

Multi-Media Inspection Report
Federal Aviation Administration
William J. Hughes Technical Center
Egg Harbor Township, New Jersey
November 2021



Written by:

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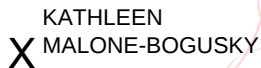


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Enforcement Officer
ECAD-CAPSB-CAS USEPA R2

Enforcement Officer
ECAD-CAPSB-CAS USEPA R2

Approved by:

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Chief - Compliance Assurance Section
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MULTI-MEDIA INSPECTION REPORT

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor
New York, New York 10007-1866

Locational Information:

Facility Name: FAA William J. Hughes Technical Center
Facility Address: Atlantic City International Airport, Egg Harbor Township, NJ 08405
Latitude & Longitude: 39.444401, -74.562881

Environmental Sensitivity Information:

Potential EJ Concerns: Yes (See Appendix B: EJ SCREEN)
Potential Flood-Prone Area: No (See Appendix C: FEMA Flood Map)
Sole Source Aquifer: Yes (See Appendix D: Sole Source Aquifer Map)

Sector Information:

Federal Facility: Yes
SIC Code: 9711 - National Security
NAICS Code: 92612 - Regulation and Administration of Transportation Programs

ICIS & other Program ID Codes (as appropriate):

FRS: 110006874365
RCRA ID: NJ5690510024
CAA ID: NJ0000003400100037

Date of Inspection: November 9, 2021
Inspector(s): Erin Floto & Carlos Colombani

Facility Representative(s):

Name	Title	Email
John Floyd	EH&S	john.floyd@faa.gov
Jay Repko	EPS	jay.repko@faa.gov
Nancy Davenport	EPS	nancy.davenport-masi@faa.gov
Theresa Angelus	Senior, EPS	theresa.ctr.angelus@faa.gov

Corrections/Updates for EPA Databases: Depending on the hazardous waste manifests review, the hazardous waste generator status might need to be changed from a SQG to a VSQG.

Table of Contents

1. INTRODUCTION.....	5
2. MULTIMEDIA INSPECTION OBSERVATIONS.....	5
2.1 Clean Air Act (CAA)	5
2.2 Clean Water Act (CWA)	7
2.3 Resource Conservation and Recovery Act (RCRA)	8
3. REGULATORY CONCERNS	9
4. SCREENING CONCERNS	10
5. ENVIRONMENTAL ASSISTANCE	10
6. ADDITIONAL INFORMATION REQUESTED	11
APPENDICES:.....	11
A: Photographs.....	11
B: EJ Screen	11
C: FEMA Flood Map.....	11
D: Sole Source Aquifer Map	11

1. INTRODUCTION

The Region 2 office of the Environmental Protection Agency (EPA) inspected the United States Federal Aviation Administration (FAA) William J. Hughes Technical Center in Egg Harbor Township, New Jersey to determine its applicability under the Clean Water Act (CWA) and to evaluate their stationary sources and hazardous waste management programs under the Clean Air Act (CAA) and Resource Conservation and Recovery Act (RCRA), respectively.

EPA inspectors Ms. Erin Floto and Mr. Carlos Colombani arrived at the facility on November 9, 2021 at 1300, presented EPA credentials, offered in- and out-briefings, and the opportunity to claim confidential business information. At the opening conference, Mr. John Floyd, Environmental Occupational Safety and Health Manager, Mr. Jay Repko, Environmental Protection Specialist, Ms. Nancy Davenport-Masi, Environmental Protection Specialist, and Ms. Theresa Angelus, Senior Environmental Program Manager joined us to discuss the purpose of our inspection.

Due to the ongoing COVID-19 pandemic, the onsite portion of the inspection consisted only of a walkthrough of the facility. The records and permits related to the environmental statutes inspected were requested via email on November 10, 2021 with a 2-week deadline. On November 15, 2021, the facility requested an additional 2 weeks, making the new deadline December 7, 2021. On December 3, 2021, the facility stated by email that the records requested were all uploaded into the SharePoint inspection folder provided by EPA.

According to the facility's website, the FAA William J. Hughes Technical Center is the nation's premier air transportation system laboratory. The facility conducts tests and evaluations, verification and validation, and sustainment of aviation systems and develops scientific solutions to current and future air transportation safety challenges by conducting applied research and development.

