



Final

National Park Service

Community Involvement Plan

Starr Mill Site

Death Valley National Park (DEVA)

Interior Region 10

National Park Service

January 2020



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LIST OF ABBREVIATIONS AND ACRONYMS

AML	Abandoned Mine/Mineral Lands
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CIP	Community Involvement Plan
DEVA	Death Valley National Park
DU	Decision Unit
EE/CA	Engineering Evaluation and Cost Analysis
EPA	U.S. Environmental Protection Agency
ESVs	Ecological Screening Values
ISM	Incremental Sampling Methodology
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPS	National Park Service
PA	Preliminary Assessment
RSLs	Regional Screening Levels
SI	Site Inspection



1.0 INTRODUCTION

The National Park Service (NPS) is issuing this *Community Involvement Plan* (CIP) as a resource to enable meaningful community involvement throughout its investigation, selection, and implementation of cleanup activities at the Starr Mill Site (Site). The NPS is conducting these cleanup activities at the Site pursuant to the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA), 42 U.S.C. §§ 9601, *et seq.* and its implementing regulations under the *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP), 40 C.F.R. Part 300. NPS is committed to encouraging public participation and providing opportunities for communication between the NPS and the affected community, interested stakeholders, and community residents during the environmental investigation and cleanup activities at the Site.

CERCLA-related terms are defined in Appendix A, Glossary.

1.1 Purpose and Objectives of the CIP

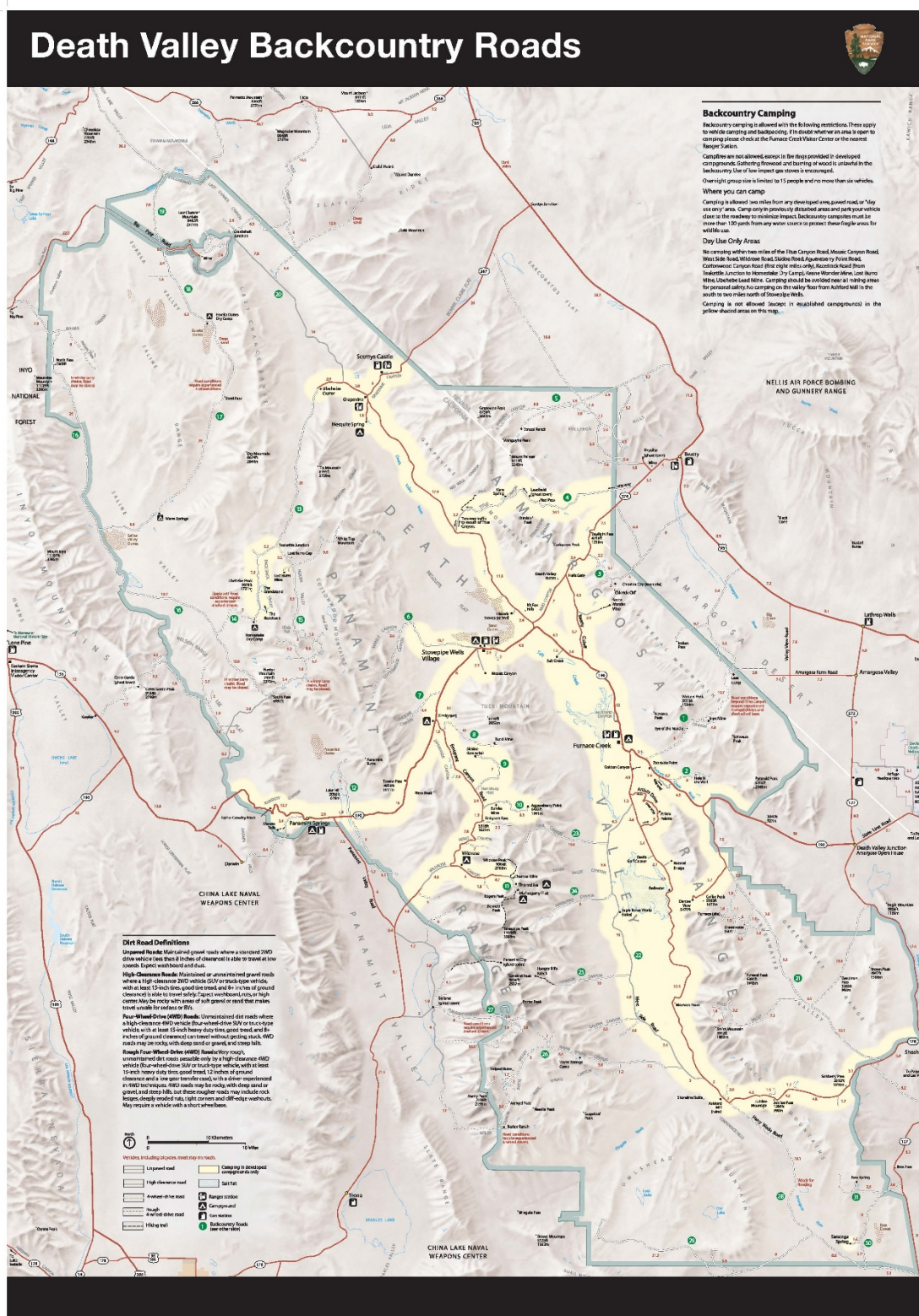
The CIP has been prepared in accordance with CERCLA and the NCP. The CIP serves as a guide for the NPS to engage and inform community members, environmental groups, government officials, the media, and other interested parties in the environmental investigation and cleanup activities at the Site. The CIP is a “living” document and will be updated or revised, as appropriate, as Site conditions or circumstances change.

