

ENVIRONMENTAL DUE-DILIGENCE AND INVESTIGATION STATUS REPORT

ANNEXATION CASE ANX-2026-01

**Environmental Context and Due-Diligence Findings
Related to Proposed Annexation ANX-2026-01**

Submitted to The Town of Holly Ridge

Date prepared 2/8/2026

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EXECUTIVE SUMMARY

Purpose of This Packet

This document provides environmental context and due-diligence analysis relevant to the proposed annexation of approximately 1,539 acres for large-scale residential and mixed-use development.

This packet:

- Documents known environmental records
- Identifies where investigation remains incomplete
- Clarifies procedural limitations of Phase I Environmental Site Assessments
- Highlights boundary conditions materially relevant to annexation
- Preserves the administrative record

It does not allege contamination, predict outcomes, or assign fault.

It documents what is known and where material uncertainty remains.

Shared Parcel Boundary – Camp Davis Pre-Regulatory Landfill (PRLF 683)

County GIS mapping confirms that Parcel ID 001971 (Tract 2), included within the proposed annexation boundary, shares approximately **0.6 miles of contiguous property line** with the Camp Davis Pre-Regulatory Landfill.

This is a direct parcel-to-parcel boundary condition.

Public references to the landfill being “approximately 0.5 miles away” measure from interior conceptual development areas. They do not reflect the legal boundary adjacency. From a hydrogeologic perspective, **parcel adjacency is materially different from interior setback distance.**

Subsurface migration potential is governed by:

- Groundwater gradient
- Stratigraphy
- Soil permeability
- Hydraulic conductivity
- Hydraulic connectivity

It is not governed by conceptual lot layouts.

This shared boundary materially alters the environmental review context.

Active Federal Investigation – Site 111 PFAS

The annexation parcels also lie substantially within the one-mile off-base sampling area established by the Department of the Navy for the ongoing remedial investigation at Camp Davis South – Site 111.

Site 111 has been designated a confirmed PFAS release area following detections in shallow groundwater. The Navy has acknowledged that groundwater flow direction has not been fully characterized and that contaminant extent has not been fully delineated. As a precaution, a one-mile off-base drinking water sampling boundary was established extending beyond installation limits.

That sampling area overlaps parcels proposed for annexation.

The federal investigation remains ongoing and is limited in scope to PFAS compounds. It does not evaluate other historically documented contamination sources within the same geographic footprint.

Annexation is therefore being considered during an open federal remedial investigation.

Cumulative Environmental Context

The annexation area exists within a broader regional environmental context that includes multiple documented and historically identified sites, including:

- The Camp Davis Pre-Regulatory Landfill
- Documented dinitrophenol (DNP) disposal sites (Bohn / Renroh / Bostic continuity documentation)
- Former weapons, range, and training areas designated under the Formerly Used Defense Sites (FUDS) program
- Recorded land-use restrictions associated with residual petroleum impacts

This is not a single-site issue.

It is a **cumulative environmental context** involving overlapping historical, regulatory, and federal records. The presence of these sites does not confirm contamination within the annexation tract; however, it establishes documented environmental activity in the region warranting proportionate evaluation.

Phase I vs. Phase II – Technical Clarification

Phase I Environmental Site Assessment

(ASTM E1527-21)

A Phase I Environmental Site Assessment is a non-intrusive, records-based review that includes:

- Historical records research
- Regulatory database review
- Site reconnaissance
- Interviews

It identifies Recognized Environmental Conditions (RECs).

It does not include:

- Soil borings
- Groundwater sampling
- Monitoring wells
- Laboratory analysis
- Plume delineation
- Migration pathway modeling

ASTM E1527-21 is explicitly a non-intrusive standard. A Phase I does not confirm subsurface conditions.

Phase II Environmental Site Assessment

(ASTM E1903-19)

A Phase II Environmental Site Assessment may include:

- Subsurface soil sampling
- Installation of groundwater monitoring wells
- Laboratory analysis
- Delineation of contamination extent
- Evaluation of migration pathways

Only Phase II-level intrusive investigation can determine whether contamination has migrated beyond known disposal boundaries.

Public Record Condition

Publicly available materials reflect Phase I Environmental Site Assessments.

No publicly documented annexation-footprint-specific Phase II soil or groundwater investigation — including along the approximately 0.6-mile shared landfill boundary — has been identified in the public record to date.

This is a procedural observation, not a contamination finding.

Accordingly, while environmental conditions have been identified through records and regulatory documentation, subsurface conditions within the annexation footprint remain unconfirmed in the public record.

Sequencing Consideration

Council is being asked to approve:

- Annexation
- Zoning
- PUD approval
- Long-term development agreement

Annexation is a threshold governance action enabling zoning entitlements, infrastructure commitments, and long-term regulatory vesting.

Environmental uncertainty unresolved at annexation cannot be fully cured retroactively. Once entitlement is granted, municipal leverage materially shifts.