The facility operates a 24/7 schedule and has an average of 4,000 employees. This includes their tenants: New Jersey National Guard, Transportation Security Administration, Federal Air Marshal Service, Atlantic City International Airport, and others. The area consists of about 5,000 acres of land. The inspection only focused on the FAA William J. Hughes Technical Center area and not its tenants.

2. MULTIMEDIA INSPECTION OBSERVATIONS

2.1 Clean Air Act (CAA)

Based on the statements from facility representatives, the documents reviewed, and the inspector's observations, the facility is regulated under the CAA for their boilers, generators, jet fuel engines, parts cleaners (solvent cleaning), spray paint booth, and ozone depleting substances (ODS). While the permit mentioned vapor recovery activity at the facility, representatives for the facility provided shutdown paperwork and communications with the New Jersey Department of Environmental Protection (NJDEP) to show it is no longer applicable. Additionally, EPA Inspector Ms. Erin Floto was contacted by the NJDEP on November 23, 2021 because they were also planning to conduct an inspection at the technical center and requesting similar documents

from the facility for their compliance evaluation. Following a discussion on the difficulty of the facility accessing the emissions statements, NJDEP agreed to conduct a review of the technical center's emission statements requested by EPA and provide EPA with an update following their review. Therefore, emission statements were not reviewed by EPA for this compliance evaluation.

Walkthrough

We visited Building 306, Motorpool, to view the parts washer and the spray paint booth. The lid of the parts washer, per the regulations, was closed since it was not in use. Secondary containment for the parts washer is provided via floor grates that drain to an oil water separator. As for the spray booth, the facility does not operate a spray gun. Instead, they use two operating scenarios (OS) for the spray paint booth: OS1 is automotive painting which has not been done in 8-10 years and OS2 is miscellaneous parts using spray paints.

We then visited Building 303, Central Utility Plant (CUP), to see three of the generators. The generators provide emergency power to the boilers that provide heat/air conditioning to Building 300. The facility has an underground storage tank (UST) outside of the building – two for fuel storage and one for spill containment. There are also three-day tanks inside of the building for the generators.

Document Review

Boilers

EPA requested a boiler inventory, annual/semiannual compliance certifications, semiannual deviation reports, combustion adjustments, and reportable excess emissions in any 24-hour block for the year 2018-2020. The facility has 15 significant natural gas boilers. The facility gets feed from South Jersey Gas. Documents provided indicate no compliance deviations during the 2018-2020 reporting years and the first semiannual 2021 reporting year. The facility provided documentation for the 2018-2020 combustion adjustments; however, for 2018, the facility provided a receipt that the combustion adjustment was submitted to the NJDEP but did not provide the actual combustion report. EPA found no issues with the 2019-2020 reports.

Generators

EPA requested generator specifications to determine applicability, the total hours run for emergency generators, and bills of lading for fuel used. The facility has 20 total emergency generators at the facility. There are no generators in use that provide the primary power source for operating equipment. The facility did have an emergency generator (#70) operate over the allocated 100 hours in 2020 and 2021, but it was operating under emergency conditions to provide power for Building 306 while the main feed was out. The unit operated 1251.0 hours in 2020 and 1321.1 hours in 2021 (through November 15th). The facility also provided the requested bills of lading to confirm the facility is using low sulfur diesel fuel.

Jet Fuel Engines

EPA requested total hours of operation, particulate emissions, and liquid fuel usage from 2018-2020. The facility has two B-52 engines, which are used to test drones. The engines are seldom in use but are necessary to the mission for the FAA. Mr. David Mills stated that the engines were not run at all in 2018 and only a maintenance run was conducted in June 2019. The engines have been down for maintenance and repair since 2019. The facility provided the maintenance service records from the contractor, AECOM, from June 2019.

Solvent Cleaning

EPA requested solvent consumption records from 2019-present and the Safety Data Sheet (SDS) and volatile organic compounds (VOC) content for solvents in use. The solvent cleaner is in the form of a SafetyKleen parts washer located in the Motorpool. The facility used 12 gallons in 2019, 21 gallons in 2020, and 25 gallons to date in 2021. The facility provided SDS/VOC content for ninety-six different solvents used by the facility and EPA found no issues with the solvents in use.

