



National Park Service Community Involvement Plan

**Grapevine Firing Range Site
Death Valley National Park
California
December 30, 2019**



Revision Log:

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LIST OF ABBREVIATIONS AND ACRONYMS

| | |
|--------|---|
| CA | California |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| C.F.R. | Code of Federal Regulations |
| CHF | Central Hazardous Materials Fund |
| CIP | Community Involvement Plan |
| DEVA | Death Valley National Park |
| DOI | Department of Interior |
| DU | Decision Unit |
| ECM | ECM Consultants |
| EE/CA | Engineering Evaluation / Cost Analysis |
| EPA | U.S. Environmental Protection Agency |
| ESVs | Ecological Screening Values |
| ISM | Incremental Sampling Methodology |
| ITRC | Interstate Technology and Regulatory Council |
| LMSA | Lead Migration Sink Area |
| MCL | Maximum Contaminant Level |
| NCP | National Oil and Hazardous Substances Pollution Contingency Plan |
| NPS | National Park Service |
| NV | Nevada |
| PA | Preliminary Assessment |
| RSLs | Regional Screening Levels |
| Site | Grapevine Firing Range |
| SI | Site Inspection |



| | |
|--------|---|
| SPLP | Synthetic Precipitation Leaching Procedures |
| SSI | Supplemental Site Inspection |
| U.S.C. | United States Code |
| USDOJ | United States Department of the Interior |
| USEPA | United States Environmental Protection Agency |
| USGS | United States Geological Survey |



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 Grapevine Firing Range (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 Site is located in Death Valley National Park (DEVA) in Inyo County, California (CA); *see* Figures 1 and 2 (Section 2).

1.2 Comprehensive Environmental Response, Compensation, and Liability Act

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 he/she 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 (DOI). The NPS, an agency within the DOI, is the CERCLA lead agency for this 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. The NPS has determined that a non-time-critical removal action is appropriate for the Site.

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 fully 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

This section describes the Site and its operational history.

2.1.1 Site Description

The Site is a former small arms range located within the Grapevine complex in the northeastern portion of Death Valley National Park (DEVA) at an elevation of approximately 2,562 feet. The Site lies approximately 5.7 miles southwest of the Nevada border, 3 miles south of Scotty's Castle, 3 miles northeast of Mesquite Spring campground, and 51 miles northwest of the Furnace Creek Visitor Center (See **Figure 2**). Access to the Site is via an unimproved road heading generally east from the Grapevine Housing Area and Ranger Station compound located off of Scotty's Castle Road (also known as North Highway). The Site is on the southern side of the canyon, partially on a rocky hillside and partially within a dry wash, approximately 0.75 mile east of the housing area. The road is closed to the general public by a locked gate and can only be accessed with an NPS personnel escort.

The Site is approximately 1.5 acres in size and is relatively level, with a hillside on the south/southwest end that is used as the target backstop. The backstop area is approximately 45 feet wide and 80 feet long, with three target positions placed along the hillside. The firing line is not marked; however, NPS personnel reportedly stood approximately 75 feet north of the targets and fired from that location (Versar, 2008). A small dirt hill located north of the firing line was also reportedly used at times as a secondary firing line for shotgun target practice using the same three target positions. During the June 2019 Site reconnaissance, two picnic tables were observed northeast of the backstop with extensive spent ammunition (brass/shells) adjacent to them. One was located approximately 85 feet northeast of the backstop, the other approximately 125 feet from it. It appears that the picnic tables were used as separate firing lines, shooting to the south/southwest into the hillside/backstop. There were less (but noticeable) amounts of spent brass between the areas from both picnic tables all the way to the backstop, indicating that firing may have taken place at various distances.

The Site and surrounding area consist of alluvial deposits (gravels with cobbles to boulders), rock outcrops, and sparse desert scrub vegetation.

2.1.2 Operational History

Formal records regarding the operational history of the Site are not available. It is believed that the shooting range was only used several times per year (over a 2- to 3-year period in the early 1990s) for target practice and to qualify staff for gun permits. The Site has reportedly been inactive since 1992 and is closed to the public.



