

M00146.AR.005953
MCAS CHERRY POINT
5090.3a

RESPONSE TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON THE DRAFT DECISION DOCUMENT FORMER CAT ISLAND
BOMB TARGET BT-2 MCAS CHERRY POINT NC

05/26/2015

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

Draft Decision Document
 Former Cat Island Bomb Target BT-2
 Marine Corps Air Station Cherry Point
 Havelock, North Carolina
 Comments provided by Jill Pafford/NCDENR on May 26, 2015

#	Section	Comment	Response
1	Page 1-1	In Section 1.1, please restate that the Navy and MCAS Cherry Point selected the remedy for BT-2 and that NCDENR concurred.	The Section 1.1 text has been modified to state, "The Navy and MCAS Cherry Point selected the remedy for BT-2 with NCDENR's concurrence."
2	Page 2-7	Table 2-1 and other sections of the document specify that inspections for Alternative 2 and 3 will occur every three years or "after significant storm events". The term "significant storm events" needs to be better defined, so that it is clear when a reconnaissance should occur. For example, a site inspection occurred in March 2014. Hurricane Arthur passed over Wood Island in July 2014. Did a site reconnaissance occur after that storm? For Alternative 3, will the reconnaissance after significant storm events be a different kind of inspection than the 3-year inspections, i.e just a walk-through versus a full mobilization of MEC/MPPEH resources?	<p>The document has been modified to define a significant storm event as a "named tropical storm and hurricane storm event".</p> <p>No inspection of Wood Island was performed after Hurricane Arthur, as the site inspection criteria proposed in this decision document had not been developed at that time.</p> <p>The 3-year inspections and the named storm inspections will only consist of a site visit to inspect for sign damage and the accumulation of MPPEH on the island. Based on the results of each site visit, the determination will be made as to whether sign repairs or another surface removal are needed.</p>

Draft Decision Document
Former Cat Island Bomb Target BT-2
Marine Corps Air Station Cherry Point
Havelock, North Carolina
Comments provided by Jill Pafford/NCDENR on May 26, 2015

#	Section	Comment	Response
3	Page 2-8	Table 2-3 - It is not clear how ARARs apply to Alternative 2, since Alternative 2 only involves warning signs and indicators. This is also stated in Section 2.8.1.2, and should be changed or amended to specify the kind of ARARs that are applicable to each Alternative.	In Attachment 2 (ARARs), the Prerequisite Column of each table identifies to which alternatives each ARAR applies. The only ARAR identified that is considered applicable to Alternative 2 is the location-specific ARAR presented in Table 3 of Attachment 2.
4	Page 2-9	Table 2-3 - It is not clear why the State and Community Acceptance for Alternative 2 is "unlikely". Has there been a public meeting regarding this decision document that would lead to that assumption? A better descriptor for State and Community Acceptance might be "low" to "high", similar to RODs. This is also mentioned in Section 2.8.1.2.	<p>It is believed that the State and Community would be unlikely to accept Alternative 2 because MEC/MPPEH would remain in place on the island and would be readily accessible to trespassers.</p> <p>A public meeting has not been held regarding this issue.</p> <p>The text has been modified to describe the likelihood of State and community acceptance of each alternative as "low" or "high".</p>
5	Page 3-1	In Section 3.1, please restate that the Navy asserts that the selected remedy will meet the threshold criteria and that NCDENR concurs.	The text has been modified to state, "Based on an evaluation of the data and other information available for the site, the Navy and NCDENR asserts, and NCDENR concurs, that the selected remedy meets the threshold criteria and provides the best balance of tradeoffs among the other alternatives with respect to the evaluation criteria."

Draft Decision Document

Former Cat Island Bomb Target BT-2

Marine Corps Air Station Cherry Point

Havelock, North Carolina

Comments provided by Jill Pafford/NCDENR on May 26, 2015

#	Section	Comment	Response
6	Attachment 1	The cost analysis for Alternate 2 is confusing, and may contain actions/cost more relevant to Alternate 3, since Alternate 2 only involves warning sign reconnaissance/replacement.	The assumptions stated for Alternatives 2 and 3 have been modified for clarification to indicate that each inspection includes a complete site walk of Wood Island in order to access all sign locations. The same LOE is needed to conduct the site inspections for Alternative 2 and Alternative 3.
7	Attachment 2	It is unclear why Region 9 PRGs are specified for the soil ARARs.	The reference to the Region 9 PRGs has been removed from Attachment 2.