

FINAL AMENDED PROPOSED PLAN

FORMER PORT ANGELES COMBAT RANGE MRS-2

PORT ANGELES, WASHINGTON

FUDS Property Number: F10WA0033

INTRODUCTION

The United States Army Corps of Engineers (USACE) is issuing an amended Proposed Plan (PP) for portions of the former Port Angeles Combat Range (PACR).

Executive Order 12580 delegates CERCLA authority to the United States Department of Defense (DoD) as the lead agency for DoD facilities. Pursuant to the Defense Environmental Restoration Program (DERP), 10 U.S.C. 2700–2711, DoD has authority to take response actions at Formerly Used Defense Sites (FUDS) for releases caused by past DoD activities. Under delegations from DoD through the United States Army (Army), USACE is the lead agent for implementing response actions under the FUDS program.

A Remedial Investigation (RI) was completed by USACE in 2015. The RI Report identified three Munitions Response Site (MRS) Boundaries at the PACR (**Figure 1**) as the following:

- Range Complex No. 1 (105.7 acres with evidence of Munitions and Explosives of concern (MEC) and Munitions Debris (MD)
- Range Complex No. 1(a) (1,286.5 acres with no evidence of MEC or MD)
- Range Complex No. 1(b) (1,238.5 acres of the Olympic National Park)

A Feasibility Study (FS) and subsequent PP were completed recommending further action (surface and subsurface clearance of Munitions and Explosives of Concern [MEC] followed by Educational Land Use Controls [LUCs]) for Range Complex No.1. The PP recommended No Action for Range Complex No. 1(a) and potential future evaluation for Range Complex No. 1(b).

MARK YOUR CALENDAR

This Amended Proposed Plan is intended to inform the public of USACE's recommendation and to solicit public comments pertaining to the proposed no remedial action recommendation for MRS-2.

Public Comment Period:

Your comments are important to us. The final decision for the Project will be made after reviewing and considering all information submitted during the comment period of October 21, 2019 – November 22, 2019.

USACE will accept written comments (via mail or e-mail) on the Amended Proposed Plan during the public comment period. Comments should be provided to the Public Affairs Office at the address below.

Public Meeting:

Holding a public meeting is one way for interested parties to share their views and comments about the Amended Proposed Plan. All interested individuals are encouraged to attend a public meeting at Room 160 in the Clallam County Courthouse, 223 E 4th Street, Port Angeles, WA. The meeting will be held on November 14, 2019 starting at 6:00 pm.

If you need additional information or would like to comment on the proposed remedy, please contact:

USACE, Seattle District Attn: Rodney Taie P.O. Box 3755 Seattle, WA 98124-3755 rodney.r.taie@usace.army.mil The PP was provided for public review and comment period from March 28, 2016 through May 23, 2016, and a public meeting was held on May 16, 2016.

Subsequently and prior to completion of the Decision Document for the proposed action at Range Complex No.1, it was determined that a portion of the PACR was transferred to the City of Port Angeles in 1968 by a quitclaim deed (deed). Pursuant to the deed, the City agreed to indemnify and save harmless the United States against claims resulting from the possible contaminated condition of the property, and agreed to restrict uses of the property precluding tilling or excavating the ground or harvesting of timber. Additionally, the deed included limited authority for DoD action at the PACR, specifically the right of the United States to post and maintain warning signs on the perimeter of the property.

The conditions of transfer outlined in the deed were communicated to WDOE in a letter dated May 2018.

Based on a review of the conditions of transfer in the deed, DoD does not have the authority under DERP to proceed with the cleanup actions presented in the 2016 Proposed Plan for the portions of the PACR covered by the deed.

In 2018, as part of a re-evaluation of the site, the PACR Complex MRS consisting of 2,629 acres was divided into three MRSs (**Figure 2**), replacing the original RI MRS boundaries identified above:

• MRS-1: 619 acres of the 621 acres transferred to the City of Port Angeles

• MRS-2: 2,007 acres

• MRS-3: 3 acres

MRS-1 consists of the City of Port Angeles Property covered by the deed transfer and includes the 105.7 acres that were recommended for surface and subsurface clearance of MEC. MRS-2 consists of the area where no munitions related material was found during the RI investigation and the adjacent Olympic National Park property. MRS-3 consists of the area where a right-of-entry (ROE) was denied during the RI but has been determined to have potential MEC explosive hazard risk.