Spray Paint Booth

EPA requested the production rate, throughput, and coating usage from 2018-2020 and maintenance records, including changing filters, from 2018-2020. The facility uses their spray paint booth for spray paints. The facility operated their spray paint booth for 14 hours and 36 minutes with 9.9 gallons of spray paint in 2018, 3 hours and 6 minutes with 3.5 gallons in 2019, 4 hours and 54 minutes with 3.3 gallons in 2020, and 5 hours and 36 minutes with 2.9 gallons in 2021 (to date of inspection). EPA reviewed the maintenance and filter records and found no issues with the maintenance based on the usage.

ODS

EPA requested specifications for the facility's air conditioning/refrigeration units, including their refrigerant type; maintenance records from 2016-present, and technician certificates for maintenance workers. The facility has 19 chillers/air conditioning units with 50 lbs or more refrigerant capacity and maintenance is performed by contractors. The facility has reported numerous leaks of refrigerant during the requested period and maintenance/repair records were provided for all reported leaks. EPA found no issues during the review of records.

2.2 Clean Water Act (CWA)

Based on the statements from facility representatives, the documents reviewed, and the inspector's observations, the facility is regulated under the CWA for discharges to surface waters. The facility is covered under a New Jersey Pollutant Discharge Elimination System (NJPDES) Stormwater Discharge General Permit with permit number NJG0153401 expiring on December 31, 2023. The facility also has a construction site disturbing one or more acre of land, and therefore, has a 5G3 Construction Activity Stormwater General Permit in place under permit number NJG317489. Mr. Colombani decided to visually inspect the construction site to ensure proper sediment and erosion control.

Walkthrough

At the Priority One Consolidation and Parking Lot construction project, the silt fence for the boundary of the project was compromised. There was an area of the silt fence that needed replacement to prevent sediment and erosion from being tracked offsite (Appendix A, IMG_0287). The downgradient stormwater drains were covered with sediment drain filters to increase sediment and erosion controls surrounding the project.

The overall parking lots of the Technical Center, stormwater drains, and streets were well-maintained. There were no visible signs of contaminated stormwater or any debris that could potentially reach navigable waters of the United States.

Document Review

The facility provided its Stormwater Pollution Prevention Plan (SP3) for the Technical Center and its SP3 for the construction project. Stormwater Best Management Practices (BMPs) for the overall site were provided, as well as weekly inspections for the Priority One Consolidation and Parking Lot. These were reviewed and no concerns were noted.

2.3 Resource Conservation and Recovery Act (RCRA)

Based on the statements from facility representatives and the inspector's observations, the facility is regulated under RCRA for hazardous waste management. EPA's RCRAInfo, a national program management and inventory system about hazardous waste handlers, lists the facility as a Small Quantity Generator (SQG) but it appears it is currently generating at a Very Small Quantity Generator (VSQG) rate. Note: This determination is preliminary. Several hazardous waste manifests and waste determinations are needed to finalize the facility's generator status for calendar year 2021. These documents are being requested under Section 6 of this report titled, Additional Information Requested.

The facility has approximately twelve (12) satellite accumulation areas (SAAs) throughout several buildings. These are the Loading Dock, the K9 Unit, the laboratories, the Fire Test Facility, and the Motor Pool. There is one Central Accumulation Area (CAA). The typical waste stream generated are waste codes: D001 (ignitable waste), D006 (cadmium), D018 (benzene), D027 (1,4-dichlorobenzene), D039 (tetrachloroethylene), D040 (trichloroethylene) and F003 (spent solvents).

Walkthrough

At Building 306, the Motor Pool, mechanics perform light maintenance inside. Any spills in the maintenance bay would enter the floor drains and pass through a 200-gallon oil/water separator located under the maintenance area in the central portion of the building. Outflow from the separator discharges to a sanitary sewer. Oil collected in the separator is drained to a 550-gallon spill containment tank. The oil/water separator is inspected monthly by a contractor and serviced as

needed. There is a 2-in-1 bowser (mobile tank) where one compartment holds 200 gallons of used oil, which was properly labeled with the words “used oil” and the other compartment holds 200 gallons of diesel. There is one 55-gallon drum used to store oily rags.