This is not a finding of contamination.
It is a sequencing question.

Core Question

Before approving annexation in a region containing:

- A 0.6-mile shared landfill boundary
- An active federal groundwater investigation
- Multiple historically documented disposal and training sites

Has intrusive subsurface testing been conducted within the annexation footprint — including along the shared boundary — sufficient to evaluate groundwater migration risk?

If not, entitlement is being granted prior to boundary-specific subsurface confirmation.

KEY DEFINITIONS AND TERMINOLOGY

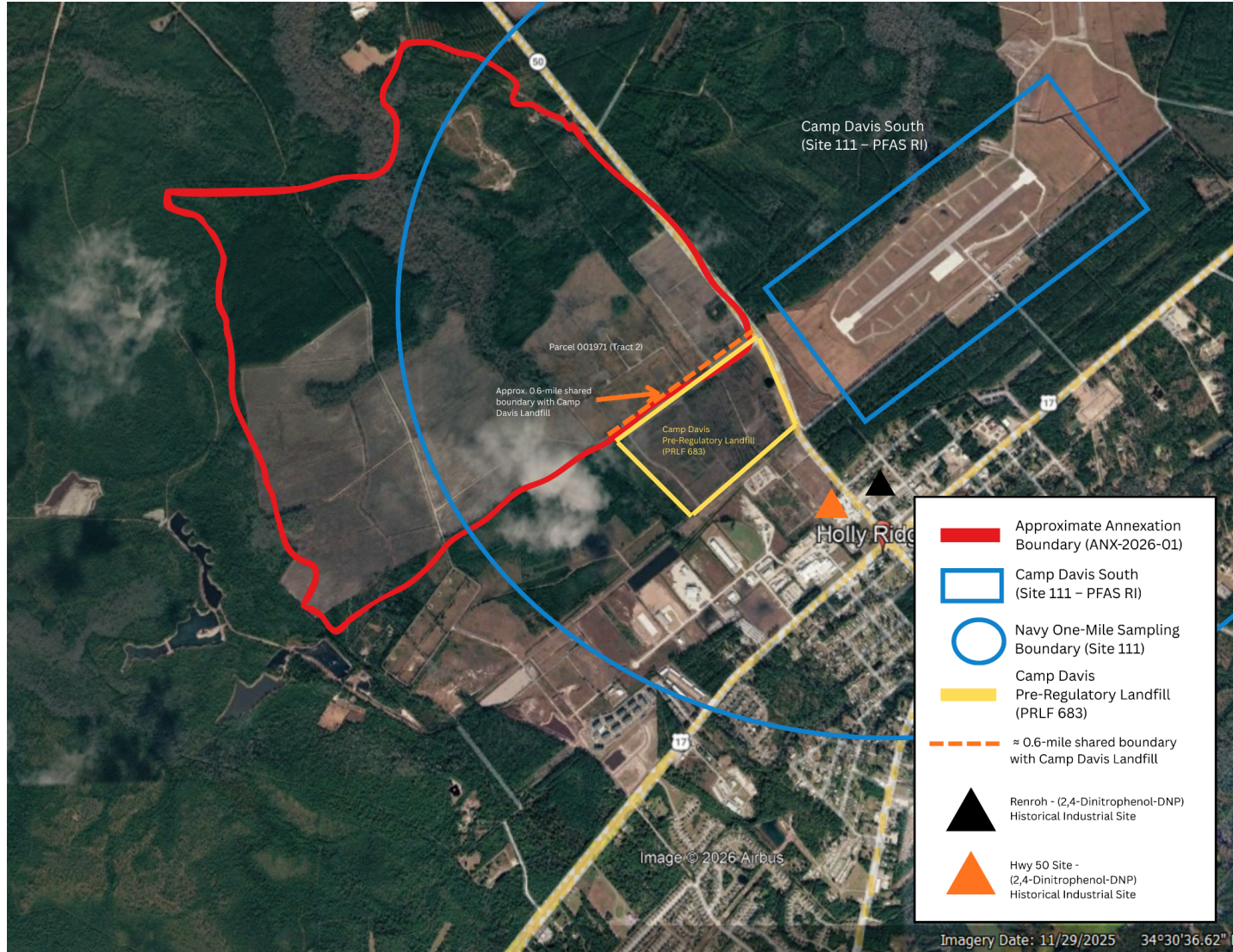
- **PFAS (forever chemicals):** Persistent synthetic chemicals associated with long-term environmental and health risks.
- **Phase I Environmental Site Assessment:** Records-based environmental review; does not include sampling or testing.
- **Phase II Environmental Site Assessment:** Soil and/or groundwater sampling and laboratory analysis.
- **Remedial Investigation:** Formal investigation to define the nature and extent of contamination.
- **Recognized Environmental Condition (REC):** Known or suspected presence of hazardous substances under ASTM standards.
- **Groundwater plume:** The mapped area of subsurface contaminant migration.
- **Land-Use Restriction (LUR):** Recorded legal limitation on land disturbance or development.
- **Formerly Used Defense Sites (FUDS):** Properties formerly owned or used by the military.
- **“No Further Action”:** Administrative regulatory status; not a determination that a site is clean.