Considering the limited authority provided in the deed, potential DERP actions at MRS-1 are limited to the posting of warning signs, maintenance of signage, and an educational website. These actions are being performed separately under an interim or non-time critical removal action (NTCRA) according to 40 CFR 300.415(b)(2) and are not part of this PP. Additionally, MRS-3, where access to investigate was denied by the property owner, is not considered in this PP and will be addressed separately.

This amended PP is for MRS-2 where no remedy is required. This PP presents the rationale for the no action recommendation.

As a FUDS property, environmental restoration is conducted by USACE to comply with the Defense Environmental Restoration Program statute (10 USC § 2710 et seq.) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC § 9601 et seq.).

USACE is issuing this amended PP as part of its public participation responsibilities under Section 117(a) of CERCLA; 42 USC Section 9617(a); and 300.430(f)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan, also known as the National Contingency Plan (NCP).

USACE, as the lead agency for site environmental activities, will select a final remedy for the site after reviewing and considering all information submitted during the public comment period, and in coordination with the Washington Department of Ecology (WDOE).

USACE may evaluate the no action proposal or propose a different response action based on public comments received or other new information. Therefore, the public is encouraged to review and comment on this amended PP.

This amended PP summarizes information that can be found in greater detail in the RI/FS Report and other documents contained in the Administrative Record file for this site, which can be accessed on the USACE website from the following link: http://www.nwk.usace.army.mil/Missions/Environmental/EnvironmentalProjects.aspx

USACE and WDOE encourage the public to review these documents to gain a more comprehensive understanding of the site and the FUDS activities that have been conducted there.

PROJECT BACKGROUND

Site History

The PACR is located seven miles southeast of Port Angeles in Clallam County, Washington. The property consists of approximately 2,629 acres. The geodetic coordinates of the property location are 48° 02' 02" N Latitude and 123° 20' 54" W Longitude. See **Figure 2** for the general location of the site and a site location map.

In early 1943, the 115th Cavalry Squadron (mechanized) requested that land be leased in the area of Port Angeles, Washington for use as a ground-to-ground combat range. The range was intended to be used for tactical firing and shortrange distance firing (200 to 300 yards). Through leases and use permits, 1,600 acres were obtained for use at the PACR. Approximately 32 additional acres, located east of Deer Park Road, were purchased in 1958. The range was used for weapons practice with 37mm and 75mm projectiles, 60mm and 81mm mortars, and various small arms. Though the acreage that was leased to, or otherwise possessed by the United States was only 1,632 acres, the full extent of the range fan and safety buffer encompassed 2,629 acres.

There were no buildings or improvements other than a spotting tower. Troops were encamped at the Port Angeles Fair Grounds/Conservation Corps Camp. Records indicate the range consisted of a single firing line, with firing to the south into the hilly and mountainous terrain. Firing occurred at direct stationary and moving targets (targets and tanks pulled across the range using cables) and indirect firing using coordinates. In April 1944, the range was declared excess and all leases and permits were canceled, returning the land to its original owners.

In August 1948, two fatalities occurred at the site when a 37mm shell exploded inside downed timber that was cut at the former range. Immediately after the deaths, the Army initiated dedudding the area suspected to be contaminated. On May 7, 1949, a Certificate of Clearance was issued for approximately 775 acres that had been cleared of dangerous/explosive material. Additional clearances of the PACR occurred in 1952, 1955, 1956, and 1957. During the 1950s, signs were posted warning the public of dangers from munitions and explosive materials at the site. In the early 1960s, 652 acres deemed to be contaminated were purchased by the United States. In 1968, 621 acres of the 652 acres were transferred to the City of Port Angeles by quitclaim deed. The remaining lands were transferred to a private individual.

MRS Boundaries

Historical site activities included munitions use at the former PACR. Areas potentially impacted by munitions-related activities were identified through a phased investigation process under the Military Munitions Response Program (MMRP). These areas were investigated during the 2015 RI and the original PACR MRS boundaries were refined into three MRS boundaries based on different levels of risk as determined by the type and distribution of potential MEC and MD within each area. The three MRS boundaries identified in the RI Report are shown on **Figure 1**.