Figure 1. Area Map

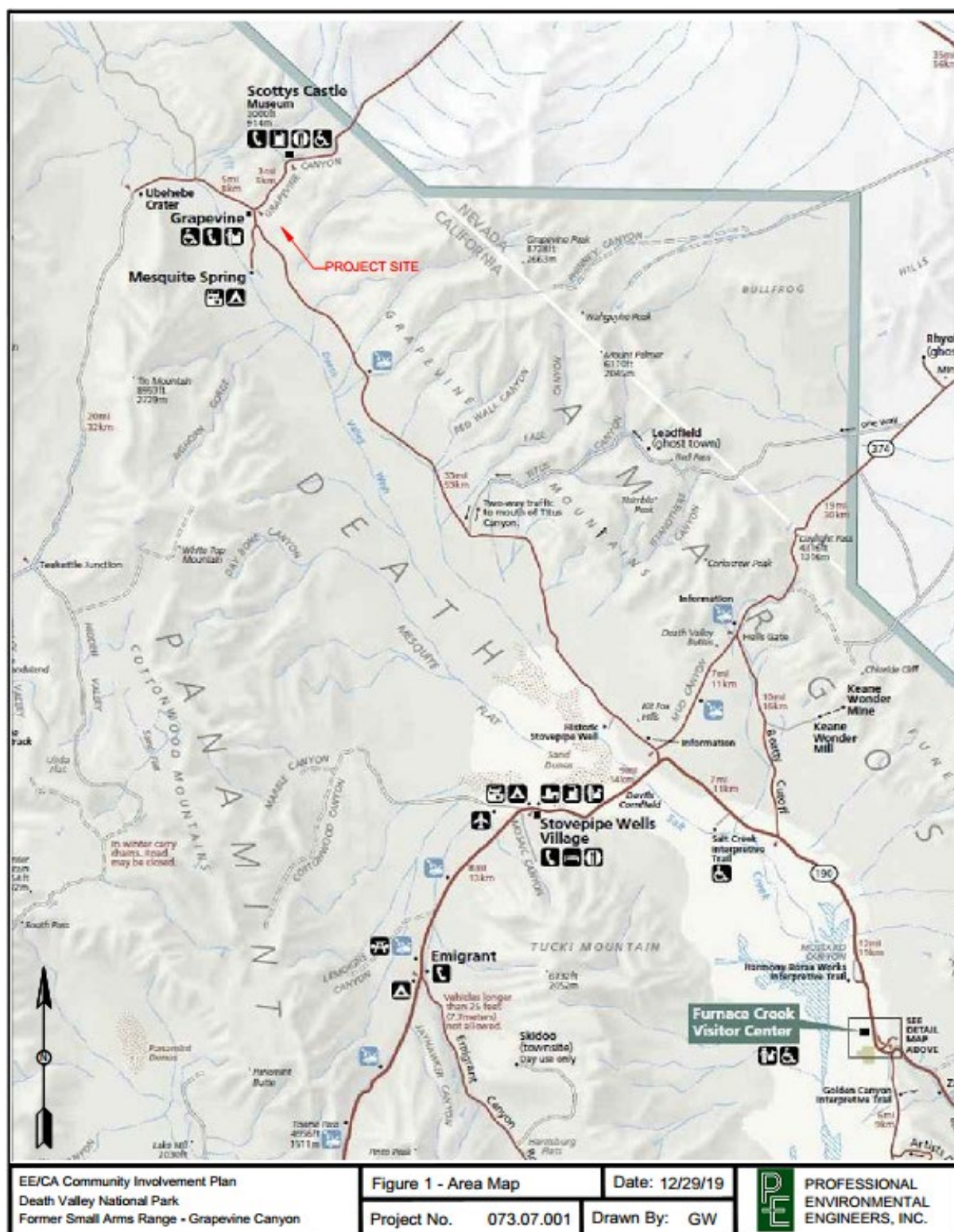