The CIP has two key objectives. The first key objective is to provide for the dissemination of information to the public in a timely, accurate, meaningful, and understandable manner. The second objective is to create opportunities—and ensure the community understands those opportunities—for active public participation, enabling interested persons to provide valuable comments that can be used by the NPS project team for planning and decision making.

The strategies to accomplish these objectives take into consideration the location of the Site and surrounding community. The Starr Mill Site is located in Death Valley National Park (DEVA), in an unincorporated area of Inyo County, California (Figure 1). The Site is located at approximately 4,000 feet above sea level and bound on the west by steep canyon walls and on the east by Emigrant Canyon Road and the eastern canyon wall. The entire Site covers an area of less than 0.5 acre. Access to the Site is via Emigrant Canyon Road, which is open to the public. The Site experiences low annual visitation. The Site consists of four terraced, in-ground process pools and/or tank foundations with stacked rock walls or “dug-in” perimeters, and a concrete grout interior liner. The Mill was operated during the 1930s. The Site currently has concrete foundations from a few of the cyanide tanks and a mound of tailings on bedrock above the road.



Figure 1. Death Valley National Park Map





1.2 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

The NPS is investigating and cleaning up the Site pursuant to CERCLA and the NCP. Congress enacted CERCLA, also known as Superfund, in 1980 to address releases and threatened releases of hazardous substances into the environment. CERCLA gives the President broad powers to respond to hazardous substance releases and threatened releases as the President deems necessary to protect the public health or welfare or the environment, including enforcement authority with respect to parties responsible for the releases. The President has delegated this authority to a number of federal departments and agencies, including the Department of the Interior. The NPS, an agency within the Department of the Interior, is the CERCLA lead agency for the Site.

To implement CERCLA, the U.S. Environmental Protection Agency (EPA) created the NCP, which is a set of regulations that detail how CERCLA cleanups are to be conducted, including requirements for community involvement activities. Different requirements apply to different types of response actions. A non-time-critical removal action is being conducted at the Site based on NPS's determination that a planning period of six months or more is available prior to the start of removal activities at the Site because no immediate threat to public health or welfare or the environment is present at the Site. As part of the non-time-critical removal action, NPS is conducting an engineering evaluation/cost analysis (EE/CA) to characterize the nature and extent of Site contamination, evaluate associated potential risks to human health and safety and the environment, identify relevant cleanup requirements, develop a range of cleanup alternatives, and identify a recommended response action alternative for the Site. As the lead agency for the Site, NPS must involve the community during the engineering evaluation and cost analysis process in the manner detailed in the NCP, and this CIP is part of that community involvement process.



2.0 PROJECT BACKGROUND

2.1 Site Description and History

Mr. Starr and Walter M. Hoover operated the Starr Mill for only a few months in 1935, using cyanide. They used the Site to process ore from Nemo Canyon. The Site was later cleaned up by National Park Service personnel (sometime prior to 1940).