In 2018, as part of the previously discussed reevaluation of the site and deed provisions, the original PACR Complex MRS consisting of 2,629 acres was divided into three MRSs (**Figure 2**), replacing the RI MRS boundaries.

MRS-1 consists of 619 acres of the 621 acres of City of Port Angeles Property covered by the deed transfer. During the RI, five MEC items and 147 MD items were found in a 105-acre area associated with a target range and impact areas. This 105-acre area is located wholly within MRS-1. MRS-1 is being addressed in accordance with the deed restrictions between the United States and the City of Port Angeles and is not addressed in this document.

MRS-2 consists of a 2,007-acre area where no evidence of military activity, MEC, MD, or munitions constituents (MC) contamination was identified during the remedial investigation of Range Complex No. 1 (a), and the adjacent Olympic National Park property. The Olympic

National Park property was not physically investigated due to lack of a programmatic agreement between the National Park Service (NPS) and DoD. However, based on the RI results, this area is not believed to be associated with a target range and does not pose an unacceptable explosive hazard risk.

MRS-3 consists of the area where an ROE could not be obtained during the RI. However, MEC and MD were recovered in grids adjacent to MRS-3 during the investigation of Range Complex No. 1 (within the current MRS-1 boundary). Based on the results obtained from the adjacent MRS and the available historic information there is a potential for MEC explosive hazard risk within MRS-3. USACE will seek approval from the property owner to access and investigate the area to determine the actual risk.

SITE CHARACTERISTICS

The 2,629-acre PACR is primarily maintained as a protected watershed by the City of Port Angeles, as a National Park, and also contains private residences. The land is hilly to mountainous. The northern portion of the PACR contains areas of meadowland/grassland and areas of dense forest. Three creeks (Surveyor Creek, Frog Creek, and Morse Creek) flowing from south to north towards the City of Port Angeles, transect the PACR. Vegetation consists of primarily second growth fir and alder with some cedar trees. In forested areas, the PACR has very dense undergrowth that makes access difficult. Recently logged areas have very dense growth of small trees and shrubs that make these areas nearly inaccessible.

Areas or ranges where past DoD munitions-related activities may have been conducted were identified based on historical records and evaluated in Archive Search Reports (ASRs). These reports identified one range (Range Complex No. 1) and seven sub-ranges. Based on historical evidence of MEC, Range Complex No. 1 was recommended for additional investigation for potential MEC hazards.

Range Complex No. 1, as described in the RI/FS Report, included the target and impact areas, and the adjacent buffer zones. The buffer zones were

confirmed based on the distribution of MEC/MD identified from the assisted visual surveys (AVS), geophysical surveys, subsurface investigation, and X-ray fluorescence (XRF) analysis conducted during the RI. Historical information about the ranges and munitions was also used to provide a representation of how the MRS was configured.

The following discussion summarizes the lack of evidence of military activity, MEC, or MD within areas investigated during the RI that are now in MRS-2, supporting the assertion that MEC or MD is unlikely to be present in MRS-2.

Figure 1 shows the locations of the firing point, two target areas, the Direct Fire Impact Area, and Indirect Fire Impact Area identified during the RI. The two target locations were approximately 500 meters (m) and 700m from the firing point. The area investigated during the RI is the Assisted Visual Survey Area (represented as a blue-dashed line on **Figure 1**).

During the RI, all of the five MEC items (M63 37mm HE projectiles) were recovered from the ground surface at Range Complex No. 1 in the vicinity of the target locations. All of the MD was also recovered from within the Range Complex No. 1. The amount and distribution of MEC and MD identified within the Range Complex No. 1 corroborated the locations of the 1948 accident, the direct fire target area with heavy contamination, and the moving target. The Range Complex No. 1, or the area where MEC and MD was identified during the RI, is wholly contained within the current MRS-1 (Figure 2). As noted in the Project Background section of this PP, the current MRS-3 (area without ROE access) was also included in the previous Range Complex No. 1 because of potential MEC risk.

