

State of North Carolina  
 Department of Environment,  
 Health and Natural Resources  
 Division of Solid Waste Management



James B. Hunt, Jr., Governor  
 Jonathan B. Howes, Secretary  
 William L. Meyer, Director

December 21, 1994

Mr. Gary McSmith  
 Atlantic Division  
 Naval Facilities Engineering Command  
 Code 1823  
 1510 Gilbert Street  
 Norfolk, VA 23511-2699

**Subject: Request for Additional Information Regarding Oversight and Cleanup at BRAC Sites**

Dear Mr. McSmith:

We recently received a copy of the Navy's response to questions raised by state agencies during their review of the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed realignment of the Naval Aviation Depot at MCAS - Cherry Point. (See attached letter, dated October 12, 1994, to Ms. Chrys Baggett, Director of the NC State Clearinghouse, from Thomas C. Horsch, Head of the Facilities Planning and Real Estate Department of the Department of the Navy.) Regarding the outstanding soil and groundwater contamination issues, this letter states, "These issues are being addressed through an agreement with the North Carolina Superfund Section established under superfund regulations. Therefore, any additional work that is indicated as needed by the testing results will be carried out in accordance with the CERCLA and under the supervision of the State Superfund Section."

Even though the Base Realignment and Closure (BRAC) sites are not identified as installation restoration program (IRP) sites, the NC Superfund Section has been reviewing BRAC related documents because it is the state's responsibility to promote, protect, and conserve the environment, health and natural resources of North Carolina. Therefore, any base activities that may adversely affect these assets justifies the state's involvement.

Documents such as Site Characterization and Evaluation Reports and Site Cleanup Plans, which were prepared for several of the BRAC sites prior to the commencement of construction activities, have been submitted to the Superfund Section thus far. It is our understanding that the contaminated areas identified in these reports will be further assessed and remediated during the construction phase. In order to monitor the progress of cleanups at the BRAC sites where contaminated areas have been

identified, the NC Superfund Section should be kept informed of the schedule, and the assessment and remedial activities undertaken during the construction phase.

**NOTE:** Should new areas of contamination be discovered during the construction activities, these areas should be reported to the state. In accordance with MCAS - Cherry Point's Hazardous Waste Management Permit, any newly identified solid waste management units (SWMUs) or areas of concern (AOCs), or newly discovered releases at previously identified SWMUs and AOCs, should be reported, in writing, within fifteen (15) calendar days of discovery. Such areas may require investigations and remedial action in order to ensure adequate protection of human health and the environment

**Additional information is requested regarding the oversight and cleanup of BRAC sites. Please address the following questions and/or concerns:**

**1. Schedule**

For each BRAC site, what is the schedule for the commencement of construction activities, and what are the proposed commencement and completion dates for the assessment and remediation activities?

**2. Coordination/communication**

Our concern involves the coordination/communication between the Navy and Marine Corps IRP remedial project managers (RPMs) and the Navy's BRAC construction project managers (and their contractors) regarding the assessment and cleanup activities to be conducted at these BRAC sites.

The Site Cleanup Plans originally identifying the contaminated areas to be addressed during BRAC construction were prepared under the direction of Navy and Marine Corps IRP RPMs. It is our understanding that these IRP RPMs (and their contractors, who were involved in the field work and preparation of the Site Cleanup Plans) will not be the same project managers and contractors who will be performing further assessment and remediation activities at these identified areas during BRAC construction. Therefore, close coordination and communication between IRP and BRAC construction personnel is essential to ensure the proper field identification and project management of the contaminated areas to be addressed, and to ensure that the cleanup goals are achieved. Close coordination and communication between IRP and BRAC construction personnel is also necessary in the notification process, and in the handling and management of any new areas of contamination that may be encountered during construction activities.

