**CH2M HILL**
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December 9, 2014

458605.FI.TP

Mr. Matt Aufman
Inactive Hazardous Sites Branch – REC Program
NCDENR – Division of Waste Management
217 West Jones St.
Raleigh, North Carolina 27603

Subject: *Quarterly Remedial Action Progress Report – 4th Quarter 2014*
IHSB Site Name: Towers Road Disposal Area
IHSB Site ID No.: NONCD0002893

Dear Mr. Aufman:

On behalf of Harvey Point Defense Testing Activity, CH2M HILL is pleased to submit the second Remedial Action Progress Report for the Towers Road Disposal Area in Hertford, North Carolina. The Remedial Action for excavation and offsite disposal of waste and impacted soil began in June 2014 and is ongoing. The Progress Report documents the activities conducted from September to December of 2014. As described in the report, the work is currently on hold pending Explosives Safety Submission approvals but is planned to be reinitiated in early 2015 to progress in a manner to achieve the mandatory work phase completion deadlines and to meet the time frame outlined in the REC Administrative Agreement.

Please contact me at 757-671-6231 if you have any questions or comments.

Sincerely,
CH2M HILL

Kim Henderson
Registered Site Manager

cc: Mr. Brian Lee/NAVFAC
Mr. Brian Murphy/HPDTA
Ms. Janna Staszak/CH2M HILL

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 1 OF 2

IHSB SITE NAME TOWERS ROAD DISPOSAL AREA

DATE & NAME OF DOCUMENT Quarterly Remedial Action Progress Report – 4th Quarter 2014

TYPE OF SUBMITTAL (circle all that apply): Report, Work plan, Work Phase Comp. Statement, Schedule Change

## REMEDIATING PARTY DOCUMENT CERTIFICATION STATEMENT (.0306(B)(2))

"I certify under penalty of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

PATRICK N. ROBERTSON, D/Admin HPDTA
Name of Remediating Party

Signature of Remediating Party

12/4/2014
Date

## NOTARIZATION

NORTH CAROLINA (Enter State)

PERQUIMANS **COUNTY**

I, DEBORAH LYMAN, a Notary Public of said County and State, do hereby certify that PATRICK N. ROBERTSON did personally appear and sign before me this day, produced proper identification in the form of DRIVERS LICENSE, was duly sworn or affirmed, and declared that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certification is true and accurate, and he or she then signed this Certification in my presence.

WITNESS my hand and official seal this 4 day of December, 2014

Notary Public (signature)

My commission expires: 24 July 2014

(OFFICIAL SEAL)

DEBORAH O. LYMAN NOTARY PUBLIC MY COMMISSION EXPIRES 24 July 2014 PERQUIMANS COUNTY, N.C.

*Document Certification Form No. DC - I*
*(Revised 8/11)*

REC PROGRAM DOCUMENT CERTIFICATION FORM - PAGE 2 OF 2
IHSB SITE NAME TOWERS ROAD DISPOSAL AREA
DATE & NAME OF DOCUMENT Quarterly Remedial Action Progress Report – 4th Quarter 2014
TYPE OF SUBMITTAL (circle all that apply): Report Work plan, Work Phase Comp. Statement, Schedule Change

## REGISTERED SITE MANAGER CERTIFICATION OF SIGNATURES

As the Registered Environmental Consultant for the Site for which this filing is made, I certify that the signatures included herewith are genuine and authentic original handwritten signatures and/or true, accurate, and complete copies of the genuine and authentic original handwritten signatures of the persons who purport to sign for this filing. I further certify that I have collected through reliable means the originals and/or copies of said signatures from the persons authorized to sign for this filing who, in fact, signed the originals thereof. Those persons and I understand and agree that any copies of signatures have the same legally binding effect as original handwritten signatures, and I certify that any person for whom I am submitting a copy of their signature has provided me with their express consent to submit said copy. Additionally, I certify that I am authorized to attest to the genuineness and authenticity of the signatures, both originals and any copies, being submitted herewith and that by signing below, I do in fact attest to the genuineness and authenticity of all the signatures, both originals and copies, being submitted for this filing.