SECTION I — PURPOSE AND SCOPE

This packet is submitted to provide **environmental context and due-diligence information** relevant to annexation decision-making. It does not assert contamination outcomes, predict health effects, or allege wrongdoing by any party. It documents where environmental conditions have been **identified but not fully evaluated or remediated**, and where investigations remain ongoing or incomplete.

SECTION II — OVERVIEW OF PROPOSED ANNEXATION AREA

The composite map below illustrates the **proposed annexation boundary** in relation to the **Camp Davis Pre-Regulatory Landfill**, the **Navy-designated one-mile Site 111 sampling boundary**, and **other historically documented environmental sites**. The geographic relationships shown here provide context for the sequencing and due-diligence considerations discussed in subsequent sections.



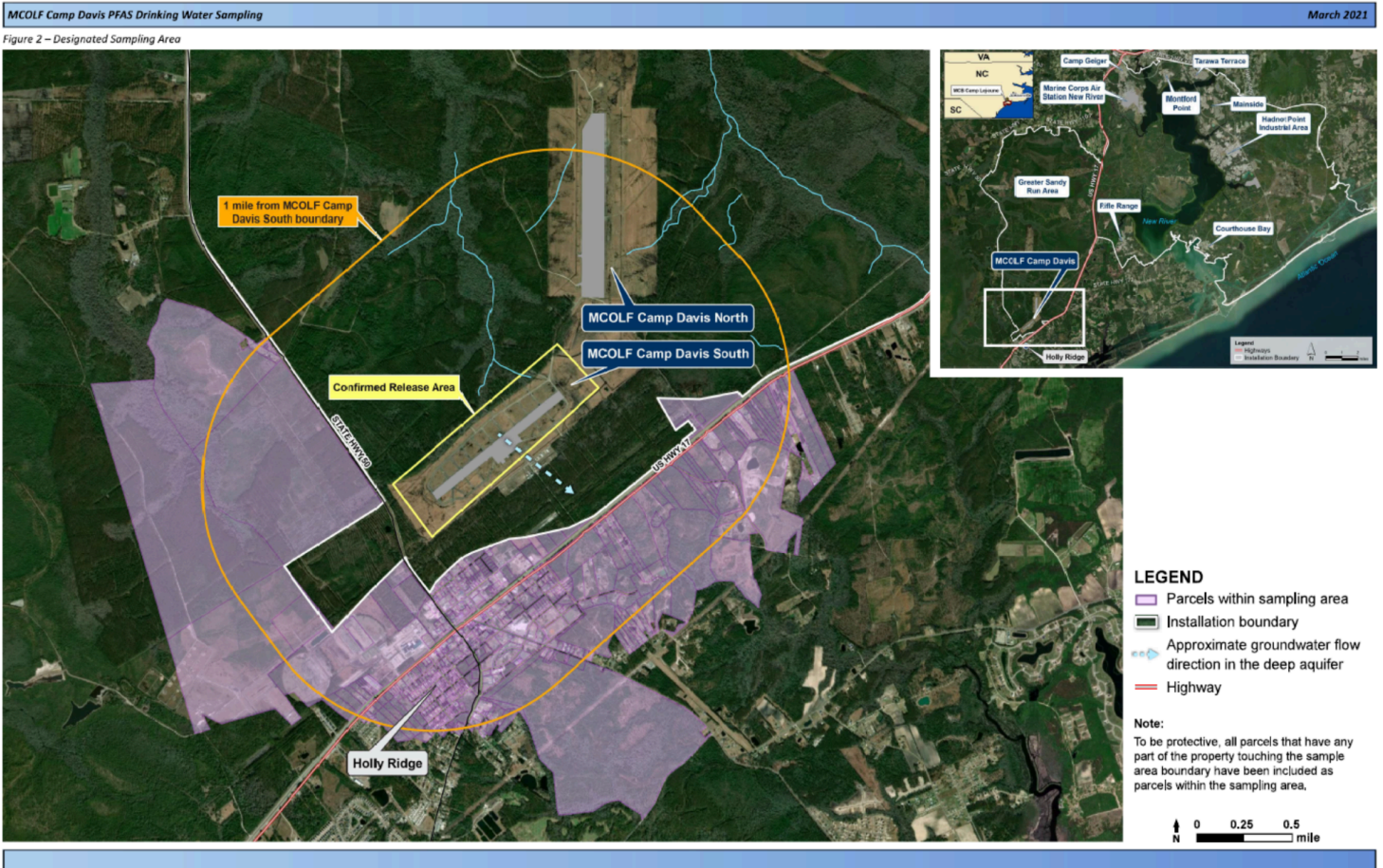
SECTION III — FEDERAL PFAS INVESTIGATION CONTEXT AND SAMPLING AREA

The U.S. Department of the Navy has designated Camp Davis South (Site 111) as a confirmed PFAS release area and is currently conducting a federal remedial investigation under the Defense Environmental Restoration Program. PFAS, commonly referred to as “forever chemicals,” have been detected at this site, and investigation and remedial planning remain ongoing. Final determinations regarding plume extent, groundwater conditions, and long-term response actions have not yet been completed.