At Building 275, the Fire Test Facility, the SAA was storing a 55-gallon drum of used oil; a 55-gallon drum of mixed waste consisting of jet-fuel, aqueous film foaming foam (AFFF) and water (Appendix A, IMG_0284); and a corroded 10-gallon petroleum-based product, which appeared to have manufacturing date of May 1983 (Appendix A, IMG_0286). Mr. Colombani informed the facility that the product should be shipped offsite. There was secondary containment for all the containers.

At Building 56, the CAA, Mr. Bill Wills serves as the hazardous waste manager. There were three 55-gallon containers of used oil (Appendix A, IMG_0282) and one 55-gallon container of flammable liquids labeled March 18, 2021. There were also about four 55-gallon drums storing non-hazardous waste, of which one appeared to not be in adequate condition to hold the product (slight suction inwards). Additionally, there were at least seventeen (17) open containers of used lamps and one stack of approximately twelve (12) used lamps fully uncovered (Appendix A, IMG_0283). The building structure acts as a secondary containment in case of any spills. There were proper spill containments kits, fire extinguishers, a fire suppression system and telephones readily available in case of an emergency.

Document Review

The facility provided personnel trainings records, hazardous waste manifests, land disposal restrictions, arrangement with local responding agencies, and weekly inspection records of the CAA. There were no concerns noted related to the documents received.

3. REGULATORY CONCERNS

Based on observations made during the walkthrough of the facility and/or a review of records provided to EPA by the facility afterwards, the regulatory concerns below were identified. Note that additional information is being requested in Section 7 to complete this evaluation. Once received, a review of the requested information may uncover other concerns.

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
CWA National Pollutant Discharge Elimination System	
<u>NJPDES 5G3 – Construction Activity Stormwater General Permit (NJ0088323)</u> Sediment & Erosion Control	At the Priority One Consolidation and Parking Lot construction site, the silt fence for the boundary of the project was compromised. There was an area of the silt fence that needed replacement to prevent sediment and erosion from tracking offsite (Appendix A, IMG_0287). <u>Corrective Action:</u> On December 13, 2021, the facility provided photographs demonstrating that the silt fence was replaced.

REGULATORY, STATUTORY OR PERMIT REFERENCE	FIELD OBSERVATION
RCRA Hazardous Waste and Universal Waste	
In accordance with 40 C.F.R. § Part 273.13(d)(1), as incorporated by reference at N.J.A.C. § 7:26A-7.1, a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.	At the Central Accumulation Area (CAA) Building 56, there were at least 17 open boxes of used lamps and 1 stack of approximately 12 used lamps fully uncovered (Appendix A, IMG_0283). <u>Corrective Action:</u> On December 13, 2021, the Facility provided a photograph that demonstrated proper closure of the opened universal waste containers.

4. SCREENING CONCERNS

No concerns were identified based on a screening for environmental, safety and health aspects outside the scope of this inspection. This screening included a check of asbestos records, including contractor certifications, during the document review.

5. ENVIRONMENTAL ASSISTANCE

Based on the observations made during the inspection, EPA would like you to be aware of the following resources to increase your understanding of applicable environmental regulations; assist you in addressing the concerns noted in Section 4 above; and/or be aware of any upcoming compliance deadlines:

- Revised Section 608 Refrigerant Management Regulations
<https://www.epa.gov/section608/revised-section-608-refrigerant-management-regulations>
- Compliance Requirements for Stationary Engines
<https://www.epa.gov/stationary-engines/compliance-requirements-stationary-engines>
- Universal Waste Information Site
<https://www.nj.gov/dep/dshw/lrm/uwaste/>
- Construction Activities (5G3)
<https://www.nj.gov/dep/dwq/5g3.htm>
- FedCenter, the Federal government's home for comprehensive environmental stewardship and compliance assistance information for Federal facility managers and their agencies
<https://www.fedcenter.gov>

6. ADDITIONAL INFORMATION REQUESTED

Below are the documents and other relevant information that was requested by EPA but have not yet been received at the time this report was written and/or additional information necessary to complete this compliance evaluation. Once received, the information will be reviewed.