KIM HENDERSON
Name of Registered Site Manager

Signature of Registered Site Manager — Date: 12·9·14

## REGISTERED SITE MANAGER DOCUMENT CERTIFICATION STATEMENT (.0306(b)(1))

"I certify under penalty of law that I am personally familiar with the information contained in this submittal, including any and all supporting documents accompanying this certification, and that the material and information contained herein is, to the best of my knowledge and belief, true, accurate and complete and complies with the Inactive Hazardous Sites Response Act N.C.G.S. 130A-310, et seq, and the remedial action program Rules 15A NCAC 13C .0300. I am aware that there are significant penalties for willfully submitting false, inaccurate or incomplete information."

KIM HENDERSON
Name of Registered Site Manager

Signature of Registered Site Manager — Date: 12·9·14

## NOTARIZATION

VIRGINIA (Enter State)

VIRGINIA BEACH **COUNTY**

I, REBECCA SINGLETON, a Notary Public of said County and State, do hereby certify that KIM HENDERSON did personally appear and sign before me this day, produced proper identification in the form of DRIVERS LICENSE, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental consultant of the remediating party of the property referenced above and that, to the best of his or her knowledge and belief, after thorough investigation, the information contained in the above certifications is true and accurate, and he or she then signed these Certifications in my presence.

WITNESS my hand and official seal this 9th day of December, 2014

Notary Public (signature)

(OFFICIAL SEAL)

REBECCA S SINGLETON NOTARY PUBLIC MY COMMISSION NUMBER 180890 COMMONWEALTH OF VIRGINIA

My commission expires: 12/31/16

*Document Certification Form No. DC - II*
*(Revised 8/11)*

# Remedial Action Progress Report
# Fourth Quarter 2014
# IHSB Site Name: Towers Road Disposal Area
# IHSB Site ID No.: NONCD0002893

| | |
|---|---|
| **PREPARED FOR:** | NCDENR Inactive Hazardous Sites Branch - REC Program |
| **COPIES:** | Brian Murphy, HPDTA<br>Brian Lee, NAVFAC |
| **PREPARED BY:** | CH2M HILL |
| **DATE:** | December 2014 |

## 1 Introduction

This Progress Report presents the field activities and results for the September 2014 to December 2014 period of the Remedial Action (RA) at the Towers Road Disposal Area (TRDA), Harvey Point Defense Testing Activity (HPDTA), located at 2835 Harvey Point Road in Hertford, Perquimans County, North Carolina (**Figure 1** and **Figure 2**). The RA began in June 2014 and is being conducted to address potential human health risks associated with exposure to waste and constituents in soil. Once the RA for waste and soil is complete, groundwater will be further evaluated as part of the Phase II Remedial Investigation (RI).

The RA was initiated prior to completion of the RI to expedite the site remediation and closure process by addressing waste, which is the presumed source of contamination to other site media. The RA consists of the excavation and offsite transportation and disposal of waste and impacted soil, as well as support activities such as erosion and sediment control installation, vegetation clearing, geophysical and topographic surveying, confirmation sampling and site restoration. The RA activities and preparation of this RA Progress Report were conducted on behalf of HPDTA and Naval Facilities Engineering Command (NAVFAC) in accordance with the Remedial Action Plan (RAP) and Preconstruction Report[1] (CH2M HILL, 2014b) and reporting requirements for the Registered Environmental Consultant (REC) Program Rules pursuant to 15A North Carolina Administrative Code (NCAC) 13C .0306(c) and 15A NCAC 13C .0306(o).

## 2 Background

The TRDA consists of the 2nd Street Disposal Area and 5th Street Disposal Area, both located in the northern portion of HPDTA. The 2nd Street Disposal Area is located in the northeast quadrant of the intersection of 2nd Street and Flat Run Road. The 5th Street Disposal Area is located north of Flat Run Road approximately 1,000 feet east of the 2nd Street Disposal Area (**Figure 2**). The 2nd Street Disposal Area is primarily a grassy field. The 5th Street Disposal Area contains a concrete pad on both the northern and southern sides of Flat Run Road.

The disposal areas were initially reported to North Carolina Department of the Environment and Natural Resources (NCDENR) in 2011. The site was entered into the REC program on April 8, 2013. The REC Phase I RI field activities were completed in 2014 and identified waste in-place; volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and

[1] The Interim Remedial Action Plan (IRAP) and Preconstruction Report document was submitted to the REC Program in April 2014. Following submittal, because the remedy was designed to remove waste and meet the remedial goals for soil, the IRAP was subsequently changed to remove "interim" and is now considered the RA for waste and soil.

metals at concentrations above regulatory criteria in soil; and VOCs, SVOCs, and metals at concentrations above regulatory criteria in groundwater (CH2M HILL, 2014a). In addition to the RA, the REC Phase II RI field activities are in progress (CH2M HILL, 2014c).