No MEC or MD was identified during the RI in Range Complex No. 1 (a), which includes the areas adjacent to the impact areas of the Range Complex No. 1 (**Figure 1**). The Range Complex No. 1 (a) area coincides with the newly designated MRS-1 and the northern portion of MRS-2 (**Figure 2**).

The lack of evidence of military activity, MEC, or MD identified within these areas supports the assertion that MEC or MD is unlikely present

outside of the target and impact areas and is unlikely to be present in MRS-2.

SCOPE AND ROLE OF ACTION

This amended PP addresses MRS-2.

As described in the following sections, no human health or ecological hazards or risks were identified that require action at MRS-2. Accordingly, the proposed action for the site is No Action – Action Not Necessary for Protection. This proposed action will be the final action for MRS-2.

SUMMARY OF SITE RISKS

USACE determined that the presence of MEC or MD at MRS-2 is unlikely. The northern portion of MRS-2 (the area that coincides with the Range Complex No. 1(a) area shown on Figure 1) was investigated during the RI. Based on the RI observations, neither MEC nor MD was observed in this northern portion of MRS-2. The AVSs in the surveyable portions of Range Complex No. 1 and Range Complex No. 1(a) were conducted in the Direct Fire and Indirect Fire Impact Areas (Figures 1 and 2). Considering the munitions identified during the RI are effective up to a distance of approximately 900m, any MEC that may remain at the site is likely present within the target area and Direct Fire Impact Area included in MRS-1 (Figures 1 and 2).

The Olympic National Park, located in the southern and southwestern portions of MRS-2, could not be surveyed during the RI due to the lack of an access agreement with the NPS (refer to **Figures 1 and 2**). However, it is unlikely MEC could be present in the Olympic National Park portion of MRS-2 based on the following: 1) the RI observations of the portion of MRS-2 that could be investigated and the lack of evidence of military activity, MEC, or MD, and 2) the location and distance of MRS-2 from the firing points, impact, and target areas.

A MEC Hazard Risk Assessment was completed for MRS-2 (Attachment A). The risk assessment determined there were no unacceptable site conditions at MRS-2.

Neither a human health nor ecological MC risk assessment was performed during the RI because MC was unlikely to be present. The 2008/2009 Site Inspection included sampling for metals and explosives. Since MC concentrations were below screening levels, MC sampling was not required for the subsequent RI. In-situ XRF screening of lead in soils indicated concentrations well below regulatory screening levels and therefore no soil sampling for lead analysis was performed. Based on the Site Inspection results and the RI XRF screening results, MC is not suspected to be present on MRS-2 in concentrations that would pose unacceptable risks to human or ecological receptors.

SUMMARY OF NO ACTION RESPONSE

The No Action response for MRS-2 will consist of completing a DD and site closure documentation. Under the No Action response, no remedial or monitoring efforts at MRS-2 are necessary for protection for human health and the environment.

Based on the available information, USACE determined the No Action response for MRS-2 is protective of human health and the environment due to physical site conditions and no unacceptable current or potential future threat of explosive hazards. Based on public comments or new information, USACE, with coordination with WDOE, may decide to modify the no remedial action recommendation.

COMMUNITY PARTICIPATION

USACE, WDOE, City of Port Angeles, and Clallam County provide information regarding the status of the site to the public through the opportunity for public meetings and the Administrative Record file for the site. USACE and WDOE encourage the public to review supporting project documents in the Administrative Record file to gain a more comprehensive understanding of the site and the FUDS activities that have been conducted.

The public is encouraged to review this Amended Proposed Plan and to submit any comments. Based on public comments or new information, USACE, with consultation with WDOE, may decide to

Amended Proposed Plan Former Port Angles Combat Range, MRS-2, F10WA0033

modify the no remedial action recommendation. Therefore, it is important to comment on the Amended Proposed Plan. Comments received will be summarized in the Responsiveness Summary section of the Decision Document, the document which formalizes the selection of the final decision. The Decision Document will be placed in the Administrative Record File.

GLOSSARY, ACRONYMS, AND ABBREVIATIONS

Administrative Record (**AR**): The documents that form the basis for the selection of a response action compiled and maintained by the lead agency.