The Site currently has concrete foundations from four cyanide tanks, stacked rock walls, and a mound of tailings on bedrock above the road.

Access to the Site is via Emigrant Canyon Road, which is open to the public (Figures 2 and 3). In 2018, 13,598 vehicles used Emigrant Canyon Road, but likely only a few of these people stopped at Starr Mill.

There is no record of any claim being filed on the site. No new claims are allowed on the site, as it is federal land managed by the National Park Service. Land uses are unlikely to change in the future.

2.2 Site Location

The Starr Mill Site is located in Death Valley National Park (DEVA), in an unincorporated area of Inyo County, California (Figures 1, 2 and 3). The Site is located at approximately 4,000 feet above sea level and bound on the west by steep canyon walls and on the east by Emigrant Canyon Road and the eastern canyon wall. The entire Site covers an area of less than 0.5 acre. Starr Mill is about one mile north of the larger, more well-known Jounigan's Mill, which is also adjacent to Emigrant Canyon Road.



Figure 2. Site Vicinity Map

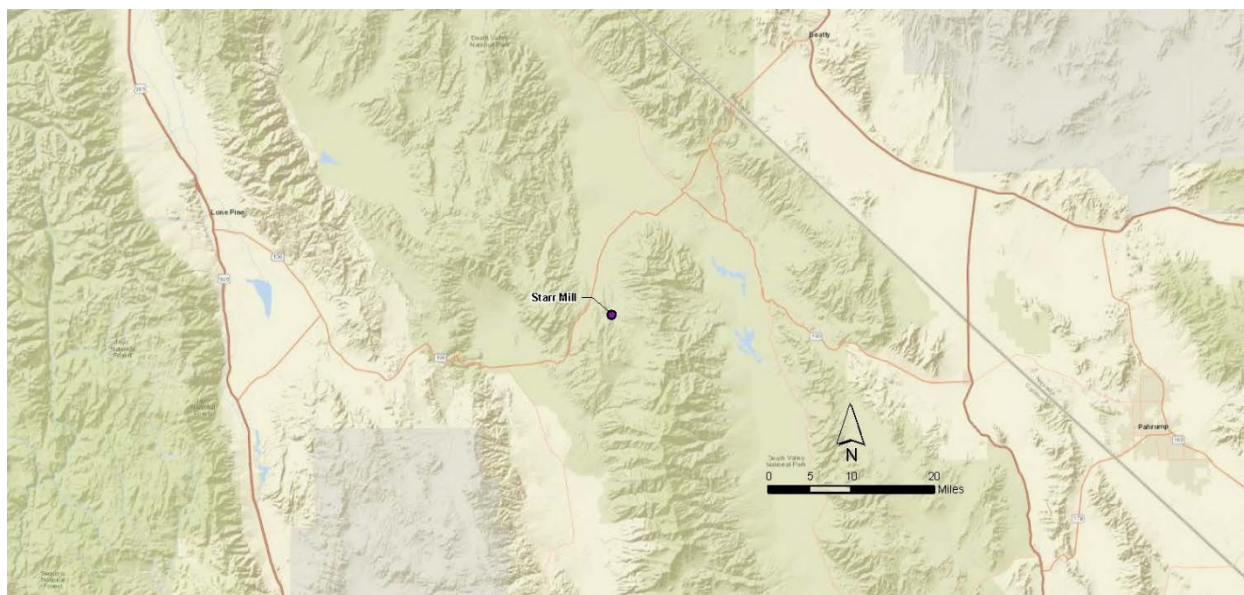
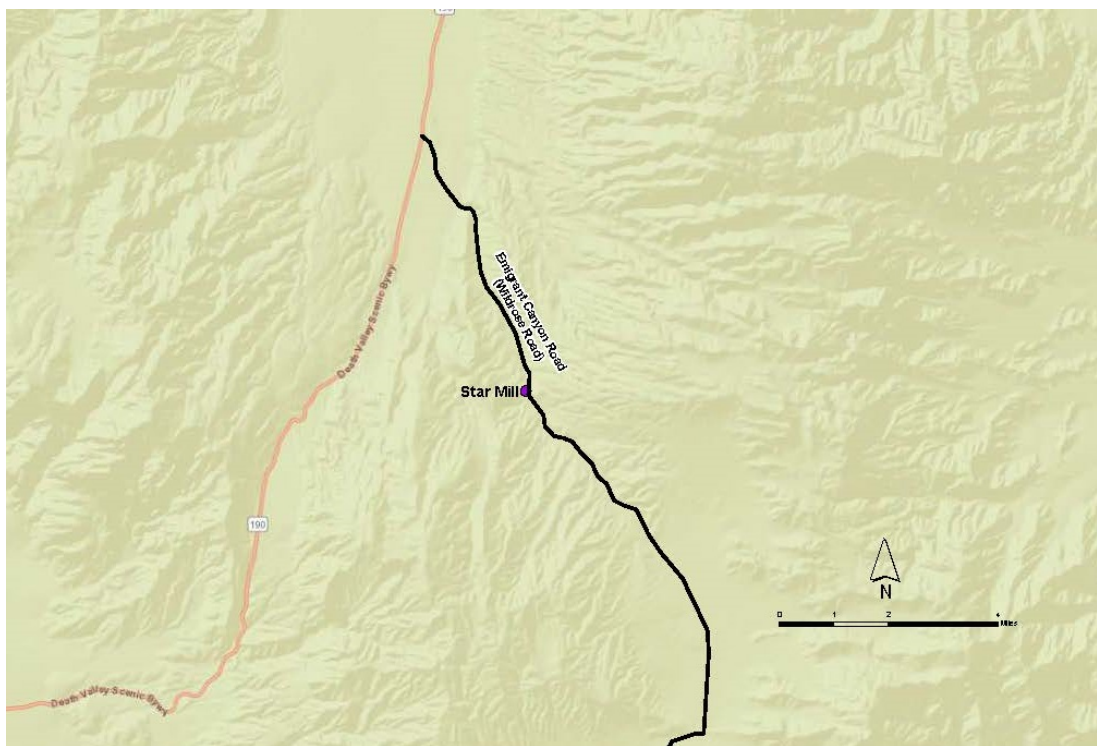