- Provide the waste determination for waste code D039, tetrachloroethylene. In 2021, shipments of D039 totaled approximately 48,950 gallons (~408,507 pounds).
- Provide the following manifests:

Tracking No. 007934342JJK	Shipped on March 5, 2021
Tracking No. 007745558SKS	Shipped on April 5, 2021
Tracking No. 007960170SKS	Shipped on June 30, 2021
Tracking No. 012830811FLE	Shipped on July 23, 2021
Tracking No. 012830813FLE	Shipped on September 16, 2021
Tracking No. 012830816FLE	Shipped on September 22, 2021
Tracking No. 012830819FLE	Shipped on September 23, 2021
Tracking No. 012830820FLE	Shipped on September 24, 2021
Tracking No. 012830821FLE	Shipped on September 27, 2021
Tracking No. 012830822FLE	Shipped on September 27, 2021
Tracking No. 012830825FLE	Shipped on September 28, 2021
Tracking No. 012830826FLE	Shipped on September 29, 2021
Tracking No. 012830827FLE	Shipped on September 29, 2021
Tracking No. 012830828FLE	Shipped on September 30, 2021
Tracking No. 012830830FLE	Shipped on October 5, 2021

APPENDICES:

A: Photographs

B: EJ Screen

C: FEMA Flood Map

D: Sole Source Aquifer Map

Appendix A: Photographs



IMG_0282 Used Oil Containers at CAA.



IMG_0283: Uncovered universal waste.



IMG_0284 AFFF, Jet Fuel and Water (Mixed Waste).



IMG_0286 Corroded container. Old product.



IMG_0287: Silt fence needing replacement.

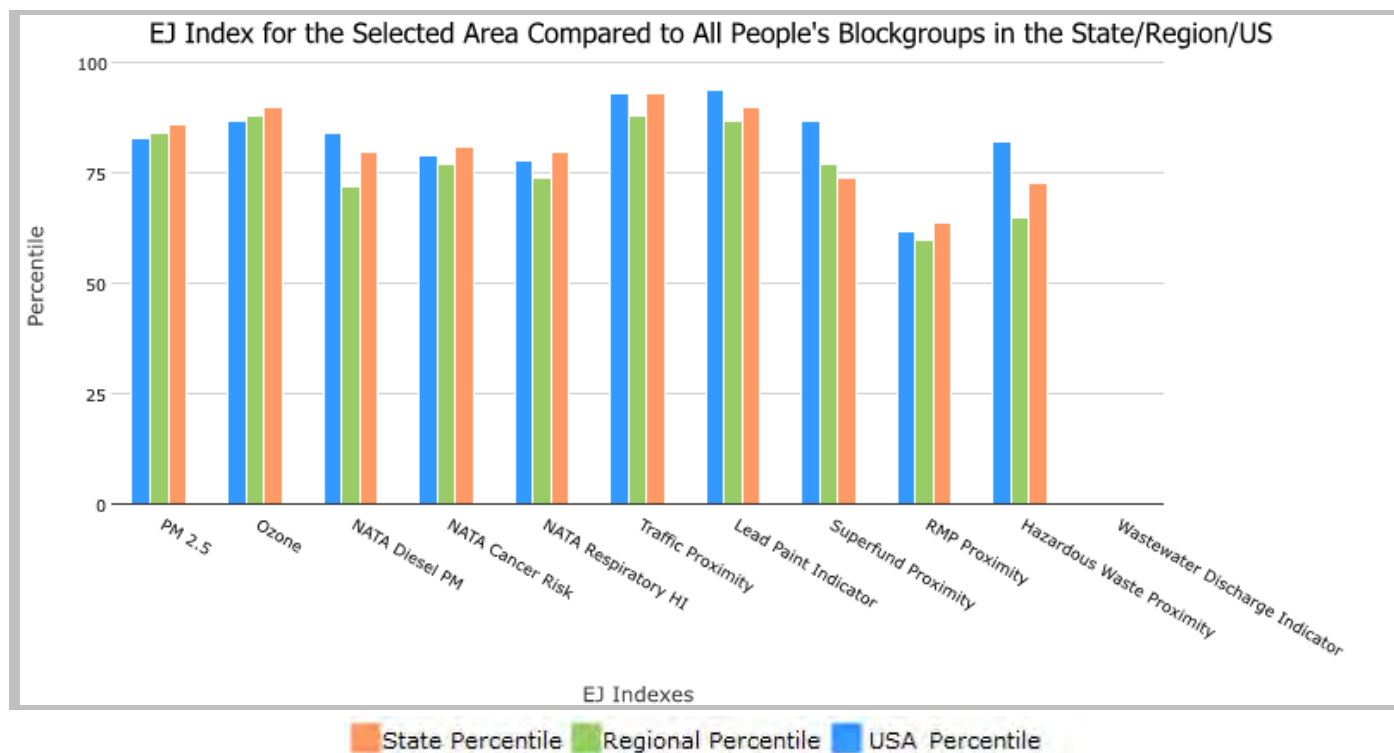
1 mile Ring Centered at 39.360314,-74.461744, NEW JERSEY, EPA Region 2

