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U S NAVY RESPONSE TO AGENCIES COMMENTS REGARDING DRAFT SITE INSPECTION
WORK PLAN FOR FORMER SKEET AND TRAP RANGE 1 MCAS CHERRY POINT NC
07/01/2008
CH2M HILL

Response to Comments
Draft Site Inspection Work Plan for Former Skeet and Trap Range #1
MCAS Cherry Point, North Carolina
July 2008

Introduction

The purpose of this document is to address comments associated with the Draft Site Inspection Work Plan for Former Skeet and Trap Range #1 at Marine Corps Air Station (MCAS) Cherry Point, North Carolina. George Lane (NCDENR - Superfund Section), Gena Townsend (USEPA), Michel Gielazyn (NOAA), and Stephen Rynas (NCDENR - Division of Coastal Management) provided comments. Responses to comments are provided in bold type.

**George Lane
Superfund Section
North Carolina Department of Environment and Natural Resources
Comments dated July 21, 2008**

1. I have reviewed the subject document and have no additional comments.

This comment has been noted.

**Gena Townsend
United States Environmental Protection Agency
Comments dated July 21, 2008**

1. The Environmental Protection Agency has completed its review of the above subject document. This document identifies the use of the USEPA Region 9 preliminary remediation goals (PRGs) for risk evaluations. Region 4 no longer uses the Region 9 PRGs instead the new Regional Screening Tables (July 7, 2008) should be used for risk evaluations.

The text has been modified to reflect that the *Regional Screening Levels for Chemical Contaminants at Superfund Sites* will be used for data screening instead of the Region 9 PRGs.

**Michel Gielazyn
National Oceanic and Atmospheric Administration
Comments dated July 18, 2008**

1. Section 2.2.4, of the subject report, states that a "preliminary ecological screening" will be done on analytical results from composite sediment samples. However, the sampling described in later sections does not state how (or if) the sediment samples will be composited.

Sediment samples will not be composited at this site, and Section 2.2.4 has been modified to remove the reference to composite sampling.

2. Is the Neuse River adjacent to the site erosional or depositional? If it's depositional, what is the sedimentation rate? This information could help us determine the potential for migrations and how deep in the sediments we'd be likely to find the shot and target fragments.

It is unknown if sedimentation data has been collected in this portion of the river. Even though the degree to which site-related erosion/deposition is occurring is currently unknown, it is expected that a water body of this nature would facilitate such processes. During this preliminary assessment, samples will be collected at multiple intervals along a 0 to 6 feet profile below the sediment surface at two locations within the study area (i.e., shot fall zone). The analytical and observational results collected during the study will provide an initial opportunity to better characterize such river dynamics. Additionally, the preliminary phase results will be used to better characterize the site and to better inform subsequent investigation, if additional investigation is deemed necessary.

3. I recommend completing grain size and TOC analysis for all sediment samples.

For the preliminary assessment, grain size and TOC analysis will be performed at three sediment sampling locations crossing the site and at two upstream sediment sampling locations. As noted in the response to comment #2, these preliminary characterization results will be used to generate the initial assessment of site conditions and be used to inform where additional data are needed if additional investigation is warranted. Therefore, the Navy prefers to keep the frequency of analysis as proposed.

4. What are the locations for the three samples to be taken for the riverbed composition and evidence of lead shots, targets, and target fragments? Will the other sediment samples be visually examined for lead shot and fragments?

The text has been modified to reflect that a visual examination of sediment will be performed at all twelve sediment sampling locations instead of only three locations.

**Stephen Rynas
Division of Coastal Management
North Carolina Department of Environment and Natural Resources
Comments dated July 3, 2008**

1. Section E.1.5 (Coastal Zones Within the Project Site) of the Plan is a discussion on whether the proposed project contemplated by the Plan would be subject to a CAMA permit. This section uses an **incorrect** standard of review. Federal projects within a State's coastal zone are reviewed under on the Coastal Zone Management Act, which requires that a proposed Federal action be consistent, to the maximum extent

practicable, with the relevant enforceable policies of the State's coastal management program. North Carolina's coastal zone management program consists of, but is not limited to, the Coastal Area Management Act, the State's Dredge and Fill Law, Chapter 7 of Title 15A of North Carolina's Administrative Code, and the land use plan of the County and/or local municipality in which the proposed project is located.

As such, the US Marine Corps (USMC) will not be applying for a CAMA permit, but will be making a consistency evaluation as outlined in Subpart "C" of 15 CFR 930. Of particular importance is an evaluation of whether the proposed project contemplated by the Plan would have a reasonable foreseeable effect on any coastal resource or any coastal use. Please see the definitions in 15 CFR 930.11.

DCM requests that Section E.1.5 be re-written to evaluate whether the proposed project would have a reasonable foreseeable coastal effect. Should it be determined by the USMC that the proposed project would have a reasonable foreseeable coastal effect the USMC will be required to submit a consistency determination to the North Carolina Division of Coastal Management (DCM) as outlined by 15 CFR 930.36 and 15 CFR 930.39. In the event that the USMC determines that the proposed project would not have a reasonable foreseeable coastal effect then the USMC will need to submit a Negative Determination to DCM as outlined in 15 CFR 930.35.

Section E.1.5 has been modified to clarify that site activities will be evaluated to determine whether the proposed project will have a reasonable foreseeable coastal effect and a consistency determination or negative determination will be submitted to the Division of Coastal Management before work commences. Appropriate references to 15 CFR 930 were added for clarity.

2. The purpose of the Plan is to provide a work plan for investigating whether the former skeet range has environmental contamination. According to the Plan: *"The former Skeet Range is also included in the MCAS Cherry Point CERCLA program. MCAS Cherry Point was placed on the CERCLA National Priorities List (NPL) effective January 17, 1995."* In reviewing the Plan we note that consultation with the following State Agencies has not been identified: NC Wildlife Resources Commission, NC Division of Marine Fisheries, NC Division of Water Quality, and NC Division of Environmental Health. DCM suggests that a section be added to the Plan to review when and how State consultation/coordination will be conducted. While CERCLA may exempt any site remediation proposals from State permitting requirements, these State agencies may have environmental concerns and regulatory issues that still need to be addressed through the consistency review process. Section E.1.7 (Compliance with Applicable or Relevant and Appropriate Requirements) may be an appropriate location for reviewing State consultation requirements.

Section E.1.7 has been modified to detail the additional stakeholder entities that will be consulted for project requirements. The following text has been included: "Additional project stakeholders have been identified and will be provided with draft project documents for review. These stakeholders include the National Oceanic and Atmospheric Administration (NOAA), the NC Wildlife Resources Commission,

**the Shellfish Sanitation Section of the NC Department of Environmental Health,
NCDENR Division of Water Quality, NC Marine Fisheries, NC Division of Coastal
Management, United States Army Corps of Engineers, and the United States Fish and
Wildlife Service.”**