



CH2M HILL
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September 10, 2015

480121.PP.PM

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

Subject: *Quarterly REC and Remedial Action Progress Report – 4th Quarter 2015*
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 this quarterly progress report, documenting both overall REC Program progress and Remedial Action progress, for this quarter for the Towers Road Disposal Area in Hertford, North Carolina. The REC Phase II Remedial Investigation was initiated in May 2014 and the Remedial Action for excavation and offsite disposal of waste and impacted soil was initiated in June 2014 and both are ongoing. This progress report documents the activities conducted from June through August 2015. As described in the report, the work is currently on hold pending Explosives Safety Submission approval and funding, but it is anticipated that these items will be resolved and the work will resume during the next quarter. Due to the continued delays, there is potential for the mandatory Remedial Investigation work phase completion deadline (April 2016) outlined in the REC Administrative Agreement to not be met; however, efforts are ongoing to identify ways to expedite the schedule. Once approval for the Explosives Safety Submission and funding are received, the project schedule will be updated and communicated to NCDENR.

Please note that the primary contact for the remediating party is now Brian Lee at 252-426-4360.

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

Sincerely,
CH2M HILL

A handwritten signature in black ink, appearing to read "Kim Henderson".

Kim Henderson
Registered Site Manager

cc: Mr. Kirk Stevens/NAVFAC
Mr. Rodger Jackson/NAVFAC
Mr. Brian Lee/HPDTA
Ms. Janna Staszak/CH2M HILL

IHSB SITE NAME Towers Road Disposal Area

DATE & NAME OF DOCUMENT Quarterly Progress Report- 4th Quarter 2015

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."

Harvey Point Defense Testing Activity
Name of Remediating Party


Signature of Remediating Party

Sept 9, 2015
Date

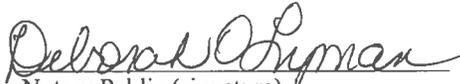
NOTARIZATION

North Carolina (Enter State)

Perquimans COUNTY

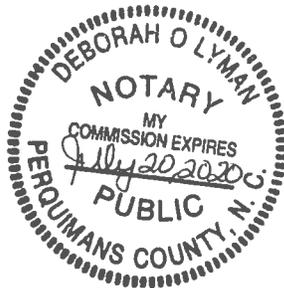
I, Deborah Lyman, a Notary Public of said County and State, do hereby certify that Patrick N. Robertson did personally appear and sign before me this day, produced proper identification in the form of drivers license, was duly sworn or affirmed, and declared that, to the best of his or her knowledge 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 9 day of September, 2015.


Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 20 July 2020



IHSB SITE NAME Towers Road Disposal Area

DATE & NAME OF DOCUMENT Quarterly Progress Report- 4th Quarter 2015

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

[Handwritten Signature]
Signature of Registered Site Manager

9.10.15
Date

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

[Handwritten Signature]
Signature of Registered Site Manager

9.10.15
Date

NOTARIZATION

Virginia (Enter State)

Virginia Beach COUNTY

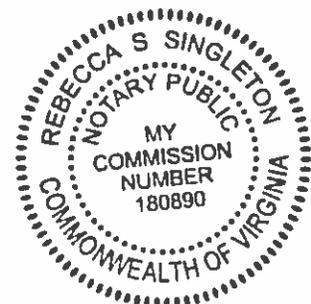
I, Rebecca Singleton, a Notary Public of said County and State, do hereby certify that Kim Henderson did personally appear and sign before me this day, produced proper identification in the form of VA drivers license, was duly sworn or affirmed, and declared that, he or she is the duly authorized environmental 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 10 day of September, 2015.