# 3 Remedial Action Activities and Performance Evaluation Results

The RA for waste and impacted soil at the TRDA was initiated on June 27, 2014 to meet following remedial action objectives:

- Limit direct exposure to waste and impacted soil.
- Reduce the potential for contaminant migration from soil to groundwater and from the waste to soil and groundwater.

Onsite work completed during this quarter (September 2014 through December 2014) consisted only of the removal and offsite disposal of RA-derived waste, as discussed in Section 5 below. The limited progress was a result of the discovery of material potentially presenting an explosive hazard (MPPEH), determined to be whole and parts of 3.5-inch M29 Practice Rockets, in the excavated material at the 2nd Street Disposal Area on August 1, 2014. As a result, onsite work was stopped and all equipment and personnel demobilized from the site on August 4, 2014, to assess the conditions and revise the plans to address the potential explosive hazard.

In preparation to resume work, development of an Explosives Safety Submissions (ESS) has been initiated for the 2nd Street Disposal Area for submittal to Naval Ordnance Safety and Security Activity (NOSSA) for review and approval to ensure applicable Department of Defense regulations and standards are applied and health and safety procedures are identified and implemented to allow the onsite work to resume safely.

For the 5th Street Disposal Area, an ESS-Determination Request (ESS-DR) was developed and submitted to NOSSA in October 2014 to determine whether or not an ESS was required to resume work. As a result of MPPEH not being identified and only a limited amount of excavation remaining at the 5th Street Disposal Area, NOSSA responded to the ESS-DR indicating in November 2014 that an ESS was not required to resume RA activities. Planning to re-mobilize and complete the remaining RA activities at the 5th Street Disposal Area has been initiated.

# 4 Quality Assurance/Quality Control

No field or laboratory quality assurance/quality control (QA/QC) sampling was completed this quarter as a result of the limited site work performed.

# 5 Remedial Action-Derived Wastes

RA-derived waste is being managed in accordance with REC Program Guidance, in a manner that provides protection of human health and the environment and that complies with all applicable federal, state, and local laws, rules, and regulations (NCDENR IHSB, 2014).

One 55-gallon drum of Toxic Substances Control Act (TSCA)-regulated solid RA-derived waste was transported offsite on October 10, 2014, by ECOFLO of Greensboro, North Carolina to the ECOFLO permitted disposal facility (USEPA ID Number NCD980842132). A total of 41.74 tons of RA-derived scrap metal and concrete, were transported offsite on October 28, 2014, to the Empire Recycling facility in Morgan's Corner, Elizabeth City, NC.

# 6 Schedule

The following work is anticipated to be performed from December 2014 through March 2015:

- Submit the draft ESS for the 2nd Street Disposal Area to NOSSA for review.
- Remobilize to complete the RA for the 2nd Street Disposal Area, pending approval of the 2nd Street Disposal Area ESS.

- Remobilize to complete the RA for the 5th Street Disposal Area. The anticipated activities at the 5th Street Disposal Area during the next quarter include:
    - Complete test pitting and additional excavation if waste is encountered, to further investigate anomalies identified during the geophysical surveying.
    - Complete offsite transportation and disposal of waste and soil, tires, and compressed gas cylinders.
    - Complete site restoration activities, consisting of a post-excavation topographic survey, backfilling to pre-excavation elevations, and applying seed and straw to all disturbed areas.

The project will proceed in a manner to achieve the mandatory work phase completion deadlines set out in the REC Administrative Agreement for the site. This includes completing the RI by April 2016 and the RA for soil by April 2021.

# 7 References

CH2M HILL. 2014a. Final Phase I Remedial Investigation Report, Towers Road Disposal Area, Harvey Point Defense Testing Activity, Hertford, North Carolina. March.

CH2M HILL. 2014b. Final Interim Remedial Action Plan and Preconstruction Report, Towers Road Disposal Areas – Waste and Soil, Harvey Point Defense Testing Activity, Hertford, North Carolina. April.

CH2M HILL. 2014c. Final Phase II Remedial Investigation Work Plan, Towers Road Disposal Areas, Harvey Point Defense Testing Activity, Hertford, North Carolina. April.

Department of Environment and Natural Resources, Division of Waste Management, Superfund Section, Inactive Hazardous Sites Branch (NCDENR IHSB). 2014. *Registered Environmental Consultant Program Implementation Guidance*. November.