The Navy has established an off-base sampling boundary extending beyond the originally identified release location. This boundary includes adjacent parcels outside the historical installation limits due to uncertainty regarding groundwater flow direction and potential contaminant migration pathways. The inclusion of off-base parcels reflects precautionary investigation scope rather than confirmed plume delineation.

Publicly available investigation summaries acknowledge that groundwater flow direction and plume extent have not yet been fully characterized. As a result, the annexation area lies within the broader federal investigation context, and final subsurface conditions and long-term land-use implications remain under active federal review.

This section documents the status and scope of the federal investigation and establishes the administrative record context relevant to annexation consideration.



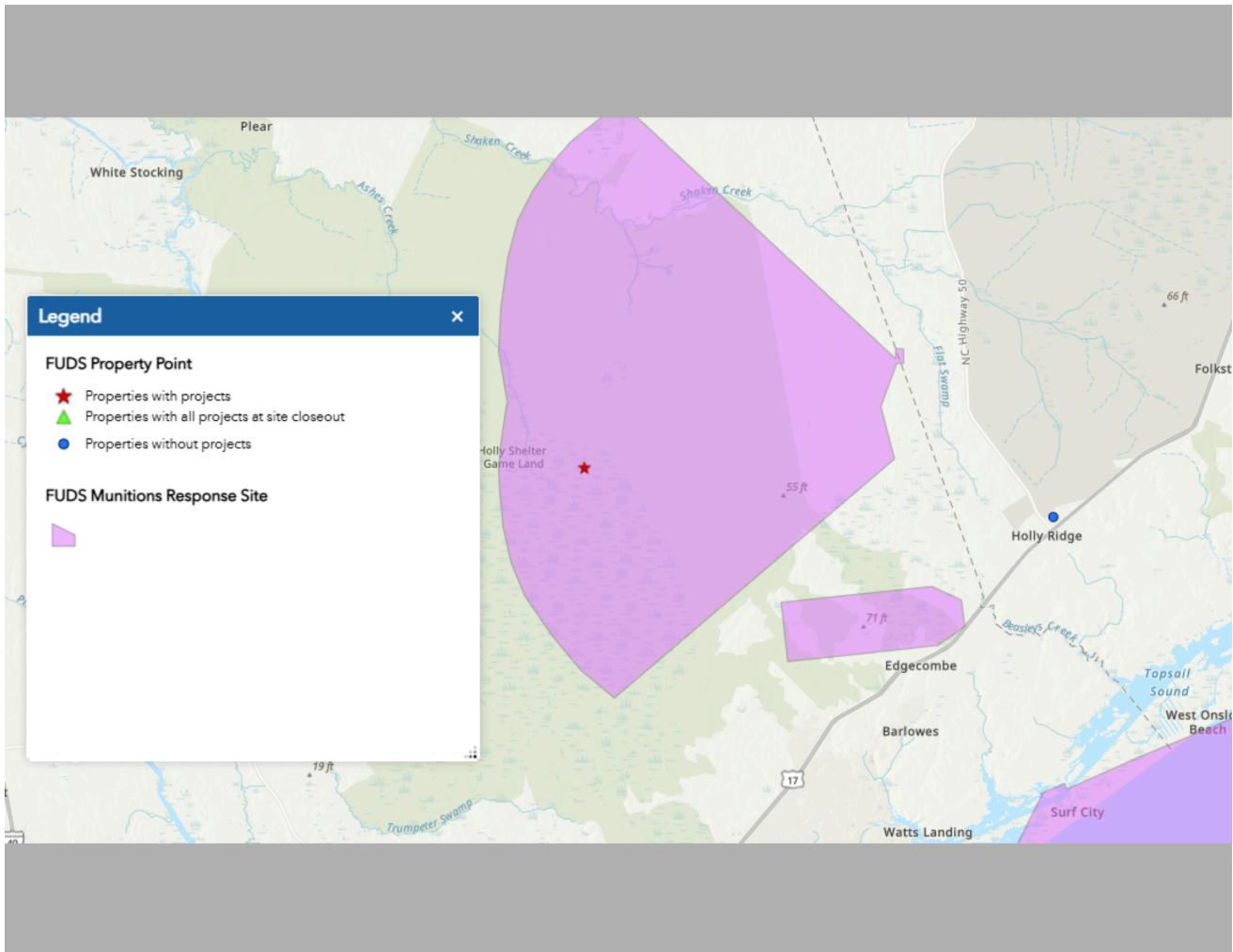


Figure 3 — Formerly Used Defense Sites (FUDS) Program Map Showing Documented Military Properties and Munitions Response Areas in Relation to Proposed Annexation Area (ANX-2026-01)

This map, sourced from the U.S. Army Corps of Engineers Formerly Used Defense Sites (FUDS) Program database, identifies documented historical military property boundaries and munitions response areas associated with former Camp Davis training and weapons-range operations. The shaded areas represent designated FUDS Munitions Response Sites, reflecting locations where military training, ordnance handling, or related defense activities occurred and where investigation, monitoring, or response actions may be conducted under federal programs.