Please explain the existing coordination/communication process between IRP and BRAC construction personnel. What is the extent of oversight by IRP personnel to ensure that contamination in the BRAC construction areas will be properly assessed and

remediated, if necessary. What procedures are to be implemented should new areas of contamination be encountered during construction? What will be the process used to notify the IRP representatives?

2. **Coordination/communication** (continued)

Our concern also involves the coordination/communication of information between MCAS-Cherry Point and the NC Superfund Section, who will be monitoring the progress of BRAC site cleanups.

Who will notify the state and keep the state informed regarding the discovery and status of any new areas of contamination, and how will this be communicated to the state?

3. **Summary and Confirmation of Site Cleanup at BRAC Sites**

A summary report documenting the assessment and remediation activities undertaken during the construction phase should be prepared and submitted to the state. This summary report should include, at a minimum, the following information for each BRAC site:

- a. Dates of field work for assessment and remediation activities;
- b. Methods of field screening used, along with equipment calibration data;
- c. Results of field screening and field screening locations;
- d. Soil sampling locations and laboratory analytical results (for investigatory sampling and confirmation sampling);
- e. Transportation of contaminated soil (name of contractor transporting the contaminated soil, quantity, destination (include manifests));
- f. Soil treatment and/or disposal (quantities and methods, associated laboratory analyses required for treatment/disposal, name and location of accepting facility, associated manifests and permits);
- g. Location, and horizontal and vertical extent, if known, of any new areas of contamination discovered during the construction phase (place location on figure and include discussion of any abatement measures taken to address these areas; analytical results of any soil and groundwater samples collected should also be included.)
- h. Discussion (with figure indicating locations) of any remaining areas of contamination left in place, so that these areas can be addressed in future investigations and remediated, if necessary.

The information requested above is necessary for the IRP and regulatory personnel involved with assessment and remediation activities at MCAS-Cherry Point to monitor the cleanup of these BRAC sites, and to be cognizant of any other areas of contamination that should be addressed on an emergency or health-risk basis, or in future environmental investigations performed at the base. Please respond to our

questions/concerns identified in items 1 and 2 above as soon as possible. A summary report (item 3) should be submitted to the NC Superfund Section upon completion of the assessment and remediation activities performed at each BRAC site. Any newly discovered areas of contamination should be reported to the state as per the conditions of MCAS-Cherry Point's Hazardous Waste Management Permit.

If you have any questions, I can be reached at (919) 733-2801, extension 244.

Sincerely,



Linda F. Raynor  
Environmental Engineer  
NC Superfund Section

cc: Jack Butler, Head, Remediation Branch, NC Div. of Solid Waste Management  
Mike Kelly, Division Deputy Director, NC Division of Solid Waste Management  
Bill Meyer, Director, NC Division of Solid Waste Management  
Beth Hartzell, Environmental Engineer, NC Hazardous Waste Permitting Branch  
Jerome H. Rhodes, Chief, NC Hazardous Waste Section  
Chrys Baggett, Director, NC State Clearinghouse  
Renee Henderson, IRP RPM, MCAS-Cherry Point  
George Radford, Supervisor, IRP, MCAS-Cherry Point  
Paul Rakowski, EFD, LANTDIV  
Thomas Horsch, Head, Facilities Planning & Real Estate Dept., Dept. of the Navy  
Gena Townsend, RPM, USEPA - Region IV, Waste Management Division  
Mickey Hartnett, USEPA - Region IV, Waste Management Division



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DEPARTMENT OF THE NAVY  
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*10/27/94*  
(804) 445-2334

TELEPHONE NO.

IN REPLY REFER TO:

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2032  
12 OCT 1994



*EHR Fy/T*

Ms. Chrys Baggett, Director  
North Carolina State Clearinghouse  
116 West Jones Street  
Raleigh, North Carolina 27603-8003

Re: ENVIRONMENTAL ASSESSMENT (EA) AND FINDING OF NO SIGNIFICANT IMPACT (FONSI) FOR THE PROPOSED REALIGNMENT OF THE NAVAL AVIATION DEPOT, CHERRY POINT (SAI NO. 95E00000075)

Dear Ms. Baggett:

This letter serves to respond to several questions raised by state agencies during review of the subject Environmental Assessment (EA) and Finding of No Significant Impact (FONSI). These comments were forwarded to us on September 9, 1994.