[Handwritten Signature]
Notary Public (signature)

(OFFICIAL SEAL)

My commission expires: 12/31/16



Progress Report

Fourth Quarter 2015

IHSB Site Name: Towers Road Disposal Area

IHSB Site ID No.: NONCD0002893

PREPARED FOR: NCDENR Inactive Hazardous Sites Branch - REC Program

COPIES: Brian Lee, HPDTA
Kirk Stevens, NAVFAC
Rodger Jackson, NAVFAC

PREPARED BY: CH2M HILL

DATE: September 2015

1 Introduction

This progress report presents the Registered Environmental Consultant (REC) program activities conducting during the June through August 2015 period for the Towers Road Disposal Area (TRDA) at Harvey Point Defense Testing Activity (HPDTA), located at 2835 Harvey Point Road in Hertford, Perquimans County, North Carolina. Preparation of this report was conducted on behalf of HPDTA and Naval Facilities Engineering Command (NAVFAC) in accordance with the Executed REC Administrative Agreement [North Carolina Department of Environment and Natural Resources (NCDENR), 2013], Remedial Action (RA) Plan (RAP) and Preconstruction Report¹ (CH2M HILL, 2014b), and reporting requirements for the REC Program Rules pursuant to 15A North Carolina Administrative Code (NCAC) 13C .0306(c) and 15A NCAC 13C .0306(o). This report meets the requirements for both the quarterly letter status report (due October 15, 2015) and the quarterly RA progress report (due September 11, 2015).

2 Background

The TRDA consists of the 2nd Street Disposal Area and 5th Street Disposal Area within HPDTA (**Figure 1** and **Figure 2**). TRDA was initially reported to NCDENR in 2011. The site was entered into the REC program on April 8, 2013. The REC Phase I Remedial Investigation (RI) field activities were completed in 2014 and identified waste in-place; volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and metals at concentrations above regulatory criteria in soil; and VOCs, SVOCs, and metals at concentrations above regulatory criteria in groundwater (CH2M HILL, 2014a). The REC Phase II RI was initiated in May 2014 and the Remedial Action was initiated in June 2014. The RA 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 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

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.

support activities such as erosion and sediment control installation, vegetation clearing, geophysical and topographic surveying, confirmation sampling and site restoration.

On site activities (RI and RA) were stopped in August 2014 due to 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. For the 5th Street Disposal Area, an Explosives Safety Submission (ESS¹)-Determination Request was developed and submitted to Naval Ordnance Safety and Security Activity (NOSSA) in October 2014 to determine whether or not an ESS was required to resume work. As a result of MPPEH not being identified within the 5th Street Disposal Area and only a limited amount of excavation remaining at that area, NOSSA responded to the ESS-Determination Request in November 2014 indicating that an ESS was not required to resume activities. However, funding limitations have prevented mobilization to resume on-site activities. NOSSA authorization to resume on-site activities at the 2nd Street Disposal Area has not yet been obtained.

3 Work Performed in Prior Quarter (June to August 2015)

No onsite work was completed during this quarter due to the discovery of MPPEH in the excavated material at the 2nd Street Disposal Area in August 2014 and funding limitations. Because no on-site work was performed, no new performance results are available, no field or laboratory quality assurance/quality control sampling was completed, and no RA-derived waste was generated or transported offsite.

In preparation for resuming on-site activities, the following work was performed:

- NOSSA provided comments on the ESS for the 2nd Street Disposal Area, which was developed 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. NAVFAC provided responses to the NOSSA comments, which NOSSA accepted.
- An addendum to the RAP and Pre-construction Report was prepared to address changes in approach needed to address the potential presence of MPPEH, and is undergoing HPDTA and NAVFAC preliminary review.
- A proposal to continue work at TRDA, including both the RA and Phase II RI, was submitted to NAVFAC and is pending negotiation and award.
- The quarterly REC and RA progress report was submitted in June 2015.

4 Work Anticipated to Be Performed in Upcoming Quarter (September to November 2015)

The following work is anticipated to be performed from September 2015 through November 2015:

- Submit the final ESS for the 2nd Street Disposal Area to NOSSA for review and approval.
- Resume the RA for TRDA (pending funding). The anticipated activities include:
 - Complete and submit the RAP and Pre-construction Report Addendum to NCDENR.
 - Procure contractors to perform on-site activities.
 - Mobilize to the 5th Street Disposal Area and transition to the 2nd Street Disposal Area.

¹ An ESS is a document required for intentional physical content with munitions and explosives of concern (MEC) and/or MPPEH and to conduct intrusive activities at sites known or suspected to contain MEC and/or MEC to ensure applicable Department of Defense regulations and standards are applied and health and safety procedures are identified and implemented to allow the work to be conducted safely.

As a result in the delays with the ESS approval and funding, there is potential for the mandatory Remedial Investigation work phase completion deadline outlined in the REC Administrative Agreement to not be met (April 2016); however, efforts are ongoing to identify ways to expedite the schedule.