Figure 3. Site Map





2.3 Previous Environmental Studies and Response Actions

A Preliminary Assessment (PA) was conducted in 2014 by Environmental Cost Management (ECM). The PA described the historical uses of the Site, current state of the Site, and approximated by visual means only the extent of various waste rock and mill tailings at the Site.

As a follow-up to PA, a Site Inspection (SI) was conducted by NOREAS, Inc. (NOREAS) at the Site in 2016. Soils are the primary media of concern at the Site. Therefore, soil samples were collected from a single decision unit (DU) at the Site, consisting of the mill foundations and cyanide process area. In addition, a total of 3 discrete samples were collected from an area where eroded mill tailings appeared to have settled, ponded, or placed, located approximately $\frac{3}{4}$ of a mile north of the Site on the west side of Emigrant Canyon Road at the 5-Mile marker. The settlement/ponded area was approximately 5,000 square feet. The soil samples were analyzed for metals, cyanide, and pH. Also, soil samples were analyzed for acid-base accounting (ABA), to determine the acid-generating potential of the soils.

A Conceptual Site Model prepared as part of the SI Report (NOREAS, 2016) illustrates the potential human and ecological exposure routes. The principal human exposure pathways are through dermal contact and inhalation of wind-blown material.

Soils from the mill foundation/cyanide process area (DU-1) contained a number of metals at concentrations above those in the background soils. Specifically, antimony, arsenic, beryllium, cadmium, copper, lead, mercury, molybdenum, selenium, silver, thallium, and zinc exceeded the background levels. In particular, arsenic, lead, mercury, and zinc were significantly higher than the background concentrations. The results of the soil sampling also indicated that arsenic exceeded the USEPA regional screening levels (RSLs) for residential soil. Also, several metals exceeded the NPS ecological screening values (ESVs). Results of ABA tests on mill tailing samples indicates that soils in DU-1 do not have net acid-generating potential.

The three discrete soils collected downgradient from (below) the Site contained the following metals above background soils levels: antimony, arsenic, beryllium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, silver, thallium, and zinc.

2.4 Current and Future Site Activities

The NPS is conducting an engineering evaluation/cost analysis (EE/CA) as part of a non-time-critical removal action to gather additional information. The NPS has determined that it has sufficient data from previous sampling efforts at the Site, so in this instance, the EE/CA process will not include additional site sampling. Existing data will be used to conduct risk assessments to evaluate human health and ecological concerns, and cleanup goals will be established. If cleanup is required, the EE/CA will also develop, present, and evaluate cleanup alternatives.