Approximate Population: 15,823

Input Area (sq. miles): 3.14

FAA William J. Hughes - EJSCREEN - Appendix B

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	86	84	83
EJ Index for Ozone	90	88	87
EJ Index for NATA* Diesel PM	80	72	84
EJ Index for NATA* Air Toxics Cancer Risk	81	77	79
EJ Index for NATA* Respiratory Hazard Index	80	74	78
EJ Index for Traffic Proximity and Volume	93	88	93
EJ Index for Lead Paint Indicator	90	87	94
EJ Index for Superfund Proximity	74	77	87
EJ Index for RMP Proximity	64	60	62
EJ Index for Hazardous Waste Proximity	73	65	82
EJ Index for Wastewater Discharge Indicator	N/A	N/A	N/A



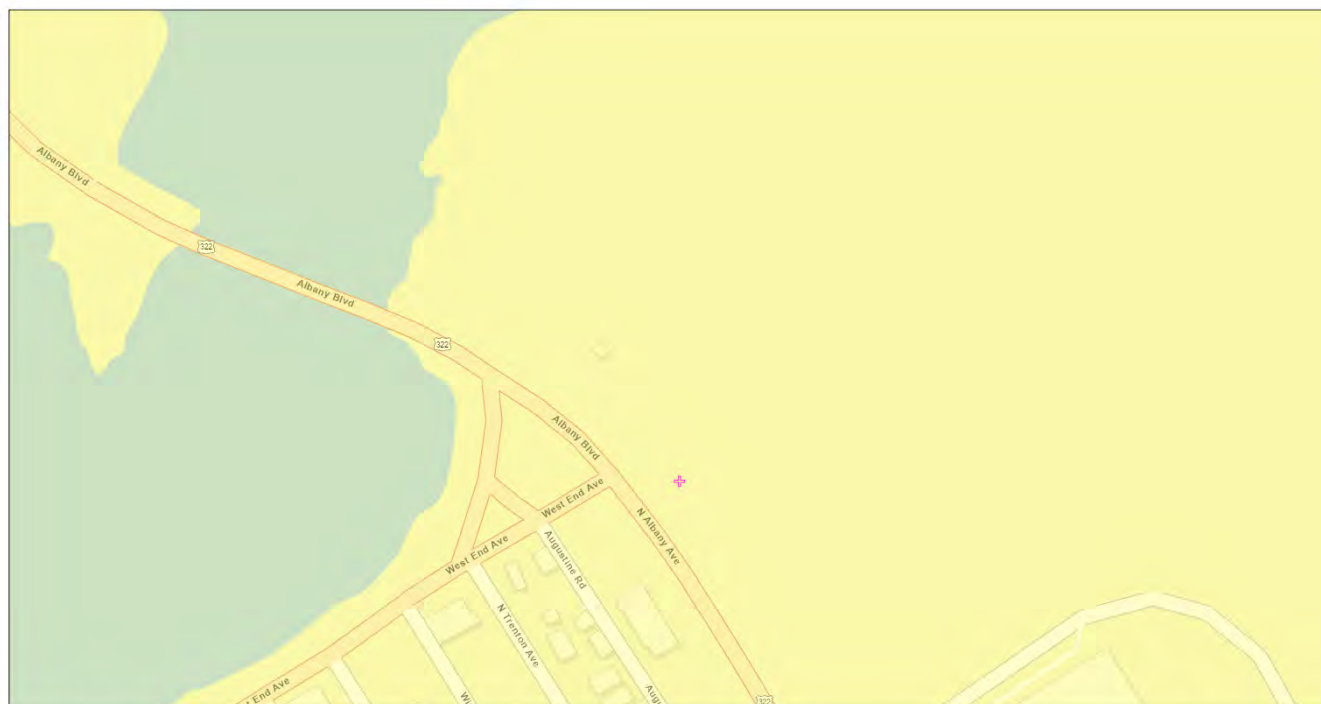
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 39.360314,-74.461744, NEW JERSEY, EPA Region 2