Archive Search Report (ASR): A detailed investigation report on past MEC activities conducted on an installation. The principal purpose of the Archives Search is to assemble historical records and available field data, assess potential ordnance presence, and recommend follow-up actions at a Defense Environmental Restoration Program – Formerly Used Defense Sites. There are four general steps in an Archives Search: records search phase, site safety and health plan, site survey, and archives search report including risk assessment.

Army: United States Army

AVS: Assisted visual survey

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA): A Federal law enacted in 1980 and modified in 1986. CERCLA provides authority and a process to evaluate and respond to releases of hazardous substances, pollutants or contaminants that may pose a threat to human health and/or the environment.

Decision Document (DD): Following receipt of public comments and final comments from the support agency, the final remedial alternative is selected and documented in the Decision Document.

DoD: Department of Defense

Feasibility Study (FS): A study undertaken by the lead agency to develop and evaluate options for remedial action. The RI data are used to define the objectives of the response action, to develop remedial action alternatives, and to undertake an initial screening and detailed analysis of the alternatives. The term also refers to a report that describes the results of the study.

Formerly Used Defense Sites (FUDS): Facility or site which was under the jurisdiction of the Secretary of Defense and owned by, leased to, or otherwise possessed by the United States at the time of actions leading to contamination by hazardous substances, for which the Secretary of Defense shall carry out all response actions with respect to releases of hazardous substance from that facility or site.

Munitions and Explosives of Concern (MEC): Specific categories of military munitions that may pose unique explosives safety risks, specifically composed of (a) unexploded ordnance, (b) discarded military munitions, or (c) munitions constituents (e.g., TNT, RDX) present in high enough concentrations to pose an explosive hazard.

Munitions Constituents (MC): Any materials originating from unexploded ordnance, discarded military munitions, or other military munitions, including explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions.

Military Munitions Response Program (MMRP): The program established by the Department of Defense to manage and address environmental impacts and health and safety concerns at former defense sites where MEC has been released to the environment.

Munitions Debris (MD): Remnants of munitions (e.g., fragments, penetrators, projectiles, shell casings, links, fins) remaining after munitions use, demilitarization, or disposal.

Munitions Response Area (MRA): Any area on a defense site that is known or suspected to contain UXO, DMM, or MC. Examples include former ranges and munitions burial areas. A munitions response area is comprised of one or more munitions response sites.

Munitions Response Site (MRS): A discrete location within a MRA that is known to require a munitions response.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP): The federal government's blueprint for responding to both oil spills and hazardous substance releases.

NPS: National Park Service

PACR: Port Angles Combat Range

Proposed Plan (PP): A plan where a brief summary of the preferred alternative is presented. The plan is made available for public comment, as part of the administrative record file, along with the opportunity for an accompanying public meeting allowing modification or alternate selection of the preferred alternative.

Remedial Investigation (RI): Investigation to characterize the site, nature of contamination and risk to human health and the environment.

ROE: Right-of-Entry

Site Inspection (SI): An investigation phase where readily available information is collected and analyzed to assess the absence or presence of contamination.

USACE: United States Army Corps of Engineers

USC: United States Code

WDOE: Washington Department of Ecology

XRF: X-ray fluorescence

Important Reference Documents

U.S. Army Corps of Engineers, 2015, Remedial Investigation Report/Feasibility Study, Port Angeles Combat Range, Washington.

U.S. Army Corps of Engineers, 2019, Engineering Evaluation/Cost Analysis (EE/CA), Port Angeles Combat Range, Washington