The proximity of these mapped areas to parcels proposed for annexation provides relevant historical and environmental context for annexation review, including land-use history, federal investigation status, and the presence of documented defense-related sites within the regional environmental record.

Source: U.S. Army Corps of Engineers (USACE), Formerly Used Defense Sites (FUDS) Program Mapping Portal.

SECTION IV — CATALOG OF IDENTIFIED AND HISTORICALLY DOCUMENTED SITES

1. Camp Davis South — Site 111 (Appendix A, Items A-1 through A-4)

- Contaminant: PFAS (forever chemicals)
- Status: Confirmed release; remedial investigation ongoing
- Limitation: PFAS-only scope

2. Bohn Disposal Area (Lloyd Road / NC Hwy 50 — South Side)

(Appendix A, Item A-5; Appendix G)

- Contaminant: **Dinitrophenol (DNP)**
- Historical record: Approx. **1,000 barrels** documented
- Evaluation: No documented Phase II sampling

3. Renroh Site — 314 W Ocean Road (Appendix A, Item A-6; Appendix G)

- Contaminants: DNP / DNT
- Discovery: 1979 (pre-CERCLA)
- Status: “No Further Action” (administrative)

4. Bostic-Associated Tracts (Appendix A, Item A-7; Appendix G)

- Contaminant lineage: DNP-associated drums
- Evaluation: Identified historically; no modern characterization

5. Camp Davis Landfill (South of Hwy 50) (Appendix A, Items A-8, A-9)

- Waste type: Unknown mixed waste
- Status: Listed for potential remediation funding
- Observations: Surface water ponding

6. Residual Petroleum Restricted Tracts (Appendix A, Item A-10)

- Restriction: Recorded land-use prohibitions
- Issue: Disclosure continuity unclear

7. Former Weapons / Range / Training Areas (Appendix A, Item A-11)

- Contaminants: Ordnance residues, metals
- Status: Identified historically; excluded from PFAS investigation

SECTION V — LIST OF FIGURES (MAP REFERENCES)

The following figures are included to illustrate the geographic relationships and environmental context discussed in this report:

**Figure 1 — Composite Environmental Context Map
Proposed Annexation Boundary (ANX-2026-01), Parcel 001971, Camp Davis
Pre-Regulatory Landfill, and Navy Site 111 One-Mile Sampling Boundary.**

**Figure 2 — Navy Site 111 PFAS One-Mile Off-Base Sampling Boundary
(Source: Department of the Navy; Appendix A, Items A-1 through A-4)**

**Figure 3 — Camp Davis Pre-Regulatory Landfill Parcel Boundary and Shared Boundary
with Parcel 001971**

Figure 4 — Bohn Disposal Area (DNP) Location Map

Figure 5 — Renroh Site Location Map

Figure 6 — Bostic-Associated Tracts (DNP Continuity Mapping)

Figure 7 — Residual Petroleum Land-Use Restricted (LUR) Tracts

Figure 8 — Former Weapons / Training Areas (FUDS Context)

SECTION VI — EVIDENCE SUMMARY

Evidence supporting this packet includes:

- Federal Navy PFAS fact sheets and maps
- Historical military and chemical disposal records
- EPA and NCDEQ listings
- Recorded deeds and land-use restrictions
- Aerial imagery (historic and current)
- Field photographs
- Meeting minutes and correspondence

Purpose of the Evidence Table

Appendix A is provided to summarize **what environmental records exist, what those records confirm, and what material information remains unavailable or incomplete** at the time of annexation consideration.

The table is designed to support informed decision-making by clearly distinguishing between:

- **Identification** of environmental conditions
- **Evaluation** through sampling or investigation
- **Remediation** or final regulatory resolution

These stages are not interchangeable.

How to Use the Table

- **“What the Evidence Confirms”**
Describes facts directly supported by cited records.
 - **“Limitations / Gaps”**
Identifies where records do not resolve subsurface conditions, plume behavior, or remediation status.
 - **“Packet Section(s) Referenced”**
Directs the reader to narrative discussion elsewhere in the packet.
 - **“Relevance to Annexation”**
Explains why the record is material to annexation findings, not whether annexation should or should not occur.
-

What the Evidence Table Is — and Is Not

The Evidence Table:

- Is a factual index of records and known information gaps
- Is intended to preserve the administrative record
- Is not a finding of contamination
- Is not a substitute for scientific investigation
- Is not a recommendation regarding annexation outcome

The table does not assign fault, predict impacts, or draw conclusions beyond what the cited records support.