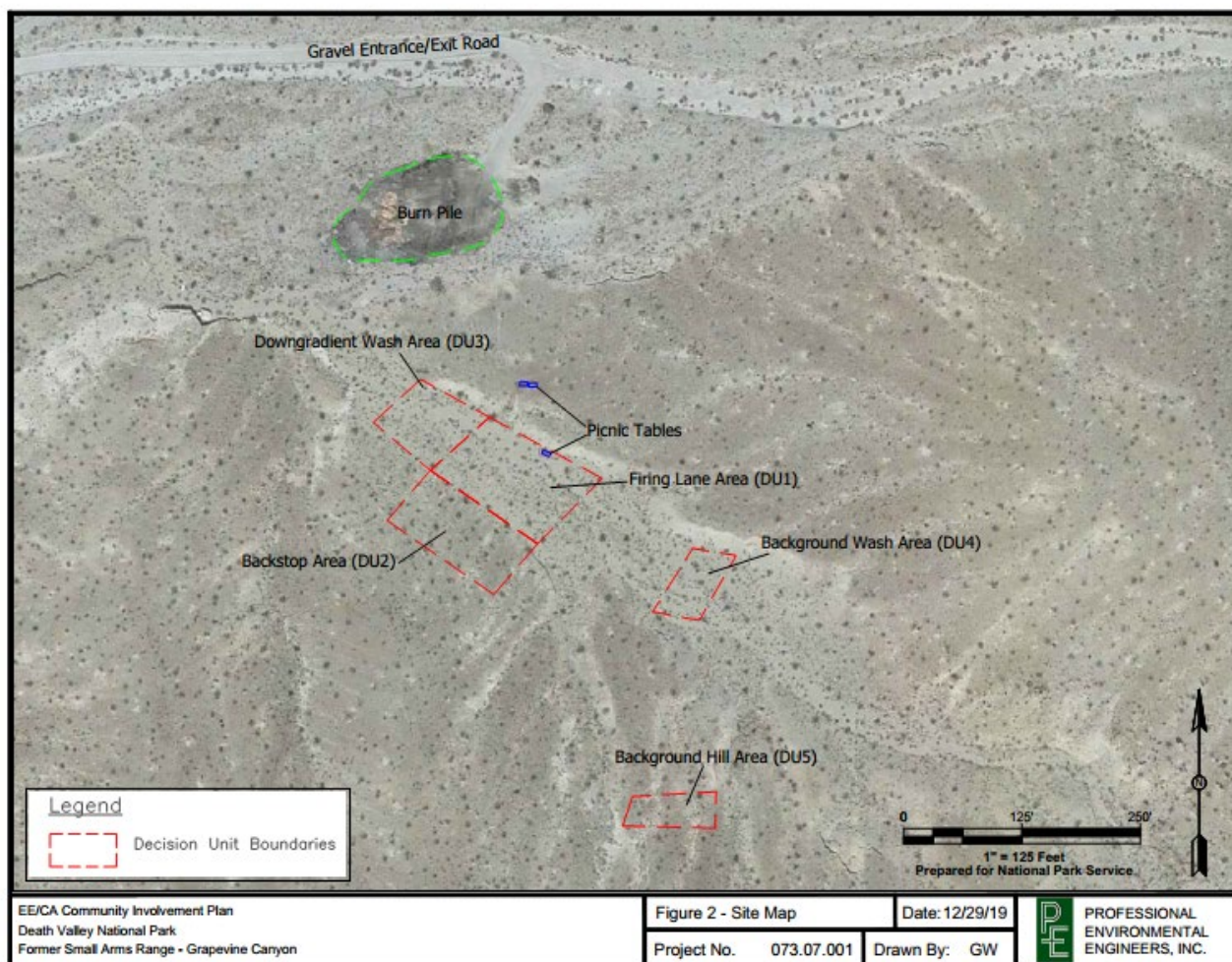