Approximate Population: 15,823

Input Area (sq. miles): 3.14

FAA William J. Hughes - EJSCREEN - Appendix B



December 7, 2021

✚ FAA William J. Hughes - EJSCREEN - Appendix B

1:2,257
0 0.02 0.04 0.08 mi
0 0.03 0.07 0.13 km

Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, OpenStreetMap contributors, and the GIS User Community

Sites reporting to EPA

Superfund NPL

0

Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)

0

EJSCREEN Report (Version 2020)



1 mile Ring Centered at 39.360314,-74.461744, NEW JERSEY, EPA Region 2

Approximate Population: 15,823

Input Area (sq. miles): 3.14

FAA William J. Hughes - EJSCREEN - Appendix B

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	7.17	8.3	2	7.76	28	8.55	15
Ozone (ppb)	43.4	41.5	84	40.8	88	42.9	55
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.424	0.695	22	0.938	<50th	0.478	50-60th
NATA* Cancer Risk (lifetime risk per million)	21	31	1	32	<50th	32	<50th
NATA* Respiratory Hazard Index	0.28	0.43	2	0.47	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	1400	830	84	1400	74	750	86
Lead Paint Indicator (% Pre-1960 Housing)	0.64	0.41	74	0.51	61	0.28	85
Superfund Proximity (site count/km distance)	0.11	0.44	18	0.29	34	0.13	69
RMP Proximity (facility count/km distance)	0.02	0.75	0	0.58	0	0.74	0
Hazardous Waste Proximity (facility count/km distance)	1.4	7.2	34	33	28	5	57
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	N/A	0.19	N/A	1.3	N/A	9.4	N/A
Demographic Indicators							
Demographic Index	71%	34%	91	36%	88	36%	90
People of Color Population	82%	44%	82	44%	77	39%	85
Low Income Population	61%	24%	93	29%	90	33%	88
Linguistically Isolated Population	20%	7%	88	8%	86	4%	93
Population With Less Than High School Education	28%	10%	91	13%	87	13%	88
Population Under 5 years of age	7%	6%	66	6%	66	6%	62
Population over 64 years of age	11%	16%	32	16%	30	15%	34

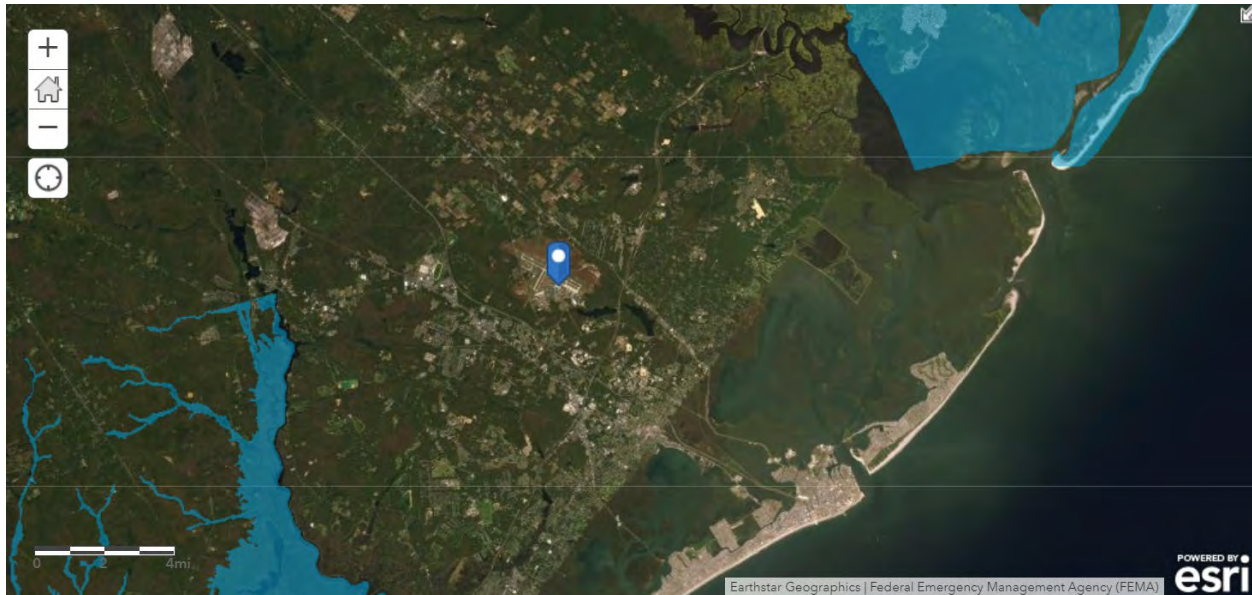
* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