12-112-005

Legend

HPDTA Boundary

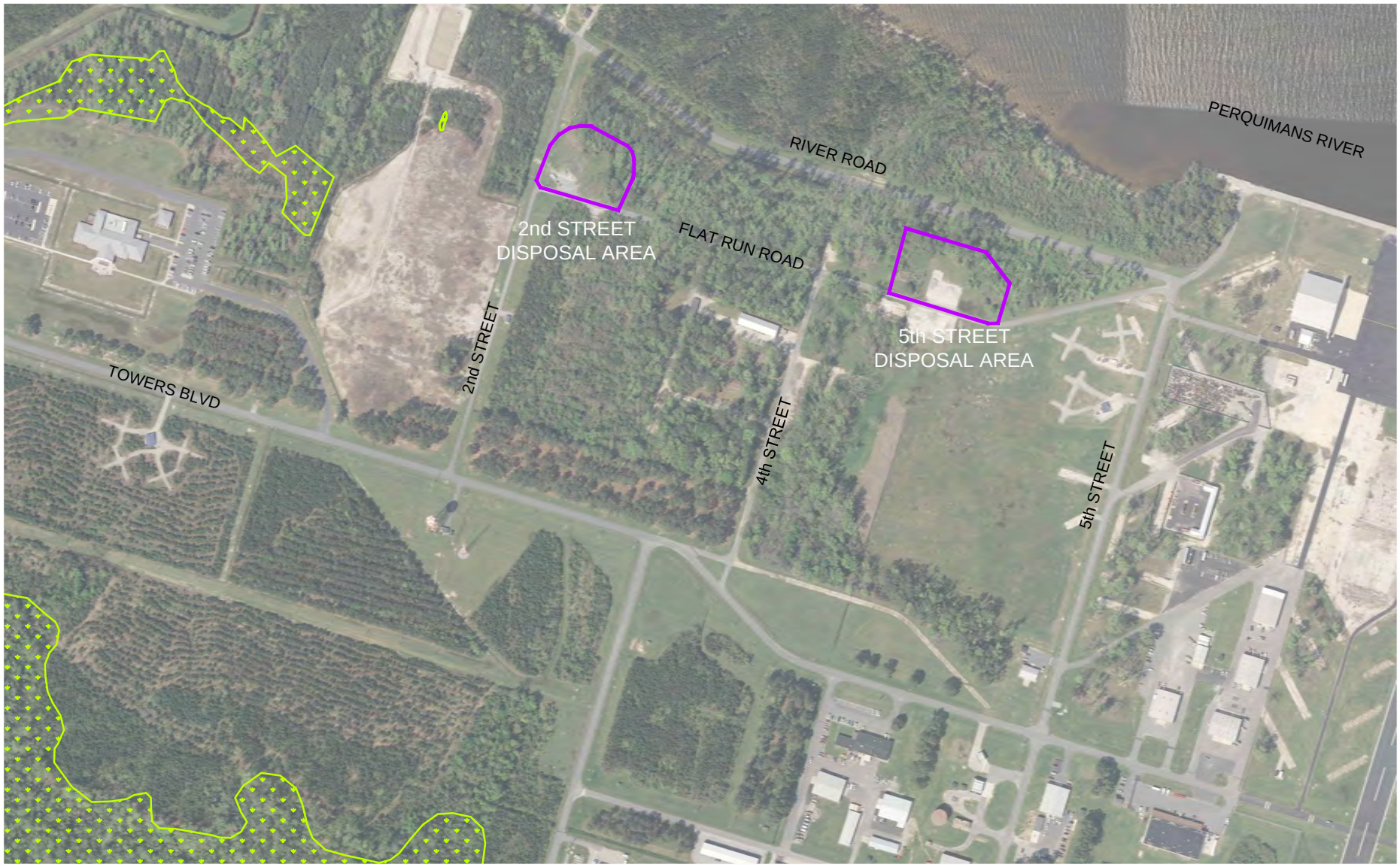
N
W E
S

0 6000 12000 Feet

Figure 1
HPDTA Location
Harvey Point Defense Testing Activity
Hertford, North Carolina

CUES MappingServices

12-112-006




Legend

Wetland

Investigation Area

N
W E
S

0 250 500 Feet

Figure 2
Site Location Map
Harvey Point Defense Testing Activity
Hertford, North Carolina

CUES MappingServices