Why This Matters for Annexation

Annexation decisions rely on the **sufficiency of information** available in the **administrative record** at the time of action. Where records identify environmental conditions but evaluation remains incomplete, that uncertainty is itself a material consideration.

Appendix A is included so that **annexation deliberations occur with clear awareness** of both existing documentation and documented unknowns.

This appendix consolidates publicly available federal, state, and local environmental records, investigation materials, and related documentation referenced throughout this report.

APPENDIX A — EVIDENCE TABLE AND SOURCE INDEX

Item No.	Site / Topic	Source / Record Type	What the Evidence Confirms	Limitations / Gaps	Packet Section(s) Referenced	Relevance to Annexation
A-1	Camp Davis South (Site 111)	Navy PFAS fact sheets & maps	PFAS (forever chemicals) detected; Site 111 designated confirmed release area	Investigation ongoing; Remedial investigation ongoing; limited in scope to PFAS compounds	Sections III, IV.1, XIV	Annexation overlaps active federal investigation
A-2	Site 111 Sampling Boundary	Navy 1-mile sampling map	Off-base parcels included due to groundwater uncertainty	Boundary is precautionary, not final plume	Sections III.B, V	Annexation parcels fall within sampling area
A-3	Groundwater Flow	Navy investigative summaries	Flow direction not fully characterized	No final plume delineation	Sections III.A, VIII	Water-supply uncertainty
A-4	Federal Investigation Status	RAB minutes, Navy correspondence	Remedial Investigation not complete	Final determinations pending	Sections III, XIV	Annexation during open federal action
A-5	Bohn Disposal Area (Hwy 50 / Lloyd Rd)	Historical military & government records	Approx. 1,000 barrels of DNP documented	No Phase II sampling documented	Sections IV.2, XVIII, App. G	Legacy chemical disposal near annexation

Item No.	Site / Topic	Source / Record Type	What the Evidence Confirms	Limitations / Gaps	Packet Section(s) Referenced	Relevance to Annexation
A-6	Renroh Site (314 W Ocean Rd)	EPA / state records (1979)	DNP / DNT identified pre-CERCLA	“No Further Action” administrative only	Sections IV.3, XVIII, App. G	Source site for DNP continuity
A-7	Bostic-Associated Tracts	Deeds, plats, historical references	Tracts linked to DNP drum transfers	No modern site characterization	Sections IV.4, XVIII, App. G	Demonstrates continuity of risk
A-8	Camp Davis Landfill (South of Hwy 50)	State listings, maps	Historic landfill location confirmed	Closure/remediation unclear	Sections IV.5, VII	Potential subsurface & surface pathways
A-9	Landfill Ponding	Recent site photographs	Recurrent surface water pooling	No sampling performed	Sections IV.5, VII	Potential migration concern
A-10	Residual Petroleum Restricted Tracts	Recorded deeds (book & page)	Soil-disturbance restrictions recorded	Disclosure continuity unclear	Sections IV.6, VII	Limits development assumptions
A-11	Former Weapons / Range Areas	Historical Camp Davis records	WWII-era training and range use	Not evaluated under PFAS or other programs	Sections IV.7, VII	Potential ordnance / metals
A-12	Phase I ESAs	Consultant reports	Historical conditions identified	No sampling; no clearance	Sections VII, XV	Reliance limitation

Item No.	Site / Topic	Source / Record Type	What the Evidence Confirms	Limitations / Gaps	Packet Section(s) Referenced	Relevance to Annexation
A-13	Phase II ESAs	—	—	No Phase II testing documented	Sections VII, XV	Subsurface conditions unknown
A-14	Water Supply Provider	Utility planning records	ONWASA expected to serve annexation	Well data limited	Sections VIII, XVI	Service adequacy
A-15	Municipal Wells	Utility communications	Wells historically shut down / drawn down	Reasons not fully disclosed	Sections VIII, XVI	Future demand risk
A-16	Regulatory Coordination	Agency correspondence	Multiple agencies involved	No consolidated findings	Sections VIII, XIV	Fragmented oversight
A-17	Aerial Imagery	Historic & current aerials	Land-use and disturbance patterns visible	No contaminant identification	Sections II, VI	Context only
A-18	Deeds & Easements	Register of Deeds	Permanent easements and LURs recorded	Purpose not always stated	Sections IV.6, VI	Legal constraints
A-19	Public Meeting Minutes	Council, RAB, utility boards	Environmental issues discussed	Inconsistent follow-through	Sections III, VI	Notice on record