The final draft EE/CA Report prepared during this process will be made available for public review and comment during a 30-day period. Following the review and comment period, the EE/CA Report will be revised as necessary and issued in final form. NPS will draft a responsiveness summary that summarizes and responds to significant public comments which



will be issued along with the Final EE/CA Report. Following the release of those documents, NPS will issue an Action Memorandum formally selecting the response action alternative for the Site. Once those steps have been taken, NPS will seek funding to implement the selected response action for the Site. Once funding is secured, Site cleanup can proceed.



3.0 COMMUNITY BACKGROUND

3.1 Community Profile

The Starr Mill Site is located in Death Valley National Park (DEVA), and in Inyo County, California (Figures 1, 3, and 3). The Site is accessed via Emigrant Canyon Road.

Inyo County is the 9th-largest county in the United States with an area of 26,488 square kilometers. Home to 18,410 people, Inyo County has a total of 9,438 households earning \$44,796 on average per year. Major cities in Inyo County are Bishop (population: 13,834), Lone Pine (population: 2,076), Big Pine (population: 1,758), Independence (population: 717), Death Valley (population: 443), Olancho (population: 343), Tecopa (population: 155), Darwin (population: 47), Keeler (population: 46), and Shoshone (population: 35).

No one lives at the Site. The closest residents live in Stovepipe Wells, approximately 15 miles driving distance from the Site (approximately 45 minutes of drive time). All residents are employees of either Death Valley Lodging Company or the National Park Service, or are family members of employees.

The Starr Mill Site is within the area specified for co-management by NPS and Timbisha Shoshone Tribe by the Timbisha Shoshone Homeland Act (P.L. 106-423).

About 1,700,000 travelers visit Death Valley National Park each year from all over the world. Most of these visitors pass through, or stay at Stovepipe Wells Resort or Furnace Creek Resort. Camping is prohibited at Starr Mill Site. In 2018, 13,598 vehicles used Emigrant Canyon Road, but likely only a few of these people stopped at Starr Mill.

3.2 Community Involvement History

Information about the Site has been posted at <https://parkplanning.nps.gov>.

3.3 Community Concerns and Needs

To identify community concerns and needs and to identify how and when citizens would like to be involved in the cleanup process, NPS invites public feedback via the following website: <https://parkplanning.nps.gov>

In addition, a notice will be emailed to the DEVA's Partnership List to solicit inputs regarding the community concerns and needs. Depending on the results of this process, NPS may conduct community interviews with local officials, community residents, and various environmental and special interest groups who represent a range of opinions and backgrounds. NPS may ask interviewees for suggestions of additional groups or individuals the NPS should interview, and NPS will contact those suggested additional groups and individuals and may revise this CIP accordingly.



4.0 PLANNED COMMUNITY INVOLVEMENT ACTIVITIES

The key objectives of the community involvement program are to establish and encourage communication between NPS and the community and provide opportunities for the public to provide input throughout the course of CERCLA response activities at the Site. For the purposes of this document, “community” refers to any interested party, not just people living in close proximity.

The following methods and techniques will be used to promote public participation and establish steps to provide timely information to interested residents, agency staff, government officials, the media, and the public at large. The first part of this section describes each community involvement activity and the second part provides a schedule for when those activities will occur.

Important: Upon request, NPS will endeavor to meet identified needs for translation, access to electronic communications, disability access, or other accommodations for people with special needs.

4.1 Communication Methods and Community Involvement Activities

- **Site Spokesperson**

Abby Wines is the designated NPS spokesperson who will inform the community of actions taken, respond to inquiries, provide information concerning the Site, and act as liaison between the NPS and community members, environmental groups, government officials, the media, and other interested parties.

