would produce a site-specific training management plan, which would establish best management practices during training and would identify preventative measures to reduce the impact to less than significant. In addition, the Army would reconfigure and upgrade SDZs on the KTA ranges, using SRTA as needed, to support this pseudo-live-fire training in accordance with Army Pamphlet 385-64, *Ammunition and Explosive Safety Standards*, in order to protect the public from accidents. Because these measures would be conducted in conjunction with the Proposed Action, the use of SRTA at KTA is not considered a significant impact. There would be no live-fire training conducted on KLOA under the Proposed Action.

SRTA would not likely produce a significant wildfire threat because the ammunition has a plastic tip and does not include the use of tracer rounds. Additionally, the ammunition does not contain lead and would not contaminate the soil. Although the ammunition would leave a shell casing, units would remove all target equipment and shell casings following training and would make every effort to restore the facility to its previous condition. Aside from these cleanup measures following training, no new mitigations would be necessary with regard to potential wastes generated by the SRTA because the new munition is not expected to contaminate the land. *Polychlorinated biphenyls*. In the Draft EIS, the Army believed that the impacts from PCBs would be significant with the construction proposed at KTA. Upon further evaluation of the KTA project area, the Army determined that the PCB levels in soil in the proposed construction area are below federally designated health risk standards. The proposed CACTF lies adjacent to the former missile launch facility at KTA, which previously housed the emergency power generator and power distribution transformers. Although the former site has the potential to be preserved as historic, activities around this site and connected to the construction and operation of the new range would have the potential to move soil and release imbedded PCBs to the air and environment. Because the PCBs exist below federally designated health risk standards, if soils were suspended into the air and personnel, the community, or the environment were exposed to these soils, the impact would be less than significant.

General training. In conjunction with the proposed CACTF, up to 200 vehicles, including Strykers, HMMWVs, and trucks would be used per exercise at KTA. Collective training exercises would be conducted generally between 90 and 180 days a year. Training activities could expose additional areas to potential leaks, spills, or drips from military training equipment. USARHAW would, during any on-site operational activities within a specific project area, implement SOPs to minimize the potential for spills or other harm to the environment. Targets and security devices would be funded by OPA. UXO cleanup is not required because KTA has supported only nonlive-fire training in the past. As further explained in Chapter 4, Section 4.12 of this document, in order to protect the public during range training exercises, SDZs have been included in the range design, in accordance with Army Pamphlet 385-64, *Ammunition and Explosive Safety Standards*. Additionally, in order to

protect Army personnel during range training events, Soldiers and officers are given safety manuals, operation-specific field manuals, and range-specific briefings prior to the training exercise, with a complete discussion of safety procedures while training. There would be no significant impacts, and no mitigation would be required.

Electromagnetic fields. Two FTI sites would be constructed at KTA. The general public is typically not allowed in areas that could contain EMF hazards from Army equipment and, therefore, would not be inadvertently exposed to EMF produced by FTI towers or RAWS. The FTI sites would be appropriately fenced to prevent trespassing and exposure to any harmful EMF. Warning signs would be posted around the perimeter of all potentially harmful EMF sources. DOD Instruction 6055.11 and Army Pamphlet 385-64, as well as other Army regulations pertaining to EMF, would be followed in the new facilities. Only trained personnel would work with equipment emitting EMF. There would be no significant impact to the public from exposure to EMF, and no mitigation would be necessary.

Petroleum, oils, and lubricants. A tactical vehicle wash would be constructed at KTA as a part of the Proposed Action. As described in Appendix D, the water from the proposed wash systems would flow through a water sediment basin, equalization basin, and secondary treatment. Treatment would include oil, grease, and grit removal and organic control. Additionally, OWSs would be provided to treat any residual water that had not gone through the main system. Oils would be skimmed regularly from the surface of the OWSs, as is the current practice for facilities using OWSs. DRMO-HI would dispose of the waste oil in accordance with federal and Army regulations.

There are no storage tanks within the project areas, and no new storage tanks would be installed as a result of the Proposed Action. Stryker wheeled vehicles would be used on KTA under the Proposed Action, but they would be maintained at SBMR. Construction activities could expose additional areas to potential construction equipment leaks, spills, or drips. During construction within a specific project area, USARHAW would implement the SOPs stated in Chapter 5, Section 5.12 of this document.

Best management practices would be used and construction and operation would follow USEPA and USAG-HI protocol for using and handling hazardous materials, such as petroleum, oils, and lubricants. Each facility maintains strict SOPs and spill contingency plans for hazardous materials and waste, identifying specific operating responsibilities and procedures. The Proposed Action would not pose any significant impacts from POLs, and no mitigation would be required.

No Impacts

Unexploded ordnance. Only blank ammunition and SRTA are permitted for use at KTA. SRTA does not produce explosives projectiles and therefore does not have the potential to introduce UXO on KTA. UXO cleanup is not required because KTA has only supported nonlive-fire training in the past. No UXO clearance would be necessary in the future, so UXO would not pose a threat, and no mitigation would be necessary.

Installation restoration program sites. There are no IRP sites under investigation on KTA, so there would be no impacts, and no mitigation would be required.

Pesticides/Herbicides. Activities associated with the Proposed Action would not affect pesticide management on KTA because this action would not increase the amount of pesticides used on the installation; therefore, there would be no impact, and no mitigation would be required.

Reduced Land Acquisition Alternative

The impacts associated with RLA are identical to those described for the Proposed Action.

No Action Alternative

The current baseline of existing conditions at KTA would continue under the No Action Alternative. Impacts would continue at their current levels with no increase in hazardous material use or waste generation. Hazardous materials and waste management, EMF issues, POLs, and wildfires would continue under existing conditions and therefore would continue to present less than significant impacts. Federal, state, and Army protocol would continue to be followed when managing, handling, and storing hazardous materials and wastes at KTA, including isolating and signing potential EMF sources on the site. Additionally, as non live-fire training would continue at KTA, SRTA would not be used under No Action. Wheeled vehicles would continue to be used, excluding Strykers, and the threat of wildfires would persist. Army activities would continue to be guided by the 25th ID(L) and USARHAW Wildfire Management Program. There would be no significant hazardous materials and waste impacts introduced to KTA or KLOA under the No Action Alternative.