Item No.	Site / Topic	Source / Record Type	What the Evidence Confirms	Limitations / Gaps	Packet Section(s) Referenced	Relevance to Annexation
A-20	Records Requests	Requests & responses	Due-diligence efforts documented	Some records pending/unavailable	Sections XIX, App. H	Demonstrates diligence

APPENDIX A — EVIDENCE TABLE AND SOURCE

WHAT THIS EVIDENCE TABLE DOES NOT CLAIM

This Evidence Table is provided solely to document the existence, source, and scope of environmental records and information publicly available at the time of annexation consideration. It does not make, and should not be interpreted as making, any of the following claims:

- That contamination is present at any specific parcel beyond what is expressly documented in cited records;
- That any identified contaminant has caused or will cause human health effects;
- That regulatory agencies have failed to act, acted improperly, or reached incorrect conclusions;
- That annexation is prohibited by law;
- That development must be halted or denied;
- That remediation outcomes, plume behavior, or exposure pathways are known or predictable.

This table does not substitute for scientific investigation, regulatory determination, or remedial decision-making. Its purpose is to identify what is documented, what has been evaluated, and where material information remains unavailable, incomplete, or subject to ongoing investigation, so that annexation-related decisions may be made with full awareness of documented environmental context and recognized uncertainty.

SECTION VII — PROCEDURAL DEFICIENCIES IDENTIFIED

- Reliance on Phase I Environmental Site Assessments alone
- PFAS-only scope of federal investigation
- Exclusion of DNP, landfill, petroleum, and ordnance sites
- Disclosure gaps regarding recorded restrictions
- Annexation timing during active investigations

These deficiencies are documented in the Evidence Table (**Appendix A, Items A-12, A-13, A-16, A-19**).

SECTION VIII — WATER SUPPLY AND GROUNDWATER CONSIDERATIONS

VIII.A Relevance (**Appendix A, Items A-3, A-14, A-15**)

The annexation area is intended to be served by municipal water infrastructure. Where groundwater contamination and plume uncertainty exist, water-supply considerations are **foreseeable**, not speculative.

VIII.B Information Needed (**Appendix A, Items A-14 through A-16**)

The following information is necessary to fully evaluate water-supply reliability and groundwater-related risk within the proposed annexation area:

- Confirmation of the specific municipal water source(s) intended to serve the annexation area, including well locations, withdrawal capacity, and treatment methods;
- Documentation of any groundwater monitoring, plume delineation, or hydrogeologic evaluation conducted within or adjacent to the annexation parcels;
- Clarification of whether existing or planned municipal wells are located within one mile of known or suspected contaminant source areas;
- Identification of any current or planned monitoring programs addressing PFAS or other contaminants in municipal supply wells;
- Confirmation of whether alternative water-supply contingency planning has been evaluated in the event contamination affects primary supply sources.

This information is necessary to establish baseline water-supply reliability and to determine whether additional investigation or safeguards may be warranted prior to full development.

SECTION IX — FORMAL WRITTEN REQUEST

Pursuant to the Town’s annexation review process and in light of documented ongoing federal investigation and identified environmental information gaps, the following information is respectfully requested for clarification and inclusion in the annexation record:

1. Identification of the specific municipal water supply sources intended to serve the proposed annexation area;
2. Confirmation of whether any groundwater sampling, plume delineation, or hydrogeologic investigation has been conducted within the annexation parcels or immediately adjacent areas;
3. Clarification of whether any municipal water supply wells exist or are planned within one mile of documented contaminant source areas;
4. Identification of any groundwater monitoring programs currently in place, planned, or required in connection with known federal or state environmental investigations affecting the surrounding area;
5. Confirmation of whether any environmental investigation beyond Phase I Environmental Site Assessment has been performed within the annexation parcels.

This request is submitted to ensure that annexation-related decisions are made with full awareness of documented environmental conditions, water-supply considerations, and any material information relevant to public infrastructure planning and long-term municipal service provision.

Section X — CLARIFYING THE SCOPE AND LIMITS OF ENVIRONMENTAL INFORMATION CONSIDERED

The following clarifications are provided to ensure the annexation record accurately reflects the scope, limitations, and status of environmental information available at the time of decision-making:

- **Phase I Environmental Site Assessments are records-based evaluations** conducted in accordance with ASTM standards and do not include sampling or laboratory testing; they identify potential recognized environmental conditions but do not determine the presence, absence, or extent of contamination.
- The **ongoing federal investigation at Camp Davis South (Site 111)** is limited to PFAS (commonly known as “forever chemicals”) and remains incomplete; it does not evaluate other historically documented contamination sources within the annexation area.
- Regulatory classifications such as “**No Further Action**” **represent administrative status** and do not constitute confirmation that contamination is absent, particularly for sites addressed prior to modern investigative standards.
- **Annexation decisions require sufficient information** to assess reasonableness and service adequacy; they **do not require proof of exposure or harm**.

This section is included to clarify the context and limitations of environmental information relied upon in annexation deliberations.