One of the comments indicates that some relocation actions had already begun prior to completion of the EA, and issuance of the FONSI. As indicated on page 2-1 of the EA, a Record of Categorical Exclusion was prepared on the interim leasing of facilities to accommodate the initial influx of engineers involved with prototyping the transferred helicopters. The prototyping process involves the evaluation of the repair and renovation process to determine the most efficient methods. The personnel are being accommodated in on-base and off-base leased facilities.

Several comments were made on the presentation of data in the "Existing Environment Section", particularly land-use and school data. While the suggested format might improve the readability of the document, the overall conclusions would not change. The comments will be considered in preparation of our future NEPA documents, in particular the Cherry Point Realignment Environmental Impact Statement (EIS).

Relative to the discussion on Open Space and Recreation, the Statewide Comprehensive Outdoor Recreation Plan was not reviewed during preparation of the NADEP EA, however, we are obtaining a copy for use in preparing the Cherry Point Realignment EIS. Existing Land-Use Plans and Master Plans reviewed during the NADEP EA preparation indicated no problems related to shortages of recreational facilities. The reason that on-station recreational resources were not characterized in the "Existing Environment Section" is that not all facilities are available for use by civilian employees. The civilian employees would rely predominantly on off-base facilities.

Regarding the noise analysis, as indicated by the commenter, the Day-Night average sound level (DNL) is the accepted methodology to assess long-term noise impacts. This methodology is supported by the 1992 FICON report. Therefore, it was the measure used to characterize the existing noise environment. The noise levels associated with the NADEP realignment are minimal when contrasted to the current level of operations at MCAS Cherry Point (less than three percent increase in flight operations expected). Therefore, no significant changes to the noise environment are anticipated as a result of this action. The EIS for the Cherry Point Realignment will include future noise contours resulting from the realignment of the FA/18s. Contours will be developed showing the current Day-Night average sound level and projected Day-Night average so that any potential land-use compatibility issues can be identified. The operations resulting from the NADEP realignment will also be included in this analysis.

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There was also a question on the assumption that a doubling of vehicular traffic would only produce a three decibel change in noise levels. We have confirmed that this is an accurate statement.

As indicated in the comment on the traffic analysis, the traffic volumes reported in the NADEP EA will serve as the future baseline conditions for the Cherry Point Realignment EIS.

In response to the comment that because of outstanding soil and groundwater contamination issues the EA and FONSI are premature, the following information is provided. These issues are being addressed through an agreement with the North Carolina Superfund Section established under superfund regulations. Therefore, any additional work that is indicated as needed by the testing results will be carried out in accordance with the CERCLA and under the supervision of the State Superfund Section. The additional testing information referenced in the EA has now been received and approximately 1100 cubic yards of soil will be removed from sites 2 and 4. The final workplan for this action is currently being completed in association with the NC Division of Solid Waste Management.

Relative to the comments on the "Mitigation Section", the reference to planning study funding from the Office of Economic Adjustment (OEA) was not meant to be a specific mitigative measure but merely to identify that planning study assistance is being coordinated by that office. OEA will be funding a Growth Management Plan during Fiscal Year 1995. The funding is being provided to the Civilian-Military Community Council.

In conclusion, the EA does provide adequate analysis to support the issuance of the FONSI. Thank you for your comments, and if you have any additional questions, my point of contact is Mr. Jim Haluska at 804-445-2307.

Sincerely,



THOMAS C. HORSCH, P.E.  
Head, Facilities Planning &  
Real Estate Department  
By direction of the Commander