5 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.

NCDENR. 2013. Executed REC Administrative Agreement, Towers Road Disposal Area. April.



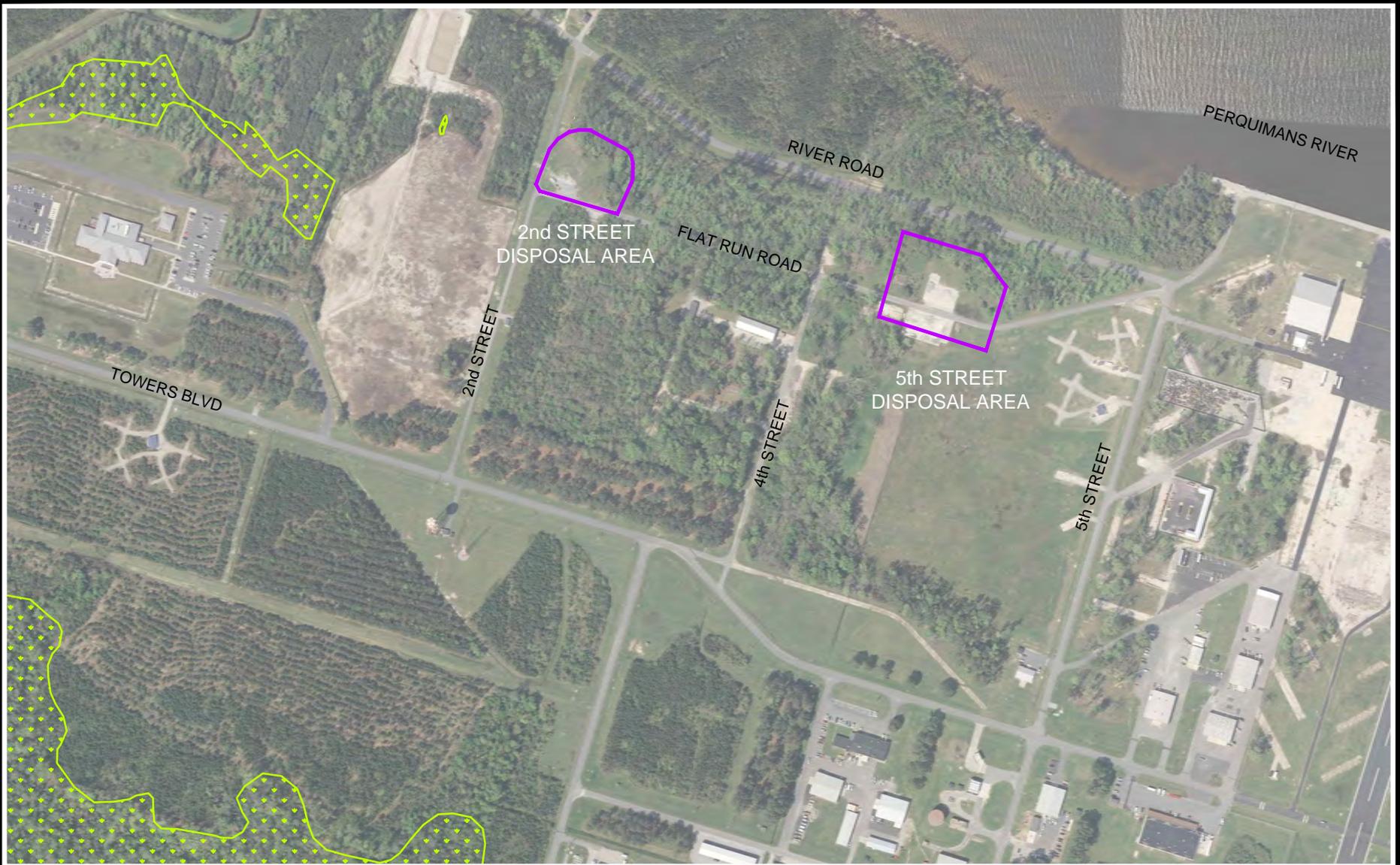
Legend

 HPDTA Boundary



0 6000 12000 Feet

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



Legend

- Wetland
- Investigation Area



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