Figure 2. Site Map





2.2 Previous Environmental Studies and Response Actions

In 2008, Versar conducted a Preliminary Assessment (PA) at the former Grapevine firing range to determine whether a release of contaminants to the environment from activities at the Site had occurred or was likely to occur (Versar, 2008). The scope of the assessment included review of available local, state, and federal agency file information; a preliminary evaluation of potential impacts to Site media; identification of potential migration routes, exposure pathways, and receptors; a Site inspection/reconnaissance; and interviews with NPS personnel.

The PA concluded that a release of metals (specifically antimony, barium, copper, and/or lead) had occurred to on-site soil and sediment from operation of the former firing range. Although the extent of impacted soil and sediment was believed to be limited, exposures related to inhalation of windborne particulates were considered likely due to the arid climate, sparse vegetation, high wind speeds, and extended wind movement at the Site.

In 2016/2017, ECM Consultants (ECM) performed a CERCLA Site Inspection (SI) that included the collection of soil samples. Results of the soil sampling confirmed a release of contaminants from previous use of the Site for small arms and rifle qualifying practice during the early 1990s. Weathering of bullets/casings has released metals (lead, antimony, and copper) to surface soils/sediment at concentrations that pose a potential risk to human and ecological receptors.

2.3 Current and Future Site Activities

Currently, NPS is conducting an engineering evaluation/cost analysis (EE/CA) as part of a non-time-critical removal action to gather additional information to fully characterize the nature and extent of Site contamination. The EE/CA process will include additional site sampling to further understand the impacts of the previous range activities on the Site. Risk assessments will be conducted 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

Death Valley is the largest U.S. National Park outside Alaska at 3.4 million acres. Approximately 1,678,660 visitors visited Death Valley in 2018. The Site is located in Inyo County, CA.

The closest residents to the Site are NPS employees living in Grapevine housing area, within DEVA (in Inyo County, CA). There are four apartments and eight RV sites for employees and their families, approximately 0.75 miles from the Site. There are a few rural residences in Nye County and Esmeralda County, NV, all at least 17 straight-line miles from the Site and on the opposite side of the Grapevine Mountains.

Beatty, NV is located about 30 miles east of the Site. The town is accessed by State Route 374 to the west and Highway 95 to the south and east. Beatty is home to the Beatty Museum and Historical Society and to businesses catering to tourist travel. According to the 2010 Census, Beatty had a population of 1,154 people with 535 households. The population density was 6.6 people per square mile. The racial makeup in Beatty is 90.9% White, 0.1% African American, 1.5% Native American, 1.2% Asian, 3.1% from other races, and 3.2% from two or more races. Hispanic or Latino of any race were 8.9% of the population.

3.2 Community Involvement History

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

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/Grapevine>.

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

As noted earlier, 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. The following methods will be used to promote public participation and establish steps to provide timely information to interested citizens, agency staff, government officials, the media, and the community at large.

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 contains the information used by the lead agency (in this case, NPS) to make its decision on the selection of a response action. It includes environmental investigation reports, decision documents, and other related information. 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 NPS originally planned to make the administrative record available at Furnace Creek Visitor Center and Stovepipe Wells Ranger Station. However, these facilities are closed indefinitely due to COVID-19.

The NPS will place as much of the administrative record online as can feasibly be made compliant with Section 508 Amendment to the Rehabilitation Act of 1973. People may make an appointment with the site spokesperson to view the complete administrative record in person at Furnace Creek, or to receive electronic copies on a DVD by mail.

- **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. 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 are ongoing to expand the mailing list. Individuals can be added to the mailing list by contacting the Site spokesperson (See above).

- **Public Comment Periods**

There will be a 30-day public comment period when the draft final EE/CA Report is issued, which will propose specific actions or decisions. Upon timely written request sent to the Site spokesperson, the NPS will extend the public comment period by a minimum of 15 days.

Following the close of a formal public comment period, the NPS will prepare written responses to significant 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 comment periods, 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
- <https://parkplanning.nps.gov/Grapevine>
- Notice sent to the Interested Parties Mailing List
- Posting At the Death Valley Post Office

- **Public Meetings**

Given the remote location of the Site, minimal public interest, and the COVID-19 pandemic, 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:

- <https://parkplanning.nps.gov/Grapevine>
- Informed Park staff at visitor center information desks (with sufficient information to address visitor questions)



- **Site Website**
NPS has established a Site website at <https://parkplanning.nps.gov/Grapevine> 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.



5.0 REFERENCES

- ECM, 2017. Site Inspection Report, Death Valley National park, Grapevine Small Arms Range.
- Interstate Technology and Regulatory Council (ITRC), 2012. Incremental Sampling Methodology.
- NPS, 2014. Community Involvement Requirements and Best Practices.
- 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>.
- USGS, 1998. East of Tin Mountain, California, 7.5 minute quadrangle topographic map.
- Versar, Inc., 2008, Preliminary Assessment, Grapevine Small Arms Range, Death Valley National Park, Grapevine Boneyard Road, Death Valley, California..



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: Interviews conducted by the lead agency as part of the process of preparing a Community Involvement Plan. For most response actions, the NCP requires the lead agency to conduct community interviews 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 (DU): 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 Grapevine Firing Range Site information repositories.

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.

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 Katherine Mine Site is a remedial 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 former Grapevine Firing Range, comprises the area contaminated or potentially contaminated by a release or threatened release of hazardous substances.



APPENDIX B: DISTRIBUTION LIST

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
Sonia Y. Angell, Director
PO Box 997377, MO0500
Sacramento, CA 95814
cdph.internetadmin@cdph.ca.gov



APPENDIX C: NCP COMMUNITY INVOLVEMENT REQUIREMENTS

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

- At the beginning of the 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.
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
 - Publish notice of availability and brief description of the Engineering Evaluation and Cost Analysis Report.
40 C.F.R. § 300.415(n)(4)(ii); § 300.820(a)(1)
 - 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)