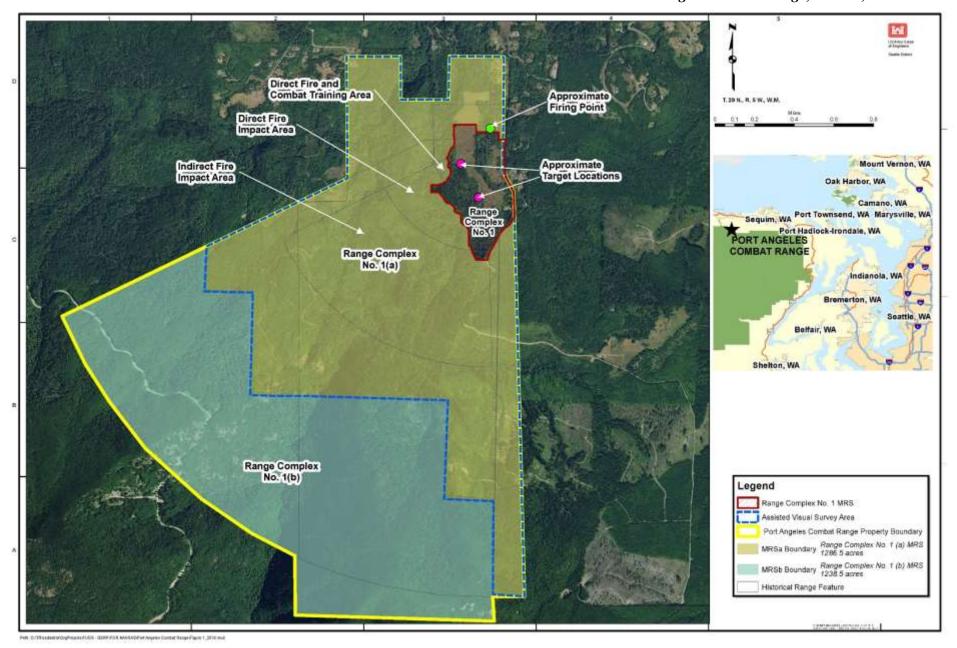


Figure 1: RI Report MRS Boundaries

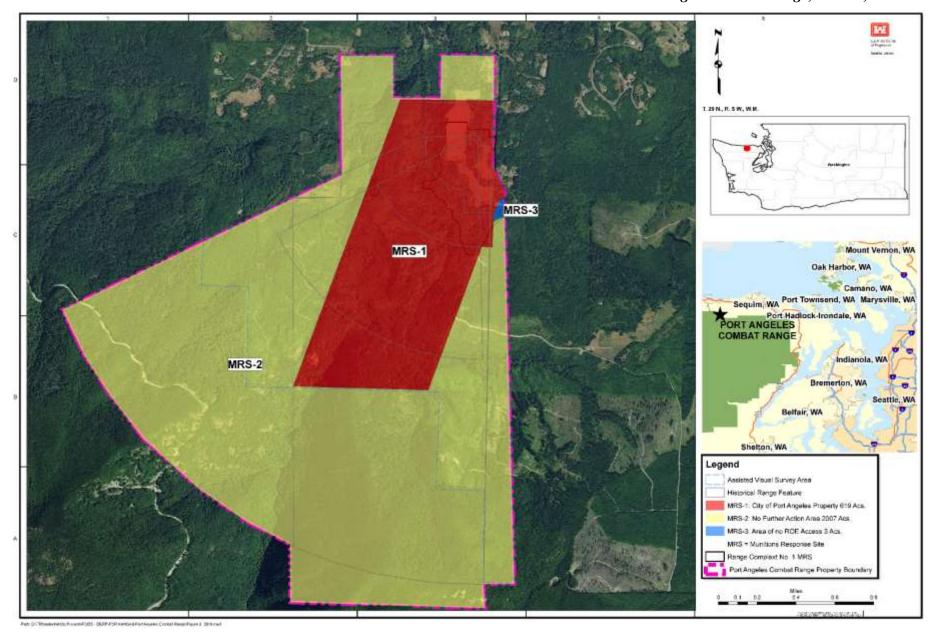


Figure 2: Former Port Angeles Combat Range MRSs

COMMENT SHEET

The USACE encourages your written comments on the proposed plan for the former Port Angeles Combat Range MRS-2 in Clallam County, Washington. This form is provided for your convenience. Please mail this form to Rodney Taie, USACE Project Lead, or bring your comments to the public meeting. You may use additional sheets of written comments. Comments by mail must be postmarked no later than November 22, 2019, to the address shown below:

Rodney Taie, Project Lead USACE, Seattle District P.O. Box 3755 Seattle, WA 98124-3755

P.O. Box 3755 Seattle, WA 98124-3755					
Scattle, WA 70124-5755					
Comment Submitted by:					
Address:					

Return Address		affix postage here
		
		

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