SECTION XI — STATUTORY AND DECISION-MAKING RELEVANCE

Annexation findings require reasonableness, consideration of public health, and adequate planning for municipal services. Proceeding amid unresolved environmental uncertainty increases procedural and legal risk.

This report does not assert conclusions beyond documented evidence but provides consolidated reference information to support informed and procedurally sound annexation deliberations.

SECTION XII — COUNCIL-RELEVANT CONCLUSION

Annexation findings require determinations of reasonableness, adequate provision of municipal services, and consideration of conditions affecting public health, safety, and welfare. Where material environmental conditions remain under active investigation or have not been fully characterized, decision-makers must rely on available documentation while recognizing known limitations and uncertainty. Consideration of documented environmental context is relevant to evaluating infrastructure planning, water supply reliability, and long-term municipal service adequacy.

SECTION XIII — REQUESTED ACTIONS

To ensure annexation findings are based on complete and documented information, the following actions are respectfully requested for consideration and inclusion in the annexation record:

1. Confirmation of the current status, scope, and anticipated timeline of the Camp Davis South (Site 111) federal remedial investigation;
2. Disclosure of whether any Phase II Environmental Site Assessments or other subsurface investigations have been conducted within the annexation parcels;
3. Consideration of whether final annexation action should occur prior to completion of active federal environmental investigations affecting adjacent or overlapping areas;
4. Review by Town Legal Counsel of available environmental documentation to confirm procedural sufficiency and completeness of the annexation record.

SECTION XIV — PENDING FEDERAL ENVIRONMENTAL ACTIONS AFFECTING ANNEXATION PARCELS

At the time of consideration of the proposed annexation, Camp Davis South (Site 111) remains subject to an ongoing federal remedial investigation conducted by the Department of the Navy. Final determinations regarding groundwater conditions, plume extent, remedial actions, and long-term land-use implications have not been issued.

This section documents that **annexation consideration is occurring while a federal environmental remedial investigation remains active and incomplete**. Final remedial findings may include plume delineation, exposure pathway evaluation, and land-use or monitoring considerations that are not yet determined.

SECTION XV — LIMITATIONS OF PHASE I ENVIRONMENTAL SITE ASSESSMENTS

Phase I Environmental Site Assessments are records-based evaluations conducted in accordance with ASTM standards and do not include subsurface sampling, laboratory analysis, or plume delineation.

A Phase I assessment identifies recognized environmental conditions based on available records and site observations but does not determine the presence, absence, or extent of subsurface contamination.

The **absence of documented Phase II Environmental Site Assessments** or other subsurface investigations within the annexation parcels indicates that subsurface environmental conditions have not been directly evaluated at those locations. (Appendix A, Items A-12, A-13.)

SECTION XVI — FORESEEABILITY OF WATER-SUPPLY IMPACTS

Because the annexation area is intended to be served by municipal water infrastructure, groundwater conditions and plume behavior are directly relevant to infrastructure planning and long-term service reliability. Where groundwater contamination investigations are ongoing and plume boundaries remain under evaluation, water-supply considerations represent foreseeable infrastructure planning factors rather than speculative conditions.

SECTION XVII — ANNEXATION SEQUENCING AND ENVIRONMENTAL RISK

Annexation is a threshold administrative action that establishes jurisdiction, service obligations, and long-term infrastructure planning assumptions. Where environmental investigations remain active and subsurface conditions have not been fully characterized, annexation decisions may occur in advance of complete environmental information. This section documents the timing relationship between annexation consideration and ongoing environmental investigation status.

SECTION XVIII — HISTORICAL CHEMICAL DISPOSAL AND DNP CONTINUITY

Historical records identify multiple sites associated with **dinitrophenol (DNP)** disposal. Many were addressed prior to **CERCLA** and not evaluated under modern standards. Documentation supporting historical site identification and continuity of known disposal areas is summarized in Appendix A (Items A-5 through A-7) and referenced in Appendix G.

APPENDIX G — DNP CONTINUITY DOCUMENTATION

This appendix references historical records and environmental documentation identifying locations historically associated with dinitrophenol (DNP) handling, disposal, or investigation within or adjacent to the annexation area. These records are maintained within publicly accessible federal and state environmental databases and archival sources.

Supporting documentation includes site listings, historical installation records, environmental program references, and associated mapping materials that establish continuity of site identification across historical and modern records.

Due to document volume and redundancy with publicly maintained regulatory archives, full source materials are not reproduced in this appendix but are available upon request. Relevant records may be accessed through the following public sources:

- **North Carolina Department of Environmental Quality (NCDEQ) Inactive Hazardous Sites Branch database**
- **U.S. Environmental Protection Agency (EPA) Superfund and CERCLIS site records**
- **Department of the Navy environmental restoration program administrative record repositories**
- **Publicly available military installation environmental records and historical archives**

These records were reviewed for purposes of identifying known historical disposal areas and documenting continuity of environmental site recognition.