Appendix C: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and EPA's Region 2 Composite Flood Risk Layer

Facility Name: FAA William J. Hughes Technical Center



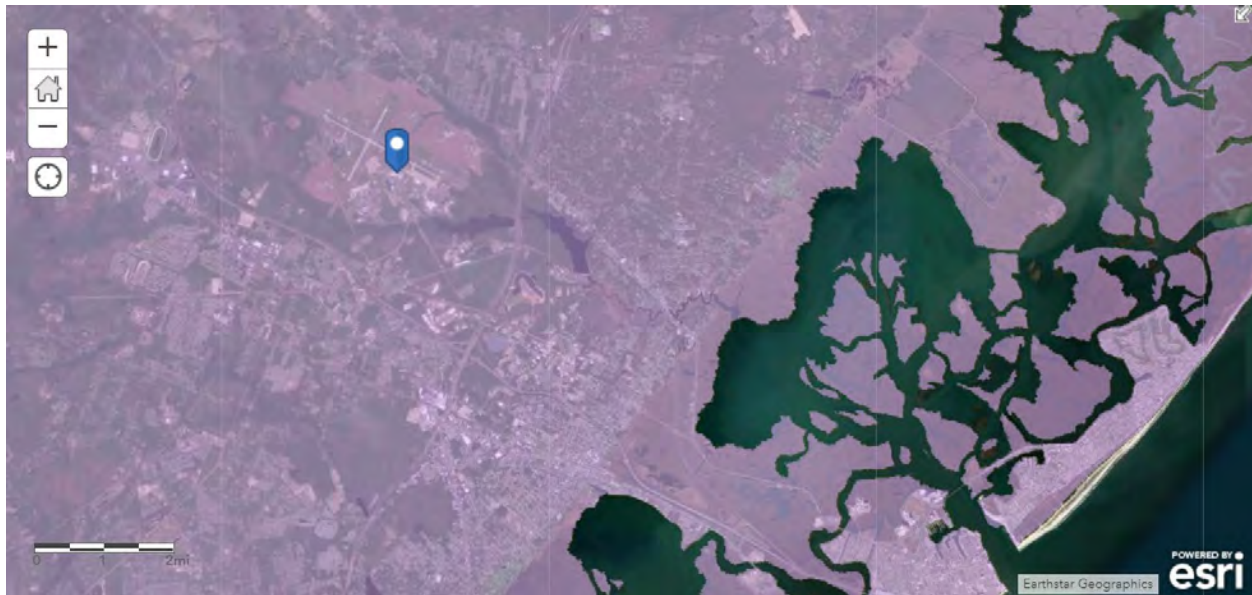
The facility is not located within a FEMA 100-year flood zone area.



The facility is located within a moderate composite potential risk area based on the EPA's Region 2 Composite Flood Risk layer.

Appendix D: Sole Source Aquifer Map

Facility Name: FAA William J. Hughes Technical Center



The facility is located within a Sole Source Aquifer area.