Abby Wines
Public Information Officer, Death Valley National Park
PO Box 579, Death Valley, CA 92328
Phone: 760-786-3221
Email: abby_wines@nps.gov

- **Administrative Record File and Information Repository**

The administrative record file is housed in both information repositories and contains Site environmental investigations and reports and other information that NPS considers or relies upon in the response action selection process. NPS will update the administrative record file at key points during the response action process, such as when important investigations and reports are completed. The information repositories are located at:

Furnace Creek Visitor Center
P.O. Box 579
Death Valley, CA 92328
8 am to 5 pm daily
Phone: (760) 786-3200



Stovepipe Wells Ranger Station

Stovepipe Wells, CA 92328

Open most days, 9 am – 3:30 pm

Phone: (760) 786-2342

- **Interested Parties Mailing List**

NPS maintains an interested-parties mailing list that includes federal, state, and local elected officials; local school district officials; selected agency staff; community groups; media contacts; and interested community members. NPS notifies the parties on the list whenever key documents are published or the status of the Site changes.

In accordance with NPS's sustainability efforts, whenever possible mailings will be sent electronically by email, with hyperlinks to documents posted on the website. However, interested parties can request conventional mail delivery if access to electronic communication is not available. In such cases, the NPS will send a letter informing interested parties of the availability of documents at the information repositories.

Efforts will be ongoing to expand the mailing list. Individuals can be added to the mailing list by contacting the Site spokesperson (see above for contact information).

- **Public Comment Periods**

A public comment period is a formal time period during which the NPS accepts comments from the public on specific proposed actions or decisions. There will be a public comment period when the draft final EE/CA Report is issued.

Generally, public comment periods last for 30 days, although they may be longer. Upon timely request (preferably to the Site spokesperson and in writing) during any public comment period, the NPS will extend the public comment period by a minimum of 15 days.

Upon request, the NPS will meet identified needs for translation, access to electronic communications, or other accommodations for persons with special needs.

Following the close of a formal public comment period, the NPS will prepare written responses to substantive public comments *received during the public comment period* (called a "responsiveness summary"); the responsiveness summary will be added to the administrative record file.

- **Public Notices**

The NPS will issue public notices to inform the community and the general public of public events, publication of key documents, and major Site milestones.



NPS will use one or more of the following methods to distribute public notices about the Site:

- Press release.
- Social media
- parkplanning.nps.gov
- Notice sent to the Interested Parties Mailing List.

- **Public Meetings or Open Houses**

Given the remote location of the Site, and minimal public interest, NPS does not intend to schedule public meetings or open houses relating to this project. As noted above, there will be public notice when the draft final EE/CA Report is made available for public review and comment.

- **Park Visitor Communication**

NPS has determined that the most effective ways to provide Site information to Park visitors will be to use the following methods:

- Park website, www.nps.gov/deva
- Informed Park staff at visitor center information desks (with sufficient information to address visitor questions)

- **Community Updates**

Community Updates are brief documents to inform the community about the Site and the environmental investigation and cleanup process

The NPS will prepare a Community Update upon completion of the draft final EE/CA Report, and possibly at other key milestones in the cleanup process.

- **Site Website**

NPS has established a Site website at parkplanning.nps.gov on which it will post general Site information as well as key cleanup and community involvement documents.

- **Community Involvement Plan Revision**

To remain flexible and able to respond to the evolving needs of the community and changes to the Site, the CIP will be reviewed and revised as needed, and posted on the website. As the response action progresses, NPS staff may identify and use additional means or activities to inform and engage the community.



4.2 Community Involvement Activity Schedule

The NPS selected the above methods and activities to engage and inform the community regarding the Site and Site activities. This section provides a schedule for when those activities will occur.

- **Ongoing Activities**
 - Respond to citizen inquiries and requests
 - Maintain the administrative record file and information repositories
 - Maintain the Interested Parties Mailing List
 - Maintain park visitor communications
 - Maintain the Site website



5.0 REFERENCES

Environmental Cost Management (ECM). 2014a. Preliminary Assessment 27 Abandoned Mineral Lands Sites Death Valley National Park Inyo and San Bernardino Counties, California and Nye County, Nevada. November.

Green, Linda W. and Latschar, John A. 1981. Death Valley National Monument Historic Resource Study: A History of Mining. Available at https://www.nps.gov/parkhistory/online_books/deva/index.htm

Interstate Technology Regulatory Council (ITRC). 2012. Technical and Regulatory Guidance: Incremental Sampling Methodology.

NOREAS, Inc. 2016. Site Inspections of Abandoned Mineral Lands (AML) Sites (Skidoo, Homestake, Journigan's, Starr, Tucki, Cashier and Gold Hill), California and Nevada.

United States Department of the Interior (USDOI). Environmental Compliance Memorandum No. ECM 14-2: Central Hazardous Materials Fund (CHF) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Process for CHF Projects. May 2014. Available at <http://www.doi.gov/pmb/oepc/upload/ECM-14-2-CERCLA-Process-for-CHF-Projects.pdf>.

United States Environmental Protection Agency (USEPA). Superfund Community Involvement Handbook. Apr. 2005. Available at http://www.epa.gov/superfund/community/cag/pdfs/ci_handbook.pdf.

USEPA. Community Involvement Toolkit. Available at <http://www.epa.gov/superfund/community/toolkit.htm>.



APPENDIX A: GLOSSARY

Definitions for CERCLA-related words found throughout the CIP are provided below.

Administrative Record File: A file that contains all information considered or relied upon by the lead agency to make its decision on the selection of a response action under CERCLA. See Section 4.1, Administrative Record File and Information Repository Details, for further information on the Site administrative record file.

CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act): A federal law, commonly known as “Superfund,” which Congress enacted in 1980 and amended in 1986 and 2002. The law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or welfare or the environment; establishes the categories of persons who are liable for such releases; and outlines a framework for investigating and responding to releases and threatened releases of hazardous substances where the lead agency determines it is necessary. CERCLA generally authorizes three types of cleanup actions: emergency response actions, removal actions, and remedial actions.

Cleanup: Used in this document to describe actions taken to address a release or threat of a release of hazardous substances, pursuant to CERCLA, that could affect public health or welfare or the environment. The word “cleanup” is sometimes used interchangeably with the terms remedial action, removal action, response action, remedy, remediation, or corrective action.

Community Interview/Survey: For most response actions, the NCP requires the lead agency to solicit input from the community to determine appropriate activities to ensure public involvement in Site-related decisions.

Community Involvement Plan (CIP): A plan that explains how NPS intends to enable meaningful community involvement throughout the cleanup process by specifying planned community involvement activities to address community needs, concerns, and expectations identified through community interviews and other means.

Decision Unit: A decision unit is the smallest volume of soil for which a decision will be made based on Incremental Sampling Methodology (see below).

Hazardous Substance: Any one of the more than 800 substances defined under CERCLA and the NCP as potentially posing a threat to human health or the environment. Hazardous substances include materials defined as ignitable, corrosive, reactive, or toxic under the Resource Conservation and Recovery Act (RCRA), as well as additional substances listed under the Clean Water Act and hazardous air pollutants listed under the Clean Air Act.

Incremental Sampling Methodology: a structured composite sampling and processing protocol that reduces data variability and provides a reasonably unbiased estimate of mean contaminant concentrations in a volume of soil targeted for sampling. Incremental Sampling Methodology provides representative samples of specific soil volumes defined as decision units by collecting



numerous increments of soil (typically 30–100 increments) that are combined, processed, and subsampled according to specific protocols.

Information Repository: A location open to members of the general public where a collection of documents (including the administrative record file) relevant to a particular CERCLA Site is made available for public review and copying. See Section 4.1, Administrative Record File and Information Repository Details, for the locations and addresses of the Starr Mill Site information repository.

Lead Agency: The government agency with the primary authority to investigate, plan and implement a response action under CERCLA and the NCP at a particular site. In this case, it is the National Park Service.

National Oil and Hazardous Substances Pollution Contingency Plan (NCP): More commonly called the National Contingency Plan or NCP, it is the federal government's regulatory blueprint for responding to both oil spills and releases and threatened releases of hazardous substances. The NCP is the result of our country's efforts to develop a national response capability and promote overall coordination among the hierarchy of responders and contingency plans. The regulations, published at 40 C.F.R. Part 300, detail how CERCLA is to be implemented.

Non-Time-Critical Removal Action: A removal action conducted when the lead agency determines that there is a planning period of at least six months before on-site activities must be initiated.

Notice of Availability: A formal notice announcing the issuance and public availability of a document (e.g., proposed plan) or documents (e.g., the administrative record file or updates thereto). A Notice of Availability is also issued when the information repositories are established. The notice may also announce commencement of a public comment period.

Public Comment Period: A period during which the public can formally review and comment on various documents and proposed response actions.

Removal Action: A type of CERCLA response action with a streamlined planning process. A removal action is conducted to address all or a part of a release or threatened release of hazardous substances when the release requires an expedited, time-critical response, or when the release is of limited size and complexity such that streamlined response planning is appropriate. There are two types of removal actions – time-critical and non-time-critical; sometimes emergency response actions (undertaken by the U.S. Environmental Protection Agency) are referred to as removal actions. The term refers both to the entire removal response action, as well as just the cleanup phase of such an action.

Response Action: The most general CERCLA term used to describe any action taken to respond to a release or threatened release of hazardous substances to protect the public health or welfare or the environment. The term includes all phases of the response, from investigation through monitoring and even enforcement activities. There are generally three types of CERCLA



response actions that may be undertaken by NPS as the lead agency: time-critical removal actions, non-time-critical removal actions, and remedial actions. The response action at Starr Mill Site is a non-time-critical removal action.

Responsiveness Summary: Document summarizing the significant comments received during a public comment period and documenting the lead agency's responses to the comments.

Site: The Starr Mill Site, which comprises the area contaminated or potentially contaminated by a release or threatened release of hazardous substances. The entire Site covers an area of less than 0.5 acre.



APPENDIX B: CONTACT INFORMATION AND DISTRIBUTION LIST

For information about Site cleanup activities, please contact:

Abby Wines
Public Information Officer
PO Box 579, Death Valley, CA 92328
Phone: 760-786-3221
Email: abby_wines@nps.gov

In addition to Death Valley National Park's normal distribution list, the following will be contacted by the park:

California Governor's Office
1303 10th Street, Suite 1173
Sacramento, CA 95814
scheduling@gov.ca.gov

[State Senator Andreas Borgeas](#)
State Capitol
Sacramento, CA 95814
senator.borgeas@senate.ca.gov

[State Representative Devon Mathis](#)
State Capitol, Suite #2111
Sacramento, CA 94249
assemblymember.mathis@assembly.ca.gov

Inyo County Environmental Health Services
kbarton@inyocounty.us

Environmental Protection Agency (EPA)
Mike Stoker, Regional Administrator
US EPA Pacific Southwest, Region 9
75 Hawthorne St.
San Francisco, CA 94105

U.S. Fish and Wildlife Service
Paul Souza, Regional Director
Pacific Southwest Region Headquarters
2800 Cottage Way
Sacramento, California, 95825

California Environmental Protection Agency (CalEPA)
Jared Blumenfeld, Secretary of the Department
P.O. Box 2815
Sacramento, CA 95812-2815



California Department of Public Health
Karen L. Smith, Director
PO Box 997377, MS 0500
Sacramento, CA 95899-7377



APPENDIX C: NCP COMMUNITY INVOLVEMENT REQUIREMENTS

The NCP specifies the following community involvement requirements for the non-time-critical removal action at this Site:

- **At beginning of process:**
 - Designate a Site spokesperson
40 C.F.R. § 300.415(n)(1)
- **No later than when the Engineering Evaluation and Cost Analysis Approval Memorandum is signed**
 - Establish two information repositories (one at a central location and one at or near the Site), and establish an administrative record file and place in the information repositories.
40 C.F.R. § 300.415(n)(4)(i); § 300.800(a); § 300.805(a)
 - Publish notice of availability of the information repositories and the administrative record file in a major local newspaper of general circulation.
40 C.F.R. § 300.415(n)(4)(i); § 300.820(a)(1)
- **Prior to completion of the Engineering Evaluation and Cost Analysis**
 - Prepare and issue a Community Involvement Plan.
40 C.F.R. § 300.415(n)(4)(i)
- **Upon completion of Engineering Evaluation and Cost Analysis and publication of the Engineering Evaluation and Cost Analysis Report:**
 - Provide a public comment period of at least 30 days for submission of written and oral comments. Upon timely request during the public comment period, extend the public comment period by a minimum of 15 additional days.
40 C.F.R. § 300.415(n)(4)(iii); § 300.820(a)(2)
- **After the close of the public comment period:**
 - Prepare a written response to significant comments received during the public comment period; consider and respond to significant comments submitted before the public comment period, as appropriate; place any such responses into the administrative record file.
40 C.F.R. § 300.415(n)(4)(iv); § 300.820(a)(2)